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Regional Water Resource Plan- South West,
Irish Water,
PO Box 13216,
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Co. Dublin.

24th August 2022

**Re: Submission to the Draft Regional Water Resource Plan- South West Region
Technical Follow Up to Initial Submission on National Water Resources Plan Consultation
SRA File Ref: 22/GD004**

A Chara,

The Southern Regional Assembly (SRA) welcome the publication of the Draft Regional Water Resource Plan South West Region (RWRP-SW) as part of the National Water Resources Plan process and welcome the opportunity to make a submission on this important framework to provide a safe, secure, reliable and sustainable water supply in our Region.

This submission is made as a technical follow up to our submission on the National Water Resources Plan (NWRP) in March 2021 and follows a similar format and recommendations made to the RWRP-EM in March 2022.

The RWRP-SW boundary is entirely within the Southern Region and we note the RWRP definition of the South West is a different configuration to the defined NUTS III (Strategic Planning Areas) regional boundaries. The SRA note the clarification that the boundary for the RWRP- SW is determined by the boundaries of the Irish Water Operational Regions, Water Resource Zone boundaries, water supply delivery areas, water body catchments and sub catchments. The SRA welcome the clarification that:

- Once the first NWRP has been finalised, while it is comprised of the Framework Plan and four (4) Regional Water Resources Plans, together they will be treated as a unified plan. The relevant regional groupings will have no ongoing application.

The RWRP-SW includes Study Area H (which includes Kerry and parts of Limerick and Cork) , Study Area J (which includes Cork and parts of Kerry, Tipperary and Waterford) and Study Area I (which includes Cork City and County and parts of Kerry).

The strategic population and economic growth at the regional level for the Local Authority areas within Study Areas H, I and J are covered by the Region's Regional Spatial and Economic Strategy (RSES) and, relevant for Study Area I, the Cork Metropolitan Area Strategic Plan.

The City and County Development Plan Core Strategies , recently reviewed, provide a further clarification of the distribution of Local Authority growth rates within the settlement hierarchy of each City and County Council.

Alignment to the relevant objectives of the RSES and growth targets within the Southern Region RSES and subsequent City and County Development Plan Core Strategies is a key consideration for the three relevant study areas.

The delivery of water infrastructure, protecting and improving water quality and ensuring sustainable sources of supply are fundamental to service infrastructure led population and economic growth and achieve the strategic outcomes of the RSES and City/County Development Plan Core Strategies for these study areas.

On the basis of the NWRP being a unified plan integrating the RWRPs, the purpose of the SRA's submission is to confirm that our previous recommendations to the NWRP are integrated into the series of RWRPs and request any clarities to ensure these recommendations are addressed.

In making this submission, the SRA acknowledge the iterative process of engagement with stakeholders and we collaborate positively with Irish Water on a number of initiatives. We look forward to continued consultation during Phase 2 of the NWRP.

Section 1.0 Context of the RSES

As stated in our submission under the NWRP, it is important to reiterate the strategic regional spatial and economic planning policy context for the Southern Region for the Phase 2 RWRPs.

The Region's priorities for investment are identified in the Regional Spatial and Economic Strategy (RSES) and Metropolitan Area Strategic Plans (MASPs) for Cork, Limerick-Shannon and Waterford which came into effect on the 31st January 2020. In line with the National Planning Framework (NPF) and the National Development Plan (NDP), they set a 12-year statutory strategic planning and economic development framework for future economic, spatial, and social development of Southern Region to become one of Europe's most "**Creative and Innovative**", "**Liveable**" and "**Greenest**" Regions.

The Southern Region has the State's most significant proposition to achieve the aim of Regional Parity. The NPF and RSES targets our three cities to grow by 50%-60% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions. Compact growth of at least 50% of all new homes that are targeted in the region's three metropolitan areas are to be delivered within their existing built up footprints and a corresponding target of at least 30% within all other settlements in accordance with NPF National Policy Objective 3b and 3c.

The settlement strategy builds on the Region's three cities and metropolitan areas of Cork, Limerick - Shannon and Waterford as engines of growth supported by a network of 14 strategically located Key Towns namely Kilkenny, Ennis, Carlow, Tralee, Wexford, Clonmel, Killarney, Mallow, Nenagh, Thurles, Newcastle West, Clonakilty, Dungarvan and Gorey.

Regeneration and growth across our Region's Cities, Key Towns and further through its network of towns, villages and rural communities are supported to build an economically resilient, competitive and growing region.

