

Water Services Strategic Plan

Public Consultation Report – Phase 1
July – September 2014



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Introduction

Introduction

The Water Services Strategic Plan (WSSP) will set out the strategies we need to implement as a country in the short, medium and longer term to ensure the availability of safe drinking water, an environment that is protected from the impacts of wastewater discharges, and efficient modern systems that meet the needs of customers, contribute to economic growth and development, and provide value for money. The document will address six key themes of customer service, clean safe drinking water, effective treatment of wastewater, a sustainable environment, supporting economic growth and investing for the future.

Irish Water is required to publish a Water Services Strategic Plan (WSSP) under Section 33 of the Water Service (No. 2) Act of 2013 (WSA). The WSSP is required to state the objectives of Irish Water in relation to the provision of water and wastewater services for a 25 year period and the means by which Irish Water proposes to achieve these objectives. Following consultation, the final plan is subject to approval by the Minister for the Environment, Community and Local Government. The implementation of the plan will be reviewed after a maximum of 5 years as stipulated in the WSA.

In line with the SEA Directive (2001/42/EC) and Habitats Directive (92/43/EEC), the WSSP is subject to a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) to provide for a high level of protection of the environment and to promote sustainable development by integrating environmental considerations into the preparation and adoption of the WSSP whilst meeting the provisions of the Directives and transposing regulations.

This Document

This document forms the evaluation report of submissions received during the first round of public consultation (PC1). Initial consultation was held from April to May 2014 with statutory and non-statutory bodies for their views on the scope of the WSSP and the scope of the Strategic Environmental Assessment of the WSSP. A public consultation then ran from July to September 2014, which invited statutory bodies, interested parties and the general public to make submissions on a Water Services Strategic Plan Issues Paper and a draft Strategic Environmental Assessment (SEA) Scoping Report (See Figure 1).

Consultation Methodology

The methodology used for this first round of public consultation in the development of the scope of the WSSP and the SEA and the screening of the Appropriate Assessment is described in the paragraphs below. It is represented graphically in Figure 1.

Scope of the Water Services Strategic Plan

Section 33(1) of the Water Services No. 2 Act (2013) defines the statutory consultees for the development of the WSSP as the Commission for Energy Regulation, the Environmental Protection Agency, each local authority and each regional planning authority.

To develop the scope and form of the WSSP, meetings were held with the statutory consultees identified in the WSA (the CER, the EPA, the regional planning authorities and the City and County Managers Association representing local authorities) and with the Department of Environment, Community and Local Government (DECLG). In addition, letters were issued to each local authority and the statutory consultees requesting input to the scope of the WSSP in relation to the following eight (8) subject areas:

- Introduction (Setting the scene);
- Challenges and Strategic Priorities;
- Meeting Customer Expectations;
- Ensuring a Safe and Reliable Water Supply;
- Providing Effective Management of Wastewater;
- Protecting the Environment;
- Supporting Future Social and Economic Growth; and
- Investing in Our Future.

The latter six topic areas address the aspects of water services listed under Section 33 of the Water Services No. 2 Act (2013).

Scope of the Strategic Environmental Assessment

For the purpose of developing the scope of the SEA for the WSSP, consultation was initially held through a workshop with representatives from the Environmental Authorities specified under the SEA transposing Regulations and other interested parties. Issues in relation to the AA process for the WSSP were also discussed at this workshop. After this workshop, written submissions were received. Other interested parties including NGOs were also invited by letter to contribute to initial scoping of SEA. The workshop and written submissions contributed to the preparation of the Draft Scoping Report issued for public consultation in July 2014 and to the AA process.

Public Consultation

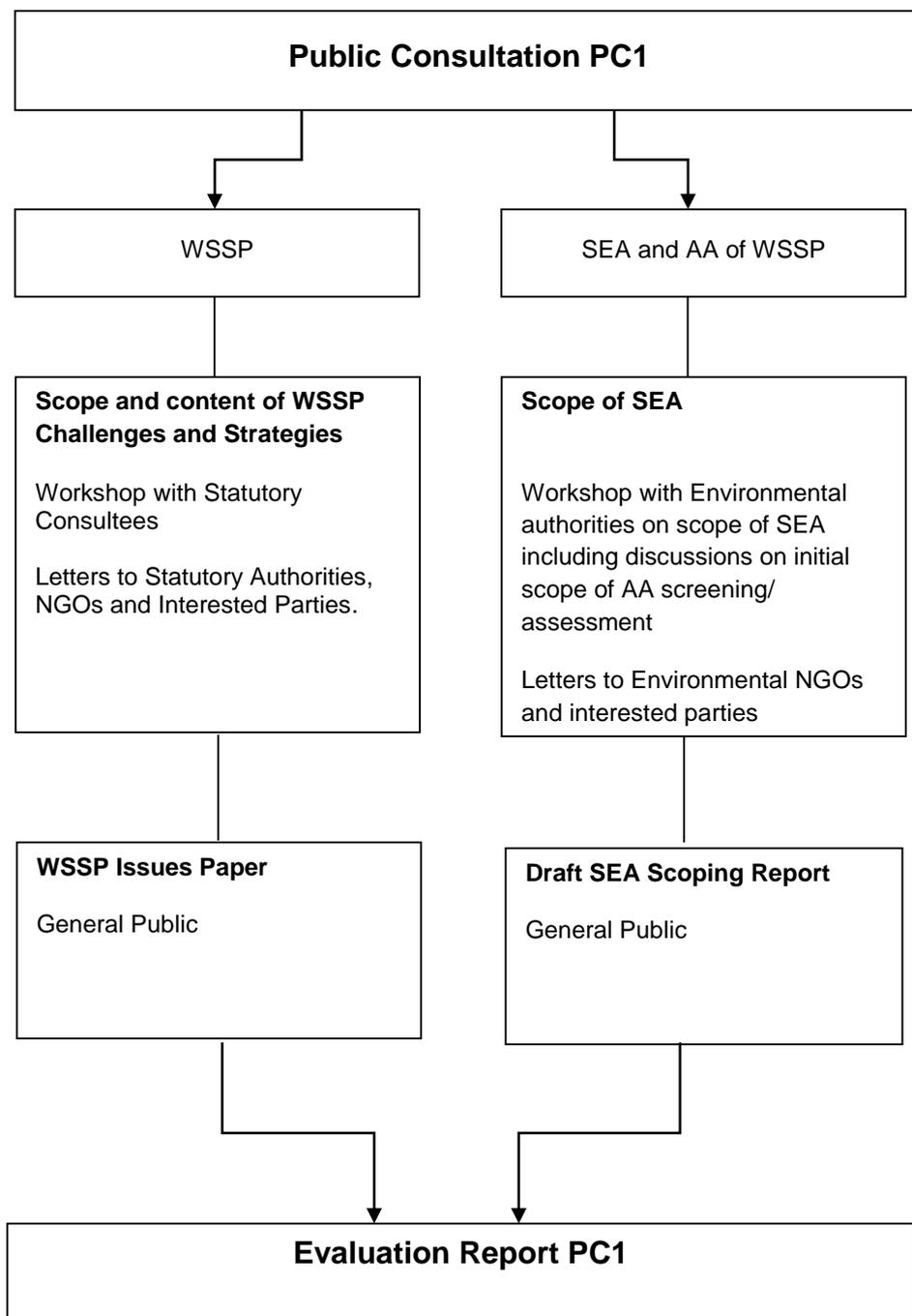
After an evaluation of feedback received from the aforementioned workshop, meetings and letters, a WSSP Issues Paper and draft SEA Scoping Report were prepared. These documents were published in July 2014 and members of the public were invited to provide feedback to Irish Water during a five week public consultation which ran from July to September 2014. See documents for Initial Public Consultation at <https://www.water.ie/projects-plans/our-plans/>.

The following methods were used to advertise this first Public Consultation (PC1):

- Advertisements in national and regional newspapers and a press release circulated to the media. A copy of the advertisement is presented in Appendix A.

- Distribution of the WSSP Issues Paper and draft SEA Scoping Report to county libraries and planning counters in local authority offices.
- Distribution of the WSSP Issues Paper, draft SEA Scoping Report and Appropriate Assessment Screening Report to all statutory consultees and all other interested parties who had taken part in the development of the scope.
- Website release of the WSSP Issues Paper and draft SEA Scoping Report and invitation for comment through the website and dedicated email address (wssp@water.ie).
- Update email to all stakeholders who had signed up for updates through the project website.

Figure 1. Consultation Methodology for Development of the Scope of the WSSP, SEA and the Appropriate Assessment screening.



Evaluation of Responses to the WSSP Issues Paper

List of Respondents

The parties who returned submissions directly relating to the preparation of the WSSP and the draft SEA Scoping Report are listed in Table 1 below.

Table 1 Parties who returned Submissions to the Issues Paper and Draft SEA Scoping Report

Name	Role and Submission	Response Area
Commission for Energy Regulation (CER)	Economic Regulator	WSSP
Environmental Protection Agency (EPA)	Environmental Regulator	WSSP and SEA
Department of Environment, Communities and Local Government	Government Department	WSSP and SEA
Department of Communications, Energy and Natural Resources	Government Department	WSSP and SEA
Department of Agriculture Fisheries and the Marine	Government Department	SEA
Department of Environment (Northern Ireland)	Northern Ireland Government Department (Trans-boundary Issues)	WSSP and SEA
Department of Arts Heritage and the Gaeltacht	Government Department	SEA
Department of Jobs, Enterprise and Innovation	Government Department	WSSP
Academic group	1 submission	WSSP and SEA
Business group	1 submission	WSSP and SEA
General Public	32 Submission	WSSP
Government office	1 Submission	WSSP and SEA
Individual County and City Councillors	4 Submissions	WSSP and SEA
Non Government Organisation	5 Submissions	WSSP and SEA
Member of Dail Eireann	1 Submission	WSSP
Local Authority	12 Submissions	WSSP
Regional Authority	1 Submission	WSSP
Private Sector	3 Submissions	SEA

Challenges and Strategies Matrix

Irish Water’s regulators (the Commission for Energy Regulation, CER, and the Environmental Protection Agency, EPA), regional planning authorities and local authorities were invited to identify their consideration of the challenges and strategies in relation to the key objectives of the WSSP. These responses are presented in full in Appendix F and summaries of the areas highlighted are presented in Table 2 below.

Further submissions received relating to the WSSP are presented in Appendices B & C of this report and have been recorded to help inform the development of the draft WSSP.

Table 2 Summary of Challenges and Strategies for the WSSP Identified by Local Authorities and Other Stakeholders

Key Challenges	Strategies
Introduction – Setting the Scene	
<p>A number of respondents stated that the WSSP should be customer facing (user friendly) with simple diagrams. It is important that messages within the WSSP are unambiguous.</p> <p>It was highlighted that Ireland has abundant water resources which, although under stress in some regions, can be used to facilitate a strong economic competitiveness.</p> <p>The relationship between Irish Water and the local authorities under the Service Level Agreements will be important for at least 12 years of the 25 year plan.</p> <p>The Health Services Executive was also highlighted as a key stakeholder in public health issues (e.g. boil water notices).</p>	<p>The plan should present key metrics, indicators and targets and detail how and when the organisation will achieve these targets.</p> <p>The plan should document both strategies for capital investment and operational excellence.</p> <p>The partnership between Irish Water and the local authorities under the Service Legal Agreements (SLAs) should be detailed including future roles, their management, staffing and resources.</p> <p>Information should be incorporated into the WSSP for customers and stakeholders on the full water cycle and the Irish Water interaction with it.</p> <p>The context of the WSSP timelines in relation to other key documents such as the Capital Investment Plan, the National Spatial Strategy and the River Basin Management Plans should be presented.</p>
Challenges and Strategic Priorities	
<p>Overall challenges of demographic change, climate change resilience; compliance with environmental standards and customer expectation balanced against funding availability and affordability were highlighted.</p> <p>It was noted that the demand for water services in Ireland does not correspond spatially with areas that have an over-capacity in water resources.</p> <p>The WSSP should ensure a balanced focus between the major cities and the regional areas.</p>	<p>The importance of water conservation in addressing the challenges was highlighted.</p> <p>The need for strategies on innovations in treatment technologies; sustainable use of resources (water, energy, chemicals, reuse of bio solids); and regulatory information systems (data integration and retrieval, paperless systems, reporting and interaction of regulatory issues were highlighted.)</p> <p>It was suggested that Irish Water should work closely with the regional and local planning authorities and input to all regional, county and local development plans.</p> <p>It was emphasised that the WSSP should be consistent with the National Spatial Strategy and that it should transcend traditional county and regional boundaries to provide a sustainable solution for the country.</p>
1. Meet Customer Expectations	
<p>A number of respondents highlighted that customer expectations will be high as a result of the water charges.</p> <p>Respondents noted the key challenge for Irish Water in this area was the requirement to meet the CER Codes of Practice.</p> <p>Good Customer engagement and communication in relation to the delivery of the services (particularly any interruptions) and accuracy of billing were noted.</p>	<p>Provide water services in accordance with the Codes of Practice, Customer Charter and Terms and Conditions as set out in the Irish Water Handbook.</p> <p>Adhere to defined Customer Service Standards and develop a customer and stakeholder communication strategy.</p> <p>Deliver on service improvements and provide assurance to customers through marketing campaigns of the provision of a quality service.</p>

Key Challenges	Strategies
	<p>Provide publicly available information to demonstrate cost efficiency of services benchmarked against international standards.</p> <p>Irish Water should deliver a balanced approach to Water Services rather than being demand driven.</p>
2. Ensure a Safe and Reliable Water Supply	
<p>The following were all listed as overarching challenges to ensuring a safe and reliable water supply: Compliance with Drinking Water Standards; resilience of supply; uncertainty in demand; protection of sources and water supply zones; leakage and demand management and impacts of climate change.</p> <p>Additional challenges related to plumbo-solvency and lead pipe removal; water stagnancy at dead ends were noted.</p> <p>The reallocation of water from areas of lower demand to the larger urban areas, particularly the provision of additional water supplies to Dublin.</p>	<p>The need to remove all current Boil Water Notices and deal with the outstanding requirements on the EPA Remedial Action list was highlighted. The importance of ongoing water conservation strategies and plans in many areas linked to pressure reduction and leakage detection.</p> <p>Additional strategies included ensuring adequate headroom capacity in water supply infrastructure; improvements to interconnectivity of schemes to ensure security of supply; the need to increase network rehabilitation rates.</p> <p>Drinking Water Safety Plans and Drinking Water Incident Response Plans to be developed and implemented for all water supply zones. Catchment management and the establishment of source protection zones are required for all supplies.</p> <p>The need for rationalisation and regionalisation of water supply services and the extension of regional water schemes linked with the 'taking in charge' of Group Water Schemes was noted by some respondents.</p>
3. Providing Effective Management of Wastewater	
<p>Challenges identified included extreme weather events and this impact on wastewater treatment particularly for combined sewerage systems.</p> <p>The assimilative capacity of receiving waters, particularly in Midlands regions of Ireland and impacts on designated Natura 2000 sites.</p> <p>Achieving wastewater authorisation compliance in the context of limited funding and the need for capacity upgrades to many Wastewater Treatment Plants (WWTPs) across Ireland.</p> <p>Surface water and Groundwater contamination from Wastewater Treatment Plants releases and leaking sewers.</p> <p>Operator competence in optimising the process operation.</p>	<p>Holistic solutions (not just asset replacement). Surface water run-off separation and retention to free-up capacity in existing WWTPs. Use of Sustainable Urban Drainage (SUDs).</p> <p>R&D and the use of (tried and tested) innovative techniques in wastewater treatment to improve compliance.</p> <p>Operator training and improvements to telemetry.</p> <p>Review and revision of National, Regional and Local Sludge Management Plans.</p> <p>Provision of stormwater retention to reduce surface water contamination from Combined Sewer Overflows. Sewer network rehabilitation.</p>
4. Protecting and Enhancing the Environment	
<p>Challenges included climate change mitigation and adaptation; meeting the requirements of the Urban Wastewater Directive and the Water Framework Directive.</p> <p>The impacts of water abstraction and effects on designated sites; the reduction in assimilative capacity of receiving waters for wastewater discharge and the cumulative impacts along a watercourse were noted.</p> <p>Risk of prosecution and compliance with abstraction standards and wastewater discharge licenses.</p>	<p>The need for a holistic and catchment based approach to the full water cycle. Irish Water taking an active role in the development of catchment management plans. The consideration of innovative technical solutions to wastewater treatment should be included.</p> <p>Improvements to energy efficiency of infrastructure with a focus on reduction in greenhouse gas emissions.</p> <p>Promotion of demand side water conservation, rainwater harvesting, sustainable urban drainage systems.</p> <p>Risk assessments of WWTPs to reduce the potential for pollution events.</p> <p>Requirements for improvements to energy consumption and sustainable technology through use of renewable technologies for power at treatment sites; anaerobic digestion and biogas extraction of sludge waste.</p>

Key Challenges	Strategies
5. Supporting Growth	
<p>Providing for national, regional and local growth targets. Uncertainty in population projections and changing demographics.</p> <p>Water service provision for balanced regional development. Mismatch between areas being promoted for development and areas which have water services infrastructural capacity.</p> <p>Provision of adequate headroom ('front loading of investment') within the infrastructure whilst ensuring that stranded assets are not developed (<i>i.e.</i> over provision of capacity which is not required in the short to medium term).</p> <p>The security of water services as critical to the future national and international economic investment by business was highlighted.</p> <p>Delivery of legacy Development Contributions Scheme infrastructure in water services by the local authority.</p>	<p>Support for the National Spatial Strategy and its update.</p> <p>Support for Forward Planning and the Core Strategies identified in the County Development Plans. Irish Water need to ensure that future county and local plans are cognisant of the environmental capacity limits on water consumption and wastewater discharges.</p> <p>Support island communities in line with national policies.</p> <p>The Irish Water policy in regard to Development Contributions Scheme infrastructure requires clarification.</p>
6. Investing in Our Future	
<p>The prioritisation of investment needs to be consistent with legal obligations and other documents such as the Capital Investment Plan.</p> <p>The availability and affordability of funds for investment was highlighted.</p> <p>Several local authorities highlighted the need to agree resourcing and staffing levels under the SLAs.</p> <p>Irish Water should determine their long-term approach to major infrastructure investments such as the Dublin Water Supply Scheme project.</p> <p>The need for continued investment into existing legacy capital build projects was noted.</p>	<p>Efficiency and value for money are key matters which should permeate all activities of Irish Water and be reflected in the plan.</p> <p>The plan should focus on achieving regulatory compliance and should set out milestones to achieve this at the earliest time. The plan should set out a strategic level timetable for meeting the requirements of all wastewater discharge authorisations and the drinking water regulations in all areas. Whilst there is a requirement to prioritise resources in the short to medium term the plan should set the roadmap to compliance in the long-term.</p> <p>System resilience to be enhanced to meet the long term needs. Asset management capability to be improved with systems and tools embracing innovative solutions.</p> <p>Develop a reliability centred asset management approach to include reactive, predictive and preventative maintenance.</p>

Submissions for the SEA Scoping Report

All submissions received for consideration in the next stages of the SEA (i.e. preparation of the SEA Environmental Report for the WSSP) are presented in Appendix D. Where appropriate, submission comments were also taken into consideration in the preparation of the Appropriate Assessment of the plan.

For completeness, the initial responses to the draft scoping of the SEA from statutory consultees and NGOs received in June are presented in Appendix E. These initial responses were evaluated by AoS Planning Consultants and the issues raised were included in the revised draft of the SEA Scoping Report published along with the WSSP Issues Paper during PC1.

Conclusions

The submissions received will be incorporated into the draft WSSP document and the supporting SEA and AA, where appropriate.

The draft WSSP, SEA Environmental Report and Natura Impact Statement will be published for a second round of public consultation (PC2) prior to being finalised for Ministerial approval.

Appendix A: Public Consultation Newspaper Advertisement



Irish Water Public Consultation: **Water Services Strategic Plan**

How would you like to see your water services evolve over the next 25 years?

Since 1st January 2014, Irish Water has taken over responsibility for the operation of public water services. Under Section 33 of the Water Services (No. 2) Act 2013, Irish Water is required to prepare a Water Services Strategic Plan (WSSP). The WSSP will outline the strategic direction for Irish Water over the next 25 years.

Everyone in Ireland has a stake in the future of our water services and Irish Water is seeking your views on how you would like your water services to evolve over the next 25 years.

