

2019



National Water Resources Plan (NWRP)

Consultation One Report

An Approach to Addressing our Drinking Water Needs

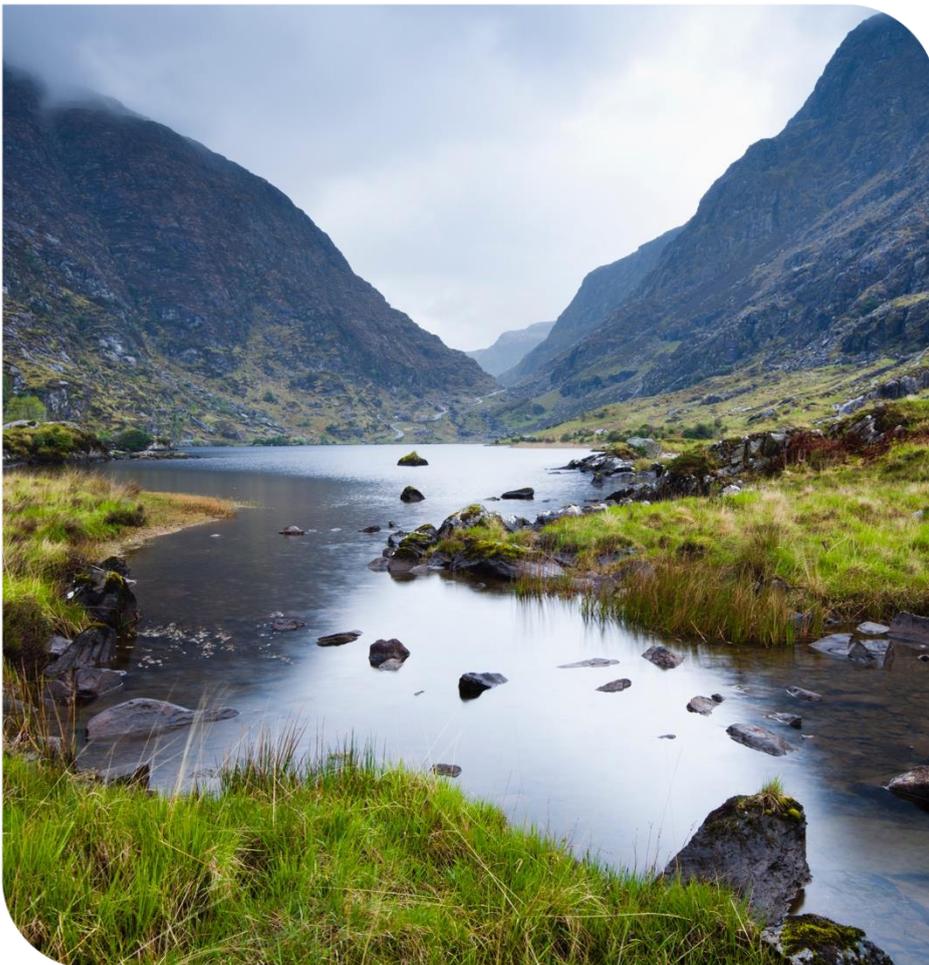


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1. NWRP background

1.1 Introduction

Irish Water is developing the first National Water Resources Plan (NWRP) that will identify how we will provide a sustainable, secure and reliable water supply to our customers for now and into the future whilst safeguarding the environment. The NWRP will set out how we will balance the supply and demand for drinking water over the short, medium and long term.

It is a 25-year strategy to ensure we have a sustainable, secure and reliable drinking water supply for everyone.

1.2 Benefits of the NWRP

This is Ireland's first National Water Resources Plan and it will be reviewed and updated as more information becomes available and in line with other national plans. Previously water resources planning was generally carried out at a local or regional level. Undertaking a national plan means that we can provide a more consistent level of supply. A national plan will ensure the best use of water resources for the benefit of all.

The NWRP sets out a standardised approach to water resources and services at national, regional and local levels, in the short, medium and long-term.

It allows us to identify areas where there may be water shortages before they happen, so that we can put in place plans to avoid or reduce the impacts of these.

Over the last number of years, we have seen some major unplanned water outages. We have experienced disruptions to our water including during Storms Emma and Ophelia and the drought conditions in summer 2018 which saw a national hosepipe ban put in place along with water restrictions in some parts of the country. Once this plan is implemented the frequency of water restrictions that impact directly on our customers will be reduced.

Without a water resources plan in place, supply problems on the network may not be identified on time and it may not be possible to prevent or avoid water outages. The NWRP will allow us to identify problems before they occur and put measures in place to minimise the impact on customers and ensure a reliable supply.

The NWRP is a long-term plan, to ensure our water resources are sustainable for future generations. A robust and sustainable water resources plan will ensure that Ireland's water supplies will have the capacity to support future growth and encourage investment.

1.3 Why do we need a NWRP?

Ireland is not a water stressed country. We need to operate our water network to cater for growth and optimise this great natural resource.

Water is part of our everyday lives. It is essential to everything we do. Recent droughts and storms have left some customers with no water or reduced water, including a water conservation order (hosepipe ban) for the first time in Ireland.

To prevent this happening in the future we must plan ahead.

How we plan our water resources today will determine the water we can provide now and into the future. Irish Water's first draft National Water Resources Plan will outline how we can do this.

1.4 Strategic Environmental Assessment (SEA)

Since 2001, EU legislation has required that certain public plans and programmes are subject to a Strategic Environmental Assessment (SEA) to determine their impact on the environment and identify ways to reduce this impact. These public plans and programmes include those relating to agriculture, forestry, energy and water. The SEA process is outlined in the European Union (EU) SEA Directive (2001/42/EC) and Appropriate Assessment (under the EU Habitats Directive). Furthermore, the EU Habitats Directive requires that a study known as Appropriate Assessment (AA) is carried out for any project or plan that is considered likely to have a significant impact on a Natura 2000 site (a European network of important ecological sites).

Initial screening of the NWRP was carried out in summer 2017 and it was determined that a SEA was required.

SEA scoping was then undertaken by Irish Water which involved collecting information on the environmental baseline and considering how this will develop without the NWRP in place, then predicting any significant environmental effects of NWRP alternatives and identifying measures to avoid or reduce effects.

The SEA Scoping Report for the NWRP was published on Thursday 9 November 2017, and a public consultation commenced to inform the development of the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), the environmental reports that will accompany the NWRP.

The SEA Scoping Report considered the following elements; Population, Economy and Human Health, Water Environment, Biodiversity, Flora and Fauna, Tourism and Recreation, Material Assets, Air Quality and Noise, Landscape and Visual Amenity, Climate Change, Cultural Heritage, and Geology and Soils.

The AA process is being carried out in parallel with the SEA process for the NWRP. The AA will be documented in a Screening Statement and a Natura Impact Statement will be produced.

1.5 Consultation one

The first round of public consultation to inform the development of the SEA and AA, the environmental reports that will accompany the NWRP, took place over six weeks from 9 November to 22 December 2017.

Members of the public, interested parties and environmental authorities were invited to contribute to the development of the NWRP as part of the SEA and AA process through public consultation, as outlined in the [NWRP Consultation Roadmap](#) in Figure 1-1.

We asked for feedback on the SEA Scoping Report and invited comments and suggestions for consideration at this stage. The following consultation questions were prepared to guide stakeholders in making a submission:

- 1) Do you have any suggestions that you would like Irish Water to consider in the preparation of its NWRP?
- 2) Section 2.1 in chapter two of the SEA Scoping Report outlines the objectives of the NWRP. Do you have any comments on these objectives?
- 3) Irish Water has reviewed plans, policies and programmes relevant to the NWRP in chapter three of the SEA Scoping Report. Are there any others that should be considered?
- 4) Chapter four 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?
- 5) Chapter five 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?
- 6) How would you like Irish Water to communicate with you as the plan progresses?

In order to generate awareness of and participation in the consultation, a range of communications tools were used to promote the consultation. These communications tools are summarised in Section 2 of this report.

Feedback from this consultation has been reviewed by the NWRP team, and relevant feedback will inform the development of the draft NWRP and will be detailed in the SEA Environmental Report. This feedback is outlined in Section 3 of this report.

