

Forward Planning,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar,
Co. Mayo

26th April 2022

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Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Re: Proposed Material Amendments to the Mayo Draft County Development Plan 2022 - 2028

A Chara,

Irish Water (IW) welcomes the opportunity to comment on the proposed Material Amendments to the Draft Mayo County Development Plan (Draft Plan) 2021-2027. We have provided observations and comments on the proposed amendments in relation to public water services below. We will continue to engage with the planning department as the development plan process progresses. Where amendments are suggested to the Draft Plan text below, proposed additions are shown in **red** and deletions in ~~strikethrough~~.

Proposed Amendment (PA) CH2.7 Core Strategy Table

The attached table provides an overview of the ability of Irish Water to cater for the 2021-2027 population allocations in the settlements listed in the Core Strategy Table, including the villages added in this amendment. Mayo County Council (MCC) may also refer to the water supply and wastewater treatment capacity registers recently issued by IW which provide an indication of available capacity in settlements served by Irish Water.

Following public consultation, the National Water Resources Plan (NWRP) Framework was adopted in Spring 2021. The next stage of the NWRP is now underway which involves the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. Public consultation stage for the North-West Regional Plan, which includes County Mayo, will be carried out in 2022.

Proposed Amendment (PA) CH2.11 Monitoring & Management PA 2.19 CSP

Irish Water have provided commentary in relation to accommodating the 2021-2027 population targets listed in the Core Strategy Table. Exceeding these targets may necessitate upgrades in some settlements and where this is under consideration, consultation with Irish Water is requested. Wastewater treatment and water supply capacity registers will be published annually and provide an indication of available capacity in settlements served by Irish Water.

Development in non-serviced lands

A number of the proposed amendments have the potential to lead to development in non-serviced lands. These include, but are not limited to, PA CH2.12 Core Strategy Policies CSP1, PA CH 3.1 Strategic Aim, PA CH3.9 Rural Housing Policies. In Volume 2, Opportunity sites have been zoned in settlements with no public wastewater infrastructure e.g., in Doohooma and many Tier V settlements.

As outlined in Draft Water Services Guidelines for Planning Authorities (Jan 2018), Section 5.3: '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

Stiúrthóirí / Directors: Cathal Marley (Chairman), Niall Gleeson, Eamon Gallen, Yvonne Harris, Brendan Murphy, Dawn O'Driscoll, Maria O'Dwyer
Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin 1 D01 NP86
Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.
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wells or wastewater 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.'

We also note MCC's own Strategic Environmental Assessment highlights the potential for adverse effects and conflicts with the strategic environmental objectives of the Draft Plan associated with many of the PAs proposed for Chapters 2 and 3.

Where development in unserviced lands is permitted these must strictly comply with the prevailing regulations and EPA Codes of Practise. Such developments shall have particular regard for, and not adversely impact on, drinking water sources.

Suggested amendments:

PA CH2.12 - CSP 1 *To promote and facilitate the **sustainable** development of all communities in the county.*

PA Ch3.1 Strategic Aim *It is the strategic aim of this chapter to facilitate the **progressive sustainable** growth of all rural areas, towns, villages and open countryside throughout the country by seeking to accommodate all persons in their choices to live in rural areas.*

PA CH2.13 CSP2

IW recommend this PA is not accepted, compliance with national and regional policies is necessary to ensure proper planning and sustainable development.

PA CH2.14 CSP4

Irish Water recommend the review of this PA. Compact growth objectives are necessary in order to maximise the capacity of existing water services and reduce additional investment costs.

PA CH5.5 TRP

There are several IW wastewater outfalls discharging directly to the proposed marine park area, as well as into waterbodies upstream in the River Moy catchment.

The proposed establishment of a National Marine Park should not significantly adversely affect existing, authorised, proposed or reasonably foreseeable Irish Water activity.

Consultation with IW is requested in order to understand the potential implications on water quality requirements.

