



Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Uisce Éireann's Draft Capital Investment Plan 2025-2029

The Regional Assembly welcomes this consultation with regard to Uisce Éireann's draft Capital Investment Plan 2025-2029 (CIP), a capital budgetary plan for the water services network in Ireland for a five-year period, which sets out where they are continuing to invest and prioritise to deliver the most urgently needed improvements in drinking water quality, leakage reduction, water availability, wastewater compliance, efficiencies, and customer service. The purpose of the CIP is to set out the investment required in order to deliver on the strategic objectives identified in the Government's Water Services Policy Statement (WSPS) and Uisce Éireann's Water Services Strategic Plan (WSSP).

It is noted that the first phase of stakeholder engagement on the methodology for the preparation of the plan was carried out by Uisce Éireann in April and May 2023. Uisce Éireann indicated that the feedback received was used to shape the development of the Draft Investment Plan and that they would like to thank the Regional Assembly for the participation in this stage.

The following submission is structured to include an overall context, detailing the role and function of the Regional Assembly and the importance of the Regional Spatial and Economic Strategy (RSES), including the Strategic Investment Priorities of the Eastern and Midland Region as they relate to water supply and wastewater services and water infrastructure for the Region. The submission focusses on the themes of Water Quality, Conservation, Future Proofing and the draft Investment Portfolio, as recommended in Section 3.2 of the draft CIP.

This submission has been prepared by the executive of the Regional Assembly and approved by the elected members of the Eastern and Midland Regional Assembly at the meeting of 8th September 2023.

1.0 Overall Context

1.1 Role and Function of the Regional Assembly

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of County Development Plans and Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions working with the National Oversight and Audit Commission.

EMRA has statutory functions providing oversight on Local Authority Development Plans and ensuring consistency between the RSES and the National Transport Authority (NTA) Transport Strategy for the Greater Dublin Area (GDA). As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

It is noted that the draft Planning and Development Bill 2022 expands on the scope of the Regional Spatial and Economic Strategy and the functions of the Regional Assembly. In this respect, Section 28 (1) (i) of the draft Bill states that an RSES shall make provision for the provision of services, including water services. Furthermore, Section 28 (13) of the draft Bill states that an RSES shall include objectives to secure the effective implementation and monitoring of the RSES, including an indication and order of priorities for infrastructure of scale relating to water services; potential sources of funding for infrastructure; cross-sectoral investment and actions required to deliver planned growth and development; and co-ordination between constituent local authorities and the co-operation of public bodies.

It is anticipated that the draft Planning and Development Bill 2022 will be adopted into legislation, with or without amendments, in the coming months.

1.2 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region

The RSES for the Eastern and Midland Region was made in June 2019, and is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by sixteen Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES is of critical importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

It is essential for the delivery of same, that investment decisions are aligned to spatial planning decisions. The RSES captures these spatial planning decisions for the Eastern and Midland Region to provide a meaningful planning and investment framework for the Region.

1.3 Ensuring Spatial Alignment

The RSES for the Eastern and Midland Region presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Athlone, Drogheda and Dundalk as Regional Growth Centres, acting as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns (which include Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places.

It is essential that investment decisions reflect this Spatial Strategy and the settlement hierarchy presented, to allow managed and sustainable growth that enables each place fulfil ambition and potential.

2.0 Strategic Investment Priorities of the Eastern and Midland Region

The RSES identifies that the sustainable growth of the Region requires the provision of water services and infrastructure in a plan-led manner to ensure that there is adequate capacity to support future development. High-quality infrastructure is an important element of a modern society and economy, it provides essential functions and services that support societal, economic and environmental systems at local, regional and national levels.

The overarching guiding principle for water in the Region is the protection, improvement and sustainable management of the water resource, as identified in the RSES Environmental Report. The strategic environmental objectives which have informed the sixteen RSOs of the RSES and which remain priorities for the Region include:

- Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the Water Framework Directive and Marine Strategy Framework Directive.
- Ensure that economic growth of the marine resource and its ecosystems are managed sustainably.
- Ensure water resources are sustainably managed to deliver proposed regional growth targets in the context of existing and projected water supply and wastewater capacity constraints ensuring the protection of receiving environments.
- Avoid inappropriate development in areas at risk of flooding and areas that are vulnerable to current and future erosion, particularly coastal areas.
- Integrate sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals.

