



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

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Uisce Éireann's Water Services Strategic Plan 2025-2050

The Regional Assembly welcomes this consultation on the Issues Paper, the Strategic Environmental Assessment (SEA) Scoping Report and the Appropriate Assessment (AA) Screening Report in advance of the preparation of Uisce Éireann's Water Services Strategic Plan 2050. The purpose of the Water Services Strategic Plan (WSSP) 2050 is to set out Uisce Éireann's short, medium and long-term objectives for the next 25 years and identify strategies to achieve those objectives, focusing on the provision of safe drinking water and ensuring that the environment is protected from the impacts of wastewater discharge.

The current WSSP was approved by the Minister and published in 2015 and covers the period from 2015 to 2040. The new WSSP will cover the period from 2025 to 2050 and will replace the current plan. It is envisaged that public consultation on the WSSP 2050 will be carried out in 2024 and that the new WSSP will be published in 2025.

This submission is tailored to address the key issues and themes which have been identified within the Issues Paper and 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 priorities of the Eastern and Midland Region as they relate to water supply and wastewater services and water infrastructure for the Region.

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 (NOAC).

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.

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000, as amended. This legislation is currently under review, and the Planning and Development Bill 2023 was approved by Cabinet on 3rd October and is due to be published in the coming weeks. The draft Planning and Development Bill 2022 (prior to its approval) expanded 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 stated that an RSES shall make provision for the provision of services, including water services. Furthermore, Section 28 (13) of the draft Bill stated 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. The publication of the Planning and Development Bill 2023 in the coming weeks will confirm if these proposed sections have remained, and it is anticipated that the Planning and Development Bill 2023 will be enacted into legislation 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 by the Members of the Assembly 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 of the RSES is supported by 16 Regional Strategic Outcomes (RSOs) that are framed around the 3 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), aligning 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 Water Services Act 2013 states that the WSSP shall be consistent, as far as is practical, with the National Planning Framework, the RSES and any river basin management plan in force at the time. The WSSP must also have regard to, inter alia, the proper planning and sustainable development at a county and local level. The RSES is of critical importance for the delivery of Project Ireland 2040 and it is essential that water infrastructure investment decisions reflect the Regional Spatial and Economic Strategy and the settlement hierarchy outlined within it in order to facilitate sustainable growth.

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 decisions impacting on the water infrastructure within the Region reflect this Spatial Strategy and the settlement hierarchy presented, to allow managed and sustainable growth that enables each place fulfil ambition and potential.

1.4 Strategic Water Infrastructure 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 water 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 the following:

- 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 discussed in more detail further in the submission.

2.0 Submission

Uisce Éireann has identified seven key issues that the WSSP 2050 must address, which have been outlined in the Issues Paper as follows:

1. Climate change
2. Awareness and behaviours

3. Circular economy
4. Digitalisation, data and cyber
5. Environment and biodiversity crises
6. Legislative, policy and regulation
7. Existing assets and new approaches to service delivery

The Issues Paper outlines that the seven key issues as listed above can be addressed through the following four themes, which are stated below:

1. Safe and reliable drinking water; ensuring the quality and reliability of water supplies is a primary requirement.
2. Protect and restore our environment; protecting and restoring the quality of the water environment is fundamental for providing safe water services and for the protection of human health and biodiversity.
3. Support customers, communities and the economy; customers' expectations must be met through the provision of high quality, reliable water and wastewater services, delivered through resilient systems, in an economic and efficient manner, reflecting the service levels customers expect.
4. Resilient services fit for the future; the approach to managing assets aims to optimise the value obtained from them by optimising performance, risk and cost across the asset lifecycle.

Having considered the Issues Paper, this submission outlines the observations of the Regional Assembly in relation to the key issues and themes identified in the Issues Paper.

2.1 Climate Change

The Issues Paper outlines that by the middle of the century, average temperatures will increase by between 1 and 1.6 degree Celsius and that extreme weather events will become more common as a result of climate change, resulting in more intense rainfall, frequent storm events, flooding and droughts. To combat this, Uisce Éireann, as a public sector body, is obliged under the Climate Action Plan 2023 to achieve a 51% reduction in CO₂ emissions and to be 50% more energy efficient by 2030 (medium term), and has committed, in line with European Climate Law, to being Net Zero Carbon by 2040 (long term).

