

Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887  
R-phost/Email: info@southernassembly.ie Idirlión/Web: www.southernassembly.ie

Regional Water Resources Plan- South East,  
Uisce Éireann,  
PO Box 13216,  
Glenageary,  
Co. Dublin.

3rd October 2023

**Re: Submission to the Draft Regional Water Resources Plan- South East Region  
Technical Follow Up to Initial Submission on National Water Resources Plan Consultation  
SRA File Ref: A 23/002**

A Chara,

The Southern Regional Assembly (SRA) welcome the publication by Uisce Éireann of the Draft Regional Water Resources Plan South East Region (RWRP-SE) 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-SW and RWRP-EM in 2022.

We note that the RWRP-SE boundary is mainly within the Southern Region – with the exception of part of county Wicklow in the north-east of Resource Plan area. We also note that the RWRP definition of the South East is a different configuration to the defined NUTS III (Strategic Planning Areas) regional boundary for the South-East. The SRA note the clarification that the boundary for the RWRP- SE is determined by the boundaries of the Uisce Éireann 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 strategic population and economic growth at the regional level for the Local Authority areas within the Resources Plan area are covered by the Region's Regional Spatial and Economic Strategy (RSES) and the Waterford 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 relevant study areas within the South-East.

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 Uisce Éireann 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 31<sup>st</sup> 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, development of an 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 it's 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 Waterford (relevant to the study areas of the RWRP-SE) 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-SE 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 East to 2031, broken down for Carlow, Kilkenny, Waterford, Wexford and Tipperary South, in Appendix 1 of the RSES are directly relevant for the RWRP-SE and the SRA would welcome a clarification that the growth projections (up to **89,000 uplift**) have been taken

into consideration in the study area population growth projections (**104240** for period 2019 - 2044) (RWRP-SE 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 of 473,480 (increase of 104,240) for the South-East Resource Plan area to 2044 whereas the RSES projection is for an uplift of up to 89,000 to a population in a range between 581,500 to 598,500 for the South East by 2031 (Carlow, Kilkenny, Waterford, Wexford and Tipperary South Local Authority Areas).

Further headroom for growth also arises for those parts of the RWRP-SE area that include parts of the Mid-West and South West Strategic Planning Areas (parts of Cork and Limerick 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 Carlow, Kilkenny, Waterford, Wexford and Tipperary and for those parts of Cork and Limerick included in the study area.

The population projection to 2044 for water services under the plan would appear to be on a lower trajectory than the RSES population projections to 2031 in the RSES for the South East.

The publication of the full results from Census 2022 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 Waterford Metropolitan Area to a total projected population of c81,769 by 2031.

The RWRP -SE has assigned **52% growth rate** to Waterford (City and Suburbs plus surrounding towns of well as Kilmeaden, Tramore, Cheekpoint, Passage East and Dunmore East. – see Table 3.8 Population Growth Rate of Settlements in the South East Region based on Local, Regional and National Planning Policy) to 2044. While the inclusion of these settlements creates a distinctly different area to Waterford City and Suburbs or the Waterford Metropolitan Area, concern is expressed that this would provide a lower rate of average annual growth than the +60% growth rate set by the statutory RSES and Waterford MASP for City and Suburbs.

The SRA recommend the higher range of growth is adopted for the City and Metropolitan Area to the 2044 horizon (It should also be noted that Table 4.1 of the NPF targets up to 60% by 2040 for Waterford City and Suburbs). The 2022 Census results indicate an accelerating rate of population increase (12.7% in City and Suburbs 2016 – 2022), which reflects key enablers and regeneration projects (see paragraph below) which will drive the growth of the Waterford Metropolitan Area.

The RWRP-SE 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 north quays regeneration), consolidation of the city suburbs, and strategic employment locations (City Centre including Waterford Cultural Quarter) North Quays Innovation District, Port Of Waterford Belview, Waterford Airport And Business Park, Research And Innovation Centre, Carriganore, IDA Business and Technology Park, former Waterford Crystal site .) Refer to Section 8.6 of the Waterford MASP.

This is critical for RSES implementation and the RWRPs need to give recognition to the City and Metropolitan Area as a primary engine 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 13,600 new jobs as a conservative estimate could be generated in the Waterford Metropolitan Area to 2031 alone as stated under Waterford MASP Section 8.0 – Table 2.

The Waterford Metropolitan Area has significant enterprise and industrial sectors with future growth planned for high value manufacturing. There are strong clusters and growth sectors in Life sciences, ICT, Engineering, Financial Services, Agri: Agri Food and Drink, Creative Industry and Tourism etc. within Waterford 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-SE, servicing the infrastructure led growth of the Key Towns **of Gorey, Wexford Town, Kilkenny City, Clonmel, Dungarvan and Thurles** 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-SE 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-SE 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).

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 East. Continued consultation with Failte Ireland on building headroom for tourism growth, international and domestic visitors to tourism service Waterford City, Key Towns including Kilkenny City, other smaller towns, visitor destinations and attractions, located within the national tourism brands in the South-East (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 Uisce Éireann 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 -SE population projections to 2044, as indicated in Table 2.3 would appear to be on a lower trajectory than the RSES population projections to 2031 in the RSES for the South East and should be amended to align with RSES population projections.  
Additional growth capacity 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-SE should directly support the growth of the Waterford Metropolitan Area and refer to the Waterford Metropolitan Area specifically in the plan. Future demand for population and employment growth within the metropolitan area (inclusive of Waterford City and Suburbs and the Remainder of the Metropolitan Area in the Waterford City Council and Kilkenny County Council areas) as set out in Table 1 of the Waterford MASP 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 Waterford City and Suburbs by 2040 (Table 4.1 of the NPF). Refer to Section 7.3 and 8.6 of the Waterford MASP 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 - SE (Gorey, Wexford Town, Kilkenny City, Clonmel, Dungarvan and Thurles) 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-SE 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 Waterford which identifies water infrastructure investment as a key enabler for growth (Waterford 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-SE 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.
- 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 Uisce Éireann'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-SE 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 (shown in Figure 8.1) provides for a solution that will address the Needs (both Quality and Quantity) across all existing WRZs by:
    - Merging supply systems within the region to form 12 new interconnected WRZs via 455 kilometres of trunk mains; reducing the number of WRZs from 111 to 58. The interconnected systems will be supplied from new and increased groundwater and surface water sources within the South East Region. Six (6) WRZs will be connected to supply systems in the Eastern and Midlands Region. These will benefit from a cross-regional transfer.
    - For the remaining WRZs in deficit:
      - Developing local new and increased groundwater sources to supply 27 existing WRZs.
      - Developing local new and increased surface water sources to supply 1 existing WRZ.
      - Improving the barrier performance at 56 existing WTPs to reduce Water Quality risk across all WRZs.
      - Upgrading the capacity of 24 WTPs and constructing 14 new WTPs.

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. As outlined in this submission above, the RSES seeks Uisce Éireann Investment Plans to align the supply of water services with the settlement and economic growth strategy of the RSES and MASPs (Waterford MASP of specific relevance to the RWRP-SE). 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, 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 Uisce Éireann on the Phase 2 of the NWRP and are a committed stakeholder and key consultee for Uisce Éireann under the final NWRP and the Phase 2 RWRPs. Continued engagement between the SRA and Uisce Éireann 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 Uisce Éireann on these recommendations and are available for future consultation and clarities as required.

Le meas,



---

David Kelly  
Director