A further statutory public consultation will seek feedback on the draft NWRP and associated SEA Environmental Report and Natura Impact Statement (NIS).

The SEA Statement will outline how environmental considerations have been integrated into the NWRP and how consultation influenced the development of the NWRP. We are committed to continuously engaging with stakeholders and we encourage feedback as we work through the development of the NWRP.



Figure 1-1 NWRP Consultation Roadmap

2. Consultation process

A number of communications tools were developed to promote the consultation and to raise awareness among the public, interested parties and environmental authorities and to encourage participation in the consultation process.

The following communications tools were used:

- NWRP webpage on the Irish Water website;
- Consultation one information leaflet available in English and Irish;
- NWRP infographic;
- Press release to national and local media;
- Newspaper adverts;
- Social media; and
- Correspondence and briefings to:
 - Elected representatives;
 - Local authorities;
 - Environmental authorities;
 - Interested parties; and
 - Media.

These communications tools and channels are discussed in more detail in this section.

2.1 Consultation promotion

2.1.1 NWRP webpage

A NWRP dedicated webpage was provided on the water.ie website and went live on 13 October 2017 at www.water.ie/nwrp. The webpage was updated with details of the first consultation on 9 November 2017. An Irish version of the webpage was also made available.

The NWRP SEA Scoping Report was available to view or download from the NWRP dedicated webpage on 9 November 2017, along with all other relevant information, including the NWRP consultation roadmap, the consultation information leaflet and the NWRP infographic.

Details on how to participate in the consultation were included on the NWRP webpage. Submissions were invited via the following channels:

By email: nwrp@water.ie

Or by Post: National Water Resources Plan, Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1, Ireland.

For the period of the consultation (between 9 November and 22 December 2017) there were 1,099 page views and 736 unique page views of www.water.ie/nwrp

Those that visited the site spent on average five minutes on this page. The majority of pages on water.ie are visited for less than a minute, showing the interest in the content and information provided.

The web page is regularly updated with the latest information as the project progresses.

2.1.2 Consultation one information leaflet

An information leaflet outlining the NWRP, details of the consultation questions and also details on how stakeholders could provide feedback on the SEA Scoping Report was published on the NWRP webpage on 9 November 2017.

The information leaflet was available in both English and Irish, a copy of which can be found in Appendix A.

2.1.3 NWRP infographic

A NWRP infographic was produced to be used in printed materials and on the webpage. The infographic is a helpful visual aid, which clearly illustrates water resources planning and outlines our approach to Ireland's first NWRP. The infographic aids communication, through an alternative format to text, assisting our efforts to effectively inform as broad a demographic as possible. The infographic can be found in Appendix B.

2.1.4 Press Release

A press release announcing the commencement of the consultation was issued to national, regional and local media. It was issued to raise awareness of the consultation amongst the general public and increase public participation. The press release included details of the NWRP and information on the consultation, along with links to the documentation and all necessary information on how to participate.

The press release was also added to the news section of the Irish Water website, www.water.ie/news

Media coverage generated is contained in Table 2-1 and a copy of the press release issued is available in Appendix C.

2.1.5 Newspaper adverts

A newspaper advert was placed in the Irish Independent on Friday 10 November 2017 and in the Irish Farmers' Journal on Thursday 16 November 2017. The advertisements were published in national newspapers to raise awareness of the consultation across the country and to encourage participation. It included a brief overview of the NWRP and announced the commencement of the first consultation, inviting feedback from members of the

public. It included details on where to find more information and on how to participate.

A copy of the newspaper advert is included in Appendix D.

2.1.6 Social Media

The launch of the NWRP consultation was promoted on social media using the Irish Water LinkedIn page, as displayed in Figure 2-1 below. Promoting the consultation on this platform enhanced the potential to inform a higher volume of people across a broad demographic.

Figure 2-1 LinkedIn post screenshot



2.2 Correspondence

2.2.1 Elected representatives

A letter to the Minister for Housing, Planning and Local Government was issued by Irish Water on 9 November 2017, along with emails sent to all elected representatives, including Ministers, TDs, Senators, MEPs and Councillors. The correspondence included details of the consultation and invited feedback on the NWRP SEA Scoping Report, with the consultation questions set out. The correspondence also outlined the next steps in the process for developing the NWRP, as well as the offer of a briefing for further information, with details on how to go about arranging this.

2.2.2 Local Authorities

To increase awareness and encourage participation in the NWRP consultation, Chief Executives and Directors of Services for Water / Environmental Services of all 31 Local Authorities were notified of the consultation via email on 9 November 2017. Correspondence included details of the NWRP, an outline of the consultation and the consultation questions, and all necessary information on how to participate.

Follow up detailed workshops also took place in 2019 with each Local Authority. Irish Water would like to thank our Local Authority partners for their input.

2.2.3 Environmental authorities

Statutory consultation started on 9 November 2017, when the NWRP SEA Scoping Report was issued to the environmental authorities listed below as part of the statutory SEA process:

- Environmental Protection Agency (EPA);
- Department of Housing, Planning and Local Government (DHPLG);
- Department of Communications, Climate Action and Environment (DCCA);
- Department of Agriculture, Food and the Marine (DAFM);
- Department of Culture, Heritage and the Gaeltacht (DCHG); and
- Northern Ireland Environment Agency ((NIEA) Transboundary).

All of the above environmental authorities were offered a briefing on the NWRP and were invited to attend a workshop which took place on 6 December 2017.

The workshop involved general discussion around the draft NWRP, and feedback on the scoping questions in relation to NWRP and the SEA and AA process to assist the environmental authorities in making a formal submission.

Since the close of consultation and as we are preparing our draft NWRP we have undertaken subsequent meetings and workshops with the environmental authorities as well as providing email updates.

2.2.4 Interested parties

Interested parties, both statutory and non-statutory were identified to ensure that a wide range of stakeholder groups that may be interested in the NWRP were made aware of the consultation and given the opportunity to engage and participate in the process.

An email was issued on 9 November 2017 to those identified, informing them of the details of the consultation and inviting them to give their feedback on the NWRP SEA Scoping Report.

A copy of the email sent is included in Appendix E.

A number of stakeholder briefings were also held with the project team presenting on the project at a number of conferences and events, both during and after the consultation period.

2.2.5 Media briefings

Briefings were offered to journalists who were interested in learning more about the NWRP and members of the Irish Water project team carried out media interviews and briefings in November 2017.

The press release and media briefings resulted in media coverage across a range of online and print media in promoting the consultation as shown in Table 2-1 below. Many of the articles focused on the recycling of wastewater element of the Scoping Report. This element was included to ensure that the report was comprehensive and considered all options before discounting them as part of the SEA process, and this was clarified by the press team where necessary.

Table 2-1 Resulting media coverage

Media	Date
Irish Independent	10 November 2017
Irish Independent	10 November 2017
98fm.com	10 November 2017
q102.ie	10 November 2017
Buzz.ie	10 November 2017
Irishtimes.com	10 November 2017
Independent.ie	10 November 2017
Campus.ie	10 November 2017
Thesun.ie	10 November 2017
Thejournal.ie	10 November 2017
Dublinlive.ie	10 November 2017
Lovindublin.com	10 November 2017

Waterbriefing.org	10 November 2017
wwtonline.co.uk	13 November 2017
Wexfordchamber.ie	13 November 2017
Industryandbusiness.ie	16 November 2017
Goreychamber.ie	27 November 2017

3. Feedback from consultation one

In addition to feedback received by the project team during workshops and briefing sessions, there were 17 written submissions received during consultation one. 15 of these submissions were from organisations and two from members of the public. This section contains an overview of the feedback outlined in those submissions and following the stakeholder briefings held. The information presented is a direct representation of the feedback received. Feedback is not presented in order of importance, rather it is presented relative to the consultation questions asked.

All submissions made on the SEA Scoping Report Consultation were reviewed and relevant feedback has been incorporated into the environmental reports. Submissions from individuals have been reported anonymously, while feedback from organisations has been attributed to them.

