



Louth County Council
Forward Planning Unit
Town Hall, Crowe Street
Dundalk
County Louth
A91 W20C

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

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Re: Response to Draft County Development Plan 2021-2027

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Dear Sirs,

Irish Water welcomes the opportunity to comment on the Draft County Development Plan for Louth 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

EMRA Regional Spatial and Economic Strategy

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the adopted East and Midlands Region 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 of the RSES which provides general policy direction in relation to the sustainable management of water.

General updates on national plans and programmes by Irish Water:

Irish Water Investment Plan (Revenue Control Period 3) 2020 to 2024

Irish Water's Investment Plan is the budgetary plan for the five year period from 2020 to 2024 inclusive, in line with our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). It sets out where we are continuing to invest and prioritise where we can deliver the most urgently needed improvements to drinking water quality, leakage, water availability, wastewater compliance, efficiencies and customer service. 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 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. Further information on the current plan submitted for approval, can be found on the CRU Website www.cru.ie

The National Water Resources Plan (NWRP)

The National Water Resources Plan (NWRP) is carrying out a review of all Water Resource Zones in the country, to determine projects to resolve deficits on a nationwide scale. The NWRP will be published in two distinct stages, the combination of which will form our overall National Water Resource Plan.

Phase 1 is the National Water Resources Plan – Framework Plan, which will be subject to Strategic Environmental Assessment and Appropriate Assessment. Phase 1 includes: the methodologies for assessing need (including how the hazards identified in the DWSPs are incorporated into the strategic plan); the methodologies for developing strategic plans for each supply as part of the Regional Water Resources Plans and, a summary assessment of need across all water supplies. The Framework Plan will highlight the vulnerability of our water supplies particularly during severe weather conditions (storms and droughts), including our largest supply, the Greater Dublin Area.

Phase 2 is made up of 4 Regional Water Resources Plans each of which will be subject to Strategic Environmental Assessment and Appropriate Assessment. The Regional Water Resources Plans will develop the strategic plan for each water supply, including short, medium- and long-term options to address risk across our supplies.

The Regional Water Resources Plan for the Eastern and Midlands Region will include the strategic Plan for the Louth, including an assessment of all potential options to resolve needs in the area, and how these have been assessed to develop a Preferred Approach, including short, medium and long term investment requirements and operational improvements.

Phase 2 follows after the adoption of the NWRP Framework Plan. Phase 1 and 2 combined will form the overall National Water Resource Plan

The models and intelligence relating to our existing water sources and asset base, that have been developed as part of our water resources planning process, have also been used to inform the operation of our supplies particularly during critical drought periods.

Public Consultation information can be found on the IW website at <https://www.water.ie/projects-plans/our-plans/nwrp/>

Proposed Core Strategy and Availability of Water Services

Wastewater Infrastructure

The County is served by a large number of wastewater treatment plants. Available capacity at any plant varies daily. Where there are constraints, applications for developments would be on a first come, first served basis. If no project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site. This would be through the Connections and Developer Services section of Irish Water's website. <https://www.water.ie/connections/developer-services/>

The table on the next page gives a snapshot of capacity of some of the larger settlements, as discussed at our infrastructural assessment workshop, earlier this year. *(Note these figures are estimates and are subject to change).*

There are constraints in the sewer networks in some settlements. Other areas, particularly if zoning changes are proposed, infrastructure will have to be assessed on a case by case basis. As above, developers should enquire through the above web link.

Wastewater Networks

A Drainage Area Plan (DAP) is underway in Dundalk and due to be completed in 2021. This will assess the wastewater network in detail to identify issues and needs. Irish Water will

engage with Louth County Council to ensure planned growth in the strategic growth areas are taken account of in this study. A DAP for Drogheda is scheduled to commence in 2021.

In parallel with the DAP's, Network Development Plans are scheduled to be carried out for Dundalk and Drogheda in 2021. This is a high-level study that will help inform how undeveloped zoned sites within the towns could be serviced.