Chapter 10 of the RSES, specifically, sets out the strategic water investment priorities for the Eastern and Midland Region and Chapter 7 details the priorities in relation to protecting the environment and climate action. Uisce Éireann are directed to the Regional Policy Objectives (RPOs) set out in the RSES which support the sustainable management of water resources to ensure a healthy society, economic development requirements and a cleaner environment for the Eastern and Midland Region. These are referred to in more detail under the following headings.

2.1 Water Quality

Ireland's abundant natural and environmental resources such as our water sources are critical to our environmental and economic well-being into the future. Of the sixteen RSOs of the RSES, RSO 4 'Healthy Communities' is to protect and enhance the quality of our built and natural environment, to ensure clean air and water for all and quality services that support human health (aligned with the NPFs NSO 10), which is central to the RSES key principle of Healthy Placemaking.

Furthermore, RSO 7 of the RSES, 'Sustainable Management of Water, Waste and other Environmental Resources' is concerned with the conservation and enhancement of the water resources in the Region, to ensure clean water supply, adequate wastewater treatment and greater resource efficiency, and to realise the benefits of the circular economy (aligned with NSOs 8 and 9 of the NPF).

The draft CIP acknowledges that safe and reliable water supplies are essential to health, and social and economic growth, and Uisce Éireann are committed to delivering the strategic objective of the Water

Services Strategic Plan (WSSP) to ‘ensure a safe and reliable water supply’ and its strategic aim to ‘manage the sustainability and quality of drinking water from source to tap to protect human health’.

In relation to water quality, the Revenue Control 4 (RC4) period of the draft CIP, which refers to the investment period of 2025-2029, will be focussed on the development of a new approach, the ‘Water Treatment Programme’ which will deliver investment mitigations across the full water treatment process. This programme will also seek to mitigate for high-risk secondary disinfection sites. Furthermore, water quality issues on the Uisce Éireann network will be mitigated through the National Lead Replacement Programme and the Cast Iron Mains Rehabilitation Programme (where water quality issues have been identified and confirmed). These programmes are identified in Table 10.1 of the RSES, Strategic Water Services Projects, which includes Uisce Éireann’s National Programme of Investment to tackle leakage through water mains rehabilitation.

In relation to wastewater treatment, the RSES states that pollution from urban wastewater is one of the key threats to water quality, due to inadequate urban wastewater treatment (UWWT), storm water overflow (SWO) or direct discharges into watercourses. The draft CIP states that impacts from SWOs are managed through national programming such as Drainage Area Plans, SWO surveys and assessments, and water quality modelling. There are approx. 2,200 SWOs nationally which are being assessed to understand and quantify risk. During the RC4 period, Uisce Éireann aim to complete all assessments by 2027. These assessments include the increased deployment of permanent monitors at SWOs nationally which will provide improved data on the long-term performance of SWOs. With respect to this, the Regional Assembly notes that a letter was sent to Uisce Éireann from the Regional Assembly in June 2023 in relation to the disposal of effluent on beaches in Dublin Bay (as a result of SWOs), in particular Sandymount Strand. In a response in July 2023, Uisce Éireann confirmed that works are planned for later this year to improve the monitoring of the overflows from the combined sewer leading to the Ailesbury pumping station (the relevant pumping station). The Regional Assembly considers this is critical to implementing RPOs of the RSES, including RPO 7.2 in relation to achieving and maintain good environmental status of marine waters in the Region, and the recognition that Dublin Bay is a UNESCO biosphere reserve and Dublin Bay is identified in Table 7.1 Strategic Natural, Cultural and Green Infrastructure Assets in the Region. The Regional Assembly members wish to highlight the worsening of this situation at Sandymount Strand since the issuing of previous correspondence with Uisce Éireann in this regard.

Furthermore, the Drainage Area Plan programme will continue in larger urban areas (including the Dublin Bay area) to investigate the performance of the entire sewerage network, and a programme of Local Flood Protection Measures will continue. Additionally, the increased use of Sustainable Drainage Systems (SuDS) in the public realm, to reduce surface water run-offs, will continue. The draft CIP also acknowledges that a significant amount of collaboration and forward planning will be required between multiple stakeholders to realise the use of SuDS. This accords with the RPOs of the RSES which require collaboration between local authorities and Uisce Éireann. In this respect, RPO 10.1 of the RSES requires that local authorities include proposals in city and county development plans to ensure the efficient and sustainable use and development of water resources and water services infrastructure.