The economic strategy aligns with the spatial strategy and supports our Cities and Metropolitan Areas as economic engines of growth supported by the Atlantic Economic Corridor, Eastern Economic Corridor and a network of Key Towns and other towns and villages for an economically resilient region (urban and rural).

By 2040, the population of the Region is projected to rise to almost two million, requiring new homes and jobs. The RSES recognises the strategic role played by all areas in achieving regional and national

targets outlined in the NPF. Achieving such ambitious targets will require an equally ambitious alignment in funding priorities and service delivery.

Water infrastructure is fundamental to service this growth (**population and employment**) and it plays a critical role in achieving our RSES Strategy outcomes for Sustainable, Planned and Infrastructure Led Development.

Regional Policy Objectives (RPOs) of direct relevance to the implementation of the NWRP (and its Phase 2 RWRPs) include RPO 4 Infrastructure Investment, RPO 7-10 Investment and Delivering Infrastructure for Metropolitan Areas, RPO 11 Key Towns, RPO 26 Towns and Villages, RPO 68 Regional Investment for Enterprise Growth, RPO 110 Ecosystem Services, RPOs 111, 112, 121 for Water Quality and implementation of the Water Framework Directive and River Basin Management Plans, RPO 122 Sustainable Drainage Systems, RPO 124 Green Infrastructure and RPOs 208-210 for Water Supply and Water Protection.

References to the final published RSES and the MASP for Cork (relevant to the study areas of the RWRP-SW) can be obtained through <http://www.southernassembly.ie/regional-planning/rses>

Section 2.0 Water Infrastructure Services for Regional Growth

In our submission to the NWRP, the SRA made recommendations for:

- Coordination with our Local Authorities to determine the detail of demand for water across urban and rural settlements, especially where significant levels of population and employment growth are targeted aligned with the objectives of the RSES and MASPs for infrastructure led regeneration and growth.
- Address on-going retrofitting and upgrades to the existing water supply networks to service existing the population and employment areas to a high standard and address current restrictions, capacity, quality and network efficiency issues.
- Service the Core Strategies of each Local Authority City and County Development Plan in our Region, working in partnership with our Local Authorities to deliver on infrastructure led planning for settlements at all scale including our cities, Key Towns, other towns, villages and smaller rural settlements.
- Ensure that metropolitan areas, which are a statutory part of the RSES through the MASPs for Cork, Limerick-Shannon and Waterford are given recognition within the NWRP in terms of their growth targets (city and suburbs and the total metropolitan area). Collaboration to plan services across Local Authority boundaries for each MASP will be required.

The SRA welcome the commitment in the RWRP-SW to align and deliver on the objectives of each RSES and coordinate with Local Authorities to invest in water infrastructure to service the Core Strategies of City and County Developments. The SRA consider the themes of our previous recommendations are being addressed but recommend some further strengthening in the approach to ensure alignment to the RSES and our past comments.

Population Growth Demand

RSES Appendix 1, page 347 sets out Local Authority population projections to 2031, which combined deliver a projected uplift between 280,000 to 343,500 in the Region to 2031.

The population projections for the South West to 2031, broken down for Cork City, Cork County and Kerry, in Appendix 1 of the RSES are directly relevant for the RWRP-SW and the SRA would welcome a clarification that the growth projections (up to 163,500 uplift) have been taken into consideration in

the study area population growth projections to 2044 (RWRP-SW Table 2.3 Study Area Population Growth 2019-2044).

The SRA note that the population growth to 2044 in Table 2.3 is for a population uplift to a population of 789,170 to 2044 whereas the RSES projection is for an uplift of population in a range between 823,000-854,500 for the South West by 2031 (Cork City, Cork County and Kerry Local Authority Areas alone).

Further headroom for growth also arises for those parts of the RWRP-SW area that include parts of the Mid-West and South East Strategic Planning Areas (parts of Limerick , Tipperary and Waterford Local Authority areas).

Consultation with Local Authorities and the relevant County Development Plan Core Strategies will inform the growth projected for locations at sub-county level for Cork City, Cork County and Kerry and for those parts of Tipperary, Limerick and Waterford included in the study area.

The population projection to 2044 for water services under the plan is lower therefore than the population projection to 2031 in the RSES for the South West SPA alone and is lower still when the relevant portion of the MW and SE SPA population targets are assigned.