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

Settlement	Proposed Population Uplift 2027	Comment for IW Observations on Draft Louth CDP
Drogheda	6,914	IW can accommodate this level of growth in terms of wastewater treatment. There are known capacity issues in both north and south Drogheda sewer networks. IW is preparing a strategic plan for the North Drogheda development lands to determine how these lands can be serviced. A Drainage Area Plan for Drogheda is proposed and works will commence on this plan in 2021. Developer led infrastructure provision will be necessary in some areas.
Dundalk	7,660	Difficulty providing for all of this growth in the short term. There are issues with both the Water & Wastewater Networks. Many pumping stations are near capacity. IW is preparing a Drainage Area Plan to assess issues and develop solution options. Developer led infrastructure provision will be necessary in some areas.
Ardee	1,655	There is headroom at the Wastewater Treatment Plant, however due to other constraints, connections may be on a first come / first served basis. Some local wastewater network upgrades may be required to accommodate development.
Dunleer	935	There is headroom at the Wastewater Treatment Plant, however due to other constraints, connections may be on a first come / first served basis.
Carlingford	200	IW can accommodate growth here.
Castlebellingham	110	There is headroom at the Wastewater Treatment Plant, however due to other constraints, connections may be on a first come / first served basis.
Clogherhead	300	There is headroom at the Wastewater Treatment Plant, however due to other constraints, connections may be on a first come / first served basis.
Termonfeckin	250	Termonfeckin is connected to the Drogheda WWTW which has capacity.

Tullyallen	220	IW can accommodate growth here.
Level 4 & 5	1,085	Generally IW could accommodate this. Some issues at Collon, Tinure and Omeath

Water Infrastructure

The National Water Resources Plan (NWRP) is carrying out a review of all WRZs in the country to determine projects to resolve deficits on a nationwide scale. For WRZs where we have deficits leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers. Developers of non-domestic developments should review their proposals to see if they can maximise efficiency in their water requirements.

The main settlements in Louth are now located in three Water Resource Zones (WRZs), as shown below.

WRZ	Settlements	Comment on Supply
South Louth & East Meath	<ul style="list-style-type: none"> ▪ Drogheda ▪ Clogherhead 	Having regard to peak time and headroom there is a deficiency in supply, however it would be possible to divert water from other Resource Zones. The NWRP will develop options for this. Network upgrading / extensions may be required and will be developer led.
Cavanhill & North Louth	<ul style="list-style-type: none"> ▪ Blackrock ▪ Dundalk ▪ Dunleer ▪ Carlingford ▪ Dromiskin ▪ Castlebellingham ▪ Louth Village ▪ Tallanstown ▪ Konckbridge ▪ Annagassan ▪ Greenore ▪ Omeath 	<p>There is available capacity to supply these settlements. Network upgrading / extensions may be required and will be developer led.</p> <p>Storage and significant network upgrade is required in the Dunleer Area.</p>
Ardee/Collon/Dr ybridge	<ul style="list-style-type: none"> ▪ Tinure ▪ Collon ▪ Tullallen ▪ Ardee 	Has capacity but when peak time and headroom are taken into account there is a deficiency. Options are being considered to resolve this issue under the NWRP. Network upgrading / extensions may be required and will be developer led.

For WRZs where we have deficits, leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers. Developers of non-domestic developments should review their proposals to see if they can maximise efficiency in their water requirements.

General Comments

Some general comments are outlined below:-

Section Reference	Observation
S10 – P2	<p>In relation to the WSSP, in first line of page 10-2 add the following words to the end of the sentence: -</p> <p><i>“This plan is reviewed on a five yearly cycle, and the first review was completed in October 2020”.</i></p>
S10 – P2	<p>In the third paragraph, in relation to CRU approval, delete the last line and replace with: -</p> <p><i>“The Commission for Regulation of Utilities (CRU) has recently approved Irish Water’s third Revenue Control Period RC3, with supporting Investment Plan (2020-2024)”.</i></p>
S10.1.2.2	<p>Under the NWRP there are now 3 no. Water Resource Zones. The reference to 5 should be updated.</p>
S10 – P4	<p>Consider the addition of, or editing of proposed Policy Objectives to include the following:</p> <p><i>“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”</i></p> <p><i>“To support 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”.</i></p>