3.1 Consultation Question 1

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

3.1.1 General feedback

The Environmental Protection Agency (EPA) noted the importance of a clean, well-protected water environment for our health, our wellbeing, our economy and our quality of life. They welcomed that key findings from the EPA's recent State of the Environment (SoE) Report *Ireland's Environment – An Assessment 2016 (EPA, 2016)* have been taken into consideration in the development of the SEA Scoping for the NWRP and are reflected within the report. The EPA also supported the consolidation of supplies but noted that Water Resource Zones (WRZs) cannot replace Water Supply Zones (WSZs) as they are defined in the Drinking Water Directive.

This submission went on to include the following points in relation to Consultation Question 1:

- **Catchment Management Approach:** In relation to the management of water resources, the EPA noted that the plan should adopt a catchment management approach, to reduce any potential negative impact on water bodies protected under the Water Framework Directive (WFD), arising from any plans which may evolve from the NWRP. Furthermore, it was suggested that the plan and SEA should consider and clarify the constraints that Irish Water anticipates will be required on land within the catchments of water supplies;
- **WFD Characterisation Process:** With regard to characterisation work undertaken by the EPA, it was suggested that this should be taken into account in developing the plan and SEA;

- Flood Risk and Flood Risk Management Plans: The EPA recommended that the susceptibility of water infrastructure to flooding is an important aspect which should be considered in the plan and SEA. They suggested that the interrelationship between the NWRP and OPW's Catchment Flood Risk Assessment and Management Study (CFRAMS), Flood Risk Management Plans (FRMPs) should be clarified and addressed as part of the assessment. They also noted that under the CFRAMS FRMPs, the OPW can designate bodies, including Irish Water, to carry out flood alleviation works;
- Offshore Islands: This submission recommended that public water supply issues pertaining to offshore islands should be considered in the plan and SEA as relevant and appropriate;
- Building Standards: The EPA recommended that the plan should address the issue of building standards/specifications for the laying of water mains and associated infrastructure, where relevant and appropriate;
- Transboundary Aspects: The EPA recommended that additional consideration is given to aspects of the plan that cross boundaries, including links with relevant Northern Ireland plans, and the importance of consultation with the relevant Northern Ireland authorities was highlighted; and
- Cumulative Effects: The EPA recommended that the issue of cumulative and in-combination effects merits detailed consideration in the NWRP, SEA and AA.

3.1.2 Catchment approach

The Green Party noted that the approach to water resource management and protection must be catchment protection. They noted that State Agencies with relevant powers to ensure the protection of catchments of water resources must sign up to and implement the NWRP, which is consistent with the Water Framework Directive. They highlighted that the implementation of a catchment protection and management approach would be more effective, more cost-efficient, deliver multiple co-benefits and would comply with the Water Framework Directive.

The Irish Creamery Milk Suppliers Association (ICMSA) emphasised that the third strategic aim of Irish Water's, Water Services Strategic Plan "*managing water supplies in an efficient and economical manner*" should be considered as part of the development of the NWRP.

Tipperary County Council (TCC), Water Services recommended that the NWRP should include an assessment of the impact of water zone and catchment protection measures on agricultural practices, such as how the prohibition of fertilizer/pesticide use may affect agricultural land use and the subsequent potential knock-on economic impacts.

Inland Fisheries Ireland (IFI) highlighted the need to protect ecological status of river catchments and to promote sustainable water use based on assessment of long-term available resources.

3.1.3 Abstraction

The issue of water abstraction was highlighted as a concern by a number of stakeholders. The Development Applications Unit (DAU) of the Department of Culture, Heritage and the Gaeltacht recommended that water should not be abstracted from areas in which detailed ecological and biodiversity impact statements have not been made. The DAU highlighted the potential for abstraction to lead to lower drought water levels, thus having an ecological effect on habitats and species.

The IFI stated that the consolidation of abstraction locations and treatment plants should not be evaluated on an economic basis alone, as the reduction in the overall number of abstractions could result in an increase in abstraction volumes at individual locations. They also emphasised that the ecological sustainability of existing abstraction rights granted under Planning Acts, Fisheries Acts and/or Water Supply Acts should be assessed. Similarly, the Health Service Executive (HSE) National Drinking Water Group emphasised the potential impacts of fewer but larger abstraction points on the Water Framework Directive objectives. In addition, the ICMSA questioned what effects the European Union Regulations regarding water abstraction may have on the farming and food sector, and suggested that a system should be put in place to ensure farmers are protected.

The HSE Environmental Health Service questioned whether any new major abstractions could have an impact on the existing zone of concentration for private group schemes.

3.1.4 Water Quality

The HSE National Drinking Water Group stated that, at present water quality is not under the control of Irish Water, as private wells and drinking water supplies are unregulated and fall outside its remit. They suggested that there may be quality issues in some cases as a result of source contamination and co-operation with other agencies should be facilitated to mitigate this risk. In addition, they highlighted the potential for water quality to be compromised with increased abstraction from lowland surface-water sources which has the potential to change the source profile and could result in an increased risk of contamination from pathogenic species of cryptosporidium, oil spillage and inappropriate pesticide use and that these risks should be addressed as part of the NWRP.

Geological Survey Ireland (GSI) and the IFI both suggested that the NWRP should address water quality as well as water quantity. GSI advised that in order to reduce water treatment costs, higher quality raw water sources should be

identified and that pollution reduction measures should be introduced in water supply source catchments.

3.1.5 Domestic water use

The HSE Environmental Health Service stated that consideration should be given to the protection of groundwater particularly in relation to private group schemes and wells in accordance with the Water Framework Directive. Although they recognised that Irish Water has no direct responsibility for private water supplies, they highlighted that there is a public health risk associated with these supplies and as the national body responsible for water supply, they suggested that Irish Water use its resources to impact positively on private water supplies. They noted that if there was an opportunity to promote and consider small single water private supplies, it should be included in the NWRP. They also suggested that, as Irish Water are one of the largest single users of energy, a focus on energy efficient water treatment plants and operations and further investment in renewable energy should be looked at.

The HSE National Drinking Water Group also raised concerns about the quality and safety of unregulated drinking water supplies. They noted that almost 20% of the population use private water supplies due to the public water supply network not being readily accessible to them. They suggested that the NWRP should consider the potential to increase the proportion of the population served by public water supplies.

Inland Waterways Association of Ireland (IWAI) noted that the NWRP is predominantly focused on the need for water for domestic, agricultural and industrial use but advised that recreational use and competing water resource needs should not be overlooked.

Indaver highlighted the need for alternative treatment structures for the management of biosolids¹ to be given consideration in order to protect human health, and suggested this should be included as part of the NWRP.

3.1.6 Aquatic environment

IFI noted that the protection of the physical environment, hydrological processes and biodiversity should be included in the NWRP when considering protection of the aquatic environment. They observed that an objective of the Water Framework Directive is to prevent further deterioration and protect and enhance aquatic ecosystems. They also highlighted that a greater commitment than just preventing fish mortality should be considered.

IFI recommended that when considering fisheries waters in the NWRP, the prevention of river fragmentation and encouragement of connectivity or re-

¹Treated sewage sludge, commonly referred to as “biosolids”, is the organic by-product of urban wastewater treatment. If appropriate treatment is applied, it may be reused as an agricultural fertiliser.

connectivity to these waters where feasible should be included. The IFI also suggested the potential impacts on the following should be assessed:

- Water quality including assimilative capacity;
- Aquatic and associated riparian habitats;
- Biological diversity;
- Ecosystem structure and function;
- Fish spawning and nursery areas;
- Surface-water hydrology;
- Passage of migratory fish;
- Areas of natural heritage and geological heritage; and
- Amenity and recreational areas.

3.1.7 Planning

Limerick Chamber noted that it may be necessary to set aside funding to allow for the expansion or provision of new water treatment plants for rural towns and villages, to accommodate future growth. In addition, in reference to the Water Supply Project, Eastern and Midlands Region, Limerick Chamber requested that there is no change to the normal operating water levels on Lough Derg, or to the statutory flows on the River Shannon.

Dublin City Council (DCC) highlighted that the NWRP should consider the impact of resource planning and the 'do-nothing scenario', such as the potential effects of non-delivery of key infrastructure developments on the people and the environment, and the knock-on effects on growth potential, existing demand for services and the receiving environment.

