



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

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Uisce Éireann's Investment Plan 2025-2029 – Phase 1 Consultation Paper

The Regional Assembly welcomes this consultation in advance of the preparation of Uisce Éireann's Investment Plan 2025-2029, a capital budgetary plan for the water services network in Ireland for a five-year period, which will provide for improvements in drinking water quality, leakage reduction, water availability, wastewater compliance, efficiencies, and customer service. The purpose of the Investment Plan 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). The preparation of the Investment Plan is subject of this Phase 1 Consultation Paper, and the second phase of engagement will be on the Draft Investment Plan 2025-2029.

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 Chapter 5 of the Consultation Paper, Outline Investment Cases, as recommended in Section 3 of the Consultation Paper.

This submission has been prepared by the executive of the Regional Assembly and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly.

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 Supply

The RSES highlights that water supply for the wider Dublin area is at critical levels of demand, and to facilitate further growth in line with NPF population growth projections, prioritisation of water supply investment for the Eastern and Midland Region should occur. Specifically, the Water Supply Project for the Eastern and Midland Region is required to ensure sufficient treated water is available to meet the long-term water supply needs of the Region, to provide for projected growth in the medium to long term (up to 2050) and contribute to resilience and security of supply in the Region. The RSES also highlights that Uisce Éireann will need to consider contingency plans to address any potential delays in the delivery of projects to ensure resilience of water supply for the Eastern and Midland Region.

In this respect, RPO 10.2 of the RSES states that EMRA supports the delivery of the strategic water services projects which are included in Project Ireland 2040 to provide for planned development and maintain and improve existing services which are set out in Table 10.1 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

2.2 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.

The RSES states that most public water comes from surface water sources including rivers and lakes, groundwater and springs and it is vital that it does not contain pollutants that might endanger public health, aquatic systems and the amenity value of our waters.

The RSES further states that pollution from urban waste water is one of the key threats to water quality, due to inadequate urban waste water treatment (UWWT), storm water overflow or direct discharges into watercourses. Hydromorphology (the physical modification of water bodies due to water abstraction, channelisation and the building of embankments, dams and weirs) is also identified as a key pressure. Loss of wetlands, discharge of silt, drainage, run-off from farming, septic tanks, peat extraction, hedge removal and land improvements can all be significant to water and aquatic habitat quality.

The aim of the Water Framework Directive (WFD) is to maintain high and good ecological status waters where they exist, and prevent deterioration of status in all waters by identifying key threats to water quality on a catchment basis. A key priority for the Region is therefore to support the implementation of the WFD to achieve and maintain at least good environmental status for all water bodies in the Region and ensure policy alignment between the core objectives of the WFD and other relevant Directives, River Basin Management plans and local authority land use plans (RPO 7.10).

In this respect, the Regional Assembly would welcome investment in the improvement of water quality, reliability and security, and supports Uisce Éireann's risk management approach which is based on the World Health Organisation's Drinking Water Safety Plans (which is also in line with the requirements of the WFD).

2.3 Sustainable Management of Water

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).

In this respect, 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 (RPO 10.1). Local authority core strategies are also required to demonstrate compliance with DHLGH Water Services Guidelines for Local Authorities and demonstrate phased infrastructure-led growth that is commensurate with the carrying capacity of water services and prevent adverse impacts on the environment (RPO 10.7). In addition, RPO 10.4 supports Uisce Éireann and the relevant local authorities in the Region to reduce leakage, minimising demand for capital investment.

In this respect, 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. Therefore, 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)).

2.4 Sustainable Management of WasteWater

As with the sustainable management of water, RSO 7 of the RSES is concerned with the enhancement of the water resources in the Region, partly through adequate wastewater treatment.

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.

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.

Furthermore, 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.

2.5 Conservation

2.5.1 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.

As previously mentioned, 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 and in this respect, Chapter 7 of the RSES includes RPOs in relation to sustainable water management solutions, for example RPO 10.15 is concerned with supporting relevant local authorities (and Uisce Éireann where relevant) in the Region to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment and in the development and provision at a local level of Sustainable Urban Drainage solutions.

The Consultation Paper refers to the implementation of the aims and actions outlined in Uisce Éireann's Biodiversity Action Plan (BAP). 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.

2.5.2 Circular Economy

As mentioned, 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 Consultation Paper 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. 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, Uisce Éireann needs to be progressive and responsive to circular economy and 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.

2.5.3 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 RPO's 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 Consultation Paper 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. 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.

2.5.4 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 Consultation Paper highlights that capital investment during the next investment period will be a key enabler 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, Uisce Éireann has an objective to reduce reliance on power supply from third party providers, thus enabling the generation of energy via renewable sources. As mentioned under Section 2.5.2 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.

Conclusion

Having regard to the above, it is considered that the preparation of the forthcoming Investment Plan should be fully informed by and aligned to the investment priorities identified by the RSES for the Eastern and Midland Region.

The Regional Assembly welcomes the opportunity to engage in the process of preparing the new Investment Plan 2025-2029 and looks forward to continuing engagement with Uisce Éireann in the further development of an Investment Plan in order to support economic, residential and environmental development throughout the Region.

Regards,

A handwritten signature in blue ink, consisting of a large loop on the left and a horizontal line extending to the right with a small hook at the end.

Jim Conway

Director, Eastern and Midland Regional Assembly

5th May 2023