A full Strategic Environmental Assessment (SEA) is being carried out to determine any environmental effects that may occur as a result of the WSSP.

Irish Water is inviting submissions on the draft SEA Scoping Report as well as the WSSP Issues Paper. This is part of a non-statutory public consultation which is running until Monday 1st September 2014.

The documents will be made available at:

- The Irish Water website www.water.ie
- Planning counters in your Local Authority office
- County libraries

Submissions can be made to Irish Water in the following ways:

- Email: WSSP@water.ie
- Post: Water Services Strategic Plan, PO Box 860, South City Delivery Office, Cork City
- Website: www.water.ie
- Telephone: LoCall 1890 278 278

Submissions received during this consultation will be considered in the preparation of the draft WSSP. There will be further opportunity to have your say during a second round of public consultation later in 2014.

Appendix B: WSSP Responses from Statutory Consultees, Other Government Departments and Non-Governmental Organisations

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
S1	Commission for Energy Regulation (Respondent S1)	<p>The Plan should be Customer Facing (User Friendly) with simple diagrams. The plan should include diagrams regarding how water is collected and treated by Irish Water and supplied to customers. It is important that messages within the plan are unambiguous.</p> <p>The Plan should present key metrics, indicators and targets and detail how and when the organisation will achieve the targets.</p> <p>The timelines in the context of other key documents such as the River Basin Management Plans, National Spatial Strategy and Regional Planning Guidelines are important.</p> <p>Matters set out in the CER Code of Practice for IW are requirements rather than expectations.</p> <p>Funding and affordability are important considerations which merit consideration. The need to prioritise investment is linked to Irish Water's balancing of its legal requirements in seeking to achieve the key objectives for the twenty five year period of the Plan. Text on prioritisation should be consistent with other documents such as the Capital Investment Plan. Efficiency</p>	<p>S1-1: Plan format.</p> <p>S1-2: Plan information.</p> <p>S1-3: Plan timelines.</p> <p>S1-4: Meeting Customer Expectations</p> <p>S1-5: Plan affordability.</p>	<p>S1: All comments made in the submission are noted and will be addressed throughout the Plan in the relevant sections.</p>	<p>S1: All sections as appropriate</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>and value for money should permeate all IW activities and be reflected in the Plan. Conservation, including demand side measures as appropriate, and innovation cut across many areas being addressed in the plan and should be considered therein.</p> <p>Extreme weather events are a challenge for water utilities. The resilience of the IW systems to cope with events should be considered in the Plan.</p> <p>Messages in the Plan should be unambiguous and not subject to different interpretations (notably the phrase 'Enhancing the Environment').</p>	<p>S1-6: Climate change and extreme weather events.</p> <p>S1-7: Plan messages</p>		
S2	Environmental Protection Agency (Respondent S2)	<p>From the EPA's perspective the Plan should clearly show that Irish Water is committed to achieving quality outcomes for waste water and a safe and secure drinking water supply. It would also need to include details on how and when the organisation will achieve these goals.</p> <p>The alignment of regulatory demands is listed as a heading (under the management of waste water chapter) and it makes reference to balancing priorities and investment. In the scale of a 25 year plan, the Plan should be focus on achieving regulatory compliance and setting out the milestones to achieve this at the earliest time. The Plan must include, for instance, a strategic level timetable for meeting the requirements of waste water discharge licences and for investment in drinking water to achieve a safe and secure supply. While there is a requirement to prioritise resources within the short to medium term, it is necessary to set out the full roadmap to compliance within the context of this long-term</p>	<p>S2: Overarching</p> <p>S2-1: Timelines over the 25 year plan with milestones for achievement of regulatory compliance with respect of wastewater authorisations.</p> <p>S2-2: Investment in Safe and secure Drinking water Supply.</p>	<p>S2: Submission is noted and the comments will be addressed in the following areas:</p> <p>S2-1: Timelines and milestones for regulatory compliance will be included in the Objective 3 "Providing effective management of wastewater".</p> <p>S2-2: Timelines and milestones for investment in Drinking Water will be included in the Objective 2 "Ensuring a safe and reliable water supply".</p> <p>S2-3: References to the potential impacts from Climate</p>	<p>S2-1: Objective 3 "Providing effective management of wastewater".</p> <p>S2-2: Objective 2 "Ensuring a safe and reliable water supply".</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>plan. The influence and impact of climate change over this period also needs to be included. Specific reference is needed to the particular actions that Irish Water plans to take to mitigate future risk from climate change.</p> <p>A holistic, resource efficient water cycle approach should be considered to provide for all aspects of water management throughout the water cycle. Drinking water safety plans form part of this holistic approach but this system thinking can be expanded to the full water cycle. For example, under the chapter 'Protecting and Enhancing the Environment' there is a paragraph heading for operation and maintenance that references the treatment works. To protect the environment it is the treatment works plus the collection systems and the receiving waters that need to be taken into consideration. Similarly, the Plan must set out the company strategy for improving sludge management practices and initiatives for both water treatment and waste water treatment sludge. A holistic water cycle approach would capture all these related aspects.</p> <p>Research, development and future technologies should form a key element of this long-term plan. Technological advances will inform key investment decisions to provide sustainable and efficient water supply and waste water management services. This may include increasing the efficiency and effectiveness of existing infrastructure through innovative technologies. Contributing to developing research in this area by working with research bodies should be noted in the plan.</p> <p>The provision of information to stakeholders on all aspects of the water cycle will be necessary to support the work of Irish</p>	<p>S2-3: Influence of Climate Change</p> <p>S2-4: Holistic Water cycle management approach.</p> <p>S2-5: Sludge Management</p> <p>S2-6: Innovation</p> <p>S2-7: Provision of information to stakeholders.</p>	<p>Change and the need for provision of suitable mitigation and adaptation strategies will be incorporated into the Plan.</p> <p>S2-4: The submission is noted and will be included in relevant sections and particularly in Objective 4 "Protect and enhance the environment."</p> <p>S2-5: Reference to development of sludge management practices and a National Sludge Management Plan will be included in the section on Providing Effective Management of Wastewater.</p> <p>S2-6: References to R&D and Innovation will be included in the relevant sections where appropriate.</p> <p>S2-7: The plan will set out a high level strategy for information and education to water stakeholders and customers.</p>	<p>S2-3: Relevant sections as appropriate.</p> <p>S2-4: Objective 4 "Protect and enhance the environment".</p> <p>S2-5: Objective 3 "Providing effective management of wastewater".</p> <p>S2-6: Relevant sections where appropriate.</p> <p>S2-7: Objective 1 "Meeting our customer expectations".</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>Water. Irish Water’s high-level strategy on the future use of information and communications technology to inform and educate water stakeholders should be set out in the plan.</p> <p>Meeting customer expectations is focused very much on the drinking water. Many customers will be paying for both provision of drinking water and the treatment of waste water. The Plan should provide a clear understanding to customers as to the service they will receive for the complete water cycle and the regulatory responsibilities Irish Water has to achieve for both water supply and waste water collection for treatment.</p> <p>Some other general areas that should be considered for the plan include;</p> <ul style="list-style-type: none"> • A strategy for innovation in treatment technologies. • A strategy for the sustainable use of resources (energy, water conservation, reduction in chemical use and maximising beneficial reuse of biosolids). • A strategic plan for regulatory information systems (efficient data retrieval and collation, paperless systems, data integration and reporting, framework for interaction of regulatory issues). <p>While Irish Water’s commitment to an integrated catchment approach; the prevention of pollution from urban waste water discharges; flood risk management; and drinking water source protection are acknowledged, it is necessary for the plan to provide a strategic level plan on how these will be achieved.</p>	<p>S2-8: Services to customers for water and wastewater services (the whole water cycle).</p> <p>S2-9: Innovation in Wastewater and water treatment technology; Sustainable use of resources; Regulatory systems and data.</p> <p>S2-10. Commitment to provision of strategic (Tier 2) plans on integrated catchment approach; the prevention of pollution from urban waste water discharges; flood risk management; and drinking water source protection</p>	<p>S2-8: The plan will provide a clear understanding to customers as to the service they will receive for the complete water cycle and the regulatory responsibilities Irish Water has to achieve for both water supply and waste water collection for treatment.</p> <p>S2-9: The plan will propose the development of a strategy for innovation in treatment technologies which will be prepared as part of a Tier 2 plan.</p> <p>S2-10. The plan will state commitment to provision of strategic (Tier 2) plans on integrated catchment approach; the prevention of pollution from urban waste water discharges; flood risk management; and drinking water source protection</p>	<p>S2-8: Objective 1 “Meeting our customer expectations</p> <p>S2-9: Objective 6 “Investing in our Future”.</p> <p>S2-10. Relevant sections where appropriate.</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
S3	Department of the Environment, Community and Local Government (Respondent S3)	Water Service Strategic Plans and their implementation will constitute a key measure under the WFD programme of measures. Ireland will be required to report on performance indicators to the EU Commission to demonstrate progress in implementing programmes of measures. These performance indicators (e.g. gaps to achieving environmental objectives and costs of individual measures) are currently under development at EU level through the WFD Common Implementation Strategy (CIS). It will be critical that preparations are made at the earliest opportunity to capture these indicators to facilitate electronic reporting to the EU Commission. In any event best practice will require such performance indicators to be captured for management purposes.	S3-1: Monitoring and Reporting	S3-1: Performance indicators will be presented in the plan in relevant sections. Regulatory requirements for monitoring and reporting will be referred to and developed within the Tier 2 and Tier 3 plans and projects.	S3-1: Relevant sections where appropriate.
S4	DCENR (IFI) (Respondent S4)	<p>We believe that priority should be given to IW structures as follows:</p> <ul style="list-style-type: none"> - Easy fix issues such as pumping stations, leaky structures, etc. A proper alarm system should be installed in such structures to record any illegal discharges to waters. Some of these structures have serial discharges that may be easily remedied. - Wastewater Treatment plants that are overloaded should receive priority funding where they are having a deleterious effect on receiving waters. - Wastewater Treatment plants that are about to become overloaded should be prioritised for upgrading as soon as possible, especially in urban areas that may undergo an expansion in building in the near future as the economy recovers. 	<p>S4-1: Ensuring safe and reliable water supply.</p> <p>S4-2: Providing effective management of Wastewater.</p>	<p>S4-1: The plan will propose policies and measures to deliver improvements to Water Supply infrastructure.</p> <p>S4-2: The plan will propose policies and measures to deliver improvements to Wastewater infrastructure.</p>	<p>S4-2: Objective 2 “Ensuring safe and reliable water supply”.</p> <p>S4-2: Objective 3 “Providing effective management of Wastewater”.</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>IW should revisit all abstraction rights granted under the Planning Acts, Fisheries Acts and Water Supplies Act with the view to reassessing the sustainability of same,</p> <p>IW should take cognisance of potential practices such as <i>ad hoc</i> water abstraction (e.g. to water crops) and practices such as cattle access to waters, land spreading of waste that may be having a detrimental effect on waters upstream of your water treatment plants. IW should also make an active contribution to national and EU draft policies that may become Government Policy e.g. REPS, GLAS, Nitrates Regulations.</p> <p>IW should take cognisance of any Guidelines produced by IFI or any other relevant body in the planning any IW infrastructural works.</p>	<p>S4-3: Abstraction</p> <p>S4-4: Environmental Regulation</p>	<p>S4-3: Irish Water will work with the EPA in determining the abstraction regime for water supply zones required to deliver a safe and reliable water supply.</p> <p>S4-4: Irish Water will contribute as a stakeholder to consultations on national and EU draft policies that may become Government Policy e.g. REPS, GLAS, Nitrates Regulations.</p>	<p>S4-3: Objective 4. “Protect and enhance the environment”.</p> <p>S4-4: Objective 4. “Protect and enhance the environment”.</p>
S5	Department of the Environment Northern Ireland (Respondent S5)	<p>NIEA would suggest that to ensure that there are no adverse environmental impacts on Northern Ireland that adequate mitigation and monitoring measures are highlighted in the Environmental Report and built into the Water Services Strategic Plan.</p> <p>We would anticipate that the transboundary nature of any likely significant adverse effects on the environment of the Republic of Ireland that would remain after measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects are incorporated into the Plan would be of particular relevance to consider in relation to Northern Ireland.</p>	S5-1: Mitigation measures and monitoring	S5-1: Performance indicators will be presented in the plan in relevant sections. Regulatory requirements for monitoring and reporting will be referred to and developed within the Tier 2 and Tier 3 plans and projects.	S5-1: Relevant sections where appropriate.

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S6	<p>Department of Jobs, Enterprise and Innovation, Enterprise Ireland and IDA Ireland (Respondent S6)</p>	<p>We welcome the opportunity to input to Irish Water’s initial consultation on the water services strategic plan, which will set the strategic direction for Irish Water out to 2040.</p> <p>The provision of competitively priced world class water services (water and waste water), at appropriate quality levels, is vital to support economic growth, to maintain and grow our the broader enterprise base, to support regional development, to continue to attract high levels of foreign direct investment and retain and create jobs, particularly in key growth sectors such as food and drink, life sciences, ICT, construction materials and other manufacturing sectors.</p> <p>We strongly support the reform of water services provision. While there are significant challenges, Ireland has the potential to make water services a competitive advantage in the longer term.</p> <p>We support the six objectives identified by Irish Water in its issues paper. The focus of this submission is on the implications for enterprise.</p> <p>Meeting customer expectations: Irish Water needs to set ambitious goals and the water services strategic plan needs to put Ireland on the right trajectory to achieve these goals. It is important that there is close engagement with business customers, that the particular needs of business customers are addressed in terms of price and quality (e.g. drinking water standard, pressure, unplanned disruption to service, resilience, security of supply, customer service, timely new connections, etc.), and that performance is monitored and publicly reported.</p>	<p>S6. Overview</p> <p>S6-1: Engagement with non-domestic customers, particularly in service performance including public reporting.</p>	<p>S6. Submission is noted.</p> <p>S6-1: Engagement with business and reporting on Irish Water performance in service standards will be included within the Meeting Customer Expectations section of the plan.</p> <p>S6-2: Non-domestic customers and relevant representative</p>	<p>S6: Introduction and Challenges and Strategic Priorities.</p> <p>S6-1: Objective 1 “Meeting our customer expectations”.</p> <p>S6-2: Objective 1 “Meeting our</p>

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		<p>We note from the CER's recent consultation on the water charges plan that Irish Water plans to consult with non-domestic customers – although their stakeholder engagement plan was not published for consultation as planned. Economic regulators in other jurisdictions are increasingly requiring water companies to engage in greater consultation with stakeholders, including, non- domestic customers when developing their business plans including capital expenditure programmes. Generally in Australia, Scotland and now England and Wales companies hold customer fora and to explain and receive input on the business and capital expenditures plans prior to formal submission to the authorities.</p> <p>Ensuring a safe and reliable water supply: Ensuring sufficient water services capacity in Dublin and key regional centres to meet future demand is central to national and regional economic development. In meeting demand, it is critical that sufficient spare capacity is available to facilitate mobile business (foreign and Irish based) investment. Providing the required water services capacity and quality levels in enterprise agency strategic sites and business parks and to strategic development zones should be prioritised.</p> <p>Providing effective removal of waste water: Supplying enough waste water capacity to meet demand (particularly in key locations and key business sites) is a key priority.</p> <p>Protecting the environment: We agree that protecting the environment must be done at least cost. We welcome the focus on energy efficiency and climate change adaptation.</p>	<p>S6-2: Consultation with business prior to business planning cycles.</p> <p>S6-3: Providing required water services capacity and quality levels in Dublin and Regional Centres. Enterprise agency strategic sites and business parks and to strategic development zones should be prioritised.</p> <p>S6-4: Supplying enough wastewater capacity to meet demand.</p> <p>S6-5: Protection of the environment at least cost. Focus on energy efficiency</p>	<p>groups will have the opportunity to input through consultation on all relevant Irish Water business plans.</p> <p>S6-3: Delivery of sufficient headroom capacity in water services will form a target within the plan.</p> <p>S6-4: Delivery of sufficient Headroom capacity in water services will form a target within the plan.</p> <p>S6-5: Irish Water must comply with EU Directives and National legislation for protection of the environment. The whole cost of</p>	<p>customer expectations".</p> <p>S6-3: Objective 5 "Support Social and Economic Growth".</p> <p>S6-4: Objective 3 "Provide effective waste water management".</p> <p>S6-5: Objective 4. "Protect and enhance the environment".</p>

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		<p>Supporting future social and economic growth: It is vital that water services in Ireland are competitively priced and provided at appropriate quality levels to allow Irish businesses to trade successfully in global markets. To that end, Irish Water needs to drive for efficiencies in all capital and operating cost factors that are within its control. As noted above, to support economic growth, it is critical that sufficient spare capacity is available to facilitate mobile business (foreign and Irish based) investment in key locations. We would welcome the opportunity to engage with Irish Water on future water needs and pricing.</p> <p>Investing in our future: Adopting a national approach to water services investment offers significant opportunities which must be captured. We welcome the focus on innovation and R&D. The adoption of new processes, procedures and technologies within Irish Water may offer sub-supply opportunities for Irish firms and the potential to attract FDI. Potential exists to engage with IDA and Enterprise Ireland on this agenda.</p>	<p>and climate change adaptation.</p> <p>S6-6: Competitive pricing of water services. Efficiencies in capital and operating costs. Sufficient spare capacity (headroom) in infrastructure assets.</p> <p>S6-7: Opportunities from a national approach. Focus on R&D and Innovation and ability of attracting businesses in this area.</p>	<p>measures under the RBMP process must be considered.</p> <p>S6-6: Irish Water will seek, using its national business model, to drive efficiency in capital and operating costs. This will be benchmarked against international best practice and proposals will be included within the plan.</p> <p>S6-7: The plan will include detail on the potential offered by a national business model and opportunities for businesses in Innovation.</p>	<p>S6-6: Objective 5. “Support social and economic growth”.</p> <p>S6-7: Objective 6. “Invest in our future”.</p>
S7	Respondent 7 – Submission 1	<p>In light of the importance of a clean and healthy water environment and the ongoing non-compliance issues and risks set out above, the 25-year Water Services Strategic Plan is an extremely significant document of national importance. Respondent welcomes the consultation on this via the SEA process. However, it is also vital that there is full public participation in the wider decision-making around the Plan beyond the SEA process, including investment prioritisation to address <i>inter alia</i> current inadequacies in urban waste water</p>	S7-1: Public Participation	S7-1: A full public consultation process on the plan, SEA ER and AA will be held following publication of the draft WSSP (PC2).	S7-1: N/A

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		<p>treatment. Whilst we acknowledge that there is no requirement in the Water Services (No. 2) Act for such participation, we believe that this omission runs counter to the requirements of the Aarhus Convention which requires that <i>'Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public.'</i></p> <p>Closely related to this are the welcome references to stakeholder involvement and engagement in the themes for proposed sections of the WSSP, as set out in the table in Appendix I. According to the table, the Introductory Section of the WSSP will include the theme of <i>'planning around you'</i> with <i>'Stakeholders centre-stage regarding priorities....'</i>. However it is unclear how such a central role for stakeholders in deciding priorities is to be facilitated, without a dedicated programme of public participation <i>'during the preparation of the plan'</i>, as required by the Aarhus Convention. The Irish Water Stakeholder Forum so far has been very much a high-level information exchange forum and due to its format and infrequent meetings, it doesn't effectively facilitate this central role for stakeholders.</p> <p>In this context, Respondent would strongly urge Irish Water to initiate a full programme of public participation on the wider WSSP, to compliment the more top-down, limited consultation on the SEA. We would also advocate an amendment to the primary legislation to enshrine this in law.</p>			

