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Planning Department,
Roscommon County Council,
Aras an Chontae,
Roscommon.



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Re: Draft Roscommon Local Area Plan 2024 - 2030

A Chairde,

Uisce Éireann (UÉ) welcomes the opportunity to comment on the Draft Roscommon Local Area Plan 2023-2029 (Draft Plan). We have provided observations and comments on the Draft Plan in relation to public water services below and will continue to engage with Roscommon County Council as the Plan preparation process progresses.

1. General

1.1 Sustainable Drainage and Green-Blue Infrastructure

Uisce Éireann welcomes the inclusion of objectives and initiatives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the NPF under NPO 57. SuDS and Green-Blue Infrastructure (GBI) 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 while providing multiple benefits e.g. improved air quality, amenity, noise reduction. The removal of stormwater from combined sewers, thus increasing capacity for foul drainage from new developments, is particularly relevant to the achievement of compact growth objectives.

Uisce Éireann would be happy to engage with any planning authorities interested in progressing nature-based rainwater management initiatives in line with the recently issued Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document. Potential opportunities include the public realm and travel measures proposed in the Draft Plan.

1.2 Planned road and public realm projects

Planned public realm, active travel 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. An example of projects that may impact Uisce Éireann assets are the local transport initiatives and public realm works proposed under the Draft Plan.

Stiúrthóirí / Directors: Tony Keohane (Cathaoirleach / Chairman), Niall Gleeson (POF / CEO), Christopher Banks, Fred Barry, Gerard Britchfield, Liz Joyce, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh.

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Development in the vicinity of Uisce Éireann assets must be in accordance with our Standard Details and Codes of Practise. Diversion Agreements will be required where an Uisce Éireann asset needs to be diverted or altered.

Where planned development may impact on Uisce Éireann assets, early engagement is requested to ensure public water services are protected and access is maintained, and to enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public. Engagement is currently ongoing with RCC in relation to the planned improvements on Circle Road.

2. Availability of Water Services

2.1 Zoning

A high-level review of the land-use zoning map has been carried out. Available network information indicates localised network extensions may be required to service some zoned sites e.g. Infrastructure (IA) sites 6 (130m), 7(southern site- 300m), Opp site 1. Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less e.g. IA sites 6, Opp site 2, 3, 4, Emp site 9.

In order to maximise the use of existing water services, we encourage phased sequential development in areas with existing water services infrastructure and spare capacity. Similarly, to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted, and the separation of stormwater from combined sewers is strongly recommended.

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

All new residential and commercial/ industrial developments wishing to connect to an Uisce Éireann network are to be assessed on a case-by-case basis through Uisce Éireann's New Connections process which will determine the exact requirements in relation to network and treatment capacity. New connections to Uisce Éireann 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 such as 'backland' sites, housing estates with private network. Third party permissions may be required to connect the largest tract of Phase 2 residential lands.

Where Uisce Éireann assets are within a proposed development site, these assets must be protected and/or diverted as appropriate e.g. IA site 3,5,7, 10, Opportunity sites 1,2,5,6,7 Employment site 10. If there is a possibility that Uisce Éireann 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/>.

Additional site-specific comments below:

- Site 5 – likely connection would be direct to Ardsallagh WWPS. The 150mm diam. sewer within site to be protected/ diverted as required.
- Site 7 (southern section) – long network extension (up to 300m) required to connect via public road. Localised upgrades and pumping may also be required. Alternatively, shorter extensions may be possible via adjacent private lands, third party permissions may be required.
- Employment site 8- reservoir on-site, boosting may be required.



In addition to the above, recent modelling of the water network has identified some minor constraints across the network, developer-led upgrades may be required to facilitate development in these areas. We note the Opportunity sites have not been included in the Infrastructure Assessment.

We would be happy to engage with Roscommon County Council further in relation to the serviceability of sites as required.

