

Athlone JUAP Team
Westmeath County Council &
Roscommon County Council

Uisce Éireann
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Re: Pre-Draft Issues Paper for the Athlone Joint Urban Area Plan 2024 – 2030

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A Chairde,

Uisce Éireann (UÉ) welcomes the opportunity to comment on the Issues Paper for the Athlone Joint Urban Area Plan 2024 – 2030. We have provided some observations and suggested text and objectives for inclusion in the draft Joint Urban Area Plan below. We will continue to engage with the planning departments of both Westmeath and Roscommon County Councils as the plan making process progresses.

1. Zoning and Availability of Water Services

Zoning

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 zoning matrices as 'normally permitted' or 'open to consideration' across all Land Uses. 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.

Uisce Éireann are available to assist in the process of identifying suitable zoned lands from a water services perspective. Sequential development in areas with existing water services infrastructure and spare capacity is encouraged. In assessing the infrastructure requirements to service a large area of land, it is preferable to have an overall development masterplan including phases of development and timelines so that a strategic water services plan for the lands can be developed.

Localised network reinforcements e.g. extensions, may be required to service some zoned sites, depending on the location and scale of development. Network upgrades are more likely to be required in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. In order 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. The removal of stormwater from combined sewers using nature-based sustainable drainage solutions is strongly encouraged in order to free up capacity for future development.

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

Where Uisce Éireann assets are within a proposed development site, these assets must be protected or diverted. 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/>. Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure e.g. backlands.

In settlements where the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g. residential dwellings, any future development of these lands regard should be had to the established use of the existing wastewater treatment plant and the potential for extensions / intensification of use of the WWTP in the future. Notwithstanding this, it should be noted that the development potential for the lands in question is ultimately a consideration for the Local Authority.

With regard to zoning and development in lands with no public water services infrastructure, as outlined in Draft Water Services Guidelines for Planning Authorities (Jan 2018), Section 5.3: 'It is the policy of Uisce Éireann to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or 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 Infrastructure

Wastewater Treatment Plants (WWTPs)

Athlone is served by two WWTPs. Athlone WWTP serves Athlone town centre and Westmeath side of the settlement, and Monksland WWTP serves the Roscommon portion of the settlement. UÉ publish wastewater treatment capacity registers in Q2 annually that provide an indication of available capacity. Available capacity is subject to change and significant new commercial or industrial development has the potential to impact on available capacity and result in the need for infrastructure upgrades.

The 2022 register (issued June 2023) indicates that there is spare capacity of approximately 14,000 population equivalent (p.e.) in Athlone WWTP.

Monksland WWTP has potential spare capacity to cater for the projections as set out in Roscommon's County Development Plan. The treatment plant is not currently compliant with Waste Water Discharge Licence but is capable of achieving at least Urban Wastewater Treatment Directive standards. The 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.

A strategic assessment of Monksland WWTP recently commenced and will investigate options for achieving license-compliance and catering for growth, with a view to progressing an upgrade project in the next investment plan period (2025-2029), subject to the necessary funding and governance approvals.

Wastewater Networks

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

Athlone Main Drainage Scheme commenced in January 2023 with substantial completion estimated at the end of 2025.

The upgrade works carried out as part of this project will involve:

- Constructing new pumping stations in Golden Island and Coosan West
- Installing over 2.8 km of sewer network
- Decommissioning five existing pumping stations
- Decommission six existing stormwater overflows
- Constructing two new stormwater overflows designed to Uisce Éireann standards
- Connecting the new and existing sewer network together

A Drainage Area Plan was completed for the Monksland agglomeration in recent years, which comprised a detailed analysis of the network. Investigations are ongoing at Bellanamullia and Daneshill pumping stations under the Pumping Station Capital Maintenance and Growth Programme to identify issues and needs to cater for planned growth. Cushla pumping station will also be assessed as part of this Programme. Depending on the location and scale of planned development, localised network reinforcements may be required.

We would like to highlight that the recast Urban Wastewater Treatment Directive (UWWTD), as proposed, includes requirements for the preparation of Integrated Urban Wastewater Management Plans (IUWWMPs) for selected agglomerations greater than 10,000 persons based on risk, by 2035. The recast UWWTD includes obligations for the reduction of pollution load from both wastewater and storm water systems (Storm Water Overflows (SWOs) and Urban Runoff respectively). If adopted, the new UWWTD will require collaboration between UÉ and Local Authorities on integrated drainage planning.

Water Infrastructure

Water Supply

Athlone is served by the Athlone Water Resource Zone (WRZ) in Westmeath and South Roscommon WRZ in Roscommon. The latest water supply capacity register issued in 2023 indicates that capacity is available in both WRZs however, Level of Service improvements, as described below, will be required in Athlone WRZ as demand increases. As above, the register is only an indication of available capacity at a point in time.

A project to provide additional capacity in Athlone WRZ is at Stage 3 Final Business Case (detailed design). It is envisaged it will be completed within the lifetime of the Local Area Plan, subject to the necessary approvals.

Water Networks

Uisce Éireann, Westmeath and Roscommon County Councils are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Monitoring of performance of the networks will continue to ensure that the most urgent works are prioritised where required.

A Network Infrastructure Plan was prepared to inform how zoned lands could be serviced. As part of this, several sections of the network were identified for upgrade or rehab in the Westmeath portion of Athlone. Concept design for these network improvements has commenced and the identified works will be progressed to construction on a nationally prioritized basis.