Public Realm and Transport Projects

e.g. PAs CH6 Sustainable Mobility, PA CH 12.8, PA CH 12.11

Planned public realm and transport measures have the potential to impact on Irish Water assets, water sources and projects e.g. tree planting, building over of assets, new connections, programming network upgrades in advance of road project, opportunity for surface water removal, provision of future-proofing ducts.

Development in the vicinity of Irish Water assets must be in accordance with our Standard Details and Codes of Practise, and Diversion Agreements will be required where an Irish Water asset is diverted or altered. Further information is available here:

<https://www.water.ie/connections/developer-services/diversion-and-build-over/>.

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.

PA 6.16, 6.17 – National Road Policies MTP 16, MTO19

There are a number of water and wastewater projects planned in County Mayo over the coming years which may require the creation of additional access points or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 80 kmh apply. These projects are necessary to meet strategic growth and environmental objectives in local, regional and national planning policy. Provision should be made for such projects in the County Development Plan as per section 2.6 Exceptional Circumstances of the Spatial Planning and National Roads Guidelines. Irish Water would welcome further engagement as provided for in MTO 19, to ensure the necessary provisions are made in the Development Plan.

IW submission on the Draft Plan, Chapter 7

As part of our submission on the Draft Plan, we recommended updates to text on ongoing projects in Chapter 7. The capacity registers and attached table provides the latest information on projects underway. Irish Water would be happy to provide any further information or clarification that may be required.

PA CH 12.13 Killala

Suggested amendment: *A new municipal wastewater treatment plant (2,300 ~~3,155~~PE) has been operational.*

General Comment on all PAs amending Land Use Zonings

Available network information indicates short network extensions may be required to service some zoned sites. Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by 150mm diameter sewers or watermains with a diameter of 80mm or less. Third-party agreement may be required where it is proposed to service a new development via private property or private water services infrastructure. Similarly, within Village boundaries, where a development is not serviced by existing infrastructure, the feasibility of extending the public network to the unserved sites would be assessed via our New Connections process.

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 as part of roads, public realm, residential or other developments is strongly encouraged; this is particularly relevant to the achievement of compact growth objectives.

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.

All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's Connections and Developer Service process which will determine the exact requirements in relation to network and treatment capacity. 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/>.

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/>. Development in the vicinity of IW assets must be in accordance with IW's standard details and codes of practise.

Additional site-specific comments are provided below.

Wastewater

- Ballinrobe-
 - BROBE1- network extension required to Cois Chuain pumping station (WWPS) may be required.
 - BROBE3- available GIS information indicates network extension will be required.
 - BROBE4- available GIS information indicates network extension may be required, network connectivity to be confirmed.
- Claremorris-
 - CLARE1- isolated site, not contiguous with settlement boundary. Significant network extension required to service site (>400m).
- Swinford-
 - SFORD1,2- Network connectivity to be confirmed, localised upgrades/ extensions may be required.
 - SFORD7- network extension >300m required.
- Killala
 - Killala3- network extensions, on-site pumping and/ or localised upgrades may be required.
 - Killala5- localised upgrades may be required.
- Doohooma- DOO1- no IW WWTP or network.
- Kilmaine- KILM1- Opportunity site at crossroads- sewer passing through site to be protected and access maintained.

Water

- Ballinrobe-
 - BROBE1 & BROBE3- regionally important 800mm dia. trunk watermain passes through these sites. This main must be protected and access maintained at all times. Minimum separation distances will apply. If protection or diversion works are necessary, a Diversion agreement will be required.
 - CLARE5- localised upgrades may be required. Check overall increase in SRR
 - SFORD1,2- localised upgrades likely to be required.
 - SFORD9- localised upgrades required
 - BDINE1- watermain passing through Opportunity Site in Ballindine East to be protected
 - BEL2- Opportunity site opposite St Anne's church- regionally important 400mm dia. trunk watermain passing through site to be protected and access maintained.

Environmental Reports

The contents of this submission and the recently issued capacity registers should be taken account of in the Environmental Reports.

Yours Sincerely,

Forward Planning Team
Asset Strategy