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S8	Respondent 7 – Submission 2	<p><u>Introduction</u></p> <p>It is to be welcomed that the environment is recognised in the Irish Water’s vision but the core objective is a ‘<i>world class water infrastructure that ensures...</i>’ etc. We believe that the scope of Irish Water’s vision should be wider than this to encompass the wider water resource, which is ultimately necessary if you are to provide ‘sustainable water services’. We propose revising the vision to reflect this. We would also propose that you add a reference to ‘wastewater’ as well as water. In relation to the draft key objectives, we welcome the inclusion of protecting the environment but seek reassurance that the enumeration does not reflect prioritisation since environmental protection is 4 out of 6 which we would contest.</p> <p>On a more immediate note, we would also be very grateful if Irish Water could issue the timeline for the remaining consultation on the WSSP SEA, so that we may plan our work programme and resources around it. This is especially the case if it is likely to take place during the holiday months as we are dependent on one staff member responding to it.</p> <p><u>Objective 1: Meeting Customer Expectations</u></p> <p>Respondent encourages Irish Water to make ‘persuading customers to embrace water conservation’ a priority, through engagement and behaviour change activities. We would further propose that under ‘further good practises’ you specify behaviour around what is disposed down drains and the toilet. In terms of water quality and efficient working of UWW Treatment plants this should also be a priority. (A particular focus in conjunction with Respondent member An Taisce could</p>	<p>S8-1: The scope of Irish Water’s vision should be wider to encompass the wider water resource. We would also propose that you add a reference to ‘wastewater’ as well as water.</p> <p>S8-2: We seek reassurance that the enumeration does not reflect prioritisation since environmental protection is 4 out of 6 which we would contest.</p> <p>S8-3: Issue the timeline for the remaining consultation on the WSSP SEA, so that we may plan our work programme and resources around it.</p> <p>S8-4: We propose that under ‘further good practises’ you specify behaviour around what is disposed down drains and the toilet. In terms of water quality and efficient working of UWWTPs this should also be</p>	<p>S8-1: Submission point noted.</p> <p>S8-2: The enumeration of the Objectives does not reflect prioritisation.</p> <p>S8-3: Public Consultation 2 will commence at the end of 2014. Date is to be confirmed.</p> <p>S8-4: Submission point is noted. We will take the opportunity to provide information on good practices in relation to what may be flushed down toilets and the detrimental impact that some items may have on our sewers,</p>	<p>S8-1: Introduction</p> <p>S8-2: N/A</p> <p>S8-3: N/A</p> <p>S8-4: Objective 1 “Meeting our customer expectations”.</p>

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		<p>also be microbeads in cosmetics which cause significant ecological damage particularly in the marine environment).</p> <p><u>Objective 2: Ensuring a safe and reliable water supply</u> Respondent welcomes IW's proposed WHO Water Safety Plan approach to addressing this challenge. An integral part of the WSP model is source protection. Whilst acute contamination problems obviously have to be addressed in water treatment plans, the issue can be significantly addressed in the medium to long term by taking a source protection approach, in conjunction with landowners and other stakeholders in the catchment.</p> <p><u>Objective 3: Providing effective waste water management</u> <i>Maximising capacity of existing sewers</i> Respondent would support IW's assessment that combined sewers and their overflows are significant challenge which need to be addressed. Whilst the consultation document says such intermittent discharges are 'unsatisfactory' there is an argument for using stronger language since they can result in significant temporary deterioration of water quality and can impact aquatic ecology, and lead to non-compliance with the Bathing Water Directive and possibly the WFD, if it causes a deterioration in the status of the receiving waters.</p> <p><i>Pre-treatment of sewage</i> Respondent has a concern that if IW refuses to accept untreated sewage in certain cases, this poses a risk that rather than complying with a requirement to pre-treat, there would be a temptation to make alternative arrangements, including possibly illegally discharging the sewage to the environment, to avoid the costs of pre-treatment.</p>	<p>a priority (microbeads in cosmetics).</p> <p>S8-5: Preparation of Water Safety Plans and Source Protection Zones.</p> <p>S8-6: Overflows from Combined Sewer Outfalls.</p> <p>S8-7: Possible option for Customers (Industry) to pre-treat sewage at source</p>	<p>overflows and treatment plants. We will implement a programme of providing relevant information to customers.</p> <p>S8-5: Submission point is noted. The Safety Plans will document the actions to be taken under normal operating and under incident conditions. To achieve this and also to comply with the requirements of the WFD we will work closely with other stakeholders.</p> <p>S8-6: Submission point is noted. Irish Water will consider the language within the plan to reflect the impacts that significant deterioration in water quality can have on the water environment and the objectives of the EU Bathing Water and Water Framework Directives.</p> <p>S8-7: Submission point is noted. Pre-treatment could only be implemented within a strict control regime and licensing through relevant authorities. This will be contained within</p>	<p>S8-5: Objective 2 "Ensuring a safe and reliable water supply."</p> <p>S8-6: Objective 3 "Provide effective waste water management".</p> <p>S8-7: Objective 3 "Providing effective waste water management".</p>

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		<p><i>Balancing costs and benefits of investment in waste water</i> Respondent welcomes IW's commitment to take account of environmental (as well as economic and social) costs when conducting this cost benefit analysis.</p> <p><i>Challenge of current and future standards</i> On the one hand the development of discharge standards that are linked to assimilative capacity are to be welcomed. This could work but only if it were part of a well-modelled integrated catchment management approach. Otherwise there is a risk that it could be used to increase loading to the environment, beyond current parameters, based on incomplete understanding of the aquatic ecology of, and cumulative impacts on, the receiving water body.</p> <p><i>Maximising the value of sludge</i> Land spreading of sludge needs to be tightly controlled and the development of an appropriate management strategy and national plan is to be welcomed. There is a particular threat of endocrine disruptors still present in sludge getting into water courses.</p> <p><i>Impact of increasing environmental constraints</i> When IW speaks about the challenge of minimising impacts of discharges at minimum cost to the customer, consideration of cost must look beyond monetary costs only. If discharges in a particular area are impacting the amenity and tourism value of a given water body, for example, customers may be willing to pay more to protect that value. To make this argument however, there needs to be more economic research done in Ireland on the monetary and non-monetary value of the</p>	<p>S8-8: Take account of environmental (as well as economic and social) costs when conducting cost benefit analysis.</p> <p>S8-9: Discharge standards that are linked to assimilative capacity need to be part of a modelled integrated catchment management approach. There is a risk that it could increase loading to the environment based on incomplete understanding of the aquatic ecology and cumulative impacts.</p> <p>S8-10: Land spreading of sludge and the development of an appropriate management strategy.</p> <p>S8-11: Getting Irish Water to fund research into assessing</p>	<p>Objective 3 of the WSSP "Providing effective waste water management"</p> <p>S8-8: Submission point is noted.</p> <p>S8-9: Submission point is noted. A whole catchment modelling approach which assesses the needs of the aquatic ecology in detail will be taken when determining the assimilative capacity of the receiving waters.</p> <p>S8-10: Submission point is noted. A national strategy to sludge management is a key early objective of Irish Water and the development of a holistic approach which maximises energy recovery.</p> <p>S8-11: Significant international research is available in</p>	<p>S8-8: Objective 3 "Providing effective waste water management".</p> <p>S8-9: Objective 3 "Providing effective waste water management".</p> <p>S8-10: Objective 3 "Providing effective waste water management".</p>

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		<p>aquatic environment. Respondent proposes that IW consider funding such research.</p> <p><u>Objective 4: Protecting the environment</u> Respondent strongly proposing a re-wording of the objectives for protecting the environment to address a significant weakness as follows:</p> <p>Delete 'working towards' so that the first objective reads 'environmental compliance'. In the previous section the objective read 'Protection of human health' and there is no reason why the objective for the environment should be any less definite.</p> <p>Delete 'playing our part' in relation to protection of national water resources and replace it with 'Ensure that all Irish Water activities does not compromise the protection of our national water resources'</p> <p>Where it is stated that IW will engage with all other water users who have a stake in the wellbeing of our environment, it is worth clarifying that that is everyone.</p> <p><i>Water Framework Directive</i> Respondent warmly welcomes IW's commitment to the principles and objectives of the WFD. We would point out that the directive requires measures to incentivise sustainable use of water. Since metering is one of the best ways of doing this, the sooner all households are metered the sooner IW will be contributing to compliance with Article 9 of the Directive.</p> <p>The WFD also requires that abstraction of water is subject prior authorisation and does not compromise the quantitative</p>	<p>the monetary value of the environment with regard to determining minimum cost for protection, particularly with regard to discharges.</p> <p>S8-12: Rewording of key objectives.</p> <p>Delete 'working towards' so that the first objective reads 'environmental compliance'. Delete 'playing our part' in relation to protection of national water resources and replace it with 'Ensure that all Irish Water activities does not compromise the protection of our national water resources'</p> <p>Where it is stated that Irish Water will engage with all other water users who have a stake in the wellbeing of our environment, it is worth clarifying that that is everyone.</p>	<p>determining the economic value of the water environment, most recently resulting from the assessment of disproportionate cost of measures under the WFD. Irish Water will work with the EPA to ensure this research is considered in cost benefit analysis of discharges.</p> <p>S8-12: Irish Water will consider suitable rewording of the objectives in the plan which will also contain substantial supporting wording to ensure unambiguity.</p>	<p>S8-11: Objective 3 "Providing effective waste water management".</p> <p>S8-12: Objective 4: "Protect and enhance the environment".</p>

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		<p>status of a surface or groundwater body. It is important that in the absence of much needed legislation in this area, IW works with the EPA to ensure that such impacts are avoided.</p>	<p>S8-13: The WFD also requires that abstraction of water is subject prior authorisation and does not compromise the quantitative status of a surface or groundwater body. It is important that in the absence of much needed legislation in this area, Irish Water works with the EPA to ensure that such impacts are avoided.</p>	<p>S8-13: The plan will include commitments for Irish Water to work with the EPA in ensuring that the quantitative status of surface and groundwater bodies is not compromised.</p>	<p>S8-13: Objective 4: “Protect and enhance the environment”.</p>
S9	Respondent 8	<p>Respondent 8 welcomes the opportunity to make representations in relation to the preparation of a Water Services Strategic Plan, which will identify objectives, challenges and high level strategies for the provision of water services over the next 25 years. The Mid-West Office would like to make the following comments:</p> <p>Spatial Planning & the Provision of Water Services Spatial planning and the provision of water services are inherently interlinked and an opportunity exists to ensure that the complementary progression of both areas can be mutually beneficial and contribute to the achievement of balanced and sustainable development at a national, regional and local level. Current national spatial policy aims to achieve balanced regional development and ensure that each region in Ireland reaches its full potential. As part of this process a hierarchical settlement structure has been identified and has formed the basis of the objectives relating to population growth, employment and service related development at all levels of policy formation in recent years. In order to ensure balanced</p>	<p>S9-1: In order to ensure balanced regional development it is essential that the provision of water services is prioritised in settlements that have been identified for growth in the National Spatial Strategy 2002 to 2020, and subsequently in the relevant Regional Planning Guidelines, City & County Development Plans and Local Area Plans</p>	<p>S9-1: Submission point is noted. The WSSP will be prepared in accordance with national and regional planning guidelines and the National Spatial Strategy.</p>	<p>S9-1: Objective 5. “Supporting social and economic growth”.</p>

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		<p>regional development it is essential that the provision of water services is prioritised in settlements that have been identified for growth in the National Spatial Strategy 2002 to 2020, and subsequently in the relevant Regional Planning Guidelines, City & County Development Plans and Local Area Plans. Inadequate water and wastewater treatment facilities in these settlements will inhibit residential, service and employment-related development, thus undermining the potential to secure the satisfactory implementation of national spatial planning policy.</p> <p>Security of Water Supply In recent years there has been extensive debate in relation to ensuring security of water supply in large urban centres, with the Dublin water supply being a particular concern. The reallocation of resources from areas of lower demand to supply large urban centres is an issue that requires careful consideration. In particular the potential impacts on communities in the areas from which water will be abstracted and the assessment and mitigation of potential environmental impacts must be properly addressed. If such a reallocation is to take place, a commitment must be made to a transparent system of community gain, to ensure that affected communities can accrue some benefit from the loss of resources in their region.</p> <p>An additional issue of which must be considered in relation to the reallocation of water resources to the Dublin region is the impact of such a precedent on balanced regional development. In the interest of sustainability it is preferable for population growth and economic development to take place in areas where ample resources exist to service such growth. It is important to ensure that the Strategic Plan for the provision of</p>	<p>S9-2: The reallocation of resources from areas of lower demand to supply large urban centres is an issue that requires careful consideration. In particular the potential impacts on communities in the areas from which water will be abstracted and the assessment and mitigation of potential environmental impacts must be properly addressed. If such a reallocation is to take place, a commitment must be made to a transparent system of community gain.</p> <p>S9-3: It is important to ensure that the Strategic Plan for the provision of water services in Ireland does not contribute to</p>	<p>S9-2: Submission point is noted. Irish Water will work with regional and local planning authorities. A National Water Resource Plan will be prepared and consulted on. All project proposals will go through the formal consultation and planning process.</p> <p>S9-3: Submission point is noted.</p>	<p>S9-2: Objective 5. “Supporting social and economic growth”.</p> <p>S9-3: Objective 5. “Supporting social</p>

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		<p>water services in Ireland does not contribute to an over-concentration of development in a single urban centre, to the detriment of other regions around the country.</p> <p>Facilitating Economic Development</p> <p>In order to ensure competitive advantage both nationally and regionally, it is vital that the Water Services Strategic Plan commits to ensuring that sufficient capacity exists in water and wastewater treatment facilities to accommodate enterprise development and economic growth. Systems with the capacity to accommodate large-scale business development must be provided, at a minimum, in the identified Gateways and Hubs throughout the Country. The lack of such facilities will compromise Ireland’s economic recovery and future growth and will restrict the achievement of balanced regional development.</p> <p>In the Service Towns and smaller settlements there is also a need to ensure that there are sufficient water and wastewater services available to accommodate future growth. Currently, there are deficiencies in water and wastewater treatment facilities in many towns and villages throughout the Mid-West which proves to be an obstacle to balanced development in the Region and the creation of employment. A similar situation exists in other Regions around the Country and the provision of water services in these areas is fundamental to their sustainable future growth.</p> <p>It is also important to ensure that the Water Service Strategic Plan acknowledges the important role that Irish Water assets can play in other aspects of economic development. In particular assets such as water towers and the large pipe network can be utilised to facilitate the delivery of broadband</p>	<p>an over-concentration of development in a single urban centre, to the detriment of other regions around the country.</p> <p>S9-4: It is vital that the Water Services Strategic Plan commits to ensuring that sufficient capacity exists in water and wastewater treatment facilities to accommodate enterprise development and economic growth. Systems with the capacity to accommodate large-scale business development must be provided, at a minimum, in the identified Gateways and Hubs throughout the Country</p> <p>S9-5: Currently, there are deficiencies in water and wastewater treatment facilities in many towns and villages throughout the Mid-West which proves to be an obstacle to balanced development in the Region and the creation of employment.</p>	<p>S9-4: Submission point is noted.</p> <p>S9-5: Submission point is noted.</p>	<p>and economic growth”.</p> <p>S9-4: Objective 5. “Supporting social and economic growth”.</p> <p>S9-5: Objective 5. “Supporting social and economic growth”.</p>

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		<p>and other communications technologies to assist with the progression of economic and social development.</p> <p>Compliance with EU Directives As set out above, major enterprise development and population growth will require the provision of water and wastewater facilities. The majority of centres identified for such growth in the National Spatial Strategy 2002-2020 have, or will require, wastewater treatment systems that discharge to river systems. Many of these systems contain Natura 2000 sites that are vulnerable to inadequately treated wastewater discharges. In the Mid-West Region significant development will be directed to the identified Gateway (Limerick/Shannon) and Hub (Ennis) and the resultant treated wastewater will discharge to the Fergus and Shannon Estuaries, both of which are designated Natura 2000 sites. Therefore, the quality of treatment of the wastewater must be such as not to impact on the habitat status of the relevant Natura 2000 sites and, indeed, from the point of view of the Water Framework Directive, must contribute to the improvement of water quality in these areas. These issues are commonly reflected in other identified growth areas nationally and it is essentially that these issues are recognised and addressed in the Water Services Strategic Plan to ensure that settlement growth can be accommodated whilst at the same time ensuring compliance with EU Directives.</p> <p>Monitoring of Cumulative Impacts In many instances small settlements throughout the Country are served by wastewater treatment facilities that are operating at or beyond capacity. While upgrading the existing systems may not be considered appropriate based on the current</p>	<p>S9-6: It is also important to ensure that the Water Service Strategic Plan acknowledges the important role that Irish Water assets can play in other aspects of economic development. In particular assets such as water towers and the large pipe network can be utilised to facilitate the delivery of broadband and other communications technologies.</p> <p>S9-7: The majority of centres identified for such growth in the National Spatial Strategy 2002-2020 have, or will require, wastewater treatment systems that discharge to river systems. Many of these systems contain Natura 2000 sites that are vulnerable to inadequately treated wastewater discharges. Therefore, the quality of treatment of the wastewater must be such as not to impact on the habitat status of the relevant Natura 2000 sites and, indeed, from the point of</p>	<p>S9-6: Submission point is noted.</p> <p>S9-7: Submission point is noted. An SEA and AA will be prepared for all Tier 2 Implementation Plans. Environmental Assessments and Appropriate Assessments will be prepared for all projects as required.</p>	<p>S9-6: Objective 5. “Supporting social and economic growth”.</p> <p>S9-7: Objective 4: “Protect and enhance the environment”.</p>