DCC also raised concerns that the Water Supply Project, Eastern and Midlands Region may be delayed due to the fact that the Water Framework Directive requires that legislation on water abstraction is put in place.

The National Water Forum raised concern regarding planning control and provision for water conservation initiatives and with whom authority lies. Whether there is a clear link between Irish Water and Local Authorities was also raised. A particular emphasis was placed on education and awareness programmes to be rolled out around water conservation and potential solutions. The National Water Forum emphasised the risk that water and wastewater services in rural areas, where there is no public supply, may not be capable of supporting population increase, leading to demand on services.

3.2 Consultation Question 2

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

GSI welcomed the objectives of the NWRP, and suggested additional objectives, such as:

- Develop a flood plan advising measures to be taken before and during flood events, including infrastructure development and source protection;
- Develop a plan to reduce pollutant inputs within the source catchment, in preference to end-of-pipe solutions;
- Identify and assess measures to reduce treated water demand, such as conservation, leak reduction, greywater reuse and rainwater harvesting; and
- Assess the water resources available at a national level including lakes, rivers and groundwater in the context of ecosystem requirements, other abstractors and any future licensing system.

Similarly, the National Water Forum queried whether water conservation initiatives should be included in the NWRP, such as utilising grey water for non-drinking water requirements, rainwater harvesting and financial incentives for households to reduce water use.

3.2.1 Water resource zones & water supply zones management

Limerick Chamber concluded that the criteria for assessing water resource zones (WRZs), as listed in Section 2.1 of the SEA Scoping Report are comprehensive. They commented that although the importance of developing a drought plan is stated in Section 2.1, it is also important to include a flood plan. The HSE Environmental Health Service echoed this, noting the importance of flood planning in addition to drought planning, due to climate change and future flood and storm event predictions.

The IFI suggested that the NWRP and SEA should consider mitigating effects of floods and droughts and by doing so, it would contribute to the provision of improved surface-water and groundwater quality, which is needed for a sustainable and balanced use of water.

Limerick Chamber noted that, as outlined in the draft National Planning Framework, planning is critically important to the sustainable management of water resources, which includes the management of water service provision, river basin management, landscape, flood risk planning, coastal and marine management and climate change adaptation. The submission went on to confirm that the use of WRZs, as described in the SEA Scoping Report, is an effective means of resource planning.

In addition, this submission also included the suggestion to include “future demand” in the assessment criteria, noting that this is particularly important in the context of WRZs, to allow for balanced resource allocation.

TCC Water Services raised concern regarding anomalies with the boundaries of the WSZs and WRZs and how they integrate with the boundaries of the district metered areas (DMAs). It was suggested that a validated system could be used across all Irish Water systems in order to solve these anomalies. As part of the same submission, it was also recommended that Irish Water should develop a

plan outlining how a severe environmental event in a major WSZ would be dealt with.

In relation to the Optioneering Assessment Methodology outlined in Chapter two of the SEA Scoping Report, the EPA suggested considering whether a water supply is included on the EPA's Remedial Action List and whether high risk hazardous events are associated with a supply's Drinking Water Safety Plan. They also recommended that leakage reduction targets should be individual to each WRZ, rather than applying a national leakage reduction target.

3.2.2 Recreational & economic use of water sources

IWAI noted that the objectives outlined in chapter two of the SEA Scoping Report do not include recreational use of water and associated potential economic benefit.

The IWAI and HSE National Drinking Water Group both indicated their concern about abstracting water from sources which have the potential to be contaminated. IWAI highlighted that water quality could be compromised from fuel or contaminants as a result of recreational usage, and recommended that these risks should be considered as part of the objectives for the NWRP.

The ICMSA suggested that changes to land management or agricultural practices would improve water quality, potentially increasing water resource availability and could also reduce water treatment requirements and associated costs. They pointed out that other industries/urban areas and non-farming enterprises, not just agriculture alone, put significant pressure on "at-risk water bodies" and these risks should be assessed as part of the NWRP.

3.2.3 Water demand

Limerick Chamber suggested that Irish Water should identify and specify how capital investment will be prioritised and the resolution of existing losses of water through leakage.

In relation to Supply Demand Balance, the EPA noted that incomplete information on users of and demands for water is included in the SEA Scoping Report and concluded that the supply demand balance assessment is based on an incomplete picture. It was highlighted that, due to this fact, Irish Water can only adopt an interim position at present. This submission included a recommendation that Irish Water should work closely with the EPA on topics such as e-flows and potentially hands-off flows.

Similarly, the DAU suggested that all potential water supply options should be assessed fully as part of the NWRP, to mitigate for a lack of robust water supply/ demand data.

DCC also expressed concern regarding water supply and demand equations. They noted that based on current trends there is a risk of supply capacity not meeting demand from 2020/2021, even if savings that result from Irish Waters' water conservation measures are taken into account.

The HSE National Drinking Water Group suggested introducing incentives for measures such as domestic harvesting of rainwater for activities other than consumption or food preparation. An additional objective was suggested around the distribution network, with regard to geographical spread and the state of repair of the network, noting that although it is included in “Demand Management”, it may benefit from a section of its own. The group suggested the following additional objectives:

- Maximising the proportion of the Irish population with access to a high-quality public water supply; and
- Implementing incentives to reduce per capita usage on public water supply and minimise waste.

A member of the public raised concern over the inclusion of effluent reuse as a water resource management option, referred to in section 2.1 of the SEA Scoping Report. This submission suggested that treated effluent may contain large amounts of chemicals, highlighting this as a cause for concern in relation to the potential impact on human health, and as such concluded that it should not be considered as an option. On the same topic, the EPA also considered effluent reuse as an inappropriate option for water resource management. Conversely, IFI expressed their support for this option, along with reservoirs and desalination, encouraging serious consideration of these options.

3.3 Consultation Question 3

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

In response to this question, stakeholders provided a number of additional plans, policies and programmes for consideration in the development of the NWRP. These additional plans, policies and programmes are outlined in Table 3-1 and will be incorporated into the development of the NWRP and SEA where appropriate. Where stakeholders provided rationale for their suggestions, it is outlined in this section.

The DAU noted that although the SEA Scoping Report refers to the Record of Monuments and Places (RMPs) which is part of the National Monuments Acts (1930 to 2004), the Sites and Monuments Record (SMR) is not included and should also be reviewed as part of the SEA process. They highlighted that the European Communities (Birds and Natural Habitats) Regulations 2011 – 2015 (S.I. No. 477 of 2011, S.I. No. 355 of 2015) provides the legislation relating to appropriate assessment of sectoral plans regarding European sites.

IFI requested that the Fisheries Consolidation Acts 1959 (as amended) should be reviewed as part of the SEA process as well as IFI’s own project, entitled *Adaptive Management of Barriers in European Rivers* (AMBER). AMBER seeks to raise awareness of the problems posed by stream fragmentation, the

pressures on freshwater ecosystems and the need for innovative solutions to restore river connectivity.

GSI suggested that it may be beneficial to include County Groundwater Protection Schemes (GWPSs) which are a component of County and Local Area Development Plans. GSI highlighted that geological and hydrogeological data contained in GWPSs can be utilised as part of Water Framework Directive assessments. GSI also noted that geochemical data such as the GSI's Tellus Project, GSI's hydrochemistry database and results from the EPA's hydrochemistry monitoring programmes should be considered.

The Green Party stated that the NWRP must comply with the Water Framework Directive and that the legal obligation to the Water Framework Directive will influence the NWRP. Similarly, the HSE National Drinking Water Group highlighted that the NWRP must take into account the Water Framework Directive, particularly the legislative requirements that refer to abstraction.

The HSE National Drinking Water Group suggested that food policies such as Food Harvest 2020 and the strategic goals of the Food Safety Authority should be considered in the development of the NWRP, as both the agricultural and food processing industries are reliant on a high quality, secure water supply.

The HSE National Drinking Water Group further suggested that Directive 2013/51 (Radioactive Substances in Drinking Water) 2016 regulations, should be taken into consideration due to the possible presence of radioactive materials in groundwater resources in certain geographical areas in Ireland. They also noted that health policies such as Healthy Ireland should be included in the NWRP as a safe drinking water supply is a key factor in improving the nation's health status. The HSE Environmental Health Service also suggested that the Healthy Ireland initiative should be reviewed as part of the SEA.