The publication of Census 2022 preliminary data and final results will provide further clarity on growth rates over the last six years but it should be noted, as stated in the RSES, that the level of change required to deliver growth projections under the NPF and RSES for Project Ireland 2040 will take several Development Plan cycles to change patterns of development and allow the lead-in time for infrastructure delivery to service the level of change required for greater balanced regional development.

Additional growth capacity for all Study Areas and sufficient headroom to service the higher range of RSES growth targets (continued out to 2044) should be provided for to ensure our Region is planning ahead with ample capacity for infrastructure led growth (for population and employment growth).

Servicing the City and Metropolitan Area

Under RSES Section 3.2 Sustainable Place Framework and Table 3.2 Settlement Typology, the role and attributes of different locations in the settlement hierarchy of the Region are defined. The RSES sets specific targets for cities and metropolitan areas (50-60% for cities and suburbs to 2040 in line with the NPF, with projections to 2031 set in each MASP).

The RSES sets a framework for the sustainable growth of the Cork Metropolitan Area to a total projected population of c408,826 by 2031. Projected population growth targets are set for Cork City and Suburbs and the rest of the metropolitan area which includes a number of large metropolitan towns. Cork City and suburbs is projected to grow by 75,000 to 2031 (36% growth) and the rest of the metropolitan area by 29,657 (31%) to 2031.

The RWRP -SW has assigned 54% growth to Cork City (assumed to be the City and Suburbs) to 2044, which is a lower rate of average annual growth than the RSES projects to 2031.

The SRA welcome the indication of higher growth rates for the City by 2044 but recommend the higher range of growth is taken into consideration for the City and Metropolitan Area to the 2044 horizon (Table 4.1 of the NPF targets up to 60% by 2040 for Cork City and Suburbs).

The RWRP-SW should also acknowledge the importance of retrofitting services within the city and suburbs and metropolitan area to alleviate existing capacity constraints, enable compact growth , brownfield regeneration and service strategic residential growth locations, including URDF regeneration projects (city centre and dockland regeneration), consolidation of the city suburbs,

Urban Expansion Areas in the metropolitan towns and strategic employment locations (city centre and docklands, Mahon, Cork Science and Innovation Park, Little Island, Ringaskiddy, Port of Cork and Cork Airport etc.) Refer to Section 7.0 and 8.0 of the Cork MASP pages 248-263.

This is critical for RSES implementation and the RWRPs need to give recognition to the City and Metropolitan Areas as the primary engines of population and employment growth in the State and Region.

The growth rates for non-domestic demand and consumption, existing and future projected, need to reflect the role of City and Metropolitan Areas as growing economic engines of the Region and State (at least 65,000 new jobs as a conservative estimate could be generated in the Cork Metropolitan Area to 2031 alone as stated under Cork MASP Section 8.3, page 261 of the RSES).

The Cork Metropolitan Area has significant enterprise and industrial sectors (the Cork MASP notes as a snap shot that in 2018 there were over 169 overseas companies employing c38,870 people) with future growth planned for high value manufacturing. There are strong clusters and growth sectors in technology, ICT, engineering, life sciences (pharma, bio-pharma and med-tech), food and beverage, financial and business services etc. within Cork City and Metropolitan Area. It is essential that water infrastructure has capacity to service existing and future industry and enterprise growth, FDI and indigenous enterprise, in the City and Metropolitan Area.

Servicing Key Towns

For Key Towns, Local Authorities are supported in targeting growth of more than 30% from their 2016 population to 2040 subject to capacity analysis and sustainable criteria under RSES Section 3.3 A Tailored Approach. The appropriate level of growth is to be determined by the Core Strategies of Development Plans. Regeneration and infrastructure led growth is supported throughout towns, villages and rural communities for each County as determined through the Core Strategies of Development Plans.

Relevant for the RWRP-SW, servicing the infrastructure led growth of the Key Towns of Tralee , Killarney, Mallow and Clonakilty as regional drivers of population and economic growth for at least 30% growth to 2040 needs to be underpinned by water services.

The SRA welcome recognition of the role of the Key Towns in the RWRP-SW but this can be strengthened further in reference to the population growth, regional and sub-regional economic growth functions Key Towns serve. Consultation with Local Authorities should continue to ensure the actual growth rates targeted at local level for Key Towns (which may exceed 30%) and other settlements in the settlement hierarchy, servicing both domestic and non-domestic demand for population and employment growth in these towns, is infrastructure led with water services. The SRA welcome IW's commitment for on-going assessment and revision to align with City and County Development Plan targets in co-ordination with Local Authorities.

