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01/02/2023

[23_UE_FP_01_Edenderry_LAP]

Re: Edenderry Draft Local Area Plan 2023-2029

Dear Sir / Madam,

Uisce Éireann (UE) welcomes the opportunity to comment on the Draft Local Area Plan for the period 2023-2029. We note, and welcome, the inclusion of many objectives & policies in Chapter 9 of the Draft LAP that will support the delivery UE plans, programmes and policies. These policy objectives will also ensure the sustainable management of water and wastewater in line with national and regional objectives as stated in the National Planning Framework and the Regional Economic Spatial Strategy for the East and Midlands Region.

We have provided some high-level updates below and we will continue to engage with the planning department as the plan process progresses. We will provide updates to Uisce Éireann plans and projects as further updates become available.

Our submission is set out as follows:

- National and Regional Policy
- Comments on Chapter 9 – Critical Infrastructure
- Other General Comments

National and Regional Policy

EMRA Regional Spatial and Economic Strategy

UÉ acknowledges the planning policy and direction provided in the National Planning Framework and National Strategic Outcome No, 9 regarding Sustainable Management of Water. In addition, we support the adopted East and Midlands Region Regional Spatial and Economic Strategy (RSES) and are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard we would draw your attention to Section 10 of the RSES which provides general policy direction in relation to the sustainable management of water

National Water Resources Plan

The NWRP outlines how Uisce Éireann intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short,

medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate social and economic growth .

A three-pillar approach will be used in the NWRP:

1. Lose Less- leakage reduction and network efficiency
2. Use Less- water conservation measures
3. Supply smarter – sustainable supplies.

Following public consultation, the NWRP Framework Plan and the Regional Water Resources Plan for the Eastern & Midlands Region have both now been adopted.

Chapter 9 – Critical Infrastructure

9.3.1 Water Infrastructure

There is no change to the Water Supply Capacity register since the publication of the Draft LAP for Edenderry.

For water resource zones where we have constraints or deficits, leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers. Developers of non-domestic developments should review their proposals to see if they can maximise efficiency in their water requirements.

9.3.2 Wastewater Infrastructure

Wastewater Treatment

The LAP lands are served by the Edenderry Wastewater Treatment Plant. The treatment plant currently has no capacity for new connections. However, there is a project underway & will be completed before the end of the LAP lifetime. The project is currently at design stage. The decision of the most favourable option will be made in Q2-23 when the Feasibility Study Report is finalised.

Alternative solutions such as private wastewater treatment plants should not generally be considered by planning authorities. Uisce Éireann will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.

Wastewater Networks

There are constraints in the sewer network in some areas. If zoning changes are proposed, infrastructure will have to be assessed on a case-by-case basis.

A Drainage Area Plan is to be undertaken for Edenderry, identifying risks and needs across the agglomeration relating to hydraulic, environmental, structural, operational and growth constraints. While hydraulic constraints exist in some areas of the network, it is envisaged that capacity is available to cater for the population targets within the lifetime of the plan, provided growth is planned in areas of the network where capacity is available.

Local network upgrades may need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of the Connections Charging Policy. New connections to Irish Water networks are subject to our Connections Charging Policy. Further information on this process is available at:

<https://www.water.ie/connections/developer-services/>.

In order to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined sewers is not permitted.

Other General Comments	
Section Number	Comment
Chapter 3 Town Centre Regeneration	<p>Planned public realm and road projects have the potential to impact on Uisce Éireann assets and projects e.g. tree planting, building over of assets, new connections, programming network upgrades in advance of road project, provision of future-proofing ducts.</p> <p>Development in the vicinity of Uisce Éireann assets should be in accordance with our Standard Details and Codes of Practice, and Diversion Agreements will be required where an Uisce Éireann asset is diverted or altered.</p> <p>Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.</p>
Chapter 3 TCP-14 Support the removal of the water tower at Blundell Park. & Appendix 1 Blundell Masterplan	<p>The water tower is an important component of the water infrastructure in Edenderry.</p> <p>The inclusion of the objective could be detrimental to the service provided to current and future customers and would have a negative impact on UEs ability to support growth in the area</p>
Chapter 9.3.4 & 10.3.3 Drainage & SUDs	<p>Uisce Éireann welcomes the inclusion of policies and objectives supporting the implementation of Sustainable Urban Drainage Systems (SUDs) and the enhancement of green and blue infrastructure. SUDs and Green-Blue Infrastructure are encouraged in new developments including the public realm and retrofitted in existing developed areas These measures can provide a cost effective and sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers (thus increasing capacity for foul drainage from new developments), while providing multiple benefits e.g. improved air quality, amenity, noise reduction.</p>
Table 10.4	<p>An estimated cost has been listed in the table in reference to the Treatment Plant upgrade. Optioneering is still underway & a solution will not be finalised until later this year. The estimate should be deleted and please insert N/A or unknown.</p>

Yours Sincerely,

Niamh McDonald

Asset Strategy
Forward Planning - East & Midlands Region