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		<p>population of the settlements and the envisaged extent of future growth, cumulatively the discharges from smaller settlements may be impacting negatively on water quality and the status of EU designated habitats and species and this issue will have to be addressed.</p> <p>Improved Energy Efficiency Opportunity exists for Irish Water to make a significant contribution to the reduction of greenhouse gas emissions nationally and it is recommended that this is reflected in the objectives set out in the Water Services Strategic Plan. Investments in wastewater treatment infrastructure should focus on energy efficiency and sustainable technology such as anaerobic digestion and biogas extraction thereby reducing greenhouse gas emissions and contributing to the achievement of national climate change and emission-reduction targets.</p> <p>Education and Awareness The Water Services Strategic Plan should also recognise the importance of collaboration, not just with Local Authorities and Regional Assemblies, but also with other organisations such as community groups and educational institutions. This collaboration is vital to achieve water conservation and reduced water consumption and to generally raise awareness of the importance of water as a national resource. The above outlined issues are integral to securing balanced regional development and the achievement of proper planning and sustainable development at national, regional and local level. I trust that the issue raised will be taken into consideration in the preparation of Irish Water's 'Water Services Strategy Plan'.</p>	<p>view of the Water Framework Directive, must contribute to the improvement of water quality in these areas.</p> <p>S9-8: Cumulatively the discharges from smaller settlements may be impacting negatively on water quality and the status of EU designated habitats and species and this issue will have to be addressed.</p> <p>S9-9: Investments in wastewater treatment infrastructure should focus on energy efficiency and sustainable technology such as anaerobic digestion and biogas extraction to enable the reduction of greenhouse gas emissions nationally.</p> <p>S9-10: The Water Services Strategic Plan should recognise the importance of collaboration, not just with Local Authorities and Regional Assemblies, but also with other organisations such as</p>	<p>S9-8: Submission point is noted. Irish Water will work towards compliance of all wastewater discharge authorisations.</p> <p>S9-9: Submission point is noted. Irish Water will develop an Energy Efficiency strategy and seek to reduce energy consumption by 5% year on year.</p> <p>S9-10: Submission point is noted. Irish Water will engage with consumer groups and the public to ensure education in</p>	<p>S9-8: Objective 4: "Protect and enhance the environment".</p> <p>S9-9: Objective 4. "Protect and enhance the environment".</p> <p>S9-10: Objective 4. "Protect and enhance the environment".</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
			community groups and educational institutions.	protection of the water environment.	
S10	Respondent 9	<p>Respondent transmitted a submission to Irish Water earlier this year on the Capital Investment Plan. This submission emphasised the need for investment to align with spatial planning policy at national, regional and sub-regional level, rather than being solely commercially driven. This is reiterated in the context of the investment plan which will form the basis of future capital plan iterations.</p> <p>Structures and Engagement How will Irish Water interact with the new Regional Assemblies in the context of the preparation of the new Regional Spatial and Economic Strategies – there is no reference to these in the documentation submitted. In this regard, what structures does Irish Water envisage between the new Regional Assemblies and specifically their Regional Planning role?</p> <p>It is suggested that formal structures are established to develop a strong interface with water service provision and regional planning priorities. Any such structure should incorporate the recently formed WFD Implementation element of the EPA in order to fully integrate water quality issues.</p> <p>Arrangements for points of contact between Irish Water and regional/ local authority planners in the preparation of land use plans, Strategic Environmental Assessments and Appropriate Assessment are required to gather data as well as a steer on future development opportunities and well as priorities within regions and local authority areas - What provisions are to be made over and above statutory consultation provisions, particularly in relation to the enhanced relationship between developers/landowners and local authorities (active land management) envisaged in the construction 2020 strategy?</p> <p>How does Irish Water interact with privately run water supply schemes /Group Water Schemes?</p>	<p>S10-1: How will Irish Water interact with the new Regional Assemblies in the context of the preparation of the new Regional Spatial and Economic Strategies – there is no reference to these in the documentation submitted. In this regard, what structures does Irish Water envisage between the new Regional Assemblies and specifically their Regional Planning role?</p> <p>S10-2: What provisions are to be made over and above statutory consultation provisions, particularly in relation to the enhanced relationship between developers/ landowners and local authorities (active land management) envisaged in the construction 2020 strategy?</p>	<p>S10-1: IW will work with the regional assemblies as a statutory consultee in the preparation of new regional spatial and economic strategies.</p> <p>S10-2: Irish Water will work with the local authorities in relation to the Construction 2020 strategy.</p>	<p>S10-1: Objective 5. “Support social and economic growth”.</p> <p>S10-2: Objective 5. “Support social and economic growth”.</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>How does Irish Water interact with the EPA?</p> <p>Environment and Climate Change SEA and AA of the Water Strategic Services Plan and Implementation Plans must consider ecological impacts – e.g. those on water-dependent European or otherwise protected sites must be assessed; as well as numerous other likely significant impacts. Should this process (and consultation on same) not be carried out in tandem with investment plan preparation?</p> <p>Climate-change modelling is critical for strategic planning – how is this being achieved, e.g. Impact of low water levels or extreme high flow events in part of the country on drinking water supplies and environmental impacts (e.g. water abstraction from high water quality status sites; and impact on achievement of WFD objectives – identified in CIP).</p> <p>The climate change modelling calibration process being undertaken in the CFRAM process – although different emphasis, outcomes and lessons could be observed, modified and applied to whole-cycle water planning.</p> <p>Catchment planning Will Irish Water be taking an active role in catchment management? In the UK, water companies have evolved over the years and now take a leading role in catchment management e.g. upstream thinking https://www.southwestwater.co.uk/index.cfm?articleid=11682 Removing pollutants at water treatment works involves using costly chemicals and so the aim of the Upstream Thinking projects is to help improve land management so that water quality and quantity is improved at source, long before it reaches water treatment works. This has a direct effect on Irish Water and their commitment towards playing a strong role in catchment management would greatly assist in implementing the Water Framework Directive.</p> <p>Modelling and Projection</p>	<p>S10-3: How does Irish Water interact with privately run water supply schemes /Group Water Schemes?</p> <p>S10-4: How does Irish Water interact with the EPA?</p> <p>S10-5: SEA and AA of the Water Strategic Services Plan and Implementation Plans must consider ecological impacts – e.g. those on water-dependent European or otherwise protected sites must be assessed; as well as numerous other likely significant impacts. Should this process (and consultation on same) not be carried out in tandem with investment plan preparation?</p> <p>S10-6: Climate-change modelling is critical for strategic planning – how is this being achieved, e.g. Impact of low water levels or extreme high flow events in part of the</p>	<p>S10-3: Irish Water has no legislative responsibility for GWSSs. However, Irish Water is a water supplier to some GWSSs and IW will work with the local authorities as appropriate.</p> <p>S10-4: The EPA is the environmental and water quality regulator of Irish Water.</p> <p>S10-5: SEA and AA of the plan are being prepared are and will be completed for all Tier 2 plans as required, as required.</p> <p>S10-6: Climate change modelling will be completed where appropriate for Tier 2 strategic planning purposes.</p>	<p>S10-3: Objective 2. “Ensuring a safe and reliable water supply”.</p> <p>S10-4: Objective 4. “Protect and enhance the environment”.</p> <p>S10-5: Objective 4. “Protect and enhance the environment”.</p> <p>S10-6: Objective 4. “Protect and enhance the environment”.</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>How do we plan for those areas where there are likely to be long-term deficiencies in water and wastewater infrastructure (due to lack of commercial viability/ priority) - There are numerous smaller settlements which require wastewater treatment infrastructure or upgraded infrastructure in order to meet the requirements of the WFD and ensure public health and safety is achieved – how are these to be addressed in the medium to long term?</p> <p>What metrics are being used to forecast and model service demand across the 25 year timeframe – is the demand model similar to other utilities such as Gas and electricity? If so, what specific provisions are made for remedial/legacy issues (would the RI baseline be useful in this regard)? Have commercial and industrial considerations been factored in, demand flexibility/peaks/troughs?</p> <p>Specific Issues</p> <ul style="list-style-type: none"> • What is the long-term approach for the ‘Dublin Water Supply Scheme’ project which has major implications for other regions, Midlands, Mid-West and West in particular. The Regional Authorities have taken part in consultation with An Bord Pleanála in this regard. • Relationship to RSES. • Relationship to NREAP and energy efficiency/renewables considerations. <p>Construction 2020</p> <ul style="list-style-type: none"> • Relationship to recently released construction strategy – National Planning Framework (NSS 2?) coordinated actions in terms of promotional actions for vacant derelict or incomplete sites (timeline for draft connections policy/replacement of Dev. contributions), “kick-start” initiative for prime lands in Dublin area/density issues (actions 12-25). • Local Authority to address infrastructure capacity issues (action 26) • IDA/FDI requirements, advance factories (actions 27/28) – metrics? • Relationship to other sectoral plans(actions 42/43) 	<p>country on drinking water supplies and environmental impacts (e.g. water abstraction from high water quality status sites; and impact on achievement of WFD objectives – identified in CIP).</p> <p>S10-7: Will Irish Water be taking an active role in catchment management?</p> <p>S10-8: How do we plan for those areas where there are likely to be long-term deficiencies in water and wastewater infrastructure (due to lack of commercial viability/ priority)?</p> <p>S10-9: What metrics are being used to forecast and model service demand across the 25 year timeframe – is the demand model similar to other utilities such as Gas and</p>	<p>S10-7: Irish Water will take an active role in catchment management particularly where relevant to the protection of tits water supply sources. Irish Water will prepared Drinking Water Safety Plans for its water supply zones which will include catchment management measures.</p> <p>S10-8: The WSSP will include milestones for the achievement of drinking water and wastewater compliance for all its water services.</p> <p>S10-9: Population growth forecasts, as available and updated in conjunction with usage data from metering will be used to determine future demand. The 25 year timeframe</p>	<p>S10-7: Objective 2. “Ensure a safe and reliable water supply”.</p> <p>S10-8: Objective 5. “Support social and economic growth”.</p> <p>S10-9: Objective 5. “Support social and economic growth</p>

Sub No.	Stakeholder	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
			<p>electricity? If so, what specific provisions are made for remedial/legacy issues (would the RI baseline be useful in this regard)?</p> <p>S10-10: Have commercial and industrial considerations been factored in, demand flexibility/peaks/troughs?</p> <p>S10-11: What is the long-term approach for the 'Dublin Water Supply Scheme' project?</p> <p>S10-12: Relationship to RSES.</p> <p>S10-13: Relationship to NREAP and energy efficiency/renewables.</p>	<p>predictions will be updated on at least a 5-yearly basis.</p> <p>S10-10: Commercial and industrial considerations are included in all demand predictions. Updated Core Strategies in the County Development Plans and Local Planning will be used in the demand forecasts.</p> <p>S10-11: The design phase of the Dublin Water Supply scheme project is currently underway. Any future proposals will be submitted through the formal planning process.</p> <p>S10-12: Irish Water will work with the regional assemblies as a consultee to any updates to the Regional Spatial and Economic Strategies</p> <p>S10-13: Irish Water will seek to improve energy efficiency in its infrastructure and has committed to a 5% year on year reduction in its energy consumption.</p>	<p>S10-10: Objective 5. "Support social and economic growth".</p> <p>S10-11: N/A</p> <p>S10-12: N/A</p> <p>S10-13: Objective 4. "Protect and enhance the Environment".</p>

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			<p>S10-14: Relationship to recently released construction strategy – National Planning Framework (NSS 2?).</p>	<p>S10-14: Irish Water will input as a consultee to the National Planning Framework.</p>	<p>S10-14: Objective 5. “Supporting social and economic growth”.</p>

Appendix C: WSSP Responses from the Public and Other Interested Parties

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
NS1	Respondent 10	<p><i>How Uisce Éireann can meet customer expectations</i></p> <p>In line with The Commission for Energy Regulation's consultation paper on Domestic Water Tariff Principles and Proposals dated 17 April 2014 Uisce Éireann should ensure,</p> <ul style="list-style-type: none"> • that the customers of Uisce Éireann are provided with the quality of service provided for in an approved code of practice; • that water services are provided by Uisce Éireann in an economical and efficient manner; • that Uisce Éireann operates in a commercially viable manner; • the conservation of water resources; • the continuity, safety, security, and sustainability of water services; • that Uisce Éireann can meet all reasonable demands for water both current and foreseeable; • the recovery of costs of water services in accordance with Article 9 of the EU Water Framework Directive; • that Uisce Éireann performs its functions in a manner that will enable the achievement by the State of the environmental objectives of that Directive; • that Uisce Éireann performs its functions in an open and transparent manner. <p><i>A safe and reliable water supply (INFRASTRUCTURE)</i></p> <p>The irony of charging for water - people are willing to accept poor-quality free services, but 'customers' are likely and are right to demand upgrades to services which may cost more than the charges. It is understood that much of Dublin's</p>	<p>NS1-1: How Uisce Éireann can meet customer expectations.</p>	<p>NS1-1: Submission is noted. All comments will be addressed as appropriate in the WSSP.</p>	<p>NS1-1: All comments will be addressed as appropriate in the relevant Objectives of the WSSP.</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>infrastructure dates back at least a century, hence the 29% losses through leaks and the issue of lead pipes; these issues must surely be addressed as a priority.</p> <p><i>Infrastructure and a new water source for the capital</i> At Dublin City Council's Corporate Strategy Meeting held on 4th April 2013, the current situation in relation to water supply was discussed. It was decided that a brief report should be forwarded to the members of the City Council concerning the overall strategic position on water for the Dublin region. This report outlined a number of key investments, which are urgently required. The City only has a 1% safety margin of spare capacity – unlike the 10-15% in most Regions. This has led to significant periods of water shortages in recent years.</p> <p>The Strategy for the Region involves parallel investment in water storage and treatment, leakage reduction, network rehabilitation and new source development and demand management. Since 1996 this Regional Strategy is being implemented to address decades of underinvestment. The water supply situation in the Dublin Region is very complex and is not amenable to quick fix or single approach solutions.</p> <p>Dublin is blessed with good raw water resources sourced from the main Rivers Liffey and Vartry but these are not inexhaustible. Current abstractions from the Liffey and Vartry rivers, which supply over 95% of Dublin's raw water, are close to their sustainable limits and cannot meet future needs. Indeed, climate change projections suggest that future rainfall in the region could reduce significantly with consequences for existing reservoirs.</p>	<p>NS1-2: It is understood that much of Dublin's infrastructure dates back at least a century, hence the 29% losses through leaks and the issue of lead pipes; these issues must be addressed as a priority.</p> <p>NS1-3: Infrastructure and a new water source for the capital.</p>	<p>NS1-2: Submission point is noted. It is an aim of Irish Water to ensure water availability and water supply resilience now and into the future. Leakage is an immediate priority for Irish Water. The issue of lead pipes will be dealt with in dealt with Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS1-3: Submission point is noted. The plan will ensure that all key strategic plans including the Water Supply Project for Dublin Region, Greater Dublin Drainage Project and Great Dublin Water Conservation Strategy and others are considered in its preparation.</p>	<p>NS1-2: Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS1.3: In the preparation of the plan key strategic plans and projects will be considered.</p>

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		<p>As regards leakage levels the Dublin Region Water Conservation project 1996-2002 reduced leakage from 42.5% to 28% and confirmed that reductions below this would require replacement of significant portions of our ancient Victorian network. Britain has a very similar water distribution network to ours and it has taken high levels of sustained investment for over 25 years to approach leakage levels of 20% there. In addition, Ireland generally (incl. the Dublin Region) has significant leakage on the customer side of the property boundary, which will take many years to bring under control to best practice standards. Investment in replacing these mains has commenced through the Dublin Region Water main Rehabilitation Project. Over 160 km of mains have already been replaced and additional projects will take place over the coming years as part of the Government funded Water Services Investment Programme. The plans and teams are in place and the Local Authorities have the ability to accelerate this replacement programme depending on funding.</p> <p>In planning for the long-term (2020-2050) future water supply needs of the Dublin & Mid East Regions, there is a scheme, at the planning stage, for use of Shannon Water, via an intermediate raw water cutaway bog storage at a new midlands Water based Eco park. This is only one element in an overall approach which envisages significant additional investments (€400m) to reduce leakage to best practice levels of 20% (a massive challenge) by 2020, combined with the implementation of full domestic metering and charging to reduce personal consumption and domestic household leakage. Only by combining all of these measures can we hope to have a sustainable water supply in the future. An</p>			

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		<p>Environmental Impact Assessment is currently being prepared which will look again at all options including the recommended option for this new source to top up the existing sources.</p> <p>Population of the Greater Dublin Area (GDA) in 1960 was 0.9 million. In 2010 it was in excess of 1.5 million and is forecast (by CSO) to exceed 2 million within the next 20-30 years. The underlying 1% to 2% annual increase in population, which has been ongoing for over 50 years, forms the basis of future demand estimates, not the Celtic Tiger rates. Population projections are based on the GDA Regional Planning Guidelines for 2010 -2022 and on National Spatial Strategy / CSO projections for the post 2022 period. Long term water supply planning is based on these population projections combined with resumption in economic growth, which can be greatly enhanced by ensuring secure sustainable provision of treated water supplies for industry and foreign direct investment wishing to locate in the Dublin, Mid East or Midlands Regions to create jobs.</p> <p>In planning for the future, it is vital that we continue investment in replacing old assets and recognise the value of a continuous water supply. For Dublin as an International City Region and the Midlands to have good capacity of quality water available would make Ireland one of the most attractive locations anywhere in the world for important industries and support job creation. It is a project that benefits not just Dublin but the national economy and is a project of national importance.</p> <p><i>Lead pipes in Dublin</i></p> <p>There is growing evidence that the scale of problems with lead in drinking water has been under-estimated in Europe and more particularly in Dublin (based on anecdotal evidence-</p>	<p>NS1.4: Lead pipes in Dublin: There is growing evidence that the scale of problems with lead in drinking water has been under-estimated in Europe and more particularly in Dublin, due to inadequate monitoring.</p> <p>NS1.5: Leakages</p>	<p>NS1.4: Submission point is noted. See Response 1-2 above.</p> <p>NS1.5: Submission point is noted. See Response 1-2 above.</p>	<p>NS1.4: Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS1.5: Objective 2 “Ensuring a safe and reliable water supply”.</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>including many constituency queries), due to inadequate monitoring. This is evident in the older districts of towns and cities, where lead pipes can be common. The range of dangers includes developmental defects in infants and reduced IQ. It is 'illegal' to have Lead Pipes in use for Drinking Water, European Communities (Drinking Water) (No. 2) Regulations 2007 –S.I No. 278 of 2007) limit the lead concentration to 25µg/l which equates to 25 parts per billion and this limit will be reduced to 10µg/l in 2013, which most of our Councils here have enforced already. It is standard practice for these Councils to replace Lead Piping with PVC Piping, as per the E.U. Directive. Many householders in Dublin with lead pipes on their premises need an undertaking from Uisce Eireann that lead pipes will be replaced with no expense to them.</p> <p>Lead pipes can and should be replaced while the meters are going in but for some reason this did not happen. Uisce Éireann needs to look at implementing a replacement policy when installing meters in the future.</p> <p><i>Leakages</i></p> <p>There is lack of clarity and concern among the public in relation to paying for water that is leaking out of the pipes. Uisce Éireann have an obligation to fix all leaks and ensure householders are not charged for water they do not consume. Regarding the leaks, it is envisaged that Uisce Éireann as a priority would be able to use pressure information from the new meters to trace leaks to specific locations - a big issue has been not knowing where that 29% is leaking out - localizing those leaks and repairing them should be a top priority - and if the meters can't give that type of information then this must be rectified so that future meters can give accurate pressure</p>	<p>NS1.6: Access to Information: Uisce Éireann should be mandated by the Government to publish annually water-wastage and loss statistics. Uisce Éireann should also publish and circulate a detailed schedule of waivers if any for the long termed ill, the unemployed and the elderly. This information could be circulated successfully through the Dept of Social Protection.</p> <p>NS1.7: Water re-use: Uisce Eireann needs to examine the possibility of water re-use so as to cut costs and to address</p>	<p>NS1.6: Submission points are noted. These do not fall under the remit of this Tier 1 plan.</p> <p>NS1.7: Submission point is noted. It is an overall aim of Irish Water to ensure that Irish Water</p>	<p>NS1.6: N/A</p> <p>NS1.7: Objective 4 "Protect and</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>readings to identify where the leaks are present. Further, in the last few years' pipes have frozen every winter, leading to water shortages. If there are changes to infrastructure or best practice guidelines that Uisce Eireann can implement this should be done to prevent the shortages.</p> <p>'First Fix Free' Dublin City Council has been unable to provide Councillors with any details of the "First Fix Free" repair scheme promised to homeowners by Minister Hogan. There are significant leaks on the householders' side of the network with one pilot project of 220 houses finding 3 houses had leaks equivalent to 90, 60 and 30 houses respectively, i.e. 3 houses were consuming as much as the other 220 houses due to customer side leaks. Uisce Eireann must publish the details of this first fix scheme prior to the charging period commencing.</p> <p>ACCESS TO INFORMATION Uisce Éireann should be mandated by the Government to publish annually water-wastage and loss statistics. If more than half of processed and cleaned water is leaking into the soil around the city that is both environmentally and economically bad and should not be hidden. Uisce Éireann should also publish and circulate a detailed schedule of waivers if any for the long termed ill, the unemployed and the elderly. This information could be circulated successfully through the Dept of Social Protection. It is the lack of information that fuels the fear in most people if people are given the full information of costs in a plain manner without all the industry jargon they can at least try and budget for the costs.</p>	<p>the problem of water scarcity, particularly in the capital with over a handful of water outages in the Dublin City last year alone.</p>	<p>services are delivered in a sustainable manner. It is a strategy of Irish Water to develop and implement a Sustainability Policy and Framework. The issue of re-use of water will be dealt with during the development of this Sustainability Policy and Framework.</p>	<p>enhance the environment".</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>Water re-use in Europe – what do you think?</p> <p>Uisce Eireann needs to examine the possibility of water re-use so as the cut costs and to address the problem of water scarcity, particularly in the capital with over a handful of water outages in the Dublin City last year alone.</p> <p>Water re-use is not widespread in Europe. Most wastewater from urban treatment plants is simply flushed out into rivers and lakes. But increasing re-use would help us respond to the increasing problems of water scarcity and drought, while reducing the risk of contamination from wastewater and lowering treatment costs. Re-use of water also has a lower environmental impact than getting it from other sources such as inter-regional water transfers or desalination.</p>			
NS2	Respondent 11	<p>We welcome the opportunity to make a submission to Irish Water and having an input on how Ireland’s public water services should evolve over the next 25 years. However at the outset we note the following reference being made by Irish Water:</p> <p>“Every person in Ireland will now be investing in Ireland’s water services and as such the opportunity to have a say in how the service will develop and serve the people of Ireland in the short, medium and long-term, is of significant importance.”</p> <p>We would contend that every person has been investing in Ireland’s water supply through general taxation. The view that the Irish people are only now starting to invest is not correct. Further we have concerns that the Water Services Strategic Plan has no reference to international best practice.</p> <p>There is no evidence of what level of research has been carried out in terms of providing an efficient, well costed and environmentally safe water supply.</p>	<p>NS2-1: We have concerns that the Water Services Strategic Plan has no reference to international best practice.</p> <p>NS2-2: There is no evidence of what level of research has been carried out in terms of providing an efficient, well costed and environmentally safe water supply.</p>	<p>NS2-1: Submission is noted. The WSSP will refer to international best practice, as appropriate.</p> <p>NS2-2: Submission is noted. The Plan will detail the high level strategies and measures proposed to secure the supply of high quality drinking water. The Tier 2, Implementation Plans and Tier 3 projects will provide detailed information how IW will provide an efficient, well costed and environmentally safe water supply.</p>	<p>NS2-1: All Objectives of the Plan, as relevant.</p> <p>NS2-2: Objective 4 “Protect and enhance the environment”.</p>