Domestic and Non-Domestic Demand for Rural Towns

The RWRP-SW states that an allowance for non-domestic growth will be required for towns and cities identified as strong growth areas under the NPF and for other areas, it is assumed there will be no significant increase in non-domestic demand.

This position should be revised with upward projections for domestic and non-domestic demand across smaller towns and rural areas to ensure there is built in capacity for servicing employment growth and factoring in increased levels of co-working hubs, research and enterprise in rural areas.

Domestic and Non-Domestic growth demand rates need to be robust to build capacity for population and employment growth and inward enterprise development into these settlements. RSES Section 3.8 and Regional Policy Objective 30 refers to settlement networks where towns combine to share assets,

strengths and project collaborations to attract investment and growth. Smaller scaled settlements within these networks, while having a smaller population level, can have a high employment levels and higher than the national and regional average of jobs to resident worker ratios (refer to NPF Appendix 2).

As an example, Killorglin in 2016 had a population of 2,199 people and a jobs total of 2,038. Good examples of towns working in collaboration to attract inward investment and jobs growth are the Kerry Hub and Knowledge Triangle (Tralee, Killarney and Killorglin), North Kerry/Shannon Estuary (Listowel, Abbeyfeale, Newcastle West), North Cork Agri Food and Tech Network (Mallow, Fermoy, Mitchelstown, Charleville), West Cork Marine Economy Network (Clonakilty Skibbereen , Bantry, Castletownbere).

In the Gaeltacht area of the SW alone, there are successful examples of research and innovation centres (Dingle Innovation Hub) and services required to support the growth of Gaeltacht Service Towns (Tralee, An Daingean, Cahersiveen, Macroom).

Consultation with IDA Ireland, Enterprise Ireland and Údarás na Gaeltachta is advised to factor a strengthened headroom for enterprise growth and non-domestic demand across both the larger scaled urban settlements and also rural towns where indigenous enterprise growth will continue to grow.

The SRA note and welcome the additional headroom that has been applied to factor in consumption demand from tourism and visitors to our Region. This is especially important for the South West. Continued consultation with Failte Ireland on building headroom for tourism growth, international and domestic visitors to tourism service Cork City, towns, visitor destinations and attractions, along the three national tourism corridors in our Region (Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands) is encouraged.

Rural Services and Serviced Site Initiatives

The RSES supports strengthening the viability of rural towns and villages and seeks initiatives to revitalize town and village centres, including co-ordination between Irish Water and Local Authorities to invest in water infrastructure, retrofit and improve the quality of service and support serviced sites and new homes in small towns and villages initiatives.

RSES RPO 26 Towns and Villages and RPO 216 Servicing of Rural Villages refers. This is particularly important to support compact growth and making towns and villages attractive for living and working with capacity to accommodate appropriate levels of growth (guided by Local Authority Core Strategies). Towns and villages with high quality place making attributes and infrastructure capacity provide a sustainable alternative to urban generated one-off housing in rural areas. A specific commitment needs to be stated in support of these initiatives and principles.

On-Going Collaboration with Local Authorities to Service City and County Development Plans

The SRA also welcome the statement that IW recognise the ongoing work between the Regional Assemblies and the Local Authorities over the process of Local Authority County/City Development Plan reviews. As these plans are finalised, IW will incorporate the increasingly refined growth rates into demand forecasts. This is critical as water supply and infrastructure investment to deliver the Core Strategy and economic strategy of each City and County Development Plan is needed to implement the NPF and RSES. The SRA recommend that this commitment is copper fastened as a key action under the NWRP.

To support our previous recommendations, the SRA reiterate for the unified NWRP that:

