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Strategic & Economic Development Directive,  
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*21\_IW\_FP\_51\_Draft-CDP Cork City*

## **Re: Draft Cork City Development Plan 2022-2028**

Dear Sir/Madam,

Irish Water welcomes the opportunity to comment on the Draft Cork City Development Plan 2022-2028. We acknowledge the considerable level of work that has gone into preparing the Draft Plan. We have provided some high level updates below and we will continue to engage with the planning department as the development plan process progresses. We will provide updates to Irish Water plans and projects as updates become available.

### **1. General updates on IW Plans/Projects:**

#### **Irish Water Capital Investment Plan 2020-2024:-**

The purpose of the Investment Plan is to set out Irish Water's budgetary plan from 2020-2024 in line with the Water Services Policy Statement 2018-2025 and our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). Our primary function is to provide clean drinking water to customers and to treat and return wastewater safely to the environment. In providing these services we play a central role in enabling economic growth, protecting both the environment and the health and safety of our customers and the public.

Irish Water's Draft Capital Investment Plan 2020-2024 has received final determination by Irish Water's regulator, the Commission of the Regulation of Utilities (CRU). IW is now developing a communications plan for stakeholders as part of which details of the planned investments in each county will be outlined.

#### **National Water Resource Plan:-**

Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water 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 the social and economic growth of our country.

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 was adopted in Spring 2021. The next stage of the NWRP is now underway which will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. Consultation on the regional plans will commence later in 2021.

In addition the Full Options Assessment stage (FOA) of the NWRP for the Cork water resource zones has been progressing, in consultation with the water services department of Cork City Council, and is due to be finalised in Q3 2021.

## **2. Drinking Water Source Protection**

Irish Water has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap. The ‘source’ component of DWSPs is a key component and a priority within Irish Water, as protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of the WFD and the revised Drinking Water Directive.

Irish Water is committed to working with public bodies and other stakeholders to protect drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality is through the implementation of our Interim Pesticide Strategy and working with the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is also currently involved in pilot drinking water source protection projects, which aim to trial catchment scale interventions to reduce the risk of pollution in water supplies.

## **3. River Basin Management Plan**

Irish Water supports the RBMP Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive characterisation activities. Irish Water is a member of Water Policy Advisory Committee, National Technical Implementation Group, and

Regional Operational Committees. Irish Water works collaboratively with the EPA Catchment Science and Management Unit (CSMU) to facilitate the identification of significant pressures and the setting of environmental objectives. In addition, Irish Water supports the Local Authority Waters Programme (LAWPRO) desktop studies and local catchment assessment work through ongoing data sharing. The objectives and priorities of the RBMP 2018 – 2021 have been incorporated into IW investment plans and work programmes as appropriate, and this will continue into the third cycle.

#### **4. Sustainable Drainage and Green-Blue Infrastructure**

Irish Water 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.

##### **Management of stormwater:**

We would also draw your attention to our Menu of Policies for Development Plans (enclosed) and specific objectives which we would like to see included as policy in the City Development Plan as follows:

Suggested objectives:

- To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water;
- to ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;

We welcome the inclusion of the below objective in the Draft City Development Plan from our Menu of Policies for Development Plans:

- to require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm;

#### **5. Climate Change:**

Irish Water is focused on addressing the impacts of climate change by adapting our assets to be resilient to climate change and mitigating our climate impact by reducing our carbon footprint. Irish Water is preparing a strategy which will respond to global and national climate change legislative and policy frameworks for climate change action and fulfils the requirements of Irish Water's Water Services Strategic

Plan 2015, The Water Services Policy Statement 2018 – 2025 and most recently the Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure 2019.

Irish Water is happy to work with the local authority to ensure the overarching goals of mitigating against, and adapting to, climate change in relation to water and wastewater are achieved.

## **6. Zoning and Zoned Lands:**

Irish Water is available to assist Cork City Council in identifying suitable zoned lands from a water services perspective, as per Appendix 3 and NPO 72 of the National Planning Framework.

In order to maximise the use of existing water services, Irish Water encourages sequential development in areas with existing water services infrastructure and spare capacity.

### Networks extensions for zoned lands:

Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works.

