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Cork County Council,
Business Growth Hub,
County Hall,
Cork.
T12 A243

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Ref: 23_UÉ_FP_29_Local Economic and Community Plan – Stage 2 LECP Public Consultation

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Re: Local Economic and Community Plan – Stage 2 LECP Public Consultation

A Chara,

Uisce Éireann (UÉ) welcomes the opportunity to submit observations at this Public Consultation Stage of the Local Economic and Community Plan (LECP). UÉ is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of UÉ to provide both drinking water and wastewater capacity to support national, regional, and local economic and spatial planning policy (subject to the constraints of the Uisce Éireann Capital Investment Plan).

We have provided some high-level comments below and we will continue to engage with the LECP Team as the plan process progresses. We will provide updates to UÉ plans and projects as further updates become available.

Our submission is set out as follows:

- National and Regional Policy
- Key Policies and Plans
- Availability of Water Services

National and Regional Policy

Regional Spatial and Economic Strategy for the Southern Region

Uisce Éireann acknowledges the planning policy and direction provided in the UN Sustainable Development Goals, the National Planning Framework and the Southern 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 8.1 of the RSES which provides general policy direction in relation to the Sustainable Management of Water Supply and Wastewater Needs.

UÉ and Cork County Council will continue to work together to identify the water services required to support planned development in line with national, regional, and local planning policies for inclusion in UÉ's Investment Plans.

Key Policies and Plans

National Water Resources Plan

Following public consultation, the National Water Resources Plan (NWRP) Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway and involves the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. The [South West Regional Water Resources Plan](#), which includes Co. Cork, will allow UÉ to review water supply needs collectively for the entire South West Region and across the spectrum of risk including quality, quantity, reliability and sustainability.

Drinking Water Source Protection

Uisce Éireann 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 Uisce Éireann, 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.

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.

Uisce Éireann encourages the inclusion of objectives in the LECP to enhance environmental protection and support the implementation of source protection measures.

Climate Change

Uisce Éireann 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 considered in UÉ 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 Uisce Éireann's 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.

River Basin Management Plans (RBMP)

Uisce Éireann 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. Uisce Éireann 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 and Green-Blue Infrastructure

Uisce Éireann 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.

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. UÉ would be happy to discuss potential opportunities to collaborate on projects that would remove stormwater from combined sewers.

LECP High Level Goal 1: Sustainable, Resilient and Empowered Communities includes objectives relating to the creation of well designed, sustainable communities and the enhancement of towns, villages and communities in the county. UE recommends the inclusion of objectives in the LECP to promote the introduction of SUDs, and particularly NbSUDs, in areas contributing to combined drainage systems where street scape enhancement or resurfacing programmes are planned.

Availability of Water Services

Water Supply and Wastewater Treatment Capacity Registers

Uisce Éireann publishes annual water supply and wastewater treatment capacity registers. The registers give an indication of the available water supply and wastewater treatment plant capacity to support growth and property development.

Water Supply and Wastewater Treatment Capacity Registers for Co. Cork are available to view at the links below: -

[Uisce Éireann Water Supply Capacity Register for Co. Cork](#)

[Uisce Éireann Wastewater Treatment Capacity Register for Co. Cork](#)

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. We look forward to engaging with Cork County Council as the LECP progresses.

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. LECP High Level Goal 1: Sustainable, Resilient and Empowered Communities includes objectives relating to renewal and regeneration of towns and villages and the development of sustainable travel infrastructure.

Development in the vicinity of UE assets must be in accordance with our Standard Details and Codes of Practice. Diversion Agreements will be required where an Uisce Éireann asset needs to be diverted or altered.

Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable UÉ to plan works accordingly and ultimately minimise disruption to the public.

Supporting Housing Delivery

LECP High Level Goal 1: Sustainable, Resilient and Empowered Communities includes objectives relating to the building of sustainable communities to encourage sustainable housing development.

Uisce Éireann recognizes that it has a key role to play in helping communities to thrive by supporting the delivery of housing, in line with the Government's Housing for All policy. UE is committed to playing its part in the national drive to provide homes by developing and prioritising the delivery of key water service infrastructure.

Uisce Éireann Transformation

In line with the Water Services Bill 2022, Irish Water became known as Uisce Éireann from January 2023. UE requests that references to Irish Water throughout the Local Economic and Community Plan be replaced by Uisce Éireann.

Yours Sincerely,

Victoria Quigley

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**Regional Forward Planning Specialist (Southern Region)
Asset Strategy & Sustainability**