Climate Action is one of the three key principles of the RSES, and the Climate Strategy of the RSES aims to ensure 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 National Strategic Outcomes 8 and 9 of the NPF). Furthermore, RSO 9 of the RSES to '*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 (aligned with National Strategic Outcomes 8 and 9). Climate regional policy objectives (RPOs) are also integrated throughout the RSES and include priorities related to the built environment, sustainable transport, energy and waste, flood resilience and water, and green infrastructure and ecosystem services.

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. However, the energy use implications, and the associated impacts on the environment and climate, of supplying and pumping water over distances when delivering water supply, should also be taken into consideration by Uisce Éireann, and the most energy efficient methods should be employed in this respect. 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. In this respect, 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. In this respect, Uisce Éireann should seek collaboration between relevant stakeholders to inform future solutions in this regard.

2.2 Awareness and Behaviours

The Issues Paper outlines that public awareness of environmental issues may lead to positive behaviour change such as reducing water consumption and that stimulating positive behavioural change across a large proportion of the public requires stakeholders to work together to raise awareness and to educate. The awareness that customers, stakeholders and the broader public have of issues can influence their behaviour and their acceptance of standards of service. Raising awareness about environmental, social, and economic issues related to water and how the individual’s behaviour influences this can therefore actively contribute to the protection and sustainable management of water.

The Issues Paper outlines changing patterns of behaviour in the short, medium and long term and notes that in the medium term (2030-2040) the continued effects of climate change are likely to encourage positive behaviours, and in the long term (2040-2050) the majority of the public is likely to have recognised the effects of climate change and adopted sustainable behaviours benefitting water conservation and environmental management.

The Regional Assembly supports the co-operation of relevant stakeholders to work together to continue to raise awareness and increase education in relation to these issues and this is evident in RPOs such as RPO 7.43 as previously mentioned. As stated in the Issues Paper, knowledge sharing, collaboration and coordination across stakeholders, in order to build meaningful engagement with society around the fundamental value of water, can encourage behavioural change.

2.3 Circular Economy

The Issues Paper outlines that in 2020 the circular material use rate in Ireland was just 2% compared to 12.8% in the EU. The Circular Economy and Miscellaneous Provisions Act 2022 underpins Ireland’s shift to a more sustainable pattern of production and consumption, and the adoption of circular economy principles will lead to progressive development of systems which avoid, recycle and reuse to

minimise negative effects on the environment. The Issues Paper illustrates the potential growth of the circular economy. In this respect, in the short term (2025-2030) recently published circular economy related strategies and plans are focusing on water as a priority area, and in the medium term (2030-2040) circular economy opportunities will include improving the efficiency of water use and waste avoidance. In the longer term (2040-2050) it is anticipated that there will be progressive advancement of technology to support the broader adoption of circular economy principles.

As outlined in the RSES, Ireland's natural and environmental resources such as water sources are critical to environmental and economic wellbeing into the future. Conserving and enhancing the quality of these resources will become more important in a crowded and competitive world as well as the capacity to create beneficial uses from products previously considered as waste, creating circular economic benefits.

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 National Strategic Outcomes 8 and 9 of the NPF). In this respect and as outlined in the RSES, the bioeconomy in Ireland has enormous potential which is yet to be unlocked. A sustainable bioeconomy is the renewable segment of the circular economy as it can turn bio-waste, residues and discards into valuable resources and significantly cut food waste. Realising this potential requires investment and implementing systemic changes that cut across different sectors (agriculture, forestry, fisheries, aquaculture, food, biobased industry). In this regard, RPO 7.34 in the RSES outlines that EMRA supports the National Policy Statement on Bioeconomy (2018) and supports the exploration of opportunities in the circular resource-efficient economy. Furthermore, RPO 10.13 in the RSES outlines that EMRA shall support appropriate options for the extraction of energy and other resources from sewerage sludge in the Region. As outlined in the Issues Paper, a more sustainable pattern of production and consumption, which retains the value of resources in the economy for as long as possible that will significantly reduce Ireland's greenhouse gas emissions is welcomed by the Regional Assembly.