Indaver advised that EU Directives must be complied with to manage wastewater sludge correctly, namely, the Urban Wastewater Treatment Directive (91/271/EEC), the Waste Framework Directive (2008/98/EC) and the Nitrates Directive (91/676/EEC).

Transport Infrastructure Ireland (TII) recommended that the following plans, policies and guidelines should be taken into account should any of the road networks be impacted by developments associated with the NWRP:

- Policies and guidelines outlined in the *Department of Environment, Community and Local Government Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*;
- TII's Traffic and Transport Assessment Guidelines (2014);
- Section 53 of the Roads Act (1993); and
- TII Publication DN-STR-03001 (formerly NRA BD 2) - *Technical Approval of Road Structures on Motorways and Other National Roads*.

All plans, policies and programmes suggested by stakeholders during consultation are listed in Table 3-1.

Stakeholder	Additional plans, policies and programmes to be considered
TII	<ul style="list-style-type: none"> • Policies and guidelines outlined in the “Department of Environment, Community and Local Government Spatial Planning and National Roads Guidelines for Planning Authorities (2012)” • TII’s TTA Guidelines (2014) • Section 53 of the Roads Act (1993) • TII Publication DN-STR-03001 (formerly NRA BD 2) - Technical Approval of Road Structures on Motorways and Other National Roads
DAU	<ul style="list-style-type: none"> • Sites and Monuments Record • European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009 • The European Communities (Birds and Natural Habitats) Regulations 2011 – 2015 (S.I. No. 477 of 2011, S.I. No. 355 of 2015) • Annex I, Annex II, & Annex IV of the EU Habitats Directive • Schedules of the Wildlife Acts 1976-2010 • Findings from ecological assessments, SEAs and AAs undertaken as part of the Water Supply Project, Eastern and Midlands Region (WSP)
Limerick Chamber	<ul style="list-style-type: none"> • National Planning Framework • Regional Spatial and Economic Strategies • Metropolitan Area Strategic Plans for the Cork, Limerick and Waterford Metropolitan areas • City Development Plans (including Limerick 2030 Vision: An Economic and Spatial Plan for Limerick) • Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary • Specific Port Plans (including the Shannon Foynes Port Company Vision 2041)
EPA	<ul style="list-style-type: none"> • Ireland’s Environment – An Assessment 2016 (EPA, 2016) • Drinking Water Report (EPA, 2017) • Urban Wastewater Treatment Report (EPA, 2017) • Water Quality Report (EPA, 2017) • Local Authority Green Infrastructure Strategies • Fáilte Ireland’s 5-year Tourism Strategy (currently in preparation) • The Draft Fourth Nitrates Action Programme and revised GAP Regulations • National Drinking Water Sludge Management Plan (within the NWRP) • Water Supply Project, Eastern and Midlands Region (WSP) • Irish Water’s Draft Pesticides Action Programme

	<ul style="list-style-type: none"> • Irish Water’s National Disinfection Programme • The National Mitigation Plan • Draft Climate Change Adaptation Framework (DCCAIE)
IFI	<ul style="list-style-type: none"> • The Fisheries Consolidation Acts 1959 (as amended) • IFI’s Adaptive Management of Barriers in European Rivers Project • National Strategy for Angling Development
GSI	<ul style="list-style-type: none"> • County Groundwater Protection Schemes • GSI Tellus project • GSI hydrochemistry database • EPA’s hydrochemistry monitoring
Green Party	<ul style="list-style-type: none"> • Water Framework Directive
HSE National Drinking Water Group	<ul style="list-style-type: none"> • Food Harvest 2020 • Food Safety Authority of Ireland’s strategic goals • Healthy Ireland Strategies • European Union (Radioactive Substances in Drinking Water) Regulations 2016 • Water Framework Directive
HSE Environmental Health Service	<ul style="list-style-type: none"> • Healthy Ireland – A Framework for Improved Health and Wellbeing 2013-2025 • The National Peatlands Strategy • European Union Directive 2013/51 (Radioactive Substances in Drinking Water) 2016 Regulations • Council Directive 2013/59/Euratom • EU Drinking Water Directive Evaluation Report
National Water Forum	<ul style="list-style-type: none"> • National Planning Framework
Indaver	<ul style="list-style-type: none"> • Urban Wastewater Treatment Directive (91/271/EEC) • Wastewater Framework Directive (2008/98/EC) • Nitrates Directive (91/676/EEC)

Table 3-1 Plans, policies and programmes suggested by stakeholders

3.4 Consultation Question 4

Chapter four 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?

The ICMSA highlighted that growth within the agriculture industry is likely to increase demand on water supplies, in line with the Department of Agriculture,

Food and the Marine's Food Wise 2025 strategy. With this in mind, the ICMSA support the approach of the NWRP in considering future demand, which they perceive as crucial from an agricultural perspective.

The DAU recommended that demand projections should run beyond 2050, because the trend in demand is continuously increasing, as future thresholds may be reached and alternative water sources will be required. The DAU questioned at what stage the proposed supply for the WSP will cease to be sufficient. The need for future alternatives to be assessed was also noted.

3.4.1 Cultural heritage

In relation to Cultural Heritage, the DAU highlighted that an additional assessment needs to be included as the SEA Scoping Report does not show a relationship between cultural heritage and the following:

- Biodiversity, Flora and Fauna: (built heritage sites are directly affected by nature and it was stated that site management plans are required to assess and minimise these impacts);
- Air Quality: (for some sites, monitors are required to measure the moisture content of air circulation and the DAU noted that this can affect delicate features including frescoes and other painted plaster); and
- Climate Change: (climate change does have an effect on both archaeological and architectural heritage sites in particular in coastal areas).

3.4.2 European sites

The DAU highlighted the importance of detailed assessments being undertaken on the potential impact of the abstraction of water from within designated European Sites. Furthermore, the NWRP should not assume there will be water available in every circumstance and would be subject to Appropriate Assessment and alternative options should be thoroughly assessed, taking into account both climate change and conservation targets during extreme droughts. This submission also recommended that the NWRP should include a map of potential abstraction sites, to provide an early indication of locational effects of pipelines needed to carry water from an abstraction point to a termination point.

3.4.3 Reservoirs & Infrastructure

DCC noted that while reference was made to two Hydroelectric Schemes, Poulaphouca on Blessington Lake and Ballyshannon on Lough Erne, that no reference was made to Ardnacrusha on the River Shannon. They stated that this should be included, considering the proposals for Parteen Basin in the WSP. This submission also noted the need to consider the planned construction of the Ringsend wastewater treatment works and proposed Regional wastewater treatment works north of Dublin city.

IWAI noted that canals are not included as waterbodies in the SEA Scoping Report, and suggested canals should be identified, and suggested as an example, that the Boyne Canal should be included as a waterbody.

3.4.4 Agriculture

The submission from the EPA highlighted that although Agriculture and Food Wise 2025 (Department of Agriculture, Food and the Marine) are referred to in the SEA Scoping Report in terms of land use and land use change, the report should also consider the effects of agriculture policy on water demand. They also advised that the effects of climate change events (such as storms, floods, drought periods, prolonged precipitation events, etc.) on the network and infrastructure should be considered as part of this assessment. They added that there is a need to cater for an extra one million people, as well as the need for increased tourism numbers to be taken into account.

GSI noted that inward investment and industrial development, as well as changes and growth in the agricultural sector are additional key issues relating to the NWRP. This submission advised that additional baseline information sources such as land-use data (Corine), geochemical data and industrial and economic development spatial strategy data from IDA and Enterprise Ireland should be included.

The HSE National Drinking Water Group advised that agriculture is a major factor both in relation to water usage and water quality and possibly merits a section of its own in the SEA.

GSI also highlighted that climate change will impact surface and groundwater resources, in relation to both quantity and quality. For example, a reduction in effective rainfall, particularly in spring/summer, has the potential to cause an increase in agricultural water use for irrigation and stock, which could increase abstraction in already stressed water areas and these issues should be included in NWRP assessments.