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		<p>We are also concerned that as of yet we do not know what Irish Water's future plans are for the Swords area and Fingal more generally.</p> <p>We need to have sight of Irish Waters plans for future investment in our area.</p> <p>Household Allowance: The issue of the annual Household allowance is the biggest issues and has caused anxiety for households. There is a need to strike a balance between water conservation and a fair free allowance. We estimate that a person living alone will use at least 150 litres of water per day and for a couple another 85 litres should be added to this total. Therefore the daily consumption will be at least 235 litres of water per day per two person household. We are of the view that an allowance of 150 litres per day for a one person household (annual allowance 54,750 litres) should be given and a second person should have an allowance of 85 litres (annual allowance 31,000 litres). Our calculation is based upon an efficient use of water. The benefit of this is that Households will use water more efficiently therefore the costs of producing water will come down substantially.</p> <p>Apartment Households:</p> <ul style="list-style-type: none"> • What is the status of the 48,000 apartments which were identified as being capable of being metered albeit as part of a separate procurement process? • Is there a plan in place for metering of Multi Unit Developments? While the installation of water metres for house owners was straightforward we appreciate that for apartment complexes access needs to be provided to Irish 	<p>NS2-3: As of yet, we do not know what Irish Water's future plans are for the Swords area and Fingal more generally.</p> <p>NS2-4: We need to have sight of Irish Water's plans for future investment in our area.</p> <p>NS2-5: The issue of the annual Household allowance</p>	<p>NS2-3: Submission point is noted. Geographical context and individual projects will not be identified in this high level strategic plan. It will be subsequent Implementation Plans which will detail how the strategies and measures contained within the WSSP will be carried out at a regional and county level.</p> <p>NS2-4: Submission point is noted. The implementation of the strategies identified in the WSSP will be detailed in a number of Implementation Plans (Tier II) which will be prepared by Irish Water following the approval of the WSSP by the Minister of the Environment Community and Local Government. During the Implementation Plans plan making process, statutory consultation on the draft WSSP and associated environmental assessments will take place in line with relevant planning guidelines and regulations.</p>	<p>NS2-3: N/A</p> <p>NS2-4: N/A</p>

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		<p>Water contractors. However in that regard it must be noted that owner management companies give access to contractors on a regular basis for maintenance and upgrading works. For example, painting and decorating of common areas, installation of individual addressable sounders as part of upgrading an emergency warning system, testing of emergency warning systems, booster tank maintenance. Permission and indemnity is granted on a regular basis. Permission from the Directors for access to a complex is not a difficult process.</p> <ul style="list-style-type: none"> • Do Irish Water perceive any obstacles to metering of multi-unit developments if so what are they? <p>Outline of Irish Water Objectives and Our Response: Customer expectations</p> <ul style="list-style-type: none"> • While the Irish Water documents state that effective and efficient customer operation is a key focus and that robust contract management systems will be incorporated there is a lack of detail and strikes us as being purely aspirational. We would have concerns that no concrete proposals seem to be available at this stage. • The objectives on payments are again aspirational with no detail. While reference to an effective tariff structure is stated again there is no explicit reference to how this will be rolled out. • In relation to wider consumer issues. Will the consumer act apply where a customer has a grievance? • We understand that a €10 customer charter charge will apply however we feel that this should be raised to €25 to encourage people to raise issues of concern. In our view the current 	<p>is the biggest issues and has caused anxiety for households.</p> <p>NS2-6: There is a need to strike a balance between water conservation and a fair free allowance. We are of the view that an allowance of 150 litres per day for a one person household should be given and a second person should have an allowance of 85 litres.</p> <p>NS2-7: What is the status of the 48,000 apartments which were identified as being capable of being metered albeit as part of a separate procurement process?</p> <p>NS2-8: Is there a plan in place for metering of Multi Unit Developments?</p> <p>NS2-9: Do Irish Water perceive any obstacles to metering of multi-unit developments if so what are</p>	<p>NS2-5: Submission point is noted. This however does not fall under the remit of this Tier 1 high level strategic plan.</p> <p>NS2-6: Submission point is noted. This however does not fall under the remit of this Tier 1 high level strategic plan.</p> <p>NS2-7: Submission point is noted. This however does not fall under the remit of this Tier 1 high level strategic plan.</p> <p>NS2-8: Submission point is noted. This however does not fall under the remit of this Tier 1 high level strategic plan.</p> <p>NS2-9: Submission point is noted. This however does not</p>	<p>NS2-5: N/A</p> <p>NS2-6: N/A</p> <p>NS2-7: N/A</p> <p>NS2-8: N/A</p>

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		<p>proposed level is too low, a higher charge will mean that Irish Water will have to strive harder to provide an efficient and effective service.</p> <p>How Irish Water should ensure a safe and reliable water supply</p> <ul style="list-style-type: none"> • When will the data gathering be completed to establish what condition the water network is in? In our view this should have been completed fully before water charges were established. • Reference is made to eliminating contamination of water supply. What are the timelines involved in this and will those households affected incur water charges? • In our experience water hardness is of major concern to residents throughout Fingal as it has a detrimental effect on shower heads, kettles and central heating systems. How does Irish Water propose to address this? • A number of residents have contacted us, in particular those living in older local authority houses where the water supply is not fit for human consumption. In one case the problem is being caused by lead pipes taking the supply into the property. Has a comprehensive survey been done to ascertain how many older properties have this problem? Will Irish Water take responsibility and address the issue? • What plans are in place to deal with the projected increase in housing and supplying enough water? • What is the strategy to deal with leaks and has a cost estimated been made for addressing leakage and wastage of 	<p>they?</p> <p>NS2-10: While the Irish Water documents state that effective and efficient customer operation is a key focus and that robust contract management systems will be incorporated, there is a lack of detail. We would have concerns that no concrete proposals seem to be available at this stage.</p> <p>NS2-11: The objectives on payments are aspirational with no detail. While reference to an effective tariff structure is stated again there is no explicit reference to how this will be rolled out.</p> <p>NS2-12: In relation to wider consumer issues, will the consumer act apply where a customer has a grievance?</p>	<p>fall under the remit of this Tier 1 high level strategic plan.</p> <p>NS2-10: Submission point is noted. This will be dealt with under Objective 6 “Investing in our future”.</p> <p>NS2-11: Submission point is noted. This will be dealt with at a high level in Objective 1 “Meeting our customer expectations”. Irish Water will be working with the CER and other stakeholders to ensure that customers are paying a fair amount for water services that they are being provided with. Indicators and targets relating to the tariff structure will be set in the WSSP.</p>	<p>NS2-9: N/A</p> <p>NS2-10: Objective 6 “Investing in our future.”</p> <p>NS2-11: Objective 1 “Meeting our customer expectations”.</p>

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		<p>water?</p> <p>How Irish Water should provide for the effective management of wastewater</p> <ul style="list-style-type: none"> The Irish Water paper outlines that it wishes to identify and rehabilitate deficient sewers however there is little in detail and on costs. <p>In relation to pre-treatment of sewage have new technologies being explored as well as research into international best practice?</p> <p>Protection of the environment</p> <ul style="list-style-type: none"> What specific measures have been put in place to ensure the environment is protected? <p>How Irish Water can support social and economic growth</p> <ul style="list-style-type: none"> In our view Irish water faces a significant challenge in meeting demand from both existing households and new developments. What measure have been put in place to ensure that all new estates are guaranteed a water supply? We note with concern your reference to assessing and supporting growth within existing funds. This is vague in the extreme and does not give us comfort that water supplies can be guaranteed in the future. <p>Investing in our future</p> <ul style="list-style-type: none"> Reference to “asset management culture” are unclear and require greater detail and less management speak. 	<p>NS2-13: We understand that a €10 customer charter charge will apply however we feel that this should be raised to €25 to encourage people to raise issues of concern. In our view the current proposed level is too low, a higher charge will mean that Irish Water will have to strive harder to provide an efficient and effective service.</p> <p>NS2-14: When will the data gathering be completed to establish what condition the water network is in?</p> <p>NS2-15: Reference is made to eliminating contamination of water supply. What are the timelines involved in this and</p>	<p>NS2-12: Submission point is noted. This however does not fall under the remit of this Tier 1 high level strategic plan. A number of policies relating to meeting customer expectations, including establishing effective communication channels with customers will be set out in the plan.</p> <p>NS2-13: Submission point is noted. This however does not fall under the remit of this Tier 1 high level strategic plan.</p> <p>NS2-14: Submission point is noted. Data gathering on the network is an ongoing process and focus is currently on the high priority areas of leakage. An asset management database is in development.</p> <p>NS2-15: Submission point is noted. Irish Water will develop</p>	<p>NS2-12: Objective 1 “Meeting our customer expectations”, as appropriate.</p> <p>NS2-13: N/A</p>

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			<p>will those households affected incur water charges?</p> <p>NS2-16: In our experience water hardness is of major concern to residents. How does Irish Water propose to address this?</p>	<p>strategies to protect our water resources while ensuring water availability, meeting water quality standards and providing an acceptable level of service to our customers. Objective 2 of the plan will contain policies relating to the development and implementation of Capital Investment Plans to eliminate non complaint drinking water. A number of indicator and targets will be set to measure the performance of the strategies and measures of the WSSP to ensure a safe and reliable drinking water supply.</p> <p>Water Charges do not fall under the remit of this Tier 1 level Plan.</p> <p>NS2-16: Submission point is noted. Irish Water will identify water supplies that suffer from aesthetic water quality issues such as water hardness and discolouration. Where these have been identified we will review our operational management in the Water Supply Zone and where these are as a direct result of</p>	<p>NS2-14: Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS2-15: Objective 2 “Ensuring a safe and reliable water supply”.</p>

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			<p>NS2-17: A number of residents have contacted us, in particular those living in older local authority houses where the water supply is not fit for human consumption. In one case the problem is being caused by lead pipes taking the supply into the property. Has a comprehensive survey been done to ascertain how many older properties have this problem? Will Irish Water take responsibility and address the issue?</p> <p>NS2-18: What plans are in place to deal with the projected increase in housing and supplying enough water?</p>	<p>operations we will seek to remediate through low cost solutions. Where aesthetic issues arise out of the raw water quality or treatment processes, we will review we will investigate the root cause of the problem and carry out works as necessary to resolve.</p> <p>NS2-17: Submission point is noted. As we improve our knowledge of our assets, collect and interrogate data we will build up a greater understanding of our asset base and how inadequacies in its operation, maintenance and condition contributes to water quality problems. We will upgrade and replace water pipelines that have a detrimental effect on water quality and utilise new mains flushing technologies to meet the required water quality standards.</p> <p>Indicators and Targets in terms of drinking water standards will be set in the WSSP.</p>	<p>NS2-16: Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS2-17: Objective 2 “Ensuring a safe and reliable water supply”.</p>

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			<p>NS2-19: What is the strategy to deal with leaks and has a cost estimation been made for addressing leakage and wastage of water?</p>	<p>NS2-18: Submission point is noted. Our primary objective is to support population and economic growth in line with national and regional spatial planning objectives. We will work with national, regional and local bodies to anticipate and plan for future growth and will facilitate growth in line with national and regional economic and spatial planning policy through the provision of appropriate water services infrastructure in line with development plans and core strategies.</p> <p>NS2-19: Submission point is noted. It is an aim of Irish Water to ensure water availability and water supply resilience now and into the future. Leakage is an immediate priority for Irish Water. Through a targeted programme of leakage detection, leakage control, pressure management and leakage repair we will bring leakage down to sustainable economic levels.</p>	<p>NS2-18: Objective 5 “Supporting social and economic growth”.</p>

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			<p>NS2-20: The Irish Water paper outlines that it wishes to identify and rehabilitate deficient sewers however there is little in detail and on costs.</p> <p>NS2-21: In relation to pre-treatment of sewage have new technologies being explored as well as research into</p>	<p>The National Water Conservation Plan is a Tier 2 level Implementation Plan which will be subject to its own plan making process and associated environmental assessments. This Tier 2 level plan will detail how the strategies/measures of the WSSP will be carried out at a regional and county level. In terms of the cost estimated for addressing leakage and wastage of water, this will be dealt with at the Tier 2 Plan level and/or Tier 3 Project level, as appropriate.</p> <p>NS2.20: Submission point is noted and this will be dealt with in Objective 3 “Providing effective waste water management” of the WSSP.</p> <p>Costs of associated works will not be dealt with at this Tier 1 stage and will be addressed at Tier 2 or Tier 3, as appropriate.</p> <p>NS2.21: Submission point is noted. Pre-treatment of sewage will be dealt with in Objective 3</p>	<p>NS2-19: Objective 2 “Ensuring a Safe and Reliable Water Supply”.</p>

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			<p>international best practice?</p> <p>NS2-22: What specific measures have been put in place to ensure the environment is protected?</p> <p>NS2-23: what measures have been put in place to ensure that all new estates are guaranteed a water supply?</p> <p>NS2-24: Reference to “asset management culture” are unclear and require greater detail and less management speak.</p>	<p>“Providing effective waste water management” of the WSSP.</p> <p>NS2.22: Submission point is noted. Strategies and measures to protect the environment will be contained in Objective 4 “Protect and enhance the environment” section of the WSSP.</p> <p>NS2-23: Submission point is noted. It is an aim of Irish Water to facilitate growth in line with national and regional economic and spatial planning policy through the provision of appropriate water services infrastructure in line with development plans and core strategies.</p> <p>NS2-24: Submission point is noted. This will be dealt with in Objective 6 “Investing in our future”.</p> <p>Asset management is defined as the co-ordinated activity of an organisation to realise the value of its assets. The assets referred</p>	<p>NS2.20: Objective 3 “Providing effective waste water management”.</p> <p>NS2.21: Objective 3 “Providing effective waste water management”.</p> <p>NS2.22: Objective 4 “Protect and enhance the environment”.</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
				to are not only the physical assets such as pipelines and treatment plants, but also the people within the organisation. Asset management looks at the management of assets throughout their life cycle from design, construction operation and eventual retirement or replacement.	<p>NS2-23: Objective 5 “Supporting social and economic growth”.</p> <p>NS2-24: Objective 6 “Investing in our future”.</p>
NS3	Respondent 12	<p>1. There are some acute problems, like boil notice areas and polluting incidences that require immediate attention. However, nobody seems to be losing any sleep over them. There are emergency measures that can be taken, which will allow the longer term capital works to proceed. Often these come in the form of a package solution.</p> <p>2. My area of expertise is in the package sewage treatment area, generally up to 2,000 PE. There has been a trend to bundle several villages with a 20 year DBO to make the contracts as big as possible. This does not, in my opinion, provide good value. The example I give is the last 4 No village package sewage treatment plants commissioned by Kildare Co. Co. They were tendered directly, with no Consulting Engineers (package plants by their nature are predesigned) and the cost per PE treated were way below the average on bundled tenders. Kildare Co Co has expressed great satisfaction with this method that provides speed of installation and quick commissioning.</p>	<p>NS3-1: There are some acute problems, like boil notice areas and polluting incidences that require immediate attention.</p> <p>NS3-2: There has been a trend to bundle several villages with a 20 year DBO to make the contracts as big as possible. This does not, in my opinion, provide good value.</p> <p>NS3-3: Allowing SME access and joint R&D on new products will pay dividends to Irish Water.</p>	<p>NS3-1: Submission point is noted. This will be addressed in Objectives 2 and 4 “Ensuring a safe and reliable water supply” and “Protect and enhance the environment”.</p> <p>NS3-2: Submission point is noted; however, it does not come under the remit of this Tier 1 level Plan.</p> <p>NS3-3: Submission point is noted. R & D opportunities will be considered under Objective 6 of the WSSP “Investing in our future”.</p>	<p>NS3-1: Objectives 2 and 4 “Ensuring a safe and reliable water supply” and “Protect and enhance the environment”, respectively.</p> <p>NS3-2: N/A</p> <p>NS3-3: Objective 6 “Investing in our future”.</p>

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		3. Allowing SME access and joint R & D on new products will pay dividends to Irish Water			
NS4	Respondent 13	This is the first formal notification that I have received as a Councillor and with the closing date of 1 st September, it makes it very difficult for me and I suspect the same for the vast majority of councillors. We cannot properly link into this process and consult with local community groups during the month of August. John Tierney and others in Irish Water should be well aware that August is the silly season for councillors as it is the only month that we don't have meetings to attend and most of us take our holidays. That also applies to most community groups and local people who may otherwise be quite engaged by this process. I think Irish Water are making a big mistake by running the public consultation throughout the month of August. Or else it is deliberate to limit the public's input. I wish to register my protest.	NS4-1: This is the first formal notification that I have received as a Councillor and with the closing date of 1 st September, it makes it very difficult for me and I suspect the same for the vast majority of councillors. I think Irish Water are making a big mistake by running the public consultation throughout the month of August.	NS4-1: Submission point is noted. A further public consultation will be held on publication of the WSSP, SEA Environmental Report and Natura Impact Statement. Both the statutory authorities and the public will be provided the opportunity to make submissions at this stage. In line with regulation and legislation, there will be a minimum consultation period of 6 weeks.	NS4-1: N/A
NS5	Respondent 14	Objective 1: Meeting Customer Expectations We welcome the inclusion of measures designed to meet customer expectations. Given the massive restructuring of water services and the changing relationships between providers and consumers it is vital to gain buy-in, trust and support of the population. However, we have concerns that the consistent rhetoric of "consumer" will not build a strong relationship with Irish citizens at a time when relations of trust and engagement between a new government organization and its constituents is weak. Much research has concluded that rather than simply being a question of phraseology; framing citizens as consumers shapes the policy culture along with public perceptions of their rights and responsibilities. In instances where there is no choice between utility providers there is a danger that "captive consumer" or "passive consumer" responses follow thereby	NS5-1: Objective 1: Meeting Customer Expectations. We have concerns that the consistent rhetoric of "consumer" will not build a strong relationship with Irish citizens. We suggest the adoption of terminology "citizen-consumers".	NS5-1: Submission point is noted.	NS5-1: N/A

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		<p>minimizing the ability to engage the public in active sustainable water use and in the shaping of water services. Instead a paradigm of engagement should be fostered around encouraging and empowering “active citizens”. This would imply assigning responsibility to citizen-consumers as “co-managers of demand” and as “co-producers” of Irish Water’s service design. Activating citizenry duties in this way is vital to sustained engagement, to fostering more equal partnership and to building understanding amongst the public. Further details of this approach can be found in Boyle and Harris’s (2009) briefing report which urges the nurturing of “co-production” models of service delivery, commenting that it “offers to transform the dynamic between the public and public service workers, putting an end to ‘them’ and ‘us’” (pg 12). We suggest the adoption of terminology “citizen-consumers” as per broader trends within sustainable consumption and production research community. This is because it is recognized that sustainability transformation cannot be delegated to the purchasing decisions of consumers alone but requires the exercise of citizenry rights and duties in complement to consumer action.</p> <p><i>Objective 1: Meeting Customer Expectations – “Customer service channels” “Customer willingness to pay”</i></p> <p>Irish Water should make use of evidence from the social sciences on water and energy consumption that shows the most informative and impactful means of citizen- consumer communications. This research shows that information on billing and water usage is most effective when it is: delivered frequently and directly (i.e. in-home displays</p>			

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		<p>versus bills); is easily understandable; suggests a breakdown of water consumption within the home; recommends savings measures; provides benchmarking mechanisms; and shows temporal and historic data on consumption.</p> <p>Along with price points, these factors have been shown to influence the potential for energy reductions through metering programmes. Darby (2009) reports a variance of between 5 and 15% reduction by adhering to these communication principles and providing direct feedback whereas an achievement of 0-10% was reported for less direct and unclear feedback accompanying water metering programmes. Overall the engagement approach should contribute to vital aims to 1) enhance visibility of consumption and 2) empower action to reduce consumption and thereby water charges. To empower action, these billing and communications measures must also link in with supports for educational interventions (e.g. An Taisce Green Homes scheme) and practical measures (e.g. supports for retrofit of household water using devices) that enable reduced water consumption. We caution that it must not be assumed that price increases and provision of generic information alone will automatically lead to water-saving behaviour.</p> <p><i>Objective 1: Meeting Customer Expectations – “Positioning and customer engagement”</i></p> <p>This section states that Irish Water will be: “Challenged with persuading customers to embrace water conservation and other good practices. Conveying this message to customers and making payment for water services the norm is</p>	<p>NS5-2: “Challenged with persuading customers to embrace water conservation and other good practices”, we would suggest changing the wording “persuading” to “engaging”.</p> <p>NS5-3: Irish Water should aim to be progressive in</p>	<p>NS5-2: Submission point is noted.</p>	<p>NS5-2: N/A</p>