- i. The RWRP -SW population projections to 2044, as indicated in Table 2.3, have a rate of growth for the combined Study Areas H, I, J (789,170) lower than the rate of growth for the RSES SW SPA alone (the Local Authority areas of Cork City, Cork County and Kerry) to 2031 (range 823,000-854,500). An increased allocation is also warranted when those parts of the MW and SW SPA allocation to Tipperary, Limerick and Waterford that fall within the RWRP-SW catchment are factored in. Additional growth capacity for Study Areas H, I and J to the horizon of the plan should be provided for a robust assessment of future demand and capacity to service population and employment growth in the Region. Refer to RSES Appendix 1, page 347 sets out statutory Local Authority population projections to 2031.
- ii. The RWRP-SW should directly support the growth of the Cork Metropolitan Area and refer to the Cork Metropolitan Area specifically in the plan. Future demand for population and employment growth within the metropolitan area (inclusive of Cork City and Suburbs and the Remainder of the Metropolitan Area in the Cork City Council and County Council areas) as set out in Table 1 of the Cork MASP (page 244 of the RSES) should be addressed in growth assumptions to ensure there is adequate capacity and headroom to service the City and Metropolitan Area, a prime driver of population and economic growth for the State and Region. The SRA recommend an upward revision of growth assumptions to 2044, based on the NPF target of up to 60% growth to the City and Suburbs by 2040 (Table 4.1 of the NPF). Refer to Section 7.0 and 8.0 of the Cork MASP pages 248-263 as an indication of strategic residential locations and strategic employment locations requiring high quality services to underpin growth.
- iii. Domestic and Non-Domestic demand and future growth needs to be supported with robust assessment and headroom to service economic growth, additional employment and underpin the role of the City and Metropolitan Area and Key Towns as engines of national, regional and sub-regional economic growth respectively.
- iv. Ensure that all Key Towns in the Southern Region that fall within the catchment of the RWRP - SW (Tralee, Killarney, Mallow and Clonakilty) are serviced for growth to the plan horizon for water demands from population and employment growth. Consultation with Local Authorities should continue to ensure the actual growth rates targeted at local level for Key Towns (which may exceed 30% growth), servicing both domestic and non-domestic demand for population and employment growth in these towns, is infrastructure led with water services.
- v. The RWRP-SW assumption that for other areas beyond the cities and larger urban centres, there will be no significant increase in non-domestic demand for water services, warrants a revision. A more robust and upward projection for domestic and non-domestic demand across smaller towns and rural areas is recommended to ensure there is built in capacity for servicing local population employment growth and factoring in enterprise growth between town networks, centres of research and innovation, co-working hubs, remote working , tourism demands and ingenious enterprise growth.
- vi. In support for rural town and village regeneration for a strong rural economy, it is important that support is provided to Local Authorities to implement Core Strategy distribution of growth to smaller settlements in addition to larger urban settlements, including services that support serviced sites and new Homes in Small Towns and Villages initiatives.
- vii. It is welcomed and important to commit within the final plan that IW will coordinate with each Local Authority to refine assumed demand and growth rates in alignment with the approved

Core Strategies of each City and County Development Plan in the Region and invest in the required water services infrastructure to deliver each Core Strategy.

Our recommendations to the NWRP and the above supporting observations align with RSES RPO 2 Planning for Diverse Areas, RPO 3 Local Authority Core Strategies, RPO 4 Infrastructure Investment, RPO 7-10 (infrastructure delivery and securing compact growth in cities and metropolitan areas), RPO 11 Key Towns, RPOs 12-25 (for each Key Town), RPO 26 Towns and Villages, RPO 34 Regeneration, Brownfield and Infill Development, RPO 35 Support for Compact Growth, RPO 68 Regional Investment, RPOs 111-112 Water Resources and Water Quality and RPOs 208-210 Water Supply.

In addition, these recommendations align with the objectives of the MASP for Cork which identifies water infrastructure investment as a key enabler for growth (Cork MASP Objective 5).

Section 3.0 Integration of Green and Blue Infrastructure (GBI) and Nature Based Solutions (NBS)

In our submission to the NWRP, the SRA made recommendations for:

- The integration of Green and Blue Infrastructure (GBI) and Nature Based Solutions (NBS) and Ecosystem Service Approaches as part of the Developing Solutions and Supply Smarter infrastructure measures and methodologies of the NWRP. Strengthened integration of these principles and projects will accord with the three outcomes of the NWRP to Lose Less, Use Less and Supply Smarter. Nature Based SuDS and an Ecosystem Service approach are strongly advocated and should be elaborated upon.