2.4 Digitalisation, Data and Cyber

The Issues Paper outlines that the rise of digitalisation, automation and robotics presents huge opportunities for the water sector in terms of efficiency, sustainability and cost. In this respect the digitalisation and automation of water infrastructure can help Uisce Éireann meet its long-term vision, but adoption will need to be accompanied by investment in data control and cyber-security. Also, challenges around social issues, such as equitable access to technology in all regions and communities should be addressed. The legislative framework will also need to be revised to include coherent terminology and clear definitions of digitalisation of the water sector.

The growth of artificial intelligence (AI) has been illustrated in the Issues Paper and this states that in the short term (2025-2030) AI will advance in data collection and testing and the use of drones and robots, in the medium term (2030-2040) it is anticipated that AI will help to predict infrastructure risks and inform operations in real time, and in the longer term (2040-2050) it is anticipated that there may be potential for some roles to be replaced by automation and robots.

The Issues Paper also outlines that AI can analyse large volumes of data such as from smart sensors and monitoring systems which can assist decision making in demand forecasting, leak detection,

energy optimisation, predictive maintenance and net zero delivery. The Issues Paper further acknowledges that the growth of technologies around the home that leverage data and digital solutions can also act to raise customer awareness and influence behaviour as customers increasingly expect tailored services that meet their specific needs. Digital technologies can empower consumers by providing real-time information about their water consumption, through smart meters and artificial intelligence-powered analytics. This is supported by RPOs in the RSES such as RPO 10.19 that supports the roll-out of Smart Grids and Smart Cities Action Plan enabling new connections, grid balancing, energy management and micro grid development.

Furthermore, the Issues Paper states that automation and robotics can improve efficiency through automated valve control, water and wastewater treatment optimisation and water quality testing, and this is supported by RPO 10.4 of the RSES which supports Uisce Éireann and the relevant local authorities in the Region to reduce leakage, thereby minimising demand for capital investment.

Having regard to digitalisation and improvements to data and automation, including the need to be responsive to the circular economy as outlined under Section 2.3, the Regional Assembly would welcome increased investment in smart water solutions and technology choice and the use of best practice in greywater and rainwater harvesting in order to positively engage local authorities and communities and to be progressive in terms of both digitalisation and the circular economy.

2.5 Environment and Biodiversity

The Issues Paper outlines that many of Ireland's environmental targets will not be met in the short term or will be delivered late, and it states that the Government has identified five main drivers of biodiversity loss in Ireland; these are intensive agricultural and forestry practices, overfishing, invasive species, changes in land use, and the over-exploitation of resources such as peatland. As the concentrations of water pollutants increase and as new contaminants emerge, the pressure on treatment processes also increases. The short, medium to long term impacts on the environment and biodiversity have been illustrated in the Issues Paper. In the short-term (2025-2030), environmental degradation and biodiversity deterioration continues as measures to address these issues take time to have a positive effect, whereas in the medium term (2030-2040) measures put in place may start to mitigate deteriorations. In the long term (2040-2050) it is noted that long-term environmental degradation, biodiversity and water pollution will be dependent on the short- and medium-term measures taken, and that collaboration will play a large role in this issue.

Chapter 7 of the RSES sets out the importance of the environment and climate and the drivers for this chapter are the key principles of Healthy Placemaking and Climate Action. The RSES identifies a number of key Regional Strategic Outcomes which support these two key principles. In this respect, 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 (aligned with National Strategic Outcomes 7 and 8 of the NPF). RSO 10 of the RSES '*Enhanced Green Infrastructure*' aims to identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as coastlines, farmlands, peatlands, uplands, woodlands and wetlands (aligned with National Strategic Outcomes 8 and 9 of the NPF). Furthermore, RSO 4 '*Healthy Communities*' in the RSES aims 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.

