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## **Re: Roscommon County Development Plan 2021 - 2027**

Dear Sir/Madam,

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the Roscommon County Development Plan 2021 - 2027. We have provided some observations and suggested text and objectives for inclusion in the draft County Development Plan below. We will continue to engage with the planning department as the development plan process progresses.

### **Background**

Irish Water is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of Irish Water to provide both drinking water and wastewater capacity to facilitate growth in accordance with core strategies at county level, and with national and regional planning policies and objectives (subject to the constraints of the Irish Water Capital Investment Programme). Roscommon County Council retains its role in facilitating the provision of adequate water services, in conjunction with Irish Water, at a local level, through Service Level Agreements (SLAs).

### **National and Regional Policy**

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the recently adopted Northern and Western Regional Spatial and Economic Strategy (RSES) and we are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard, we would draw your attention to Section 8.5 of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs.

### **Water Services Strategic Plan**

In 2015 Irish Water published its Water Services Strategic Plan (WSSP), which sets out strategic objectives for the delivery of water services over a 25 year period and sets a context for investment and implementation plans. This plan is reviewed every five years and the first review is currently underway. Irish Water and Roscommon County Council will continue to work together to identify the water services required to support planned development in line with national and regional planning policies for inclusion in Irish Water Capital Investment Plans.

## 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 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.

The Draft 2020-2024 Investment Plan is currently subject to the final determination by Irish Water's regulator, the Commission of the Regulation of Utilities (CRU). Irish Water anticipates that the CRU will make its decision on the plan in August 2020.

Further information on the investment plan submitted for approval can be found on the CRU Website [https://www.cru.ie/document\\_group/irish-water-revenue-control-2020-2024/](https://www.cru.ie/document_group/irish-water-revenue-control-2020-2024/)

## Zoning

Irish Water is available to assist Roscommon County 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.

## Sustainable Drainage and Green Infrastructure

Irish Water encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in new developments 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, while providing multiple benefits e.g. improved air quality, amenity, noise reduction.

## 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.

## Connections and Developer Services

New Connections to the Irish Water networks are subject to our Connections Charging Policy. This is managed through the Connections and Developer Services section of Irish Water's website <https://www.water.ie/connections/developer-services/>. Irish Water can work with developers to form the best solution for a particular site.

The Connections and Developer Services section also manage the diversion or alteration of Irish Water assets. Where 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 <https://www.water.ie/connections/developer-services/diversions/>.

## **Irish Water Infrastructure**

### ***Waste Water Treatment Plants***

Irish Water recently issued the wastewater treatment capacity register for Roscommon. The register outlines the capacity available for all settlements with a public wastewater treatment plant within your local authority area. A project is underway to resolve capacity constraints at Ballaghderreen WWTP.

### ***Waste Water Networks***

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

Drainage Area Plans (detailed assessments of wastewater networks) were recently completed for Boyle and Monksland. In Roscommon town, sewer rehabilitation has been carried out in recent years to address inflow and infiltration issues. In addition, the Roscommon Town Main Drainage project is at tender stage and involves the upgrade of sewers, pumping stations and provision of storm storage to bring storm overflows on the network into compliance. There are no known significant constraints in other settlements in the county.

## **Water Infrastructure**

### ***The National Water Resources 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. The National Water Resources Plan will outline the longer term plan for the Roscommon area and is due to be published for public consultation later this year.

### ***Water Supply for Roscommon***

The public water supply in Roscommon is split into nine water resource zones (WRZs). Monksland is supplied by South Roscommon WRZ while Roscommon town and Cortober are supplied by Roscommon Central WSS and Boyle Regional WRZ respectively.

Four of the WRZs (South Roscommon, North East Regional PWS, Roscommon Central WSS, Lough Mask RWSS) may require further investigative studies or interventions to facilitate significant new connections to the network. It is unlikely that there will be any issues facilitating new connections in the remaining WRZs (Arigna Regional PWS, Mount Talbot/Four Roads, Castlerea PWS, Boyle Regional and North Roscommon RWSS), although further investigative studies or interventions may be required in some instances.

The full options assessment stage of the NWRP is currently progressing, in consultation with the water services department of Roscommon County Council. This will identify the preferred interim and long-term interventions required to ensure a sustainable water supply in Roscommon, and nationally.

## **Water Networks**

Irish Water and Roscommon County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Irish Water and Roscommon County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Mains rehabilitation works have recently been carried out in Athleague, Kiltewan, and Roscommon town.

### **Suggested policies/ objectives**

Irish Water has a suite of policies/objectives which we would like to suggest to the Council for inclusion in the County 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 Roscommon County Council as the Draft Development Plan preparation progresses. Further consultation documentation can be directed to [spatialplanning@water.ie](mailto:spatialplanning@water.ie).

Yours Sincerely,



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Suzanne Dempsey

**Asset Strategy & Sustainability**  
**Spatial Planning Lead**

## Menu of appropriate Objectives/Policies for Water Services in Development Plans

### General Policies in relation to Water Services

- a) To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;
- b) To consult with Irish Water in the development of Plans, SDZs, etc in order to ensure the proposed spatial strategy takes account of:
  - the available capacity of the public water services infrastructure;
  - the need to protect and optimise existing and planned public water services infrastructure;
  - the need for sequential and phased development;
  - the financial and environmental implications of development in sensitive areas.
- c) Prior to granting planning permission the Council will ensure that adequate water services will be available to service development and that existing water services are not negatively impacted. Council should require developers to provide evidence of consultation with Irish Water prior to applying for planning permission;
- d) To protect existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;

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### Water Supply

- e) To protect both ground and surface water resources including taking account of the impacts of climate change, and to support Irish Water in the development and implementation of Drinking Water Safety Plans and the National Water Resources Plan;
- f) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements.

### Wastewater Services

- g) 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;
- h) 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;
- i) 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;

- j) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- k) To ensure that all new developments connect to the public wastewater infrastructure, where available, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water;
- l) To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;
- m) The provision of single house septic tanks and treatment plants in the Plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended, will be required;
- n) To ensure that private wastewater treatment facilities, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality.

**Note:** As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, *'Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.'* The opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.