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		<p>particularly challenging...Irish Water is building a lasting brand that aspires to be associated with all the characteristics of a high performing utility” (pg5).</p> <p>We would suggest changing the wording “persuading” to “engaging” and would caution against reliance on messaging and branding alone to achieve water conservation measures amongst householders and businesses. While these can form part of WDM measures, it is important that marketing and PR activities do not take place in isolation from community engagement, policy supports, retrofit plans and design regulations. While there is certainly a degree of learning required amongst the general public (e.g. to make visible the water that various activities consume and to assist them in modifying their practices to reduce water use as well as make savings), the majority of evidence in the social and psychological sciences including that from CONSENSUS, has disproved the “information deficit” model as a means of achieving behaviour change. Indeed, the ESRI recently showed that the €10 million Power of One campaign on energy efficiency failed to achieve behaviour change whilst it did increase awareness (Diffey et al. 2013). This illustrates the long reported gap between awareness and action and the difficulty in shifting ingrained, and often unconscious everyday habits / practices such as those relating to water use in the home. While social research shows that many people agree that saving money is an incentive for water saving, the correlation between these statements and actual action remains weak. CONSENSUS research has shown that householders need skills, tools and incentives to encourage habitual change in their everyday water using</p>	<p>its engagement with citizens building on successes made through incentive and reward schemes (e.g. Tidy Towns) and through experiential educational interventions (e.g. Eco-Teams and Green Schools).</p> <p>NS5-4: Objective 2: Ensuring a safe and reliable water supply: If reference to sustainable water use and WDM is not made as a separate Objective, we suggest amending Objective 2 to “ensuring a safe, sustainable and reliable water supply and managing water demand”. At minimum, WDM should be mentioned as an explicit aspect of Objective 2.</p> <p>NS5-5: “Complying with regulations” Irish Water should not only seek to comply with regulations but</p>	<p>NS5-3: Submission point is noted. This will be dealt with in Objective 1 of the WSSP “Meeting our customer expectations”.</p> <p>NS5-4: Submission point is noted.</p>	<p>NS5-3: Objective 1 “Meeting our customer expectations”.</p> <p>NS5-4: N/A</p>

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		<p>practices (Davies et al. 2014; Doyle, 2013). In order for Irish Water to meet its objectives attention is required to address the variety of social, cultural, technical and policy forces that constrain and enable people’s habits – again highlighting the need for integrated water demand management strategies across sections and areas of action within Irish Water (See section on “Demand Management” at the end of this report on pg. 6). Irish Water should aim to be progressive in its engagement with citizens building on successes made through incentive and reward schemes such as Tidy Towns and through experiential educational interventions such as Eco-Teams and Green Schools. The success of the plastic bag levy was a coordinated information campaign, with clear alternatives (reusable bags), supportive regulatory measures and a general appreciation by people that behaviour needed to change. Social networks have been shown to play a key role in learning about new behaviours and technologies for sustainable resource consumption, while social comparisons (e.g. levels of consumption by neighbours and behaviour of friends and relatives) are also being highlighted as influential in shifting practices. As a new institution Irish Water has the opportunity to become a global leader in progressive water supply and management, not simply meeting expectations of the populace but also shaping expectations along more sustainable trajectories.</p> <p>Objective 2: Ensuring a safe and reliable water supply If reference to sustainable water use and WDM is not made as a separate Objective, we suggest amending Objective 2 to “ensuring a safe, <u>sustainable</u> and reliable water supply and <u>managing water demand</u>”. At minimum, WDM should</p>	<p>should anticipate and actively contribute to regulation and policy development both within Ireland and internationally.</p> <p>NS5-6: “Energy & Natural Resources” A more nuanced understanding of water-energy consumption linkages is important as significant carbon and energy savings can be made by strategies to reduce water consumption. Explicit links and research funded across Irish Water, Sustainable Energy Authority of Ireland and the Department of Communications, Energy and Natural Resources should be developed.</p> <p>NS5-7: Objective 5: Supporting future social and economic growth: <i>“Meeting the demand for water services”</i> Managing demand</p>	<p>NS5-5: Submission point is noted.</p> <p>NS5-6: Submission point is noted. Objective 6 of the WSSP “Investing in our future” will contain research and development related policies.</p> <p>We will actively pursue Research and Development in areas relevant to our business and track opportunities to develop and adopt new technologies.</p>	<p>NS5-5: N/A</p> <p>NS5-6: Objective 6 “Investing in our future”.</p>

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		<p>be mentioned as an explicit aspect of Objective 2. Presently, the only mention of demand in the WSSP is with respect to “supplying enough water to meet demands”. Although it is clearly important to forecast and monitor demand projections, targets for demand management and water savings should also be taken into account. A “balanced approach to demand management” is mentioned in Appendix 1 pg. 45 as a theme for “Objective 2” in the Draft SEA Scoping Report. We welcome this and urge its inclusion and more detailed elaboration in the WSSP to reflect this priority.</p> <p><i>Objective 2: Ensuring a safe and reliable water supply - “Complying with regulations”</i> Irish Water should not only seek to comply with regulations but should anticipate and actively contribute to regulation and policy development both within Ireland and internationally.</p> <p><i>Objective 2: Ensuring a safe and reliable water supply - “Energy & Natural Resources”</i></p> <p>We welcome the attention to the connections between energy and water resources. Energy is used in water services (from extraction, treatment, delivery) and in the home for water practices (heating of water and energy use in water using devices). This has been labelled the ‘water energy nexus’. For example, the UK Environment Agency (2009) revealed that 6% of the UK’s emissions are related to water, 90% of which are associated with hot water use in the home. Therefore an immediate and ongoing task of Irish Water should be to quantify energy used for water services. An example of such an approach was conducted in California by Bob Wilkinson (2000) ‘Analysis of The Energy</p>	<p>should also be mentioned with regards to supporting sustainable future economic and social development.</p> <p>NS5-8: <i>“Engagement with customers and stakeholders”</i> Suggest setting up a Strategic Panel with representatives from key sectors and professions to feed into Irish Water’s ongoing strategy development in this regard.</p> <p>NS5-9: <i>“Innovation & new technology”</i> We suggest adding “research” to this Objective title so that it becomes “Innovation, research and new technology”.</p> <p>NS5-10: Demand Management Support, more direct interventions to assist</p>	<p>NS5-7: Submission point noted. This will be addressed under Objective 5 “Supporting social and economic growth”.</p> <p>NS5-8: Submission point is noted.</p> <p>NS5-9: Submission point is noted. Research and development will be contained</p>	<p>NS5-7: Objective 5 “Supporting social and economic growth”.</p> <p>NS5-8: N/A</p>

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		<p>Intensity of California's Water Systems'. A more nuanced understanding of water-energy consumption linkages is important as significant carbon and energy savings can be made by strategies to reduce water consumption. Likewise, it is possible to integrate water and energy demand management strategies. Research by the California Energy Commission reported that the energy savings from water conservation programmes would achieve 95% of the savings expected from their 2006-2008 Energy Efficiency Programmes at 58% of the cost. These savings are significant and illustrate the importance of holistic sustainable development strategies and collaboration across sectors. These actions would go towards meeting the 'EU 2020 Climate and Energy Package' (highlighted in the Draft SEA Scoping Report) as water conservation strategies can contribute towards the EU's target of 20% improvement in energy efficiency (or 20% demand reduction). Therefore explicit links and research funded across Irish Water, Sustainable Energy Authority of Ireland and the Department of Communications, Energy and Natural Resources should be developed.</p> <p><i>Objective 5: Supporting future social and economic growth – "Meeting the demand for water services"</i></p> <p>Managing demand should also be mentioned with regards to supporting sustainable future economic and social development. WSSP States that Irish Water will "assess how growth can be appropriately supported" (pg14). The expected impact of demand reduction targets should be built into these forecasts too.</p>	<p>householders in overcoming inefficient, unsustainable and unnecessary water-use practices as part of an integrated WDM strategy.</p> <p>NS5-11: In the context of a changing climate, combined with present fiscal constraints, there is a strong case for examining potentially less capital-intensive strategies based on reducing water demand in the home.</p> <p>NS5-12: A dedicated demand management team should be established within Irish Water and tasked explicitly with integrating WDM measures across the company. CONSENSUS would welcome targets to be imposed by CER and suggest that Irish Water</p>	<p>within Objective 6 of the WSSP "Investing in our future".</p> <p>NS5-10: Submission point is noted.</p> <p>NS5-11: Submission point is noted. It will be a policy of Irish Water to engage and persuade customers to embrace water conservation and other good practices.</p>	<p>NS5-9: Objective 6 "Investing in our future"</p> <p>NS5-10: N/A</p> <p>NS5-11: Objective 1 "Meeting our customer expectations".</p>

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		<p><i>Objective 5: Supporting future social and economic growth – “Engagement with customers and stakeholders”</i></p> <p>We welcome this Objective and suggest setting up a <u>Strategic Panel</u> with representatives from key sectors and professions to feed into Irish Water’s ongoing strategy development in this regard. This also links into the “strategic partnerships” agenda set out under Objective 5. An interesting reference point for public engagement is Anglian Water’s “Customer Engagement Platform”</p> <p><i>Objective 5: Supporting future social and economic growth – “Innovation & new technology”</i></p> <p>One role of the Strategic Panel detailed above should be foresight and strategic planning for sustainable water technologies and practices. We also suggest adding “research” to this Objective title so that it becomes “Innovation, research and new technology”. The current wording states that the focus will be on tracking opportunities “to develop and adopt new technologies”. This is a limited focus and we suggest broadening remit to include research in other areas such as environmental monitoring, behavioural and social research. In their review of Irish Water’s Consumption Research Project (IWCRP) the ESRI (2014) also called for further measuring and monitoring of consumption levels. This research should be ongoing and take into account socio-demographic factors along with considering different types of water use practices adopted by different members of the population to target the most water-intensive practices. In addition, ongoing in-depth studies and pilots on the effectiveness of various WDM interventions are required as initiated by the CONSENSUS research project outlined in our closing remarks. This is</p>	<p>implement procedures to demonstrate the effectiveness of their WDM measures.</p>	<p>NS5-12: Submission point is noted.</p>	<p>NS5-12: N/A</p>

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		<p>important as if water use continues to rise then technical efficiencies will be cancelled out leading to continued overall (and unsustainable) growth. A broader understanding of water use by citizens is required.</p> <p>Demand Management – further commentary for WSSP and Draft SEA Scoping Report</p> <p>It is essential for Irish Water, in conjunction with researchers and private sector partners, to support more direct interventions to assist householders in overcoming inefficient, unsustainable and unnecessary water-use practices as part of an integrated WDM strategy.</p> <p>In the context of a changing climate, which itself will alter freshwater availability, combined with present fiscal constraints, there is a strong case for examining potentially less capital-intensive strategies based on reducing water demand in the home. For example, a Canadian study by Brandes <i>et al.</i>, (2006) report that simple efficiency fixtures coupled with behavioural changes can result in household water savings of between 33% to 50%, at lower costs and more quickly than new supply projects designed to meet escalating demand. In the UK WaterWise provided an evidence base for large scale water efficiency in homes in 2010 stating that “savings of up to 34 litres per property per day are possible from applying a multi-measure water efficiency retrofitting method in the traditional way, using current technology and means of engaging customers to encourage behaviour change”. The costs of retrofitting range from £41 to £240 per property.</p>			

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		<p>As CONSENSUS research shows, water charging is only one influencing factor for patterns of water use and at minimum there is a tripartite structure required here: (1) provide affordable and accessible infrastructure and devices to enable people to change their behavior (2) provide evidence clearly outlining why such a change in behaviour is sound from an environmental, economic and societal perspective (3) ensure practical, hands-on guidance ensuring that householders know how to best use the supporting infrastructure (for example, Eco-teams or local groups could be enlisted in their installation).</p> <p>Along with elevating the role of WDM within Irish Water's WSSP and SEA, a dedicated demand management team should be established within Irish Water and tasked explicitly with integrating WDM measures across the company. They should be given responsibility for developing quantifiable targets and actions for reduction in water usage across a range of sectors and practices (for example, collectively aiming at an 80 litres per capita per day target for household water use by 2020). For example, DEFRA's (2008) "Future Water" strategy includes a target for reducing household consumption by 13% by 2030 - from 150 litres to 130 litres per person per day. In addition, Ofwat (the British water economic regulator) requires water companies to meet efficiency targets. This is set at a one litre reduction per- property per-day each year between 2010-2015. CONSENSUS would welcome such targets to be imposed by CER and suggest that Irish Water implement procedures to demonstrate the effectiveness of their WDM measures.</p> <p>The EU Blueprint to Safeguard Europe's Water policy is mentioned in the 'Draft SEA Scoping Report', however it is</p>			

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		<p>not noted that this will require progressive attention to water efficiency targets (at basin and sectoral level). In addition, Irish Water should work with other institutions to create improved water performance of buildings, design regulations and water devices (including enhanced labelling). There are clear exemplars of similar strategies in the energy sphere and in other countries that could be transposed to the water environment. Examples here include Australia's Water Efficiency Label (WEL) scheme and AECB Water Standards for buildings that set performance requirements for individual water using appliances without compromising on comfort and quality. Building regulations (e.g. expansion of Part L) should include targets for water reduction and could draw on the UK code for sustainable homes, which includes rainwater harvesting, greywater systems, efficient devices and behaviour changes that collectively can reduce household water consumption to less than 80 litres per person, per day.</p> <p>Towards a new approach Based on our research at CONSENSUS we believe a new approach is required based on actively engaging citizen-consumers, building adaptive capacity and enhancing connections between our water use and the natural environment. Smarter water management systems would contribute towards this including smarter tariffs that better reflect fluctuations in water availability (seasonal in crisis periods) and increasing consumption levels (overall or at peak points). This would also contribute to building resilience in the face of climatic fluctuations and predicted population growth. Exploration of both hard (infrastructural) and soft measures (including education for low water</p>			

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		<p>consumption in the home) is essential. On and off-line engagement platforms that activate demand responses consistently and in the context of below average water-levels (or peak demand) may provide for more sustained and deeper engagement rather than using reactive or once-off approaches. In CONSENSUS we are prototyping and trialling this approach through our HomeLabs research (Davies A. & Doyle, R. 2014 in press; www.consensus.ie/homelab). Working with partners in the academic, commercial and non-governmental sector we are implementing and evaluating devices, products, educational supports, online tools and policy simulations within a cross-section of households. Ethnographic evaluation will reveal insight on the most effective combinations of strategies that can shift everyday water using practices and will lead to cross-sectoral recommendations.</p> <p>Our HomeLabs project builds upon an extensive research period that engaged over 40 key stakeholders across water-related sectors in imagining future scenarios for sustainable water consumption along with long-term action plans for their achievement. Together with others in the sustainable consumption and behaviour change community, CONSENSUS takes everyday water using practices rather than individual attitudes or values as a starting point for behaviour change Our work further builds on foundational research conducted on baseline national water use motivations, drivers and behaviours by the CONSENSUS team as part of an all- island lifestyle survey.</p>			
NS6	Respondent 15	The CSO has a legal obligation to ensure that Ireland is able to complete Eurostat questionnaires on water and waste water statistics. These questionnaires request national (and	NS6-1: We consider that there is scope for Irish Water, the EPA, CSO, etc. to work	NS6-1: Submission is noted. This will be addressed under	NS6-1: Objective 5 “Investing in our future”.

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		<p>sometimes River Basin District level) data on topics such as:</p> <ul style="list-style-type: none"> - Renewable freshwater resources; - Annual freshwater abstraction; - Water use; - Waste water treatment plants capacity; - Sewage sludge production and disposal; - Generation and discharge of waste water; and - Water quality. <p>The Draft Scoping Report and Issues Paper highlight many topics that have a relevance to these areas. Additional areas that we would be interested in developing statistics on include:</p> <ul style="list-style-type: none"> - Expenditure on water conservation measures; - Capital expenditure on water and waste water infrastructure; <p>and</p> <ul style="list-style-type: none"> - Economic sector and socio-demographic analyses of your customers (both residential and non-residential) - the collection of reference numbers such as CRO/VAT number for enterprises and postcodes would facilitate us in matching your data with the CSO Business Register to get NACE code and with the Census of Population to get information on household characteristics - any such analyses would be conducted under the Statistics Act, 1993 and for statistical purposes only. <p>We consider that there is scope for Irish Water, the EPA, CSO, etc. to work together to ensure that a reliable time series of statistics on these topics is available for policy research and to meet statistical obligations.</p>	<p>together to ensure that a reliable time series of statistics on these topics is available for policy research and to meet statistical obligations.</p>	<p>Objective 5 “Investing in our future”.</p>	
NS7	Respondent 16	<p>The Competent Authority for biocidal products would like to input in to the draft SEA scoping report for water services by Irish Water and would like to indicate that there are legal</p>	<p>NS7-1: There are legal responsibilities of Irish Water with respect of the Biocidal</p>	<p>NS7-1: This will be dealt with under Objective 4 of the WSSP</p>	<p>NS7-1: Objective 4 “Protect and</p>

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		<p>responsibilities of Irish Water with respect of the Biocidal Products Regulation (528/2012) as amended (334/2014). These Regulations are directly applicable in the state. The control and enforcement measures relating to biocidal products are provided for by SI 427 of 2013 (as Amended).</p> <p>In particular biocidal products used by Irish Water must be either notified or authorised by this office. To use products that are not notified or authorised is illegal and will result in enforcement action.</p> <p>In particular, some of the products that are directly relevant include:</p> <p>1. Product-type 4: Food and feed area disinfection products - Products used for the disinfection of equipment, containers, consumption utensils, surfaces or pipe work associated with the production, transport, storage or consumption of food or feed (including drinking water) for humans and animals. Products used to impregnate materials which may enter into contact with food.</p> <p>2. Product-type 5: Drinking water disinfection products - Products used for the disinfection of drinking water for both humans and animals.</p> <p>Other biocidal products that may be utilised on water facilities or procured by Irish Water are likely to include:</p> <p>1. Product-type 14: Rodenticides - Products used for the control of mice, rats or other rodents, by means other than repulsion or attraction, in or around water treatment facilities.</p>	<p>Products Regulation. The control and enforcement measures relating to biocidal products are provided for by SI 427 of 2013 (as Amended). In particular, biocidal products used by Irish Water must be either notified or authorised by this office. To use products that are not notified or authorised is illegal and will result in enforcement action. It may be useful that the scoping document addresses these requirements especially given the importance of delivering potable water to the public through water disinfection (e.g. by chlorine based products or ozonation/ionisation/electrolysis systems).</p>	<p>“Protect and enhance the environment”.</p> <p>Irish Water will comply with all relevant legislative requirements, including the Biocidal Products Regulation. We must act in an environmentally responsible manner, protect the water sources that we use and the waterways to which we discharge.</p> <p>Irish Water will develop an Environmental Policy together with an environmental management system which will apply to all of our operations. This will help us minimise the impact on the environment in our operations, comply with applicable laws and regulations (including the Biocidal Products Regulation) and establish a culture of continual improvement.</p> <p>The interrelationship of this Regulation with the WSSP will be dealt with in the SEA Environmental Report.</p>	<p>enhance the environment”.</p>

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		<p>2. Product-type 16: Molluscicides, vermicides and products to control other invertebrates - Products used for the control of molluscs (such as zebra mussels at water intake pipes or water treatment facilities), worms and invertebrates not covered by other product-types, by means other than repulsion or attraction.</p> <p>3. Product-type 17: Piscicides - Products used for the control of fish, by means other than repulsion or attraction.</p> <p>It may be useful that the scoping document addresses these requirements especially given the importance of delivering potable water to the public through water disinfection (e.g. by chlorine based products or ozonation/ionisation/electrolysis systems).</p>			
NS8	Respondent 17	<p>Importance of water services for enterprise development</p> <p>Ireland's economic growth depends on the ability of businesses to trade successfully in increasingly competitive global markets. The provision of reliable, competitively priced water services (water and waste water), at appropriate quality levels, is critical to support economic growth and job creation. Water services play a key role in supporting economic activity and job creation, particularly in key sectors such as food and drink, life sciences, ICT, construction materials and other manufacturing sectors. Water is a vital input to the provision of products and services across the economy and plays a critically important role in maintaining and growing our existing export base, in continuing to attract high levels of foreign direct investment and retaining and creating jobs.</p>	<p>NS8-1: Ensure that water and waste water services are competitively priced in a global context. Irish Water needs to drive for efficiencies in the delivery of water services – in particular, it needs to ensure that operating, maintenance and capital costs in Ireland are brought into line with international best practice.</p>	<p>NS8-1: Submission point is noted. The CER is the body responsible for ensuring that the prices that we charge to customers are competitively priced in a global context are fair and reasonable. Objective 1 of the Plan "Meeting our customer expectations" contains a strategy to ensure that we work with the CER and other stakeholders to satisfy customers that they are paying a fair amount for the water services that they are being</p>	<p>NSNS8-1: Ensuring complete pricing: Objective 1 "Meeting our customer expectations"</p> <p>Water services efficiency: Objectives 2 and 3 "Ensuring a safe and reliable water supply" and "Providing effective waste water</p>