As outlined in the RSES, 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 amenity value. 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 flood risk management is specifically addressed in the RSES under RPOs 7.12 - 7.15, and RPO 7.29 is in support of the rehabilitation and/or rewetting of suitable peatland habitats. Furthermore, the RSES states that pollution from urban wastewater is one of the key threats to water quality, due to inadequate urban wastewater treatment, storm water overflow or direct discharges into watercourses. In this regard 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. Also, RPO 10.16 aims to implement policies contained in the Greater Dublin Strategic Drainage Study (GSDSDS).

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 stormwater overflows), 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 of the RSES; Strategic Natural, Cultural and Green Infrastructure Assets in the Region.

The Regional Assembly recognises the impact of water quality on the environment, human health and biodiversity in the RSES and welcomes an emphasis on the implementation of wastewater and stormwater processes to mitigate against the negative impacts of pollution, and similar to Section 2.2, welcomes the collaboration with and co-operation of relevant stakeholders to raise awareness concerning the impacts on biodiversity and the environment, and the change of behaviours required regarding this.

2.6 Legislation, Policy and Regulation

The Issues Paper outlines that new or changed water policy, legislation and regulation has a direct influence on Uisce Éireann through new or changed requirements which in turn necessitate change to the physical assets and natural environment associated with the delivery of water and wastewater services. The timeframe of legislative changes has been illustrated in the Issues Paper to show that in the short term (2025-2030) current considerations include the adoption and implementation of the Urban Wastewater Directive and the Drinking Water Directive, whereas in the medium term (2030-2040) ongoing updates to existing policies and regulation, in addition to new policies and regulation, will continue to affect Uisce Éireann. In the longer term (2040-2050) there will be other legislative and regulatory changes which will emerge and it is stated that Uisce Éireann will continue to remain responsive and adaptable to these.

The key relevant policy, legislation and regulation in relation to the preparation of the WSSP 2050 includes the Urban Wastewater Directive, the Drinking Water Regulations, the Water Environment Act and the Maritime Area Planning Act 2021 (as amended).

The RSES supports that the requirements of the Urban Wastewater Directive should underpin the approach to wastewater treatment in the Region as the UWWTD sets standards for both treatment and disposal of sewage as well as monitoring requirements for wastewater discharges from urban areas. In this respect, RPO 10.10 of the RSES aims to 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.

The Regional Assembly welcomes the requirement under the Water Services Act 2013 that the WSSP shall be consistent, as far as is practical, with the RSES, and that the WSSP must also have regard to, inter alia, the proper planning and sustainable development at a county and local level. In this respect, as previously outlined, it is essential that water infrastructure investment decisions reflect the RSES (in order to facilitate sustainable growth).

2.7 Existing Assets and Approaches to Service Delivery

The Issues Paper outlines that a large proportion of the water infrastructure in Ireland was installed decades ago and requires repair, replacement or upgrade therefore the approach to service delivery needs transforming to align with the long-term vision and objectives and to exploit new technologies and ways of working with stakeholders. The future projection of infrastructure and technology has been illustrated in the Issues Paper which outlines that in the short term (2025-2030) ageing infrastructure and interacting issues may place strain on Uisce Éireann's ability to renew its infrastructure and deliver improvements to service, whereas in the medium term (2030-2040) factors such as sustainability requirements, evolving technology, population growth and climate change will influence how Uisce Éireann adapts to deliver services at acceptable costs. In the longer term (2040-2050) it is outlined that new technologies and ways of working are likely to support a transition to a more adaptive, flexible and resilient service delivery model that continues to deliver outcomes in spite of uncertain futures.

With regard to the impacts of existing water infrastructure on water quality, as Ireland's population is expected to reach six million by 2050, the RSES supports the delivery of strategic water services projects to upgrade the existing water infrastructure, as outlined in RPO 10.2. The projects identified in Table 10.1, Strategic Water Services Projects, of the RSES include the Water Supply Project for the Eastern and Midland Region, Uisce Éireann's National Programme of Investment to tackle leakage, Vartry Water Supply Scheme, and the Rural Water Supply Scheme. Furthermore, RPO 10.10 of the RSES states that it is an objective to increase compliance with the Urban Wastewater Directive to 99% in 2027 and 100% by 2040, and the RSES supports the delivery of wastewater improvement programmes in the Region which are identified in Table 10.2 Wastewater Infrastructure. These include the Greater Dublin Drainage Project, the Ringsend Wastewater Treatment Plant Project, the Athlone Main Drainage Project and the Upper Liffey Valley Sewerage Scheme.