### Connections to IW networks:

All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's New Connections process which will determine the exact requirements in relation to network and treatment capacity. 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/>. Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure.

Where Irish Water assets are within a proposed development site, these assets must be protected or diverted. If there is a possibility that Irish Water assets will need to be altered or diverted as a result of a proposed development, a diversion agreement may be required. Further information on this process is available at: <https://www.water.ie/connections/developer-services/diversions/>.

## **7. Planned road and public realm projects**

Planned public realm and road projects have the potential to impact on Irish Water 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.

Development in the vicinity of Irish Water assets should be in accordance with our Standard Details and Codes of Practice, and Diversion Agreements will be required where an Irish Water asset is proposed to be diverted or altered.

Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Irish Water to plan works accordingly and ultimately minimise disruption to the public.

## **8. Small Towns and Villages Growth Programme:**

The Small Towns and Villages Growth Programme (STVGP) provides funding for Water and Wastewater Treatment Plant growth capacity in smaller settlements which are not otherwise provided for in the Capital Investment Plan 2020 to 2024. The STVGP is focused on supporting growth in areas already served by IW infrastructure but where current or future capacity deficits have been identified. Irish Water is working with Local Authorities across the country to ensure that the investment is made appropriately in accordance with the relevant county/city development plan.

Under the STVGP scheme local authorities were asked to nominate qualifying settlements, in order of priority.

IW is currently reviewing the nominations in detail to determine which project(s) will be funded, taking into account the order of priority provided by the local authority, the allocation available and the potential solutions and cost estimates.

IW has recently announced funding for the upgrade of the Killeens WWTP as part of the STVGP. IW will keep the Council updated on the project as the City Development plan progresses.

## **9. Wastewater Infrastructure in Cork City:**

### **Wastewater treatment capacity:**

Details on available capacity at each WWTP is outlined in Irish Water's 2019 Wastewater Treatment Capacity Register (WWCR) which was issued to Cork City Council in June 2020. The 2020 Wastewater Treatment Capacity Register is currently being prepared and will be issued to LAs once finalised in the coming months; in the interim the 2019 WWCR can be used to provide indications of available treatment capacity.

In addition, the attached Table 1 provides an update for the main neighbourhoods and towns to correlate with those listed in the Core Strategy (Table 2.2) of the Draft City Development Plan.

### **Buffer zones:**

Irish Water does not currently have a policy on exclusion zones around public wastewater infrastructure. With regard to the development of sensitive receptors, such as dwellings, in close proximity to existing wastewater treatment facilities; Cork City Council may wish to consider restricting development in these instances given the potential operational impacts e.g. noise/ odour nuisance, on existing wastewater treatment facilities.

We note the EPA recommend a buffer of 50m for smaller WWTPs: <https://www.epa.ie/publications/compliance--enforcement/waste-water/wastewater-treatment-manuals---treatment-systems-for-small-communities-business.php>.

A greater buffer e.g. 100m could be considered for WWTPs, or pumping stations catering for >1,500pe.

In this regard, we would also draw the Council's attention to policy (d) in the attached Menu of Policy Objectives for Development Plans which recommends '*the protection of existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for water services infrastructure as necessary*'.

### **Wastewater networks:**

The attached Table 1 provides a high level synopsis of wastewater networks capacity in the main sewers in each city neighbourhood/suburb/town, to correlate with the Core Strategy (Table 2.2) of the Draft City Development Plan. Table 1 also provides a synopsis of strategic upgrades where these are needed to service certain areas. Local network upgrades/extensions are also likely to be needed to cater for individual sites.

*Drainage Area Plans (DAPs)*: A DAP for Cork City is currently well advanced and is at Stage 3. The DAP is continuing to assess in detail the performance of the wastewater networks in the city. In addition a DAP for Ballincollig is nearing completion. Irish Water will keep Cork City Council updated on progress with the DAPs as the development plan process progresses.

In addition, Irish Water and Cork City Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc, and Irish Water and Cork City Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

## **10. Water Infrastructure in Cork City:**

### **Water treatment/source capacity:**

The majority of Cork city and suburbs are supplied from the Cork City Water Resource Zone, which includes the Lee Road Water Treatment Plant, the Inniscarra Water Treatment Plant and the Glashaboy Water Treatment Plant. There is considerable interconnectivity between all water supplies serving the city, and there is capacity available from a treatment/source perspective to cater for the proposed population targets in the Draft City Development Plan. The attached Table 2 provides a high level synopsis of water treatment/source capacity to correlate with the Core Strategy Table 2.2 from the Draft City Development Plan.