3.4.5 Geology

GSI stated that groundwater abstractions may have an impact on biodiversity, the water environment and geology and groundwater-dependent terrestrial ecosystems. They advised that although geology does not typically change quickly, it is a vital component of the SEA, and noted that geological mapping and interpretation can change as more data becomes available. They highlighted that geology can influence the following:

- Groundwater water quality distribution (different bedrock and unconsolidated geologies influence aquifer development);
- Groundwater and surface water chemistries;
- Surface water seasonal sustainability (different geologies include runoff/base flow ratios); and
- Some ecosystems are dependent on the geology of that particular location.

3.4.6 Water resource management

The Green Party highlighted the need for robust quantitative analysis in the SEA. They advised that factors such as water demand, water demand

management and reduction, energy demand and greenhouse gas emissions must be analysed quantitatively, with particular emphasis on water resource management.

The HSE Environmental Health Service recommended that the potential for health gain should be assessed throughout the NWRP, for example, health gain from recreational use of water bodies and not just from a safe water supply. The group also commented that while weather events have been noted as a key issue in the SEA Scoping Report, it does not take into account rainfall modelling. They recommended that rainfall modelling with the relevant metrological services should be taken into account.

The HSE Environmental Health Service also made reference to future trends, in particular detailed consideration to the impact of the National Planning Framework and proposals to potentially develop five urban areas as main centres of economic development.

3.4.7 Future trends

Limerick Chamber noted their concern with Government's approach to the prediction of population growth for regional cities, and the associated low water demand predictions that have been arrived at. They emphasised that economic growth in cities such as Limerick, will increase their demands on water and therefore the water supply requirements for such cities must take account of potential future growth. This submission also queried if Irish Water has assessed the expected relationship between an aging population and water usage.

The Green Party highlighted that the SEA should address co-benefits and synergies with other public policy objectives. By way of example this submission explained that the management of wetlands to reduce Dissolved Organic Carbon and Suspended Solids emissions into waterways would lead to a higher raw water quality intake for drinking water supplies, reduce the generation of trihalomethanes in water supplies, as well as meeting other public policy goals, including mitigating greenhouse gas emissions, controlling flooding, restoring both terrestrial and aquatic biodiversity and restoring landscapes.

The IFI emphasised the need to include sport and relevant commercial fishing and angling in the baseline data and to incorporate them into the assessment of future trends. They noted that under the National Strategy for Angling Development, the IFI are aiming to increase the contribution from angling to €932 million and increase employment by 1,800 jobs.

GSI suggested that Teagasc should be added to the list of data sources. They also noted that climate change will impact surface and groundwater resources.

3.5 Consultation Question 5

Chapter five 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?

Feedback received from the ICMSA proposed an environmental assessment be undertaken of a number of water and wastewater treatment plants adding that this could lead to significant gains in terms of the environment as well as economic efficiency.

Referring specifically to the draft SEA objectives, GSI made observations on the following:

- Population, Economic, Tourism and Recreation, and Human Health: GSI highlighted the need to prevent adverse impact on inward investment resulting from inability to provide sustainable water supply; and
- Geology and Soil: GSI highlighted the importance of avoiding damage to geological heritage sites and minimising potential impact on water resources from geological hazards (e.g. landslides).

The EPA highlighted that while the Water Framework Directive environmental objectives to achieve Good Status, or Good Ecological Potential exists, the objective of no deterioration should also be adhered to. Therefore, if a higher objective (high status) exists then the objective of the plan must be to sustain this level.

The EPA made specific reference to the draft SEA objectives, as follows:

- Population, Economy, Tourism and Recreation, and Human Health: Suggested that the term “*providing water services*” could be used in place of “*undertaking water services*” and that “*Prevent damage to recreation and amenity facilities*” could be revised as “*Protect and where possible enhance recreation and amenity facilities*”;
- Biodiversity, Flora and Fauna: Suggested 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: Suggested that the scope includes “*Protect and where possible improve water as an economic resource*”;
- Landscape and Visual Amenity: Suggested that the scope includes “*Protect and where possible enhance designated landscapes*”; and
- Cultural Heritage: Suggested the scope be revised to include “*Protect cultural heritage resources.*”

The HSE Environmental Health Service recommended that the SEA criterion or set of principles for assessing what is appropriate in the NWRP should be clearly outlined, and the same approach must be applied in the assessment of alternatives. They commented that where the SEA process informs the final NWRP, the SEA Environmental Report should clearly and transparently document it.

They also noted that the NWRP should validate why recognised alternative assessment methodologies are not used and the reasons for choosing one as opposed to the other.

The HSE National Drinking Water Group recommended that incentives should be implemented to reduce the per capita use on the public supply and as a result minimise waste and that this could be incorporated into an objective.

3.6 General feedback

Stakeholders welcomed the preparation of the NWRP by Irish Water and the opportunity to participate in the first round of consultation on the development of the NWRP.

Feedback suggested further consultation with different organisations regarding different aspects of the NWRP. For example, commenting on the potential effect of the NWRP on salmon rivers, the DAU noted the importance of consulting with IFI given their extensive expertise in relation to this species. Similarly, further consultation with the National Parks and Wildlife Services (NPWS) is recommended by the DAU ahead of the completion of the draft NWRP, particularly in relation to water abstractions from, and wastewater treatment plant discharges to European sites.

IFI requested that they be consulted further on any proposed developments, including the prevention of river fragmentation and encourage the connectivity or the re-connectivity of fisheries waters, where possible.

Regarding the level of detail and information currently available to inform this first stage assessment, the DAU noted that further re-iterations of assessment will be necessary, to avoid any potential omissions in the draft NWRP.

IWAI recommended that the Canal Authorities should be consulted, with regard to the environmental issues for the SEA.

Similarly, the EPA noted the importance of early engagement with both the NPWS and IFI, particularly regarding any potential introduction of support measures for individual water treatment plants. The EPA also referenced their SEA pack, checklist, Spatial Information Sources, Guidance on Alternatives and suggested that their WebGIS SEA Search and Reporting Tool should be used.

TII highlighted that, should any of the road networks be impacted by developments associated with the NWRP, further consultation would be required to obtain approval from TII and/or any Public Private Partnership contracted with responsibility for any motorway. They further noted that any proposed schemes arising from the NWRP should not compromise the construction of any future national road schemes and that any scheme should include a Traffic and Transport Assessment in accordance with the relevant guidelines.

The National Water Forum observed that Irish Water needs to input into national policies on water conservation provisions in legislation and regulations, for

example, developing construction regulations/legislation and linkages to the National Planning Framework.

Finally, regarding the outcome of consultation, the HSE Environmental Health Services emphasised that the SEA Environmental Statement should consist of a summary of how environmental considerations have been integrated into the final NWRP, including how the submissions received from stakeholders have been taken into account during the development of the NWRP and the reasons for choosing the final NWRP.

4. Next Steps

Feedback received during consultation one has been reviewed by the NWRP team, and relevant feedback has informed the development of the draft NWRP and will be detailed in the associated environmental reports. Irish Water would like to thank all of those who have engaged with us and made submissions as we develop this plan further.

A ten-week statutory public consultation seeking feedback on the NWRP draft Framework Plan and associated SEA Environmental Report and Natura Impact Statement (NIS) will run in December 2020.

Following on from this Phase 1 public consultation on the draft Framework Plan, there is still some important work to be done before the Framework Plan is finalised.

The submissions and observations received from public consultation will be taken into consideration, and the Framework Plan updated.

The final Framework Plan will then be produced, accompanied by a Strategic Environmental Assessment Statement and an Appropriate Assessment Determination.

The SEA statement will outline the issues raised and demonstrate the amendments that were made to the Framework Plan as a result of the consultation. The SEA Statement will outline how environmental considerations have been integrated into the NWRP and how consultation influenced the development of the Framework Plan.

The final Framework Plan will be adopted in early 2021, alongside the SEA Statement and second Consultation Report.

Phase 2 comprises four Regional Water Resources Plans each of which will be subject to Strategic Environmental Assessment and Appropriate Assessment. Each of the four regions will also have their own public consultation phases. These public consultations will take place throughout 2021.

We are committed to continuously engaging with stakeholders and we encourage feedback as we work through the development of the NWRP.