Regarding the use of new technologies, the need for appropriate adaptation as referred to under Section 2.1 of the submission, in relation to climate proofing measures will be necessary to not only

ensure a comprehensive response to the challenge of climate change in the Region but also to improve service delivery.

Finally, regarding approaches to service delivery, RPO 10.8 of the RSES encourages the development of a new rural settlement investment approach, coordinating Uisce Éireann, local authority, developer and community led solutions ensuring that sustainable water services solutions are progressively implemented. Furthermore, RPO 10.9 of the RSES states that local authorities and Uisce Éireann should work together to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or 'windfall' type economic development opportunities where high-water use is required. As outlined in the Issues Paper, new integrated solutions such as blue green infrastructure that harness natural processes are encouraged. The Regional Assembly welcomes new approaches to delivering solutions, in partnership with multiple stakeholders, in order to deliver services in ways that deliver wider benefits to society.

2.8 Other Considerations

The Regional Assembly considers the seven key issues centred around the themes identified by Uisce Éireann to be comprehensive and relevant to the current situation in Ireland.

Regarding additional issues that should be addressed, the Regional Assembly considers that the topic of food security should be discussed in more detail within the issues identified, having regard to RSO 8 '*Build Climate Resilience*', and having regard to the future safeguarding of water and soil quality in Ireland and the impact of biodiversity loss, caused by intensive agricultural and forestry practices, overfishing, changes in land use and the over-exploitation of resources such as peatland, all in the wider context of increasing population and climate change. The protection of water and soil quality along with the diversification and variety of crops grown in Ireland which depend on good water quality should be addressed.

Another issue that should be addressed is the management of water supply during summer drought periods due to the increasing impact of climate change and how excess rainwater could be stored in Ireland for use during drier periods. With respect to this it is noted that RPO 10.1 of the RSES states that local authorities shall include proposals in development plans to ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development and a cleaner environment. Uisce Éireann could provide further guidance to local authorities in this respect, in the draft WSSP.

Furthermore, in recognition that national and other administrative boundaries do not reflect the transboundary nature of the environment, the RSES seeks to ensure effective management of shared landscapes, heritage, water catchments, habitats, species and transboundary issues in relation to environmental policy in co-operation with relevant departments in Northern Ireland. This is reflected in RPO 11.1, All Ireland Approach, of the RSES. Therefore, increased co-operation between the Republic of Ireland and Northern Ireland to achieve high status water quality should be promoted and encouraged due to the transboundary flow of water on the Island.

3.0 SEA Scoping Report and AA Screening Report

A Strategic Environmental Assessment (SEA) Scoping Report for the WSSP 2050 has been carried out and the aim of the SEA Scoping Report is to determine the scope of the assessment and SEA methodology. The next SEA stage following scoping will involve the assessment of the draft WSSP 2050 and alternative approaches considered against strategic environmental objectives (which were developed based on the key considerations from the baseline review and the policy, plan and programme review already undertaken).

In relation to Appropriate Assessment (AA), given the strategic nature of the WSSP 2050, the AA Screening Report concludes that there is potential for likely significant effects on one or more European sites, in view of the sites' conservation objectives. Furthermore, at this stage of the AA process, all European sites across the Republic of Ireland and Northern Ireland are screened in. The AA Screening Report also states that in the absence of more detailed information on the WSSP 2050 the precautionary principle must be applied, therefore, in accordance with Article 6 (3) of the Habitats Directive, Stage 2 AA of the WSSP 2050 is required and this will be presented in a Natura Impact Statement to fully inform the AA to be undertaken by Uisce Éireann.

4.0 Conclusion

Having regard to the above, it is considered that the preparation of the Water Services Strategic Plan 2050 (WSSP) should be fully informed by and aligned to the 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 Water Services Strategic Plan 2025-2050 and looks forward to continuing engagement with Uisce Éireann.

Regards,



Clare Bannon

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31st October 2023