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National Water Resources Plan,
Irish Water,
Colvill House,
24 - 26 Talbot Street,
Dublin 1.

21st December 2017

Our Ref: SCP171101.1

Re: National Water Resources Plan SEA Scoping Opinion

Dear Ms. McMahon,

I refer to and acknowledge your correspondence, dated 13th November 2017, in relation to the Strategic Environmental Assessment (SEA) Scoping for the National Water Resources Plan (the Plan) currently being prepared by Irish Water.

The importance of a clean, well-protected water environment for our health, our wellbeing, our economy and our quality of life is clear. Our most recent State of the Environment (SoE) Report *Ireland's Environment – An Assessment 2016* (EPA, 2016) identifies the need to Restore and Protect Water Quality as one of the key environmental actions for Ireland (full report available at www.epa.ie/pubs/reports/indicators/SoE_Report_2016.pdf).

We welcome that the key findings and recommendations in the SoE Report have been taken into consideration and reflected in the Scoping Report. The serious challenges facing Ireland's water environment and water/wastewater treatment infrastructure are also reported extensively in our most recent Drinking Water Report (EPA, 2017), Urban Waste Water Treatment Report (EPA, 2017) and Water Quality Report (EPA, 2017).

This scoping submission by the EPA is intended to support the preparation by Irish Water of an effective National Water Resources Plan for the country. Our comments have been framed around the Consultation Questions posed in the scoping notification. Information on resources and guidance to assist the SEA and Plan preparation processes is also provided.



Responses to Consultation Questions

1. Do you have any suggestions that you would like Irish Water to consider in the preparation of its National Water Resources Plan (NWRP)?

Consolidation of Water Supplies

The EPA supports and encourages the consolidation of water supplies which would allow efficiencies of operation to be achieved and treatment issues that are more acute in small supplies to be resolved.

Water Resource Zones (WRZs)

While we recognise that Water Resource Zones (WRZs) may be used for resource planning, it should be noted that they cannot replace Water Supply Zones. The latter are defined in the Drinking Water Directive and are the basis for the calculation of monitoring programme requirements.

Catchment Management Approach

We urge that the Plan should adopt a Catchment Management approach to the management of water resources. This will be important in ensuring that projects arising from the Plan and associated abstractions, discharges etc. do not have a negative impact on receiving or downstream water bodies protected under the Water Framework Directive (WFD), including high status water bodies.

To properly consider water resources in a catchment sense and to ensure that demand and water balances are properly assessed, we recommend that the interrelationship between the Plan and Irish Water waste water treatment plant discharges and leakages need to be considered.

We recommend that the Plan and SEA should consider and clarify what constraints Irish Water envisages will be needed on the land within the catchments of water supplies. For example, will the Drinking Water Protected Areas get larger if the volumes abstracted increase? Will there be constraints on land spreading applications? etc.

WFD Characterisation Process

We recommend that the in-depth characterisation work undertaken by the EPA as part of the second cycle of River Basin Management planning should be taken into account in developing the Plan and SEA. This information can be accessed via the WFD Application on EDEN.

In the WFD characterisation process, 9 public water supplies have been identified as potential significant pressures on waterbodies; 6 due to abstractions and 3 due to discharges from the water treatment plant. Irish Water should factor this information into the development of the NWRP.

We note that the Scoping Report refers to information currently available in the Draft RBMP. It will be important that this information is updated upon publication of the Final RBMP (expected in Q1 2018). We expect that the Final RBMP will set out various Areas for Action and it will be important that these areas are taken into account in the developing the Plan and SEA.

Flood Risk and Flood Risk Management Plans

We recommend that the susceptibility of water infrastructure to flooding is an important aspect which should be considered in the Plan and SEA. The interrelationship between the Plan and OPW's CFRAM Flood Risk Management Plans (FRMPs) should be clarified and addressed as part of the



assessment (e.g. are there any water retention measures or infrastructure works proposed as part of the FRMPs that have potential to impact on the Plan, etc.). We note that under the CFRAM FRMPs, OPW can designate bodies, including Irish Water, to carry out flood alleviation works.

We are aware that the next iteration of the CFRAM FRMPs will address additional non-urban areas at risk of significant flooding, which may assist Irish Water in assessing water resource options (route selection etc.).