The feedback received from Phase 1 and 2 will form the overall final National Water Resources Plan which will be published at the end of 2021/beginning of 2022.

Appendix A. Consultation one information leaflet

water.ie/nwrp



National Water Resources Plan

Consultation one



Part of **ervia** group

Contact details

To make a submission on the NWRP or for further information please contact:

Email: nwrp@water.ie

Web: www.water.ie/nwrp

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

General queries

9am-5.30pm, Mon-Fri

Telephone: **Callsave 1850 448 448** or **+353 1 707 2824**

Minicom: **LoCall 1890 378 378** (for hearing impaired customers with their own minicom equipment).

Water supply queries and emergencies

24 hours a day, 7 days a week

Telephone: **Callsave 1850 278 278** or **+353 1 707 2828**

Minicom: **LoCall 1890 378 378** (for hearing impaired customers with their own minicom equipment).

Please note that the rates charged for 1850 (Callsave) and 1890 (LoCall) numbers may vary across different service providers. Calls made using mobiles may be more expensive. This publication is available in Braille, on CD and in large text format on request by calling 1850 448 448.

National Water Resources Plan

Irish Water is developing the first National Water Resources Plan (NWRP) that will outline how we move towards a sustainable, secure and reliable drinking water supply for everyone over the next 25 years whilst safeguarding our environment. The objective of the NWRP is to outline how we intend to maintain the balance between supply and demand for drinking water over the short, medium and long term.

What is happening now?

Irish Water is seeking feedback on the NWRP Strategic Environmental Assessment Scoping Report. In preparing the NWRP, Irish Water needs to prepare some key environmental reports including a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). A public consultation is now underway to inform the development of these reports.

Public consultation will be undertaken for six weeks from Thursday 9 November to Friday 22 December 2017 during which time the SEA Scoping Report can be viewed and downloaded at www.water.ie/nwrp

National Water Resources Plan | Consultation one | 3

Irish Water is inviting feedback on the following consultation questions:

- > Do you have any suggestions that you would like Irish Water to consider in the preparation of its NWRP?
- > Section 2.1 in chapter two of the SEA Scoping Report outlines the objectives of the NWRP. Do you have any comments on these objectives?
- > Irish Water has reviewed plans, policies and programmes relevant to the NWRP in chapter three of the SEA Scoping Report. Are there any others that should be considered?
- > Chapter four 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?
- > Chapter five 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?
- > How would you like Irish Water to communicate with you as the plan progresses?

Submissions will not be individually responded to but will be summarised in a consultation report which will be published on www.water.ie/nwrp

All submissions made on the SEA Scoping Report will be reviewed and relevant feedback incorporated into the environmental reports and the draft NWRP as appropriate. Submissions from individuals will be reported anonymously and feedback from organisations will be attributed to them.

In summer 2018, the draft NWRP will be published and an eight week statutory public consultation will be undertaken, before being reviewed and finalised later that year.

Have your say

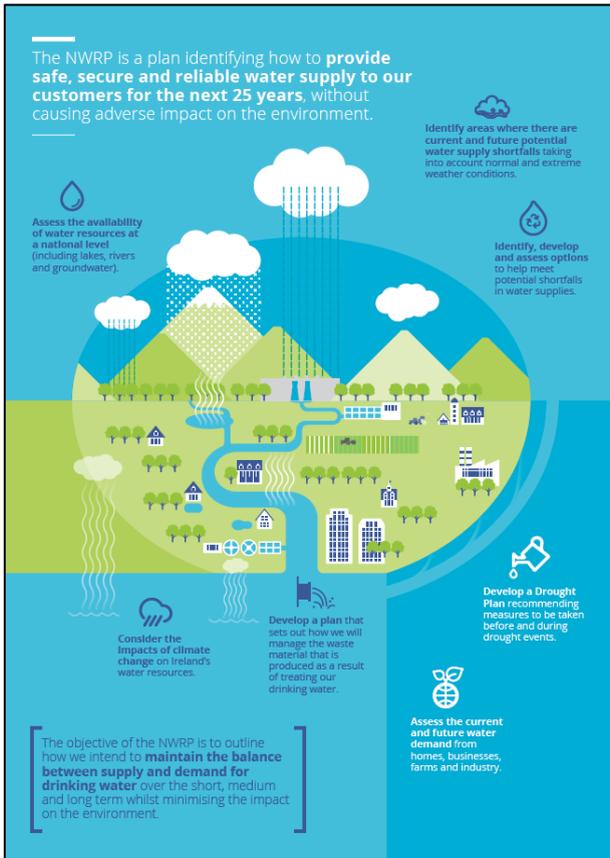
If you would like to make a submission, please send it by email or post by **Friday 22 December 2017**

Email: nwrp@water.ie

Post: National Water Resources Plan, Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1, Ireland

4 | National Water Resources Plan | Consultation one

National Water Resources Plan | Consultation one | 5



Why do we need a NWRP?

Irish Water has a statutory responsibility to ensure the proper and effective management of water resources across the country, and to ensure all customers have access to safe, clean drinking water.

In order to ensure this, Irish Water needs to identify where any existing or future issues may occur and provide sustainable, safe and cost effective solutions.

This is Ireland's first National Water Resources Plan and will be reviewed and updated as more information becomes available and in line with other national plans. Previously water resources planning was undertaken at a county or regional level.

The objective of the NWRP is to set out how we intend 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.

The NWRP will help Irish Water meet this objective throughout Ireland so that people have access to drinking water while our natural environment is protected.

What is the benefit of the NWRP?

A national plan will ensure the best use of water resources for the benefit of all.

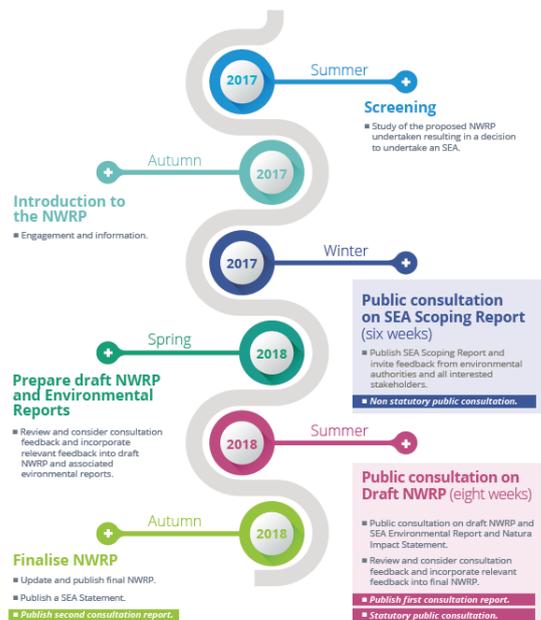
The NWRP is a long term plan, to ensure our water resources are sustainable, not only for future generations but for industry too. A robust and sustainable water resources plan will show that Ireland's water supplies will have the capacity to support future growth and encourage investment.

How will the NWRP be developed?

The following activities will be undertaken in the development of the NWRP:

- > Assess the availability of water resources at a national level (including lakes, rivers and groundwater);
- > Assess the current and future water demand from homes, businesses, farms, and industry;
- > Identify areas where there are current and future potential water supply shortfalls taking into account normal and extreme weather conditions;
- > Identify, develop and assess options to help meet potential shortfalls in water supplies;
- > Consider the impacts of climate change on Ireland's water resources;
- > Develop a Drought Plan recommending measures to be taken before and during drought events;
- > Develop a plan that sets out how we manage the waste material that is produced as a result of treating our drinking water.

