

Pre Draft Carlow Graiguecullen Joint Urban LAP,  
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22\_IW\_FP\_40\_Carlow Graiguecullen Joint Urban LAP

## **Re: Issues Paper – Carlow Graiguecullen Joint Urban Local Area Plan 2023-2029**

A Chara,

Irish Water (IW) welcomes the opportunity to comment on the Issues Paper for the Carlow Graiguecullen Joint Urban Local Area Plan 2023-2029. We have provided commentary and suggested text and objectives for inclusion in the draft Local Area Plan below and attached.

### **Wastewater Infrastructure**

#### ***Wastewater Treatment Plants (WWTPs)***

Currently, capacity is available the Mortarstown WWTP which serves Carlow town and Graiguecullen. In addition, an upgrade of the Mortarstown WWTP is planned to increase capacity at the WWTP. The project is due to be completed in 2025, subject to all statutory and budgetary approvals processes.

#### ***Wastewater Networks***

A Drainage Area Plan (DAP) has commenced for the Carlow wastewater network which will assess in detail the performance of the wastewater network in the settlement. Irish Water will keep Carlow and Laois Councils updated on progress with the DAP as the LAP process progresses.

In parallel with the DAP, a Strategic Network Development Plan is also being progressed for Carlow town. This is a high-level study that will help inform how undeveloped zoned sites within the city could be serviced. Irish Water will keep Carlow and Laois Councils updated on progress as the LAP process progresses.

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

## **Water Infrastructure**

### ***Water Supply (treatment and source)***

Carlow and Graigucullen are served by the Carlow North Water Resource Zone (WRZ) and it is envisaged that the Carlow North WRZ has capacity to cater for growth in the Carlow Graiguecullen area.

### ***National Water Resource Plan and Draft Regional Water Resource Plan – East & Midlands (RWRP-EM)***

Following public consultation, the National Water Resources Plan (NWRP) Framework Plan was adopted in Spring 2021.

In addition, as part of the National Water Resource Plan process, Irish Water has published the Draft Regional Water Resources Plan for the East & Midlands Region (draft RWRP-EM) and the public consultation period has now closed. IW is in the process of reviewing all submissions. The draft RWRP-EM includes the Carlow North Water Resource Zone.

The development of the RWRP-EM allows Irish Water for the first time to review water supply ‘needs’ collectively for the entire East and Midlands Region and across the spectrum of risk including Quality, Quantity, Reliability and Sustainability. It allows Irish Water to consider local Options to resolve these needs and larger Options that can address multiple supplies across a wider area. Within this document we have summarised how our options assessment methodology was applied to the water supplies within the East and Midlands Region, and how this resulted in a ‘Preferred Approach’ to resolving constraints in various water resource zones.

The published Draft RWRP-EM is available to view and download on the IW website at <https://www.water.ie/projects/strategic-plans/national-water-resources/rwrp/eastern-midlands/>

### ***Water Networks***

Currently there are constraints on some trunk mains in the town and it is anticipated that capital upgrades will be required in the coming years. Irish Water will keep Carlow and Laois Councils updated on any proposed works/design proposals as the LAP process progresses.

In addition, Irish Water, Carlow County Council and Laois County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Irish Water and the Councils will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

## **Zoning**

Irish Water would welcome the opportunity to assist Carlow and Laois County Councils in identifying suitable zoned lands from a water services perspective. 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.

All new 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/>.

Depending on the extent of development targeted and realised, network upgrades may be required, particularly 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. 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.

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/>.

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

Irish Water encourages policies 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 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.

Irish Water 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.

### **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, requirement to programme upgrade works in advance of road project.

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 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.

### **Suggested policies/ objectives**

Irish Water has a suite of policies/objectives which we would like to suggest to the Council for inclusion in the Local Area 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 Carlow and Laois County Councils as the LAP preparation progresses.

*Jana Goold*

***IW Forward Planning Team – Southern Region  
Asset Strategy***