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		<p>Enterprise needs access to secure, competitively priced, quality water services. In greater detail:</p> <ul style="list-style-type: none"> Water is an important input to many business processes. We need to ensure that water and waste water services are competitively priced in a global context. Irish Water needs to drive for efficiencies in the delivery of water services – in particular, it needs to ensure that operating, maintenance and capital costs in Ireland are brought into line with international best practice; Although Ireland has made substantial investments in water and waste water infrastructure through successive water services investment programmes, significant further investment is required. We need a strategic medium to long term approach to investment planning that delivers an adequate supply of quality water services while also ensuring that Ireland is cost competitive. While drinking water quality in Ireland is generally high, a continued focus on ensuring it remains so is required as contamination of water supplies can have a major impact on enterprise, particularly in the food and biopharma sectors; and We also need to ensure that other quality and reliability measures of particular relevance to enterprise are monitored and improved where necessary. These include minimising disruptions to service and ensuring minimum pressure levels. <p>We strongly support the reform of water services provision in Ireland. While there are significant challenges in the near</p>	<p>NS8-2: A strategic medium to long term approach to investment planning that delivers an adequate supply of quality water services while also ensuring that Ireland is cost competitive is needed.</p> <p>NS8-3: Focus on ensuring drinking water quality remains high</p> <p>NS8-4: Ensure that other quality and reliability measures of particular relevance to enterprise are</p>	<p>provided with by putting an effective tariff structure in place. The efficiency of the delivery of water services will be dealt with in Objectives 2 and 3 “Ensuring a safe and reliable water supply” and “Providing effective waste water management”.</p> <p>NS8-2: Submission point is noted. The strategic medium to long term approach to investment planning that delivers an adequate supply of quality water services will be dealt with in Objectives 2, 3 and 6 “Ensuring a safe and reliable water supply”, “Providing effective waste water management” and “Investing in our future”.</p> <p>NS8-3: Submission point is noted. Drinking water quality will be dealt with in Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS8-4: Submission point is noted. This will be addressed at a strategic level in Objective 2</p>	<p>management”, respectively.</p> <p>NS8-2: Objectives 2, 3 and 6 “Ensuring a safe and reliable water supply”, “Providing effective waste water management” and “Investing in our future”, respectively.</p> <p>NS8-3: Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS8-4: Objective 2 “Meeting our customer expectations”.</p>

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		<p>term, Ireland has the potential to make water services a competitive advantage in the attraction of mobile investment in the longer term. The timely implementation of the water reform plans, including the development of an effective economic regulatory framework and water services strategic plan, is critical to deliver the adequate supply of competitively priced, quality and reliable water services required to support enterprise development and job creation.</p> <p>1. Meeting customer expectations</p> <p>Irish Water needs to set high standards and ambitious goals. We acknowledge that the service standards required have to be tailored to fit to the water sector according to its stage of network development. Therefore Irish Water's water services strategic plan needs to put Ireland on the right trajectory to achieve its long term water services goals as the network is upgraded and the investments work through the system.</p> <p>While we understand the focus on domestic customers given that water charges for them are just about to be introduced, the water services strategic plan also needs to give due consideration to how it will meet non-domestic customer expectations in the short, medium and longer term. It is important that is clear what non-domestic customers can expect in terms of price and quality (e.g. drinking water standard, pressure, unplanned disruption to service, resilience, security of supply, customer service, timely new connections, etc.). It is also important that these metrics are monitored and publicly reported.</p> <p>We note from the CER's recent consultation on the water charges plan that Irish Water plans to consult with non-domestic customers - although their stakeholder engagement plan was not published for consultation as planned. Economic regulators in other jurisdictions are increasingly requiring water</p>	<p>monitored and improved where necessary. These include minimising disruptions to service and ensuring minimum pressure levels.</p> <p>NS8-5: Meeting customer expectations: Give due consideration to how the Plan will meet non-domestic customer expectations in the short, medium and longer term. It is important that these metrics are monitored and publicly reported.</p> <p>NS8-6: Ensure that processes are put in place to ensure that customers and stakeholders have a say in Irish Water's business plans for each given review period, and particularly in relation to the prioritisation of investments.</p> <p>NS8-7: Ensuring a safe and reliable water supply: The main water investment priorities to support economic growth and jobs are: (i) Ensuring sufficient water services capacity in Dublin to</p>	<p>"Meeting our customer expectations".</p> <p>NS8-5: Submission point is noted. Non-domestic customer expectations will be addressed at a strategic level in Objective 1 "Meeting our customer expectations".</p> <p>NS8-6: Submission point is noted. This will be addressed at a strategic level in Objective 1 "Meeting our customer expectations" as relevant.</p> <p>NS8-7: Submission point is noted. This will be addressed at a strategic level in Objectives 2</p>	<p>NS8-5: Objective 1 "Meeting our customer expectations".</p> <p>NS8-6: Objective 1 "Meeting our customer expectations".</p> <p>NS8-7: Objectives 2 and 5 "Ensuring a safe and reliable water supply" and</p>

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		<p>companies to engage in greater consultation with stakeholders, including, non- domestic customers when developing their business plans including capital expenditure programmes. Generally in Australia, Scotland and now England and Wales companies hold customer fora and to explain and receive input on the business and capital expenditures plans prior to formal submission to the authorities (see example given in the textbox).</p> <p>We recommend that Irish Water, in conjunction with the CER, ensures that processes are put in place to ensure that customers and stakeholders have a say in Irish Water's business plans for each given review period, and particularly in relation to the prioritisation of investments.</p> <p>2. Ensuring a safe and reliable water supply</p> <p>The availability of a safe and reliable water supply is critical to meet the current and future needs of domestic and non-domestic customers.</p> <p>We agree with Irish Water on the challenges that have to be addressed to achieve this objective – eliminating boil notices; complying with water quality standards; supplying enough water to meet demand; and reducing leakage.</p> <p>The main water investment priorities to support economic growth and jobs are:</p> <ul style="list-style-type: none"> • Ensuring sufficient water services capacity in Dublin to meet future demand: As Ireland's only city of international scale, it is essential that Dublin has a sufficient supply of competitively priced, quality water and waste water treatment capacity to meet current and future demand; • Delivering water services capacity to support regional development policy: Promoting enterprise development and job creation at regional level is a Government priority. 	<p>meet future demand. (ii) Deliver water services capacity to support regional development policy; and (iii) In meeting demand, it is critical that sufficient spare capacity is available to facilitate mobile business (foreign and Irish based) investment. Providing the required water services capacity and quality levels in enterprise agency strategic sites and business parks and to strategic development zones should be prioritised.</p> <p>NS8-8: In providing effective removal of waste water, ensure costs for business are competitive with those internationally.</p> <p>NS8-9: In supporting future social and economic growth, drive for efficiencies in all capital and operating cost factors that are within its control. In addition, the costs allowed for capital and operating expenditure need to be benchmarked against those</p>	<p>and 5 “Ensuring a safe and reliable water supply” and Supporting social and economic growth”.</p> <p>NS8-8: Submission point is noted.</p> <p>NS8-9: Submission point is noted. Benchmarking of</p>	<p>“Supporting social and economic growth”, respectively.</p> <p>NS8-8: Objective 3 “Provide effective waste water management”.</p> <p>NS8-9: Objective 1 “Meeting our customer expectations”.</p>

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		<p>Irish Water needs to deliver sufficient capacity to support residential and enterprise expansion plans; and</p> <ul style="list-style-type: none"> In meeting demand, it is critical that sufficient spare capacity is available to facilitate mobile business (foreign and Irish based) investment. Providing the required water services capacity and quality levels in enterprise agency strategic sites and business parks and to strategic development zones should be prioritised. <p>3. Providing effective removal of waste water Irish Water faces significant challenges in providing effective waste water services. We welcome the focus in the issues paper on meeting current and future customer needs and meeting environmental obligations in the most cost effective way. It will be important that Irish water costs for business are competitive with those internationally. Again, supplying enough waste water capacity to meet demand (particularly in Dublin and other key centres, and key business sites) is a key priority.</p> <p>4. Protecting the environment As stated above, improving Ireland's environmental sustainability is important, but it must be done at least cost to Irish water customers – domestic and non-domestic. The focus on energy efficiency and climate change adaptation are welcome. Early adaptation to climate change can reduce costs. Well managed, the availability of water could become an important competitiveness asset for Ireland in an increasingly water scarce region2.</p> <p>5. Supporting future social and economic growth As stated under objective 2 above, the availability of a safe and reliable water supply is critical to meet the current and future needs of domestic and non-domestic customers. It is also vital that water services in Ireland are competitively priced</p>	<p>of competitor and comparator countries.</p> <p>NS8-10: Potential large enterprise investment projects can also have a tangible impact on water requirements (e.g. treatment capacity and water network capacity). The enterprise agencies would welcome the opportunity to engage with Irish Water on likely future water needs of their existing client base and the likely future pipeline.</p> <p>NS8-11: Prioritise the provision of the required water services capacity and quality levels in enterprise agency strategic sites and business parks and to strategic development zones.</p> <p>NS8-12: To ensure the availability of competitively priced world class water services on a par with other</p>	<p>operating expenditure against those of competitor and comparator countries will be addressed in the WSSP.</p> <p>NS8-10: Submission point is noted. Irish Water will work with national, regional and local development authorities and business organisation to identify short, medium and long term requirements for water services to support economic development. This will be dealt with in Objective 4 "Supporting social and economic growth".</p> <p>NS8-11: Submission point is noted. Irish Water will work with national, regional and local development authorities and business organisation to identify short, medium and long term requirements for water services to support economic</p>	<p>NS8-10: Objective 5 "Supporting social and economic growth".</p> <p>NS8-11: Objective 5 "Supporting social and economic growth".</p>

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		<p>and provided at appropriate quality levels to allow Irish businesses to trade successfully in global markets. To that end, Irish Water needs to drive for efficiencies in all capital and operating cost factors that are within its control. In addition, the costs allowed for capital and operating expenditure need to be benchmarked against those of competitor and comparator countries.</p> <p>We strongly welcome the focus on economic growth and the proposed national planning policy focus for supporting both Dublin and regional development. In terms of projecting/forecasting growth, population trends are a key variable. Potential large enterprise investment projects can also have a tangible impact on water requirements (e.g. in terms of treatment capacity and water network capacity). The enterprise agencies would welcome the opportunity to engage with Irish Water on likely future water needs of their existing client base and the likely future pipeline. As the provision of sites for mobile investment requires significant pre-investment (e.g. land acquisition and development, buildings, etc.), the enterprise agencies have reasonable clarity on short and medium term water infrastructure needs. As a start, Irish Water needs to prioritise the provision of the required water services capacity and quality levels in enterprise agency strategic sites and business parks and to strategic development zones.</p> <p>The development of the performance monitoring framework as proposed by the CER in its recent consultation on the water charges plan is critical to ensure that any cost savings in expenditure are not realised at the expense of outputs.</p> <p>In setting service standards and performance targets for short to medium term, it is important to remember that Scottish Water, for example, was also seen to be behind the curve in terms of service provision and investment compared to English</p>	<p>countries (with which we compete for trade and investment), Irish Water's targets to improve efficiencies and performance over the timeframe of the strategic plan need to be informed by the improvements achieved in other jurisdictions at comparable stages of development.</p> <p>NS8-13: The adoption of new processes, procedures and technologies within Irish Water may offer sub-supply opportunities for Irish firms and potential to attract FDI. Potential exists to engage with IDA and Enterprise Ireland on this agenda. These agencies and Science Foundation Ireland may also engage on the R&D agenda.</p> <p>NS8-14: Irish Water should be required as part of the water charges plan to put in place a timetable for data collection and the development of key performance indicators to ensure that a complete</p>	<p>development. This will be dealt with in Objective 5 "Supporting social and economic growth".</p> <p>NS8-12: Submission point is noted. Irish Water's targets to improve efficiencies and performance over the timeframe of this strategic plan will be informed by the improvements achieved in other jurisdictions at comparable stages of development, as relevant.</p> <p>NS8-13: Submission point is noted. This will be dealt with in Objective 6 "Investing in our future".</p>	<p>NS8-12: Each Objective, as appropriate.</p> <p>NS8-13: Objective 6 "Investing in our future".</p>

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		<p>and Welsh water companies prior to the instigation of a road map for market reform from 2006 onwards³. To ensure the availability of competitively priced world class water services on a par with other countries with which we compete for trade and investment, Irish Water's targets to improve efficiencies and performance over the timeframe of the strategic plan need to be informed by the improvements achieved in other jurisdictions at comparable stages of development.</p> <p>6. Investing in our future</p> <p>The specific objectives identified by Irish Water here involve delivering high quality water services at affordable cost and implementing innovative technical solutions to drive efficiencies.</p> <p>On the former objective, the points that we have raised under previous objectives will also be relevant here. In particular, significant potential exists to enhance services, and to ensure more effective capital and operational expenditure by adopting a national approach to water and waste water provision. It is important that these opportunities are captured and that Irish water costs are competitive internationally.</p> <p>We welcome the focus on developing and fostering an innovation culture both within Irish Water and across its stakeholders. The adoption of new processes, procedures and technologies within Irish Water may offer sub-supply opportunities for Irish firms and potential to attract FDI. Potential exists to engage with IDA and Enterprise Ireland on this agenda. These agencies and Science Foundation Ireland may also engage on the R&D agenda.</p> <p>As mentioned previously, effective performance measurement and reporting is critical is to ensure that any cost savings in expenditure are not realised at the expense of outputs. As recommended by NERA in its interim review assessment for</p>	<p>performance baseline is in place before the first full review period (2017-2022).</p> <p>NS8-15: Over the timeframe of the strategic plan, Irish Water needs to introduce the qualitative based performance measures used in more mature regulated markets like England, Wales and Scotland.</p>	<p>NS8-14: Submission point is noted. This does not fall under the remit of this Tier 1 level Plan.</p> <p>NS8-15: Submission point is noted. Targets and indicators will be set for the 25 year period with specific targets and indicators for each interim investment period within the overall plan period. Qualitative based performance measures used in more mature regulated markets will be set, as appropriate. .</p>	<p>NS8-14: N/A</p> <p>NS8-15: Each Objective of the plan.</p>

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		<p>the CER, we believe that Irish Water should be required as part of the water charges plan to put in place a timetable for data collection and the development of key performance indicators to ensure that a complete performance baseline is in place before the first full review period (2017-2022). NERA has identified a number of indicators in areas with scope for fast improvement where the collection of baseline data should be feasible over the interim review period</p> <p>– these include waste water treatment compliance, drinking water quality, leakage, pressure levels, interruptions to supply and customer service.</p> <p>Over the timeframe of the strategic plan, Irish Water needs to introduce the qualitative based performance measures used in more mature regulated markets like England, Wales and Scotland.</p>			
NS9	Respondent 18	<p>This submission paper addresses the six draft objectives for the Strategic Plan to 2040.</p> <p>The Chamber fully supports Irish Water's high-level objective of delivering a "world-class water infrastructure that ensures secure and sustainable water services, essential for our health, our communities, the economy and the environment."</p> <p>Dublin Chamber therefore makes the following recommendations in regard to the Water Services Strategic Plan in order to realise this objective.</p> <ol style="list-style-type: none"> 1. Businesses have been paying for water for decades, and it is important that they are clear on the services they receive in return. 2. A regional approach to the Water Services Strategic Plan to better assess and address the projected drivers of consumption and supply in each region. 	<p>NS9-1: There must be sufficient opportunity for redress should Irish Water fall short of its responsibilities in this regard. Businesses have been paying for water for decades, and it is important that they are clear on the services they receive in return.</p> <p>NS9-2: Irish Water must provide communication channels for customers who</p>	<p>NS9-1: Submission point is noted. This will be dealt with under Objective 1 "Meeting our customer expectations."</p>	<p>NS9-1: Objective 1 "Meeting our customer expectations".</p>

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		<p>3. Investment is necessary to realise the potential of water security and supply as a key point of competitiveness for attracting and retaining businesses in Ireland.</p> <p>4. The capital investment needed is high due to a legacy of under-investment. In order to achieve operational efficiencies and cost savings while increasing service quality, prioritisation must be driven by the business case for projects.</p> <p>1. Meeting Customer Expectations</p> <p>Irish Water has responsibility for providing a clean safe water supply to current and future customers connected to the network. Since its inception, it has repeatedly expressed an aim of engaging with customers and providing excellent service. The Chamber supports this commitment to quality customer service.</p> <p>However, there must be sufficient opportunity for redress should Irish Water fall short of its responsibilities in this regard. Businesses have been paying for water for decades, and it is important that they are clear on the services they receive in return.</p> <p>The Chamber welcomes the assurance that customers will be “required to pay only for planned and sustainable development”. The aim to ensure that investment is not “wasted” on premature or oversized water services is also a positive step towards ensuring value for money.</p> <p>Nevertheless, Irish Water must provide communication channels for customers who have concerns about development plans in their area, or who are dissatisfied with the service they receive.</p> <p>2. Ensuring a safe and reliable water supply</p>	<p>have concerns about development plans in their area, or who are dissatisfied with the service they receive.</p> <p>NS9-3: By the indication in the Environmental Scoping Report, geographical context is not likely to be applied to WSSP strategies. Dublin Chamber is of the view that a regional approach is necessary for the drafting and implementation of the WSSP. Although it is envisaged that subsequent Implementation Plans will detail how strategies will be carried out at a regional and county level, the WSSP itself must take account of the significant disparity in the water resources and services available across the country. Generalisation across Ireland’s greatly varying water systems is unlikely to produce the best possible plan over next 25 years.</p>	<p>NS9-2: Objective 1 “Meeting our customer expectations” aim is to establish both customer trust and a reputation for excellent services. It will be a policy to establish effective communication channels with customers. The details of these customers’ communication channels are outside the remit of this plan.</p> <p>NS9-3: Submission point is noted. The WSSP sets out the key challenges facing Irish Water in relation to provision of water and wastewater services and environmental compliance, and the high level strategies for meeting these challenges. Geographical context and individual projects are not identified in this high level strategic plan. It will be subsequent Implementation Plans which will detail how the strategies and measures contained within the WSSP will be carried out at a regional and county level.</p>	<p>NS9-2: Objective 1 “Meeting our customer expectations”.</p> <p>NS9-3: Objective 5 “Supporting social and economic growth”.</p>

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		<p>2.1. Need for regional approach The Greater Dublin Area (GDA) currently accounts for 39% of the State's population. 1.8 million people currently live in the GDA with this figure set to grow to 2.2 million by 2031. Projected population growth together with a number of other risk factors (including climate change, which could cause summer water shortages) threaten future water supply in the Dublin Region. Dublin Chamber urges Irish Water to prioritise efforts to address the situation, from the Dublin Water Supply Project (Shannon) to the Ringsend Wastewater Treatment Plant upgrade to the Water Mains Rehabilitation Project in the Dublin Region. Irish Water has acknowledged the strain on infrastructure in the Dublin Region, yet the Chamber is concerned by the indication in the Environmental Scoping Report that geographical context is not likely to be applied to WSSP strategies. Dublin Chamber is of the view that, in line with the Regional Planning Guidelines, a regional approach is necessary for the drafting and implementation of the WSSP. Although it is envisaged that subsequent Implementation Plans will detail how strategies will be carried out at a regional and county level, the WSSP itself must take account of the significant disparity in the water resources and services available across the country. Generalisation across Ireland's greatly varying water systems is unlikely to produce the best possible plan over next 25 years. This point is further developed in Section 5, Supporting future social and economic growth.</p> <p>2.2. Developing a Water Demand Management System Over half of the world's population lives in urban areas, a proportion expected to increase to 66 per cent by 2050.2 Supplying water to these people is a complex challenge, a key</p>	<p>NS9-4: Developing a Water Demand Management System: The four water treatment plants which supply the Dublin Region operate at about 99% capacity on a day-to-day basis. While it is clear that a new water supply is needed, Dublin Chamber proposes that a Demand Management System could be implemented in tandem with the relevant capital projects (i.e. the Dublin Water Supply Project).</p> <p>Innovations on the supply-side (e.g. rainwater harvesting) and the demand side (e.g. managing consumptive demand to postpone or avoid the need for new supply infrastructure) could go a long way to achieving Irish Water's goal of ensuring a safe and reliable water supply for Ireland.</p> <p>NS9-5: Providing effective waste water management: Ireland is currently subject to a</p>	<p>NS9-4: Submission point is noted and will be dealt with in Objective 2 "Ensuring a safe and reliable water supply".</p>	<p>NS9-4: Objective 2 "Ensuring a safe and reliable water supply".</p>