Furthermore, in relation to wastewater treatment, the RSES states that the elimination of untreated discharges from settlements in the short term, while planning strategically for long term growth and taking account of the requirements of the Urban Wastewater Directive should underpin the approach to investment in wastewater treatment in the Region. As with the approach to investment in water supply, the RSES also supports the development of a new rural settlement investment approach, coordinating Uisce Éireann, local authority, developer and community-led solutions to ensure that sustainable water services solutions are progressively implemented in the Region (RPO 10.8). RPO 10.3 also states that the Regional Assembly and local authorities shall liaise and cooperate with Uisce Éireann to ensure the delivery of Uisce Éireann’s Investments and other relevant investment works

programme of Uisce Éireann that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies, and provide for long term solutions for wastewater treatment for the Region.

The RC4 period of the draft CIP states that the capital interventions that are required to bring wastewater treatment plants (WWTP) into compliance with the Urban Wastewater Treatment Directive (UWWTD) will continue. In relation to the Eastern and Midland Region, this relates to the Athlone wastewater treatment plant which requires upgrading in order to comply with the UWWTD. Furthermore, Uisce Éireann have committed to ending the discharge of untreated wastewater in the agglomerations listed by the Environmental Protection Agency. In this respect Uisce Éireann will take account of the priority environmental areas, as identified by the EPA through the Priority Areas List (PAL), and areas where wastewater discharges are significantly impacting on water bodies. Athlone WWTP is included on the EPA's PAL. This is in line with RPO 10.11 of the RSES which states that EMRA supports the delivery of the wastewater infrastructure set out in Table 10.2, Wastewater Infrastructure, of the RSES. Athlone Main Drainage Project is included in Table 10.2.

The Regional Assembly would welcome investment in the improvement of water quality, reliability, and security.

2.2 Conservation

The RSES sets out an approach to water management in the Region requiring that water is used as efficiently as possible, that addresses water wastage, water conservation and reduces leakage and minimises demand for capital investment.

Uisce Éireann manages approx. 64,000km of water networks nationally. The network performance is measured using a Leakage Management System and in 2022, the leakage rate nationally was at 37%. In the RC4 period, Uisce Éireann will focus on reducing the leakage rate further through its Leakage Strategy which includes finding and repairing leaks on the public network and watermain rehabilitation programme. This complies with RPO 10.4 of the RSES which supports Uisce Éireann and the relevant local authorities in the Region to reduce leakage, minimising demand for capital investment.

The Regional Assembly welcomes Uisce Éireann's Leakage Strategy with investment in the water conservation initiatives presented in the National Water Resource Plan (NWRP), which is based around the three pillars of lose less (reduce leakage), use less (improve water efficiency) and supply smarter (improve infrastructure).

2.2.1 Biodiversity

RSO 11 of the RSES, 'Biodiversity and Natural Heritage', aims to promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species, including landscape and heritage protection. This is aligned with NPF NSOs 7 and 8. Furthermore, RSO 10 focuses on enhanced green infrastructure and the aim is to identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands, woodlands and wetlands, also aligned with NPF NSOs 8 and 9.

Chapter 7 of the RSES sets out the importance of the environment and climate in this respect, and the drivers for this chapter are the Key Principles of the RSES of Healthy Placemaking and Climate Action.

The RSES acknowledges that it is vital that our surface water sources including rivers and lakes, groundwater and springs do not contain pollutants that might endanger public health, aquatic systems and the amenity value of our waters. With regard to biodiversity, species considered to be most under threat are those linked to wetlands and that are sensitive to water pollution. Aquatic habitat quality

can be significantly impacted by the loss of wetlands, discharge of silt, drainage, run-off from farming, septic tanks, peat extraction, hedge removal.

Uisce Éireann have developed a Biodiversity Action Plan (BAP) and the draft CIP refers to the implementation of the aims and actions outlined in this. In this respect Uisce Éireann aims to plant over 250,000 native tree species by 2030, and is committed to ensuring no net loss of biodiversity associated with the delivery of Uisce Éireann infrastructure projects, and where possible, to achieve a biodiversity gain. The Regional Assembly welcomes this to ensure that investment in water infrastructure and responsible management to protect ecosystems, and the Regional Assembly further directs Uisce Éireann to the RPOs in the RSES in this manner.

2.2.2 Circular Economy

RSO 7 of the RSES is concerned with the conservation and enhancement of the water resources in the Region, not only to ensure clean water supply, adequate wastewater treatment and greater resource efficiency, but also to realise the benefits of the circular economy (aligned with NSOs 8 and 9 of the NPF).

