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Forward Planning Section,  
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South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24, D24 A3XC

[21\_IW\_FP\_47\_SDCC-CDP]

14/09/2021

**Re: Response to South Dublin County Council Draft CDP (2022 - 2028)**

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Dear Sir / Madam,

Irish Water (IW) welcomes the opportunity to comment on the Draft County Development Plan for the period 2022-2028. We note, and welcome, the inclusion of many objectives in Chapter 11 of the Draft CDP that will support the delivery IW plans, programmes and policies. These policy objectives will also ensure the sustainable management of water and waste water in line with national and regional objectives as stated in the National Planning Framework and the Regional Economic Spatial Strategy for the East and Midlands Region.

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 further updates become available.

Our submission is set out as follows:

- National and Regional Policy
- General Updates on IW Plans and Programmes
- Proposed Core Strategy & Availability of Water Services
- Other Policies & Plans
- General Comments

## 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.

**Stiúrthóirí / Directors:** Cathal Marley (Chairman), Niall Gleeson, Eamon Gallen, Yvonne Harris, Brendan Murphy, Maria O'Dwyer

**Oifig Chláraithe / Registered Office:** Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86

Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.

**Uimhir Chláraithe in Éirinn / Registered in Ireland No.:** 530363

## General Updates on Irish Water National Plans and Programmes

### 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, waste water 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 can be found on the CRU Website [www.cru.ie](http://www.cru.ie)

### The National Water Resources Plan (NWRP)

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. A three-pillar approach will be used in the NWRP:

1. Lose Less- leakage reduction and network efficiency
2. Use Less- water conservation measures
3. Supply smarter – sustainable supplies.

Following public consultation, the NWRP Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway which will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. Consultation on the regional plans will commence later in 2021.

## Proposed Core Strategy and Availability of Water Services

### Wastewater Infrastructure

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 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.

### Ringsend Waste Water Treatment Works

Dublin City's waste water is currently treated at Ringsend waste water treatment plant. Planning permissions for a major upgrade at Ringsend Waste Water Treatment Plant were granted in 2012 and 2019, respectively. The upgrade is currently underway and will facilitate the existing plant meeting future waste water treatment requirements, which will allow for growth in both population and industry. The project is being delivered on a phased basis, and when works are complete in

2025, Ringsend will have the capacity to treat the waste water for a population equivalent of 2.4 million while achieving the standards of the Urban Waste Water Treatment Directive.

### **Greater Dublin Drainage (GDD)**

The GDD project involves the development of a new regional waste water treatment facility and associated infrastructure including pipelines to serve the Greater Dublin Area and parts of the surrounding counties of Kildare and Meath. The GDD project is acknowledged as a critical piece of national infrastructure and has been identified in the National Planning Framework (NPF) as a National Strategic Outcome of the National Development Plan. The project will have the capacity to provide waste water treatment for the equivalent of half a million people to support the needs of a growing population and economy in Dublin and the surrounding counties, whilst also contributing to system resilience and flexibility.

The GDD project will assist the Dublin local authorities in delivering on their plans for future development; not just in terms of local spatial planning policy but also in supporting consolidation of the metropolitan area, sustainable population growth, economic prosperity and continued confidence for investors in the long term. An Bord Pleanála granted a Strategic Infrastructure Development permission for GDD in 2019, but that decision was quashed (in November 2020) following legal challenge. The SID application has since been remitted to An Bord Pleanála. The project's strategic importance remains unchanged.

### **Wastewater Networks**

Throughout the County, general capital maintenance upgrades are on-going through Network programmes based on needs. This includes rehabilitation of sewers, upgrades to pumping stations, assessment of storm water overflows and installation of telemetry in line with national programmes.

As mentioned in our Issues Paper response, Drainage Area Plans are being progressed for the wastewater networks in South Dublin. These studies will model the existing sewer network / future scenarios and develop solutions to overcome the current constraints.

- **Dodder Valley DAP** - Ongoing
- **City Centre DAP** - Ongoing
- **Nass Road Lands** - Strategic Study commenced

There are many areas within the waste water network that on occasion experience significant capacity challenges; in particular, capacity exceedance will occur more frequently where rainwater from roof or paved surfaces is drained to the waste water system, most notably in areas served by a single combined sewerage and surface water system.

Irish Water strongly encourages the removal (or significant reduction, if full removal is not feasible), of surface water inflows to the waste water system. In order to support this objective, Irish Water encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in both existing and new development areas.

### **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 Water Supply Project

The Water Supply Project (WSP) remains the project identified to deliver a 'new source' water supply for the Eastern and Midlands area. Whilst various analysis done to date continues to indicate that WSP is the preferred approach for the Eastern and Midlands Region, this will require review and confirmation in light of the NWRP (Framework and Regional Plans and associated statutory consultations and SEAs). Following the publication (and statutory consultation) of the draft Regional Plan for The Eastern and Midlands Region, the WSP will be reviewed, after which it is anticipated that WSP will be subject to further public consultation. Once Abstraction Legislation is enacted, planning permission will be sought from An Bord Pleanála for the Strategic Infrastructure Project. A separate licence application will be made to the EPA.