Offshore Islands

We recommend that public water supply issues pertaining to offshore islands should be considered in the Plan and SEA as relevant and appropriate.

Building Standards

We recommend that, where relevant and appropriate, the Plan should address the issue of building standards / specifications for the laying of water mains and associated apparatus including valves and meters. This is with a view to ensuring that recent problems associated with pipes freezing in newer housing developments are avoided for future water services projects and, where possible, that issues with older pipes/apparatus are rectified during upgrade / maintenance works.

Cumulative Effects

We recommend that the issue of cumulative and in-combination effects merits detailed consideration in the Plan and SEA / AA.

Transboundary Aspects

We recommend that additional consideration is given to transboundary aspects of the Plan, including links with relevant Northern Ireland plans. Consultation with the relevant Northern Ireland authorities will also be important.

2. Section 2.1 in Chapter 2 of the SEA Scoping Report outlines the objectives of the NWRP. Do you have any comments on these objectives?

Table 2.1 Water Resource Management Potential Option Types

In relation to Table 2.1, it should be noted that the EPA is not in favour of direct effluent reuse as a source of drinking water.

Optioneering Assessment Methodology

We recommend that the optioneering assessment methodology should include consideration of whether a water supply is included on the EPA's Remedial Action List and/or whether high risk hazardous events are associated with a supply's Drinking Water Safety Plan.

Leakage Reduction Targets

In supply demand balancing, we recommend that leakage reduction targets should be individual to each water resource zone, rather than applying a national leakage reduction target. We recommend that more aggressive targets should be in place for sources where the abstraction is putting the water body at risk or water treatment plants are being operated close to or above design capacity.

Supply Demand Balance

We note that other users and demands on water are not covered in detail in the Scoping Report. We recommend that the Plan and SEA should acknowledge that incomplete information is available on users of and demands for water and the supply demand balance assessment is therefore based on an incomplete picture, meaning that Irish Water can only adopt an interim position at present. It will be important that Irish Water works closely with the EPA on topics such as e-flows and potentially hands off flows.

Hydromorphology

Where any potential barriers or bankside measures are proposed to be put in place to support individual plants, we recommend that Irish Water should engage with the EPA and IFI at an early stage.

3. *Irish Water has reviewed plans, policies and programmes relevant to the NWRP in Chapter 3 of the SEA Scoping Report. Are there any others that should be considered?*

We recommend that the following additional plans/programmes should be considered:

Biodiversity: consideration should be given to Local Authority Green Infrastructure Strategies where prepared / available.

Tourism: Failte Ireland's 5-year Tourism Strategy, currently in preparation, should be considered, to optimise any synergies that may exist between the two plans and to ensure that future tourism initiatives are underpinned by adequate and appropriate water infrastructure.

Water:

- The Draft Fourth Nitrates Action Programme and revised GAP Regulations, which implement the Nitrates Directive;
- National Drinking Water Sludge Management Plan (this was previously identified as a Tier 2 Implementation Plan but it would now appear that this plan will fall under the NWRP – this should be clarified in the final Plan and SEA Environment Report);
- Eastern & Midlands Regional Water Supply Project;
- Irish Water's Draft Pesticides Action Programme;
- Irish Water's National Disinfection Programme.

Climate: The National Mitigation Plan should be referred to in Table 3.1 and Appendix B. It should also be noted that DCCA recently published the Draft Climate Change Adaptation Framework (required under the Climate Action and Low Carbon Development Act 2015).

Section 3.3.1 Key Influences: It should be noted that while the overarching WFD environmental objective to achieve Good Status, or Good Ecological Potential, exists, if a higher objective (high status) exists then that is the objective for the water body because of the no deterioration condition. This is also relevant in the context of Table 5.1.



4. Chapter 4 of the SEA Scoping Report sets out the current baseline environment conditions and future trends. The environmental issues are summarised in Table 4.4. Do you have any comments on these?

Section 4.1 Introduction: Reference is made to the significant pressure work produced by EPA (2016), but reference should also be made to both hydromorphology and abstractions not being developed to a significant enough level in that assessment, both of which are critical to the Plan.