2.2 Wastewater Infrastructure

2.2.1 Wastewater Treatment Plants (WWTPs)

There is potential spare capacity at Roscommon Town WWTP to cater for the majority of the projected population increase of 1,608 (600 housing units) over the Draft Plan period.

Roscommon Town WWTP has capacity available however, the plant is currently not compliant with WWDL ELVs but is capable of achieving at least UWW standards. Potential availability of capacity in this case would be dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2007, which is the responsibility of the relevant Local Authority to determine. Connection applications will be assessed on an individual basis considering their specific load requirements.

It is anticipated that a strategic assessment and feasibility study for the Roscommon WWTP will commence in the short-term to investigate options for achieving license-compliance and catering for growth. Should the outcome of this require an upgrade Project, this will advance for funding and governance approval in the next investment plan period (2025-2029).

2.2.2 Wastewater Networks

The Roscommon Main Drainage Scheme was recently completed and included the upgrade of sewers, pumping stations and provision of storm storage to bring storm overflows on the network into compliance and provide for growth and development. Uisce Éireann and Roscommon County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

A Network Development Plan has been drafted for Roscommon town, which will help inform how zoned sites within the town could be serviced.

2.3 Water Supply Infrastructure

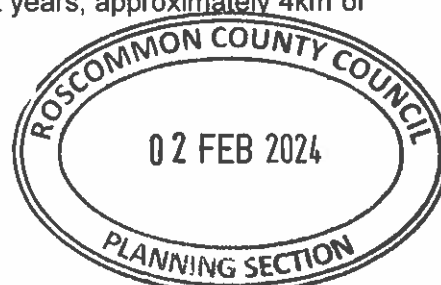
2.3.1 Water Supply

Roscommon town is supplied by the Roscommon Central Water Resource Zone. It is envisaged that there is adequate capacity to cater for the projected population increase over the Plan period 2024-2030.

Following public consultation, the National Water Resources Plan (NWRP) Framework Plan was adopted in Spring 2021. The next stage of the NWRP involved the development of four regional water resources plans identifying plan-level approaches to address the identified need in a sustainable manner, and was completed in 2023. The North-West Regional Plan, which includes Roscommon town, is available [here](#).

2.3.2 Water Networks

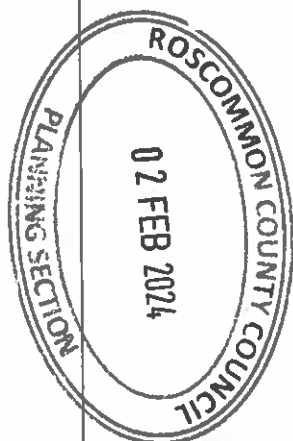
Uisce Éireann and Roscommon County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Uisce Éireann and Roscommon County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. In recent years, approximately 4km of mains have been replaced in Roscommon town.



A Network Infrastructure Plan has been prepared to help inform how undeveloped zoned sites within the town can be serviced. The Plan identified some minor constraints in the network, developer-led upgrades may be required to facilitate development in some areas.