We note that Figure 11.0 of the Draft Plan sets out a high level schematic of the WSP. That schematic has since been superseded. In recognition of this and having regard to the project's dependence on statutory consultation in respect of the NWRP Regional Plan; further anticipated non-statutory consultation at project level, and ongoing technical review, we attach a high level schematic that illustrates the route from Parteen to Peamount without referencing specific design aspects that may be subject to change. We respectfully suggest that this is a more appropriate illustration for the County Development Plan.



### WSP – Preferred Scheme.

Illustration taken from the Final Options Appraisal Report (2016), which had been subject to public consultation.

Irish Water welcomes Policy IE2 of the Draft Development Plan and its associated objectives. With respect to the WSP we would suggest that the first bullet of IE Objective 2 be rephrased from "*The Eastern and Midlands Region Water Supply Project*" to "*The Water Supply Project Eastern and Midlands Region*".

We acknowledge the Infrastructural Assessment contained in Appendix 2A. Below is a high level overview.

SDCC Neighbourhoods	POP 2016	POP 2028	Wastewater	Water
Tallaght	71,350	76,525	North Tallaght - City Centre Drainage Area Plan (DAP). Tallaght South - Dodder Valley DAP, will develop solutions with regard to current network constraints.	When taken into account as part of the GDA, water supply can be deemed to be low during critical periods of drought / significant winter events etc. Network upgrades may be necessary depending on the location and scale of development. <b>Applies to all Neighbourhoods below</b>
Naas Road	1,384	3,349	IW will work with SDCC & DCC on the Naas Road Masterplan. Constraints downstream of 9B Sewer and on into City Centre. Significant storm water removal from combined sewers needed	As above
Templeogue / Walkinstown / Rathfarnham / Firhouse	78,166	85,264	Included in the Dodder Valley Drainage area plan which will develop solutions to network constraints	As above
Clondalkin / Clonburris / Greencastle	44,500	55,206	Included in the City Centre Drainage Area Plan will develop solutions with regard to current network constraints.	No issues in relation to strategic network New distribution Network required for Grangecastle West SDZ. Clonburris SDZ
Lucan / Palmerstown / Adamstown	59,000	68,483	Included in the City Centre Drainage Area Plan will develop solutions with regard to current network constraints. No physical project on investment plan.	No issues in relation to strategic network
Citywest	8,238	15,900	Part of the City Centre DAP will develop solutions with regard to current network constraints. Note sewers are privately owned at this time.	No issues in relation to strategic network
Saggart	3,133	3,531	Part of the City Centre DAP will develop solutions with regard to current network constraints.	No issues in relation to strategic network
Rathcoole	4,351	6,409	Part of the City Centre DAP will develop solutions with regard to current network constraints.	No issues in relation to strategic network
Newcastle North / East and South / West	3,093	5,039	Local Network Reinforcement - Peamount. & City Centre Drainage Area Plan	No issues in relation to strategic network
Uplands / Rural	5,552	5,579	N/A	Brittas / Little capacity in areas

## Other Policies and Plans

### Planned road and public realm projects

Planned public realm and road projects have the potential to impact on Irish Water assets and projects e.g. tree planting, building over of assets, new connections, programming network upgrades in advance of road project, provision of future-proofing ducts. Development in the vicinity of Irish Water assets should be in accordance with our Standard Details and Codes of Practice, and Diversion Agreements will be required where an Irish Water asset is diverted or altered. Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Irish Water to plan works accordingly and ultimately minimise disruption to the public.

### General Comments

We note the inclusion of an water services infrastructural assessment in Appendix 2. Some final observations are outlined below: -

**Replace wording:** Tallaght Neighbourhood Area – Wastewater / Drainage.

**Reason:** Following DAP surveys mentioned above, an error was discovered in the sewer records

**Appendix 2–  
Part 1B  
Infrastructural  
Assessment**

There will be a network upgrade required to facilitate the longer term growth needs of the Cookstown area. The upgrades being potentially located in the Belgard Road/Airton Road and Bancroft Park areas. Irish Water can work with developers to form the best solution. This would be through the Connections and Developer Services section of Irish Water’s website. <https://www.water.ie/connections/developer-services/>

### Suggest the inclusion of these additional Objectives in the Table below

**Reason:** National Strategic Outcome 9 (NSO9) of the NPF: ‘Sustainable Management of Water, Waste and other Environmental Services.’

Section 11.1	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.
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Section 11.1	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.
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Yours Sincerely,



Niamh McDonald

**Asset Strategy**  
**Forward Planning - East & Midlands Region**