Sustainable water management practices such as adopting circular economy systems can assist in meeting obligations under the Water Framework Directive and Climate adaptation. The draft CIP states that Uisce Éireann has adopted a cradle-to-cradle circular economy approach and has prepared a National Wastewater Sludge Management Plan which sets out sustainable proposals for the investment in the future treatment, transport and reuse of sludge. Furthermore, Uisce Éireann is committed to reducing the existing high energy carbon footprint associated with water sludge dewatering and as part of this, Uisce Éireann is embarking on a pilot project to use reed beds to dewater water sludge containing aluminium sulphate. This aligns with RPO 10.13 of the RSES which states that EMRA shall support appropriate options for the extraction of energy and other resources from sewerage sludge in the Region.

Having regard to the aforementioned RPOs and the need for water conservation generally, in order for Uisce Éireann to be progressive and responsive to circular economy, the Regional Assembly would welcome investment in smart water solutions and technology choice, present best practice in greywater and rainwater harvesting, all in order to positively engage local authorities and communities.

2.2.3 Climate Resilience

Climate Action is one of the three Key Principles of the RSES and the Climate Strategy set out ensures that the RSES drives climate resilience throughout the Region and accelerates climate action. RSO 8 'Build Climate Resilience' seeks to ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region (aligned with NSO 8, 9). Climate regional policy objectives are integrated throughout the RSES and includes priorities related to the built environment, sustainable transport, energy and waste, flood resilience and water, and green infrastructure and ecosystem services.

As mentioned, Chapter 7 of the RSES sets out the importance of the environment and climate, and RPOs in the chapter focus on climate resilience, which overlap with improving water quality and conserving water supply. Water supply is regarded as critical infrastructure and one that should be resilient to future hazards and threats, both man-made and natural and to the impacts of climate change. Many of the measures used to protect water quality can also prove beneficial in tackling climate change. Furthermore, water conservation has significant climate benefits both by reducing operational energy use and by reducing infrastructural requirements.

The need for appropriate adaptation or climate proofing measures will be necessary to ensure a comprehensive response to the challenge of climate change in the Region. The draft CIP states that Uisce Éireann's approach aligns with the Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure and that understanding potential impacts and identifying adaptation measures are key to future proofing services to deliver a low carbon climate resilient water and wastewater service. In this respect, the draft CIP states that abstraction and catchment studies will be undertaken in order to understand climate resilience on Uisce Éireann's assets, and the early undertaking of technical assessments and studies in relation to wastewater are essential for understanding how best to deliver water quality improvements.

Furthermore, RPO 7.43 of the RSES highlights that Climate Action Regional Offices and local authorities should consider the identification of critical infrastructure within their functional areas, particularly of the interdependencies between different types of sectoral infrastructure, as a first step in 'future proofing' services and to help to inform longer-term adaptation planning and investment priorities. Uisce Éireann should seek collaboration between the Climate Action Regional Offices and local authorities to inform future solutions in this regard, and direct investment accordingly.

2.2.4 Energy Efficiency

RSO 9 of the RSES, 'Support the Transition to Low Carbon and Clean Energy' is concerned with pursuing climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. This is aligned with the NPFs NSOs 8 and 9.

The draft CIP highlights that capital investment during the next investment period will be a key enabler to reducing energy consumption, through initiatives like the replacement of existing assets with more energy efficient assets, and all capital investments will be assessed to identify the most energy efficient means of achieving a project's primary driver. Furthermore, in the RC4 period, Uisce Éireann will invest further on reducing the reliance on power supply from third party providers, thus enabling the generation of energy via renewable sources. As mentioned under Section 2.2.2 Circular Economy, this is in line with RPO 10.13 of the RSES which states that EMRA shall support appropriate options for the extraction of energy and other resources from sewerage sludge in the Region.

2.3 Future Proofing

The future proofing of ensuring a safe and reliable water supply is a key objective of Uisce Éireann, and this is in accordance with the strategic aim of the WSSP to 'manage the availability, sustainability and reliability of water supply now and into the future'. Uisce Éireann, in the preparation of the National Water Resources Plan (NWRP), has identified water supplies that have a deficit of water available for use or will have at some stage in the future. These supplies are determined as Supply Demand Deficit and the draft CIP states that these will be prioritised for investment, depending on the level of deficit experienced or predicted.