NWRP consultation roadmap



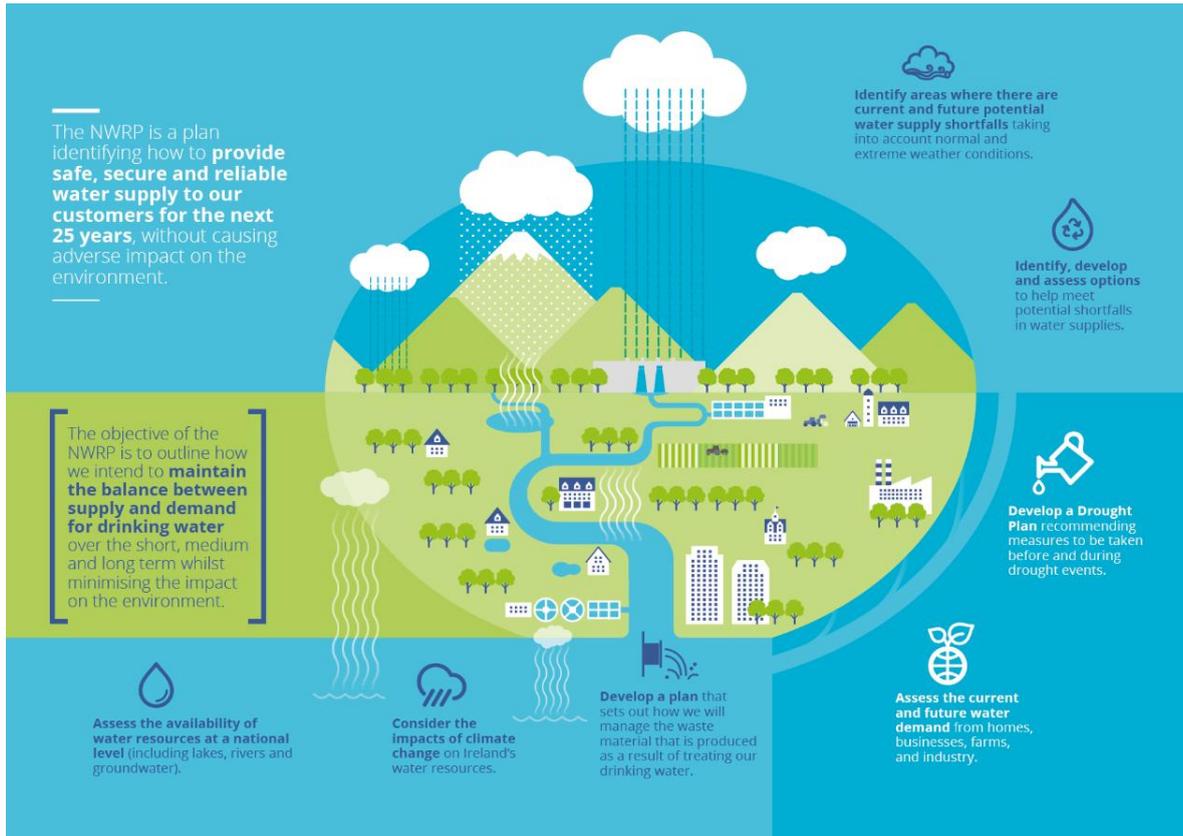
Next steps

Following the conclusion of this consultation, Irish Water will review and consider feedback received from stakeholders. In summer 2018, the draft NWRP will be published and an eight week statutory public consultation will be undertaken, before being reviewed and finalised later that year.

The final NWRP will be published in 2018. After this, Irish Water will undertake a review and update of the NWRP every five years at least. This review will assess the actions and objectives of the first NWRP and make recommendations for new or updated approaches.

The revised plan and associated environmental reports will again invite feedback during its development prior to adoption.

Appendix B. NWRP infographic



Appendix C. Press Release

Irish Water preparing for the future with development of National Water Resources Plan (NWRP)

Thursday November 9, 2017

Irish Water is preparing for the future with the development of the first National Water Resources Plan (NWRP). The plan will outline how we move towards a sustainable, secure and reliable drinking water supply for everyone over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water 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 us to prepare for the future and ensure that we can provide enough safe, clean drinking water to enable the social and economic growth of our country.

There are a number of elements that will be undertaken in the development of the NWRP. Irish Water will consider availability of water by assessing water resources at a national level (including lakes, rivers and groundwater) and assessing the current and future water demand from homes, businesses, farms, and industry. We will consider impacts on those water supplies by identifying areas where there are current and potential water supply shortfalls by taking into account normal and extreme weather conditions. This will include considering the impacts of climate change on Ireland's water resources and the development of a Drought Plan recommending measures to be taken before and during drought events. When we have identified the potential shortfalls we will also assess the options for meeting these shortfalls. Finally, the NWRP will develop a plan that sets out how we manage the waste material that is produced as a result of treating our drinking water.

In preparing the NWRP, Irish Water needs to undertake some key environmental reports including a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). A public consultation was launched today to inform the development of these reports.

We want to hear from anyone who has views on the SEA Scoping Report (available at www.water.ie/nwrp) and its content and any other comments or suggestions that should be considered at this stage.

Commenting on the NWRP, Mary McMahon, Acting Water Resource Strategy Specialist with Irish Water said, "We are currently developing the draft plan with a view to publishing the final 25-year National Water Resources Plan in 2018. A national plan will ensure the best use of water resources to ensure a constant supply of safe clean drinking water and how best to meet any challenges while continuing to support social and economic growth."

All submissions made on the SEA Scoping Report will be reviewed and relevant feedback incorporated into the environmental reports. Irish Water will refer to the environmental reports when preparing the Draft National Water Resources Plan. In summer of 2018, the draft NWRP will go on display for an eight-week statutory public consultation, before being reviewed and finalised later that year.

After this, Irish Water will undertake a review and update of the NWRP every five years at least to ensure that the latest available information is factored in. This review will assess the actions and objectives of the first NWRP and make recommendations for new or updated approaches. The revised plan and associated environmental reports will again invite feedback during its development prior to adoption.

The public consultation will be undertaken for six weeks from Thursday 9 November to Friday 22 December 2017 during which time the SEA Scoping Report can be viewed and downloaded at www.water.ie/nwrp and comments and feedback sent to Irish Water as follows:

Email: nwrp@water.ie

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

ENDS

Appendix D. Newspaper advert

Strategic Environmental Assessment Scoping Report for the National Water Resources Plan

Public consultation

Irish Water is developing the first National Water Resources Plan (NWRP) that will outline how we move towards a sustainable, secure and reliable drinking water supply for everyone over the next 25 years whilst safeguarding our environment.

A six week public consultation is now underway to inform the development of the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), the environmental reports that will accompany the NWRP.

Irish Water is now seeking any additional information that should be considered in the SEA Scoping Report which is available at www.water.ie/nwrp

Comments and feedback can be sent to Irish Water by Friday 22 December 2017:

Email: nwrp@water.ie

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

All submissions will be reviewed and relevant feedback incorporated into the environmental reports. Irish Water will refer to the environmental reports when preparing the draft National Water Resources Plan. There will be further consultation opportunity at this stage.

Safeguarding our water for our future



Appendix E. Email to interested parties

National Water Resources Plan Consultation 1

Dear XXX,

Irish Water is developing the first National Water Resources Plan (NWRP) that will outline how we move towards a sustainable, secure and reliable drinking water supply for everyone over the next 25 years whilst safeguarding our environment. The objective of the NWRP is to outline how we intend to maintain the balance between supply and demand for drinking water over the short, medium and long term.

A six-week public consultation is now underway to inform the development of the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), the environmental reports that will accompany the NWRP.

Irish Water is now seeking feedback on the SEA Scoping Report, and any other comments or suggestions that should be considered from stakeholders at this stage. The SEA Scoping Report can be viewed and downloaded at <https://www.water.ie/nwrp>.

Submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report may be made by **Friday 22 December 2017** as follows:

Email: nwrp@water.ie

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

The following consultation questions have been prepared in order to guide you in making a submission:

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

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

Submissions will not be individually responded to but will be summarised in a consultation report which will be published on www.water.ie/nwrp.

All submissions made on the SEA Scoping Report will be reviewed and relevant feedback incorporated into the environmental reports and the draft NWRP as appropriate. Submissions from individuals will be reported anonymously and feedback from organisations will be attributed to them.

In summer 2018, the draft NWRP will be published and an eight-week statutory public consultation will be undertaken, before being reviewed and finalised later that year.

After this, Irish Water will undertake a review and update of the NWRP every five years at least. This review will assess the actions and objectives of the first NWRP and make recommendations for new or updated approaches. The revised plan and associated environmental reports will again invite feedback during its development prior to adoption.

Yours sincerely,

Mary McMahon

Acting Water Resource Strategy Specialist

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