3. Other Comments and Suggestions on the Draft Plan text

Topic	Comment
7.4 RTAMS	<p>Consider inclusion of an objective requiring the use of sustainable drainage systems (SuDS) utilizing the guidance of DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design and Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document. Please note, no additional surface water will be accepted into the combined/ foul sewer network.</p>
<p>Water Services Objectives and Ch 7 Infrastructure and Transport</p>	<p>There are no objectives specifically related to water services included in the Draft Plan. As noted in Ch 1.3 and elsewhere, objectives in the County Development Plan have not been extensively reiterated.</p> <p>Chapter 7 addresses transport only and no other form of infrastructure. The Chapter does not include a text box referring to the relevant policy objectives in the County Development Plan, as is the case for other Chapters e.g. Ch 6.</p> <p>In order to provide and operate the public water services necessary to achieve the objectives of this Plan, we note the need to ensure adequate objectives are included supporting same, via the CDP or LAP, as appropriate. We have attached our menu of suggested objectives, and suggest that where any are not sufficiently allowed for in the CDP, they be addressed by way of a new objective within the Draft Plan.</p> <p>As a minimum, UÉ suggest the inclusion of a new, or amendment of existing, over-arching objective supporting the operation, maintenance and provision of infrastructure necessary to realise the objectives of the Draft Plan.</p>
<p>Water services infrastructure development in Land Use Zonings</p> <p>Agriculture, Unzoned Lands</p>	<p>Uisce Éireann’s activities in the provision of public water and wastewater services include access to, operation, maintenance and upgrading of existing assets, and where necessary, the provision of new infrastructure in multiple Land Use zoning types, as well as lands outside of zoned areas.</p> <p>In order to provide and operate the public water services necessary to achieve the objectives of this Plan, we note the need to include water services infrastructure in the zoning matrices as 'permitted in principle' or 'open for consideration' across all Land Uses- including Agriculture. Similarly, it is important sufficient provision is made in the Plan to allow for the necessary delivery of water services infrastructure in unzoned areas, subject to proper planning and sustainable development.</p>



Ch 9.2 Integrating Climate Action into Roscommon Town	RCC may wish to consider inclusion of an objective relating to water conservation e.g. Objective (h) in the attached Menu. Reducing customer water use will not only reduce the pressure on the public water supply system but will also reduce carbon emissions associated with water treatment and supply.
Protection of riparian areas e.g. 9.3 Flood Risk RN 55	Uisce Éireann welcomes objectives in relation to the protection of riparian buffers; this will play an important role in protecting biodiversity and water quality. Notwithstanding this, the Draft plan should allow for access to and maintenance of existing Uisce Éireann infrastructure. Similarly, provision of new or upgraded assets may be required within riparian buffers, rivers, streams, wetland or natural floodplains in limited instances e.g. new outfalls, expansion of riverside WWTP sites, subject to proper planning and sustainable development.
Ch 9.3 Flood Risk RN 58	We propose that this objective is not limited to large-scale developments, suggested amendment: <i>Require all new large-scale developments to provide 'Sustainable Urban Drainage Systems' (SUDS) as part of their development proposals.</i>
Environmental Reports and Infrastructure Assessment	The contents of this submission should be taken account of in the Environmental Reports and Infrastructure Assessment.

Yours Sincerely,

Elaine Heneghan

Elaine Heneghan

Regional Forward Planning Specialist

Asset Strategy



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

General Policies in relation to Water Services

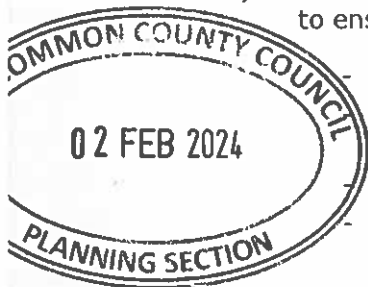
- a) To work closely with Uisce Éireann to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;
- b) To consult with Uisce Éireann in the development of Plans, SDZs, etc. in order to ensure the proposed spatial strategy takes account 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. The Council should require developers to provide evidence of consultation with Uisce Éireann 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;

Water Supply

- e) To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change;
- f) To support Uisce Éireann in the development and implementation of Drinking Water Safety Plans which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.
- g) To support Uisce Éireann in the development and implementation of the National Water Resources Plan for Ireland's public water supplies which seeks to address issues around the availability of water;
- h) To promote water conservation and demand management measures among all water users, and to support Uisce Éireann in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations.

Wastewater Services

- i) 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;

- j) 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;
- k) 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;
- l) To support Uisce Éireann 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;
- m) 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 Uisce Éireann;
- n) To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;
- o) 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 for Domestic Waste Water Treatment Systems (PE. ≤10) (EPA 2021), as may be amended, will be required;
- p) 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. Uisce Éireann 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.