2. General

Sustainable Drainage, Green-Blue Infrastructure and Circular Economy

Uisce Éireann encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments including the public realm and retrofitted in existing developed areas, in line with NPO 57 of the National Planning Framework. 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.

Uisce Éireann would be happy to engage with Westmeath and Roscommon County Councils to discuss stormwater removal opportunities, in particular to progress 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.

Similarly, Uisce Éireann are happy to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model and reduce greenhouse gas emissions. In developing this Plan and associated zonings, consideration should be given to circular economy opportunities. These may include advanced treatment and re-use of WWTP effluent to meet the needs of adjacent industry, production of biogas through anaerobic digestion and re-use of water sludge.

Planned road and public realm projects

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, stormwater separation, requirement to programme upgrade works in advance of road project.

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.

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.

Suggested policies/ objectives

Uisce Éireann has a suite of policies/objectives which we would like to suggest to the Councils for inclusion in the Local Area Plan in relation to protecting Uisce Éireann 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.

3. Background

Uisce Éireann

Uisce Éireann is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of Uisce Éireann to provide both drinking water and wastewater capacity to support national, regional and local economic and spatial planning policy (subject to the constraints of the Uisce Éireann Capital Investment Plan). In line with the Water Services Bill 2022, Irish Water became known as Uisce Éireann from January 2023 and assumed full responsibility for the delivery of all public water services in Ireland on a phased basis during 2023.

National and Regional Policy

Uisce Éireann acknowledges the planning policy and direction provided in the National Planning Framework and the Regional Spatial and Economic Strategies for the Eastern Midlands and North West 2020-2032 and we are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard, we would draw your attention to the relevant section of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs.

Uisce Éireann, Westmeath County Council 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 Uisce Éireann Capital Investment Plans.

Water Services Policy Statement

The Water Services Policy Statement (2018 - 2025) (WSPS) was published by the Department of Housing, Planning and Local Government on 21 May 2018, as required under the Water Services Act 2017. It identifies high level objectives and priorities for the delivery of water and wastewater services over the period to 2025. It was prepared in line with the Water Services Acts to give clear direction to strategic planning and decision making on water and wastewater services in Ireland. The WSPS identifies policy objectives set across the three thematic areas of Quality, Conservation and Future Proofing.

Water Services Strategic Plan

In 2015 Uisce Éireann published its Water Services Strategic Plan (WSSP), which sets out six strategic objectives for the delivery of water services over a 25-year period and sets a context for investment and implementation plans. These strategic objectives are:

- Meet customer expectations;
- Ensure a safe and reliable water supply;
- Provide effective management of wastewater;
- Protect and enhance the environment;
- Support social and economic growth;
- Invest in our future.

The next WSSP, Water Service Strategic Plan 2050, is currently being prepared, and public consultation on the Issues Paper was undertaken in 2023.

Uisce Éireann Strategic Funding Plan

Under the Water Services Act 2017, Uisce Éireann is required to submit a Strategic Funding Plan to the Minister within three months of the publication of the Water Services Policy Statement. The Uisce Éireann Strategic Funding Plan (2019–2024) was approved in November 2018 and reflects the principles, themes and policy objectives identified in the WSPS and the strategic objectives outlined in the WSSP. It outlines the costs, both operational and capital, associated with the arrangements that Uisce Éireann proposes to make and measures that it intends to take to implement the objectives of the WSSP.

Capital Investment Plan

The purpose of the Investment Plan is to set out Uisce Éireann'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.

Uisce Éireann's Capital Investment Plans are subject to final determination by Uisce Éireann's regulator, the Commission of the Regulation of Utilities (CRU). An explanatory booklet which includes details of the planned investments in each county in the 2020-2024 Investment Plan period is available [here](#). The list of projects and programmes included in our Investment Plan is continuously being refined and is subject to budget, technical and environmental constraints, as well as statutory approvals.

Preparation of the next Investment Plan (2025-2029) is now underway.

Climate Change

Uisce Éireann 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. The impacts of climate change are taken into account in Uisce Éireann plans and projects e.g. the National Water Resources Plan.

Uisce Éireann 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 Uisce Éireann'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.

Uisce Éireann is happy to work with the local authorities to ensure the overarching goals of mitigating, and adapting to, climate change in relation to water and wastewater are achieved.

The National Water Resources Plan

Uisce Éireann 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 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 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. Since then four regional water resources plans have been developed and adopted which identify plan-level approaches to address the identified need in a sustainable manner.

Drinking Water Source Protection

Uisce Éireann 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 Uisce Éireann, 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.

Uisce Éireann is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources. Good examples of where Uisce Éireann is working in partnership with other stakeholders to protect drinking water quality are the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-

specific NPDWAG Catchment Focus Groups. Uisce Éireann is 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.

River Basin Management Plan (RBMP)

Uisce Éireann supports the River Basin Management Plan (RBMP) Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive initial and further characterisation activities. Uisce Éireann is a member of Water Policy Advisory Committee, National Technical Implementation Group, and Regional Operational Committees. Uisce Éireann 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, Uisce Éireann 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 UÉ investment plans and work programmes as appropriate, and the objectives and priorities of the third cycle RBMP (2022-2027) will be a key driver for the next investment plan.

We look forward to engaging with Westmeath and Roscommon County Councils as the Draft Local Area Plan progresses.

Yours faithfully,

Niamh McDonald & Elaine Heneghan

Niamh McDonald and Elaine Heneghan
Forward Planning
Asset Strategy & Sustainability

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.