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Regional Water Resource Plan- Eastern and Midland Region,  
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21<sup>ST</sup> March 2022

**Re: Submission to the Draft Regional Water Resource Plan- Eastern and Midland Region  
Technical Follow Up to Initial Submission on National Water Resources Plan Consultation  
SRA File Ref: 22/GD002**

A Chara,

The Southern Regional Assembly (SRA) welcome the publication of the Draft Regional Water Resource Plan Eastern and Midland Region (RWRP-EM) 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.

The RWRP-EM includes Study Area 6 (which includes Carlow), Study Area 7 (North Tipperary) and Study Area 8 (Limerick/Clare), which are part of the Southern Region and whose strategic population and economic growth at the regional level are covered by the Region's Regional Spatial and Economic Strategy (RSES) and, relevant for Study Area 8, the Limerick-Shannon Metropolitan Area Strategic Plan.

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 for these study areas.

As the RWRP-EM boundary includes parts of all three Regions with a different configuration to the defined NUTS II ( Region) and NUTS III (Strategic Planning Areas) regional boundaries, alignment to the relevant objectives of the RSES and growth targets within the Southern Region RSES is a key consideration for the three relevant study areas. The SRA note the clarification that the boundary for the RWRP-EM 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.

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 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 over 50% 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 Limerick-Shannon 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-EM 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.

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 Mid-West to 2031, broken down for Limerick, Clare and Tipperary NR, in Appendix 1 of the RSES are directly relevant for the RWRP-EM and the SRA would welcome a clarification that the growth projections (up to 90,500 uplift) have been taken into consideration in the study area population growth projections to 2044 ( RWRP-EM Table 2.2).

The SRA note that the population growth to 2044 in Table 2.2 (c 92,350 additional uplift) is marginally above the RSES and NPF Implementation Road Map July 2018 projections to 2031.

Additional growth capacity for Study Areas 7 and 8 may be required for a more robust assessment of future demand (water demands from employment growth also needs to be factored and robust).

The RSES population projection for Carlow (uplift of up to 8,500 by 2031) as outlined in RSES Appendix 1 (page 347) is an important component of the population growth to 2044 assigned to Study Area 6 which indicates a total uplift of 26,830 to 2044.

The SRA request that IW confirm that robust growth rates have been assumed to service that part of our Region within Study Area 6 and we await details of the RWRP for the South East to confirm that uplift of up to 24,500 to 2031 for the Southern Region's South East Strategic Planning Area is serviced in full.

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% 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 Limerick Shannon Metropolitan Area to a total projected population of c177,550 population by 2031. Projected population growth targets are set for Limerick City and Suburbs (in Limerick and Clare) and for the remainder of the Metropolitan Area (in Limerick and Clare) which is inclusive of Shannon. The SRA welcome the indication of growth for Limerick City by c60% by 2044 but recommend that direct reference needs to be made to the growth of Limerick -Shannon Metropolitan Area and service its growth rates to 2031 and beyond to 2044 (inclusive of Limerick City and Suburbs and the Remainder of the Metropolitan Area) as set out in Table 1 of the Limerick Shannon MASP (page 286 of the RSES).

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-EM, servicing the infrastructure led growth of the Key Towns of Ennis, Carlow and Nenagh as regional drivers of growth for at least 30% growth to 2040 needs to be underpinned by water services. As the exact details of the next adjoining RWRP and the towns serviced within it are not included, the SRA advise that the Key Towns of Thurles (also in the northern part of Tipperary) and Newcastle West (in the southern part of Limerick) are taken into consideration and that it is confirmed servicing their growth targets will be included in the RWRP for the adjoining South West/ South East water regions as relevant.

The SRA note and 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 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. Additional growth capacity for Study Areas 7 and 8 to the horizon of the plan may be required for a robust assessment of future demand (water demands from population and employment growth). Refer to RSES Appendix 1, page 347 sets out Local Authority population projections to 2031.
- ii. The population uplift for Carlow is an important component of growth in Study Area 6. Using RSES Appendix 1, it is important to confirm that robust assessment of future demand (water

demand from population and employment growth) to service that part of the South East of the Southern Region within Study Area 6.

- iii. The RWRP-EM should directly support the growth of Limerick -Shannon Metropolitan Area (refer to the Metropolitan Area in the plan) and ensure water demands from population and employment growth for the metropolitan area (inclusive of Limerick City and Suburbs and the Remainder of the Metropolitan Area inclusive of Shannon) as set out in Table 1 of the Limerick Shannon MASP (page 286 of the RSES) are robustly addressed in the water demand growth assumptions to the plan horizon.
- iv. Ensure that all Key Towns in the Southern Region that fall within the catchment of the RWRP -EM are serviced for at least 30% growth to the plan horizon for water demands from population and employment growth. The SRA expect that our Region's other Key Towns close to the boundaries of this RWRP-EM are being addressed in the subsequent RWRPs for the South West and South East water region catchments.
- v. 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.
- 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.

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 Limerick-Shannon and which identify water infrastructure investment as a key enabler for growth (Limerick -Shannon MASP Objective 4).

### **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-EM 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.
- Promotion of NBS for water protection and wastewater treatment, which have significant potential to deliver biodiversity, improve water quality, reduce flood risk, and create habitats.
- 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.
- Achieving key sustainability objectives for climate change and develop a carbon neutrality roadmap.