Section 4.2 Population: consideration should be given to setting the population / human health aspects in the context of the National Planning Framework and the need to cater for an estimated additional 1 million people. The need to cater for increased tourist numbers should also be taken into account.

Section 4.5 Material Assets: Agriculture and FoodWise 2025 are referred to in the Scoping Report in terms of landuse / land-use change, water quality and air quality. The assessment should also consider the impacts of agriculture policy (e.g. dairy expansion) on water demand.

Section 4.8 Climate Change: the susceptibility of the network and infrastructure to climate change events such as storms, floods, drought periods, prolonged precipitation events etc. should also be considered as part of the assessment.

5. Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the NWRP and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?

We have reviewed the Draft SEA Objectives as outline in Table 5.1 and note that they are generally fit for purpose. A number of suggestions are provided below, which are aimed at strengthening the proposed SEA Objectives and moving the focus towards optimising the Plan's potential positive impacts and the potential co-benefits of improved management of water resources for the environment, society and the economy.

Population, Economy, Tourism and Recreation, and Human Health – PEH 1: We suggest that the term “providing water services” could be used in place of “*undertaking water services*”.

PEH 2: We suggest that “*Prevent damage to recreation and amenity facilities...*” could be revised as “Protect and where possible enhance recreation and amenity facilities...”.

Water Environment – WE 1: As a general comment, it should be noted that while the overarching WFD environmental objective is to achieve Good Status, or Good Ecological Potential, where a higher objective (high status) exists, then that becomes the objective for that water body because of the ‘no deterioration’ condition.

Biodiversity – BFF 1: We suggest that “*Prevent damage to terrestrial, aquatic and soil biodiversity...*” could be revised as “Protect and where possible enhance terrestrial, aquatic and soil biodiversity...”



Material Assets – MA2: We suggest editing the wording as follows: “Protect and where possible improve water as an economic resource.”.

Landscape - LVA 1: We suggest that “Prevent damage to designated landscapes...” could be revised as “Protect and where possible enhance designated landscapes...”.

Cultural Heritage – CH 1: “Avoid damage to cultural heritage resources...” could be revised as “Protect cultural heritage resources...”.

6. How would you like Irish Water to communicate with you as the plan progresses?

All communication with EPA in relation to the Plan and SEA should be sent electronically to the following email addresses: DrinkingWater@epa.ie and sea@epa.ie

Scoping Process Guidance

Guidance on the SEA Scoping Process, including an SEA Pack, Integration Guidance, SEA Checklist and SEA Spatial Information Sources is available on the EPA website and should be considered in the preparation of the SEA. This can be consulted at the following address: <http://www.epa.ie/pubs/advice/ea/>

Guidance on *Developing and Assessing Alternatives in SEA* (EPA, 2015) and *Integrating Climate Change into SEA* (EPA, 2015) is also available at the above link.

In addition, the EPA’s SEA Integration Guidance (attached to this submission) sets out the key environmental issues to be taken into account, as relevant and appropriate, in the preparation of the SEA and provides general information on the integration of environmental considerations into the Plan.

SEA WebGIS Search and Reporting Tool

The EPA SEA WebGIS Search and Reporting Tool is a GIS based web application that allows users to explore, interrogate and produce an indicative report on key aspects of the environment in specific geographic areas. These reports are indicative and will provide an overview of key aspects of the environment within a specific plan area. This may be used to inform the SEA screening and scoping stages for Plans and Programmes with particular reference in the first instance to the land use sector, though it is also applicable to other sector plans. It may be accessed via www.edenireland.ie

Environmental Authorities

Under the SEA Regulations (S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011), notice should also be given to the following:

- The Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears to the competent authority that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment



- where it appears to the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht.

We may provide further comments as the scoping process progresses. We will also continue to engage with Irish Water as the Plan and SEA develop and will participate in relevant workshops as appropriate. We will also provide additional comments upon receipt of the Draft Environmental Report and Plan and associated documents during the next statutory consultation phase of the SEA Process.

Should you have any queries or require further information in relation to the above please contact the undersigned.

I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely

A handwritten signature in cursive script that reads 'Tara Higgins'.

Dr Tara Higgins
SEA Section,
Office of Evidence and Assessment