The draft CIP identifies the Greater Dublin Drainage and the Water Supply Project, Eastern and Midland Region, as critical intergenerational projects which will deliver vital water/wastewater infrastructure for the Country. These two projects are identified as having a significant impact on Uisce Éireann's delivery strategy and are being actively considered in the overall planning particularly with regard to the spend profile and acknowledging the impact on the Uisce Éireann supply chain. In this respect, the Greater Dublin Drainage Project and the Greater Dublin Area Resilience Programme are both identified in the draft CIP as programmes for the RC4 investment period.

In terms of future proofing for wastewater, the main areas of investment for the RC4 period are two programmes of work: the Small Towns and Villages Growth Programme (300 candidate WWTPs currently identified nationally), and the Large Towns and Cities Growth Programme. The former was

initiated in the RC3 investment period (2020-2024), and the latter will be a new programme established in the RC4 period. This accords with Section 10.8 of the RSES which states that the development of a new rural settlement investment approach, to ensuring that sustainable water services solutions are progressively implemented, should be encouraged.

Furthermore, existing projects and programmes progressed under the RC3 period specific to addressing wastewater network constraints will continue into the RC4 period, including the Network Extension Programme, Local Infrastructure Housing Activation Fund (LIHAF)/Major Urban Housing Delivery Sites (MUHDS) Programme, and the Local Network Reinforcement Programme. These programmes will assist in tackling wastewater network constraints and therefore assisting in providing for population growth in the Region and ensuring a safe and reliable water supply for future generations.

Additionally, RPO 10.10 states that EMRA will support Uisce Éireann and the relevant local authorities in the Region to eliminate untreated discharges from settlements in the short term, while planning strategically for long term growth in tandem with Project Ireland 2040 and in increasing compliance with the requirements of the Urban Wastewater Treatment Directive from 39% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040. In this respect, the Regional Assembly would welcome investment in wastewater networks being prioritised, in order to achieve these targets.

2.4 Draft Investment Portfolio

EMRA supports the delivery of the strategic water services projects which are included in Project Ireland 2040 and set out in Table 10.1, as stated by RPO 10.2, of the RSES. Table 10.1 of the RSES states:

- The Water Supply Project for the Eastern and Midland Region to supply water to the Greater Dublin Area and other communities in the Eastern and Midland Region
- Uisce Éireann's National Programme of Investment to tackle leakage through find and fix (Active leakage control) and water mains rehabilitation
- Vartry Water Supply Scheme
- The Rural Water Programme

Furthermore, in relation to wastewater infrastructure, RPO 10.3 of the RSES states that the Regional Assembly and local authorities shall liaise and cooperate with Uisce Éireann to ensure the delivery of Uisce Éireann's Investments and other relevant investment works programme of Uisce Éireann that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies, and provide for long term solutions for wastewater treatment for the Region. In this respect, EMRA supports the delivery of the wastewater infrastructure set out in Table 10.2 of the RSES (RPO 10.11). Table 10.2 of the RSES states:

- The Greater Dublin Drainage Project
- The Ringsend Wastewater Treatment Plan Project
- The Athlone Main Drainage Project
- The Upper Liffey Valley Sewerage Scheme

It is noted that the Vartry Water Supply Scheme and the Upper Liffey Valley Sewerage Scheme, as referenced in the RSES, are completed. The draft CIP states that the scale of the proposed investment for the RC4 period is a significant increase compared to the investment delivered during RC3, however confirmation of available investment will be agreed through the Strategic Funding Plan, and the Regulatory Control process, and a draft investment portfolio is included as Appendix 4 of the draft CIP. The draft investment portfolio consists of a draft list of projects and programmes which are expected

to commence, progress or be completed during the RC4 period, and it is subject to budget, legislative changes, technical, supply chain and environmental constraints, as well as statutory approvals.

The array of projects for the Eastern and Midland Region, as stated at Appendix 4 of the draft CIP, are noted and include the Old Connaught Woodbrook Water Supply Scheme, the Dunlavin Rationalisation Scheme, and the Navan Mid-Meath Programme. They include the following specifically identified in the RSES:

- The Water Supply Project for the Eastern and Midland Region
- The Greater Dublin Drainage Project
- The Ringsend Wastewater Treatment Plan Project
- The Athlone Main Drainage Project

It is also noted that the Active Leakage Control and Water Mains Rehabilitation programme (included in Table 10.1 of the RSES) has been identified by Uisce Éireann as an important programme contained within the draft CIP.

3.0 Conclusion

Having regard to the above, it is considered that the draft Capital Investment Plan 2025-2029 should be fully informed by and aligned to the investment priorities identified by the RSES for the Eastern and Midland Region in order to support economic, residential and environmental development throughout the Region.

Regards,



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