**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 needs to be a priority action for the unified NWRP. The SRA support IW's projects that integrate reduction in energy usage, carbon sequestration, and 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.
- ii. IW are an important stakeholder for the SRA in a collaborative project under the Interreg Europe "Blue Green Cities" project (<http://www.southernassembly.ie/eu-projects/blue-green-city>). 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. Continued collaboration with the SRA through this initiative is encouraged. The SRA's forthcoming Framework for Blue Green Infrastructure and Nature Based Solutions in the Southern Region prepared with ARUP will be a resource to Local Authorities and regional stakeholders. 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 collaboration with IW in this framework once completed.

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-EM including the identification of needs, status of infrastructure and supply, modelling for climate change, option developments across separate 134 Water Resource Zones, nine Study Areas and the development of Regional Options, including technical reports for each study area in the appendices.

The SRA note where the analysis has determined:

- Across the 134 Water Resource Zones across the RWRP-EM, two thirds record a Supply Demand Deficit, meaning existing supplies do not meet current or future needs in terms of source availability, water treatment plant capacity or demand growth requirements. Without infrastructure intervention, it means IW will have difficulty supporting projected growth and economic development.
- Network improvements and proactive leakage reduction alone will not resolve the issues with our supplies over the medium-to-long term.
- Under the Water Framework Directive, IW will need to modify surface water and groundwater abstractions and improve the sustainability of the national water supply from its current baseline through sustainable abstraction limits.

The SRA note the main recommendations (in summary) emerging of particular relevance for the Southern Region and implementation of the RSES, which include:

- Through a detailed screening process, a high number of Feasible Options were identified. A key consideration is whether to target a high multiple of individual Water Resource Zone infrastructure improvements (over 330 such options identified) which have local benefits. By considering larger scaled infrastructure interventions that resolve supply over a wider area covering several zones and spanning study areas (a combination of study area and regional approach), operational efficiencies, improved sustainability, cost and reliability outcomes are achieved.
- The screening for the study area and regional approach (preferred approach) also recorded more positive outcomes for Ecology (Best AA) and Environment (Best Env) than the multiple Water Resource Zone Level approach. This option allows IW to consider a more holistic and strategic way of transforming our water supplies. The preferred approach is adaptable to change across a range of future scenarios including climate change, growth projections, sustainability outcomes and changes in leakage targets.
- One of the Feasible Options, referred to in the draft RWRP-EM as the New Shannon Source (NSS), is the only option identified with the supply capacity and capabilities to supply multiple Water Resource Zones across the entire region. This type of option is known as a Regional Option.
- To assess the feasibility of the Regional Option, direct and indirect transfers of water supply between study areas was factored (for example the New Shannon Source in addition to supplying the GDA to reduce deficits also, through the network transfers within the GDA to supply other areas, including Study Area 6 which includes Carlow).

- For Study Area 6 (which includes Carlow), options for infrastructure upgrades include connections from the New Shannon Source to service Carlow transfer from Srowland Water Treatment Plant in Study Area 9) to Browns Hill Reservoir. This option will require the provision of new storage, new pumps, new pipe networks and upgrades to Water Treatment Plants for water quality purposes.
- For Study Area 7 (North Tipperary) options for infrastructure upgrades include decommissioning some older infrastructure, new ground water abstractions, new /upgraded reservoirs, new /upgraded pumps and new/upgraded network to allow for the additional supply. Options include interconnection between different Water Resource Zones and supply to the Study Area from the New Shannon Source.
- For Study Area 8 (Limerick Clare) , options for infrastructure upgrades include decommissioning some older infrastructure and supply to some Water Resource Zones from the New Shannon Source with new pumps and upgraded networks. For larger demand areas including Limerick City, the Study Area preferred approach includes options to provide spare capacity across zones to service higher centers of demand. These options will include new/upgraded pumps, new reservoirs and new/upgraded networks to allow for the transfer of the additional supply. An advanced leakage reduction programme for Ennis is also targeted.
- As it will take a number of investment cycles to deliver the Preferred Approach across all Water Resource Zones, IW must continue to deliver safe, secure, and reliable water supplies to meet customers' needs and enable growth in the region. IW have identified 116 interim short-term capital maintenance solutions for all Water Treatment Plants that will be utilized and maintain a sustainable water supply during implementation of the preferred approach.

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

- i. The preferred approach that combines infrastructure upgrades and efficiencies to our water infrastructure, enabling a transfer of supply to locations of high and growing demand between Water Resource Zones and across Study Areas, including the identified Regional Option, aligns 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. The RSES seeks Irish Water Investment Plans to align the supply of water services with the settlement strategy of the RSES and MASPs (Limerick-Shannon MASP of specific relevance to the RWRP-EM). It also seeks that such infrastructure planning takes into consideration seasonal pressures on critical service infrastructure, climate change implications and leakage reduction. The preferred approach demonstrates that these objectives are being taken into consideration. The final determination of the preferred approach going forward to next stages need to screen that our RSES objectives are met through that approach.
- ii. The SRA strongly encourage the continued partnership approach with Local Authorities to ensure that optimal infrastructure to guarantee a quality supply to service Core Strategies (urban and rural growth and population and employment needs) is achieved through the final agreed approach.
- iii. 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.



- iv. 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 6, 7 and 8 in the RWRP-EM, 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,



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David Kelly,  
Director