The SRA note the positive integration of these principles in the RWRP-SW and welcome the commitment for:

- Ensuring that IW build and manage infrastructure responsibly so that ecosystems are protected, and where possible enhanced.
- The implementation of IW Biodiversity Policy which seeks that in association with the provision of water and wastewater services, biodiversity and the natural environment are conserved, protected and where practical enhanced through our responsible stewardship, sustainable water services and strong partnerships.
- Implementation of the IW Biodiversity Action Plan (BAP) in 2021.
- One of the key objectives of the BAP is the promotion of nature-based solutions (NBS) for water protection and wastewater treatment, which have considerable potential to deliver biodiversity. NBS are multi-functional measures that aim to protect water resources and address water-related challenges by restoring or maintaining ecosystems, as well as natural features and characteristics of waterbodies using natural means and processes.
- Support for IW projects that integrate NBS that include reduction in energy usage, carbon sequestration, and amenity use for local communities. IW support a broad range of measures such as: wetlands, basins and ponds, reedbeds, buffer strips and hedges and forest riparian buffers.
- Examples of NBS being utilised by Irish Water in the South West Region include Integrated Constructed Wetlands in Lixnaw, County Kerry, native tree planting and bog rehabilitation, biodiversity enhancement measures near Lough Guitane, where IW work with the Forest Service and planning for the establishment of 5.27 hectares of riparian woodland at the IW Treatment Plant.

- Identifying opportunities for the incorporation of NBS, and catchment management activities within IW abstraction catchments will continue to be encouraged and promoted through the NWRP.

To support our previous recommendations, the SRA reiterate for the unified NWRP that:

- i. The positive commitment to adopt GBI, NBS, Ecosystem Services and protect and enhance Biodiversity through the IW Biodiversity Action Plan is commended and needs to continue to be a priority action for the unified NWRP. The SRA support IW's projects that integrate NBS, reduce energy usage, carbon sequestration and provide amenity use for local communities. The SRA support and encourage further collaborative projects for Sustainable Urban Drainage Systems, wetlands, basins and ponds, reedbeds, buffer strips and hedges and forest riparian buffers inter alia with the relevant stakeholders.
- ii. IW are an important stakeholder for the SRA in a collaborative project under the Interreg Europe "Blue Green Cities" project. This project is seeking, through good practice learning in the EU and our Region, to improve policy making and the implementation of projects that integrate GBI and NBS at national, regional and local levels. The SRA and ARUP have recently completed and published our Blue Green Infrastructure and Nature Based Solutions Framework for the Southern Region, Our Green Region, which will assist IW projects as a toolkit and it can be accessed at: <http://www.southernassembly.ie/eu-projects/blue-green-city/blue-green-city-other-publications>
- iii. IW's support for this framework when completed through their Lose Less, Use Less and Supply Smarter policy and infrastructure planning and delivery will be important for RSES implementation. The SRA encourage continued collaboration with IW to implement this framework going forward.

Our recommendations to the NWRP and the above supporting observations align with RSES RPO 111 Water Resources, RPO 112 Water Quality, RPO 122 Sustainable Drainage Systems (SuDS), RPO 124 Green and Blue Infrastructure, RPO 125 Green and Blue Infrastructure Corridors, RPO 126 Biodiversity, RPO 110 Ecosystem Services, RPO 200 Green and Blue Infrastructure and Recreation and RPO 218 Sustainable Urban Drainage (SUDs)

Section 4.0 Capital investment to implement Irish Water's Strategic Plans and Initiatives.

In our submission to the NWRP, the SRA made recommendations for:

- Working with Local Authorities in partnership to confirming the evidence base on the need for water services investment as a critical infrastructure servicing the NPF, RSES, MASPs and City/County Development Plans. This partnership approach needs to inform Government Departments, DEPR for the NDP Review and the Project Ireland 2040 Delivery Board, on the justification and business case to fund water infrastructure investment to the levels required (retrofitting and growth) in the Regions.

The SRA commend the depth of evidence base analysis and scenario testing undertaken and documented in the RWRP-SW including the identification of needs, status of infrastructure and supply, modelling for climate change, option developments across separate Water Resource Zones and the development of Regional Options, including technical reports for each study area in the appendices.