Irish Water is currently reviewing the network and storage needs for the Ballincollig area and will keep the Council updated on progress as the City Development Plan progresses.

In addition, there are a number of strategic projects progressing to improve water supply in the city. Further details are outlined in the sections below.

#### Lee Road WTP upgrade:-

Construction of a new water treatment plant on the existing site at Lee Road is well advanced and once works are complete (anticipated in Q1 2022 subject to funding and approvals processes), the upgraded and modernised plant will provide a more secure water supply for the future of Cork City.

#### **Water Networks:**

The attached Table 2 provides a high level synopsis of water capacity in the main water networks in each city neighbourhood/suburb/town, to correlate with the Core Strategy table in Chapter 2 of the Draft CDP. Table 1 also provides a synopsis of strategic upgrades where these are needed to service certain areas. Local network upgrades/extensions are also likely to be needed to cater for individual sites.

#### Strategic Network Upgrade Projects:

IW is progressing several strategic water network projects on the city water network. These projects will enhance the security of supply for the city network and will provide further interconnectivity between the Lee Road Water Treatment Plant and the Inniscarra Water Treatment Plant thereby increasing overall capacity for the city. Details for the main projects are as follows (timelines are subject to funding and approvals processes):

- Eastern Strategic Link Phase 2 - extension of trunk watermain from Tivoli to Shanakiel - at construction stage and current anticipated completion date mid 2023. Phase 1 of the Eastern Strategic Link (ESL) water main project (trunk watermain) is completed; which followed a path from the very east of the city at Tivoli, along the quays to the city centre. The project allows for first-time connectivity across the city's water networks from East to West. Phase 2 will complete the interconnectivity from the city centre all the way to Shanakiel.
- Shanakiel Rising mains & Distribution mains - upgrade of networks connecting reservoirs and associated pump stations - at construction stage and current anticipated completion date mid 2023.
- Wilton to Lee Road Trunk Main - provision of new trunk main to provide a connection between the Inniscarra WTP and the Lee Road WTP - at construction stage and current anticipated completion in mid 2023.
- IW in partnership with Cork City Council, have progressed a significant leakage reduction programme in Cork city in recent years which identified key issues facing the city water network and the steps required in order to reduce leakage and secure supply for future growth. There is a long term programme in place to enhance and rehabilitate water mains to assist in achieving target leakage savings.

In addition, Irish Water and Cork City Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities in the city and suburbs. Irish Water and

the Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

## 11. General Comments

Some general comments on sections of the Draft CDP are outlined below: -

Draft CDP Chapter/Section Number:	Amendment/suggested update:
Chapter 7 Economy and Employment - Section 7.41	Chapter 7 provides details including maps of a number of strategic employment sites which are proposed to be zoned for light industry and related uses. It should be noted that some of the sites may not be contiguous to existing water/wastewater infrastructure and any infrastructure upgrades or networks extensions needed to serve the sites would need to be customer funded/driven in accordance with the current IW connections charging policy.
Chapter 9, Environmental Infrastructure	IW welcomes the inclusion of information on water services, the NWRP etc in Chapter 9. We would also draw your attention to the further updates we have provided in Sections 9 and 10 above and in Tables 1 and 2 on strategic projects progressing to assess and upgrade water/wastewater infrastructure in Cork.

## 12. Suggested policies/objectives

Irish Water has a suite of policies/objectives which we would like to suggest to the Council for inclusion in the Development Plan in relation to protecting Irish Water assets and the environment for the benefit of current and future population served by public water services networks. We have attached these policies/objectives to this submission.

We look forward to engaging with Cork City Council and providing regular updates on Irish Water activities as the Development Plan preparation progresses.

Yours sincerely,

*IW Forward Planning Department.*

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Attached:

Table 1 – Wastewater Capacity Update September 2021

Table 2 – Water Capacity Update September 2021

Menu of Policy Objectives for Development Plans