The SRA note the main recommendations (in summary) of relevance for the implementation of the RSES, which include:

- The Regional Preferred Approach is defined as the combination of the three (3) Study Area Preferred Approaches for the South West Region.
- Although the Preferred Approach for the South West Region does not involve a large-scale regional interconnected supply, the Study Area Preferred Approach does comprise large, interconnected supplies within the Study Area boundaries and in this way provides the benefit of resilience and improved environmental outcomes, through the decommissioning of unsustainable sources.
- Through interconnections within the Study Areas, merging zones and greater efficiencies in services, the SRA understand the number of WRZs in the region will reduce from 174 to 92.
- The Preferred Approach also comprises 63 local WRZ Options, which will supply rural settlements that are challenging to supply via a transfer due to the difficulties in transporting small volumes of water over long distances.
- The approach will increase resilience and provide improved environmental outcomes. Other benefits of the Preferred Approach include:
 - Improved environmental outcomes through the decommissioning of inefficient infrastructure and abstractions from surface water and groundwater abstractions.
 - Increased resilience through large, interconnected supplies that include the expanded Cork City WRZ and Central Regional – Lough Guitane WRZ
 - An estimated reduction in overall required abstraction volumes compared with the alternative of maintaining fragmented supply systems. This reduction is met mostly through effective leakage reduction targets.
 - Improved minimum Level of Service in drought and winter conditions across all WRZs in the South West Region, as well as increased resilience during normal and dry conditions.

The SRA also note the clarification that it will take a number of investment cycles to progress these projects and they may change in later iterations of the NWRP. Over time, the intention is to ensure the delivery of a more Sustainable, Resilient and cost-effective water supply service.

To support our previous recommendations, the SRA reiterate for the unified NWRP that:

- i. The Regional Preferred Approach and identified benefits are supported and align with Section 8.1.1 of the RSES for Water Supply. RPOs 208-210 support the development of the NWRP and seek strategic water services investment and a move towards a sustainable, secure and reliable public water supply in our Region over the 25 years plus horizon while safeguarding the environment.
- ii. Among the benefits of the Regional Preferred Approach cited in RWRP-SW Section 8.0, the SRA would caution the statement that lower headroom allowance and demand peaking factors represent an estimated 20% of the reduced Demand in the SDB calculations for large supply systems. As outlined in this submission above, the RSES seeks Irish Water Investment Plans to align the supply of water services with the settlement and economic growth strategy of the RSES and MASPs (Cork MASP of specific relevance to the RWRP-SW). It also seeks that such infrastructure planning takes into consideration seasonal pressures on critical service infrastructure, climate change implications and leakage reduction. The final determination of the preferred approach going forward to next stages needs to ensure that robust headroom allowances have been taken into consideration within calculations for existing and future domestic and non-domestic demand (some considerations to strengthen this built in capacity and headroom have been outlined above). It is essential the Study Areas have built in future service capacity and headroom to attract inward investment, population and employment growth across the Region (urban and rural areas) to meet NPF, RSES and City and County Development Plan targets and ambition for sustainable growth. This is essential for our Region's competitiveness, to underscore regional parity and balanced regional development.

- iii. The SRA strongly encourage the continued partnership approach with Local Authorities to ensure that optimal infrastructure is phased and delivered to guarantee a quality supply to service Core Strategies (urban and rural population and employment growth) through the final agreed Regional Approach.
- iv. The NWRP principles of Lose Less, Use Less and Supply Smarter, which align with the RSES, need to be delivered through the final approach to ensure sustainable supply, protect water resources and transition to a smarter, climate resilient region.
- v. The SRA strongly encourage IW to make the business case to Central Government on the critical need to invest in water infrastructure and deliver the recommendations under the NWRP and final approach through capital investment. Delivery of infrastructure to provide a safe, secure, reliable and sustainable water supply in our Region, in particular to service those parts of our Region in Study Areas H, I and J in the RWRP-SW, is critical for RSES implementation.

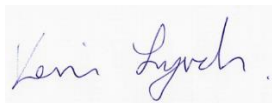
Our recommendations to the NWRP and the above supporting observations align with RSES RPO 4 Infrastructure Investment, RPO 7-10 (infrastructure delivery for MASPs), RPO 68 Regional Investment, RPO 175 Infrastructure-led Planning, RPOs 208-210 for Water Supply, RPO 227 Funding and RPO 228 Smart Growth Initiatives.

Conclusion

The SRA welcome this consultation opportunity with Irish Water on the Phase 2 of the NWRP and are a committed stakeholder and key consultee for Irish Water under the final NWRP and the Phase 2 RWRPs. Continued engagement between the SRA and Irish Water on these phases is encouraged and will be welcomed.

I trust the above recommendations can be taken on board to help strengthen the final unified NWRP from the Region's perspective. The SRA would welcome the opportunity to engage with Irish Water on these recommendations and are available for future consultation and clarities as required.

Mise le meas,



Kevin Lynch
A/Director