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		<p>component of which is meeting the increased demand generated by new city-dwellers.</p> <p>The four water treatment plants which supply the Dublin Region operate at about 99% capacity on a day-to-day basis. While it is clear that a new water supply is needed, Dublin Chamber proposes that a Demand Management System could be implemented in tandem with the relevant capital projects (i.e. the Dublin Water Supply Project).</p> <p>The demand management approach aims to get the maximum out of the water supply already available. This approach could be of huge benefit to the Dublin Region as the area set to be most affected by supply shocks in coming years. The GDA's population will continue to grow, but demand could be managed in such a way as to reduce pressure on the system. This can be done sustainably and without harming business or domestic activity.</p> <p>In the context of constrained funding for investment, there is significant scope for Ireland to position itself as a world leader in the area of water conservation and demand management. Ireland is well-placed in this regard given the abundance of water in the country and the fact that a low pressure pipe system is in place.</p> <p>Innovations on the supply-side (e.g. rainwater harvesting) and the demand side (e.g. managing consumptive demand to postpone or avoid the need for new supply infrastructure) could go a long way to achieving Irish Water's goal of ensuring a safe and reliable water supply for Ireland. Irish Water may usefully look to other countries and regions with success in this field, such as Australia and Ontario.</p> <p>3. Providing effective waste water management</p>	<p>European Court of Justice Infringement case regarding wastewater treatment. We must live up to our international 'green' image by improving the environmental quality of our waters.</p> <p>NS9-6: Sewer overflows and coastal water quality: Irish Water must ensure an effective system is in place to deal with heavy rainfall events (which are set to become more frequent) and the resulting overflow from sewers.</p> <p>NS9-7: Pipe and sewer rehabilitation and replacement: In the process of rehabilitating deficient sewers and pipes, minimising the impact on customers and road users must be a top priority.</p> <p>NS9-8: Irish Water's commitment to "investigate, develop and adopt best practices and technologies for the rehabilitation and replacement of underground</p>	<p>NS9-5: Submission point is noted. This will be dealt with under Objective 3 and 4 of the WSSP "Providing effective waste water management" and "Protect and enhance the environment".</p> <p>NS9-6: Submission point is noted. This will be dealt with under Objective 3 of the WSSP "Providing effective waste water management"</p> <p>NS9-7: Submission point is noted. This does not come under the remit of the WSSP.</p>	<p>NS9-5: Objective 3 and 4 "Providing effective waste water management" and "Protect and enhance the environment", respectively.</p> <p>NS9-6: Objective 3 "Providing effective waste water management"</p> <p>NS9-7: N/A</p>

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		<p>Ireland is currently subject to a European Court of Justice Infringement case regarding wastewater treatment. We must live up to our international 'green' image by improving the environmental quality of our waters.</p> <p>3.1. Sewer overflows and coastal water quality Irish Water must ensure an effective system is in place to deal with heavy rainfall events (which are set to become more frequent) and the resulting overflow from sewers. The current situation impacts on water users and may also have adverse effects on tourism in Ireland. For example, in recent weeks several areas in the Dublin Region were forced to impose swimming bans following sewer overflows and the subsequent contamination of bathing areas. A disruption during a peak summer period affects regular local swimmers, but may also lead tourists to believe that Ireland's bathing waters are unsafe. The Destination Dublin Strategy, which aims to double tourism revenues in the Dublin Region by 2020, has identified coastal areas as having significant potential for growth. This analysis remains true throughout Ireland, and every effort must be made to protect and enhance our coastal amenities for residents and tourists alike.</p> <p>3.2. Pipe and sewer rehabilitation and replacement In the process of rehabilitating deficient sewers and pipes, minimising the impact on customers and road users must be a top priority. Interruption to water supply greatly affects business competitiveness, while road works disrupt connectivity and pedestrian footfall, which is important to retailers.</p> <p>Dublin Chamber fully welcomes Irish Water's commitment to "investigate, develop and adopt best practices and technologies for the rehabilitation and replacement of underground infrastructure". Once identified, Dublin Chamber</p>	<p>infrastructure". Once identified, Dublin Chamber recommends that these best practices be developed into a code of conduct for projects likely to cause this type of disruption. The code of conduct could then be made publicly available such that customers are aware of projects in their locality and have a guide for what impacts or disruptions they can expect.</p> <p>NS9-9: Protecting the environment: Irish Water must aim to realise its capital projects in the most environmentally-friendly way possible. Dublin Chamber suggests that Irish Water look to other countries for best practice in this regard, perhaps employing environmental impact clauses in tenders for projects.</p> <p>NS9-10: Supporting future social and economic growth: All new housing developments will require water services. If they are likely to be</p>	<p>NS9-8: Submission point is noted. Our approach to providing for sustainable future growth will be based on the principles of asset management to balance the investment needs. This approach will consider the development of infrastructure, operational activities and asset maintenance, adoption of innovation and new technologies, utilising the best available data and information on our assets to underpin any investment. We will support growth whilst delivering a satisfactory service outcome and best value for our customers.</p> <p>NS9-9: Submission point is noted.</p>	<p>NS9-8: Objective 6 "Investing in Our Future"</p> <p>NS9-9: Objective 4 "Protect and</p>

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		<p>recommends that these best practices be developed into a code of conduct for projects likely to cause this type of disruption. The code of conduct could then be made publicly available such that customers are aware of projects in their locality and have a guide for what impacts or disruptions they can expect.</p> <p>4. Protecting the environment Major water infrastructure projects such as the Dublin-Shannon pipeline pose significant environmental impacts. While these projects are essential for the development of Ireland's water infrastructure, Irish Water must aim to realise its capital projects in the most environmentally-friendly way possible. Dublin Chamber suggests that Irish Water look to other countries for best practice in this regard, perhaps employing environmental impact clauses in tenders for projects.</p> <p>5. Supporting future social and economic growth Dublin Chamber recognises that predicting when and where growth will occur is an uncertain science. However, as Irish Water acknowledges: "all scenarios indicate that the Dublin and Mid East Regions will continue to grow significantly faster than other regions". This is reflected in the recently-published figures on the need for housing in the Dublin Region. Of the 90,000 new housing units needed in Ireland by 2021, 60,000 are required in Dublin. Commuter belt counties Louth, Meath, Kildare and Wicklow will require a further 26% of new units. Housing needs in Ireland vary greatly on a county-by-county basis: some counties have a surplus while others are severely undersupplied. Analysing the national figures alone would mask this reality and obscure the areas in greatest need.</p>	<p>concentrated in the GDA, it follows that the WSSP should focus specifically on this area. This approach would not ignore Irish Water's national remit, nor would it be implemented at the expense of other regions.</p> <p>NS9-11: Investing in our future: Integrating data from Local Authorities and collecting future data: Dublin Chamber expects that Irish Water's national remit will allow it to adopt a more uniform approach to the collection of data in the future. The Chamber also recommends that Irish Water research and implements international best practice in the collection and analysis of water data.</p> <p>NS9-12: The current leakage levels are not readily available. If leakage levels were published more frequently,</p>	<p>NS9-10: Submission point is noted. Geographical context and individual projects are not identified in this high level strategic plan. It will be subsequent Implementation Plans which will detail how the strategies and measures contained within the WSSP will be carried out at a regional and county level. Objective 5 "Supporting social and economic growth" will address the high level strategies and measures for meeting the demand for water services.</p> <p>NS9-11: Submission point is noted.</p>	<p>enhance the environment".</p> <p>NS9-10: Objective 5 "Supporting social and economic growth".</p> <p>NS9-11: Objective 5 "Supporting social</p>

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		<p>The same can be said for water. All new housing developments will require water services. If they are likely to be concentrated in the GDA, it follows that the WSSP should focus specifically on this area. This approach would not ignore Irish Water's national remit, nor would it be implemented at the expense of other regions. A regional perspective simply recognises the areas which will see the greatest demand for water services into the future and aim to develop plans accordingly.</p> <p>6. Investing in our future</p> <p>6.1. Integrating data from Local Authorities and collecting future data</p> <p>The data migration process from Local Authorities to Irish Water was due to begin in July 2014 and is scheduled for completion in January 2015. The process poses considerable challenges given the complexity of the former billing arrangements, lack of uniformity in the data and expected gaps therein.</p> <p>Dublin Chamber expects that Irish Water's national remit will allow it to adopt a more uniform approach to the collection of data in the future. The Chamber also recommends that Irish Water research and implement international best practice in the collection and analysis of water data. The more knowledge available regarding customer consumption patterns etc., the more effective the policies that Irish Water will be able to develop.</p> <p>6.2. Engagement with Customers and Stakeholders</p> <p>In line with its aims of engaging customers, Irish Water should aim to foster a culture of ownership of water services. Active 'water citizenship' could be an important part of the</p>	<p>perhaps on a regional basis, customers could be encouraged to take an interest in and ownership of the state of their local water infrastructure. Increased transparency in this regard would also allow domestic and non-domestic customers to see if they are getting value for money.</p>	<p>NS9-12: Submission point is noted. This however does not come under the remit of this Tier 1 level Plan.</p>	<p>and economic growth".</p> <p>NS9-12: N/A</p>

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		<p>development of a Water Demand Management System as recommended in Section 2.2.</p> <p>Leakage reduction efforts in the Dublin Region offer a useful example. Between 1996 and 2002, leakage in the Dublin Region was reduced from 42% to 28%. Further progress has been achieved since 2007 via the Water Mains Rehabilitation Project but the current leakage levels are not readily available. If leakage levels were published more frequently, perhaps on a regional basis, customers could be encouraged to take an interest in and ownership of the state of their local water infrastructure. Increased transparency in this regard would also allow domestic and non- domestic customers to see if they are getting value for money. Similar initiatives in other areas of water services could add to this improved engagement.</p>			
NS10	Respondent 19	In relation to Wastewater Treatment by the use of Reed beds and the plantation of slow growing willow trees, where permitted, as a low maintenance measure, there should be installed at various locations around the site, telemetry and other technical monitoring devices to measure water levels (in case of excess water causing run-off) and the resultant BOD/PH of treated residue entering the Environment vs the non- monitored adjacent site.	NS10-1: Installation of telemetry and environmental monitoring in and around Wastewater Treatment by the use of Reed beds and the plantation of slow growing willow trees.	<p>NS10-1: Submission point is noted. Waste water treatment will be considered within Objectives 3 and 4 of the WSSP “Providing effective waste water management” and “Protect and enhance the environment”.</p> <p>The use of particular treatment measures will be considered within Tier 2 level Implementation Plans and Tier 3 level Projects, as relevant.</p>	NS10-1: Objectives 3 and 4 “Providing effective waste water management” and “Protect and enhance the environment”, respectively.
NS11	Respondent 20	Please let me have landline phone number to allow free of charge contact with Irish water.	NS11-1: Please let me have landline phone number to allow free of charge contact with Irish water.	NS11-1: Submission is noted. This does not fall under the remit of this Tier 1 Plan. Irish Water can be contacted on 1890 278 278 or 01 707 2828	NS11-1: N/A

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NS12	Respondent 21	Irish Water customers should have a say, entitled to remove the water meter themselves for financial reasons, Irish Water should offer the services of removing water meters, not because of protest reasons but for financial reasons, people may wish to receive an unmetered bill, it might give them better piece of mind, and Irish Water should be more understanding of customers financial positions and should give customers a choice of receiving meters and not forcing them on them. I wish that Irish Water, The department and the CER will consider this very very seriously.	NS12-1: Replacement of metered billing with an assessed charge.	NS12-1: Submission is noted. This does not fall under the remit of this Tier 1 Plan.	NS12-1: N/A
NS13	Respondent 22 – Submission 1	Will Irish Water be holding Public meeting on WSSP and SEA? or will everything be done impersonally. On the internet no personal contact.	NS13-1: Will Irish Water be holding Public meeting on WSSP and SEA?	NS13-1: Submission point is noted. On publication of the WSSP, SEA Environmental Report and the Natura Impact Statement consultation with the public and statutory authorities is required. In line with regulation and legislation, there will be a minimum consultation period of 6 weeks. Public meetings will not be held on the draft WSSP.	NS13-1: N/A
NS14	Respondent 22 – Submission 2	The first job is to fix the Infrastructure / leaking pipes. Up-grade re-new our reservoir Up-grade, build, new water treatment Plants. Up-grade, build, new waste water treatment Plants. Stop the water metering program, invest this money in the above. Investing in the above will show a quick return in short period of time. This is work that needs to be done now. It would create sustainable jobs, in the communities, taxes would be paid. Meters could be put in strategic points in the water system to find were the leaks are. Not meters in every home as this is to privatise the whole water system. Brian Gould 0860529112	NS14-1: The first job is to fix the Infrastructure/leaking pipes. Up-grade/re-new our reservoir Up-grade/build new water treatment Plants.	NS14-1: Submission point is noted. The strategic aims, policies and associated measures relating to Water and Waste Water infrastructure will be dealt with in Objective 2 “Ensuring a safe and reliable water supply” and Objective 3 “Provide effective waste water management”. The implementation of these higher	NS14-1: Objective 2 “Ensuring a safe and reliable water supply” and Objective 3 “Providing effective waste water management”, respectively.

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			NS14-2: Stop the water metering program and invest this money in infrastructure, leaking pipes, up-grading/re-new reservoirs and up-grading/building new water treatment Plants.	<p>level strategies and measures will be detailed in the Tier 2 Implementation Plans and Tier 3 level projects.</p> <p>NS14-2: Submission is noted. This does not come under the remit of the WSSP.</p>	NS14-2: N/A
NS15	Respondent 23	I expect to be metred by 1 October, I would strongly object to being assessed. I am prepared to pay for the water that I use only. All customers are entitled to clean drinkable water. Nobody should have to pay for water that is not fit for purpose. All leaks should be fixed ASAP, customers should not have to pay for water that is escaping out of the system. Waste water should be dealt with efficiently. I do not want to hear of land or beaches being contaminated. It is disgraceful the amount of money which has already been given to consultants (where was the regulator and the Government?) This should stop immediately. I do not want to hear of excessive salaries being paid to employees. No bonuses should be paid until customers have clean water from leak free pipes.	NS15-1: All leaks should be fixed as soon as possible.	NS15-1: Submission point is noted. Leakage is an immediate priority for Irish Water. Through a targeted programme of leakage detection, leakage control, pressure management and leakage repair we will bring leakage down to sustainable economic levels. We will introduce pressure management measures, provide incentives to reduce customer side leakage and replace or rehabilitate water pipelines. We will prioritise our leakage management activities based on need and adopt a 'risk based' approach to provide sufficient capacity in the water supply system to meet	NS15-1: Objective 2 "Ensuring a safe and reliable water supply"

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				<p>acceptable levels of service to our customers.</p> <p>The National Water Conservation Plan is a Tier 2 level Implementation Plan which will be subject to its own plan making process and associated environmental assessments.</p> <p>This Tier 2 level plan will detail how the strategies/measures of the WSSP will be carried out at a regional and county level.</p> <p>NS15-2: Submission point is noted. Waste water treatment will be considered within Objectives 3 and 4 of the WSSP. The use of particular treatment measures will be dealt with at lower level plans and Projects, as appropriate.</p> <p>NS15-3: Submission point is noted. This does not fall under the remit of this Tier 1 Plan.</p>	
			<p>NS15-2: Waste water should be dealt with efficiently</p> <p>NS15-3: Salaries and bonuses</p>		<p>NS15-2: Objectives 3 and 4 “Providing effective waste water management” and “Protect and enhance the environment”, respectively.</p> <p>NS15-3: N/A</p>
NS16	Respondent 24	<p>Water Services Strategic Plan Issues Paper Page 5 - Objective 1: Meeting Customer Expectations</p> <p>Customer willingness to pay Customers need to be satisfied that they are paying a fair</p>			<p>NS16-1: N/A</p>

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		<p>amount for the water services that they are receiving. It is essential that Irish Water has an effective tariff structure and customer protection measures in place to achieve this</p> <p>Here and now, I wish to register my particular concern about the complete lack of clarity and information on assessed charges for unmetered properties. The regulator already agrees that it is only fair and equitable that Customers who overpay will be reimbursed.</p> <p>I believe that I will be overpaying significantly if I am 'assessed' on the current Irish water proposals. Yet where in all of the Irish Water documentation I've trawled through are the pertinent details regarding how an unmetered property (which uses far less water than the 'assessed charge') will be reimbursed by Irish water?</p> <p>- The only rumours I have heard is that Irish Water say that 'when' a property is eventually metered that the actual usage will be compared with the assessed usage and if it can be clearly shown that the customer's actual usage is less than the previously assessed usage, then they might consider a reimbursement. If the newly metered property records a higher level of usage than the assessed charge, then Irish Water may claw back additional charges from the customer. Is there any truth/substance to either of the above scenarios? Where is the written proposal/decision by CER about this issue?</p> <p>- How can an unmetered property prove to Irish water that it uses less water than what it's been 'assessed' and charged for?</p> <p>(a) many properties may never be metered, and so may be in a permanent state of overpayment with assessed charges. How is this fair or equitable?</p>	<p>NS16-1: Lack of clarity and information on assessed charges for unmetered properties.</p> <p>NS16-2: Details regarding how an unmetered property (which uses far less water than the 'assessed charge') will be reimbursed by Irish water? How can an unmetered property prove to Irish water that it uses less water than what it's been 'assessed' and charged for?</p> <p>The whole issue of tariffs and billing for unmetered properties is totally muddy and unsatisfactory.</p>	<p>NS16-1: Submission point is noted. This does not fall under the remit of this Tier 1 Plan.</p> <p>NS16-2: Submission point is noted. Details pertaining to unmetered properties charges/reimbursements do not come under the remit of this Tier 1 Plan.</p>	<p>NS16-2: N/A</p>

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		<p>(b) property occupancy and circumstances are constantly changing over time. There could be significant drops/increases of water usage from quarter to quarter or year to year, depending on family life circumstances, new members arriving, older ones departing etc. i.e. The 'actual usage' recorded when a meter finally gets installed does not necessarily reflect the same actual usage a year earlier when a property was unmetered and billed for assessed usage.</p> <p>The whole issue of tariffs and billing for unmetered properties is totally muddy and unsatisfactory.</p> <p>I would appreciate any relevant information and facts in writing that you can give me to clarify my worry and anxiety about this.</p>			
NS17	Respondent 25	<p>In reading the content of the Water Services Strategic Plan (WSSP) its objectives at section 2.1 are noted. These include the following:</p> <ul style="list-style-type: none"> • Drinking water quality; • The prevention of risks to human health or the environment relating to the provision of water services; • The existing and projected demand for water services; • Existing and reasonably foreseeable deficiencies in the provision of water services by Irish Water; • Water conservation measures; and • Management of the property of Irish Water. <p>Although it is clear from the “Draft Scoping Report” that the report deals with what are termed “high level strategies” for providing water services to their customers, it appears to me that a vital element regarding the protection of the public water supply is overlooked or omitted. It is stated that IW has responsibility for providing a clean safe water supply to current and future customers connected to the network, yet no</p>	<p>NS17-1: No mention is made in regards to protecting the clean safe water supply from risks that may be present in consumer side water installations, or from the waste of water that can occur from such installations.</p>	<p>NS17-1: Submission point is noted. The risk of consumer side water contamination will be dealt with in Objective 2 of the WSSP “Ensuring a safe and reliable water supply”.</p> <p>We will develop and implement a National Water Resource Management Plan that will address ‘at risk’ water sources and treatment facilities whilst ensuring that there is sufficient water to meet the demands of population and economic growth. Our Water Resource Management Plan will focus on efficient and sustainable use of water, system resilience,</p>	<p>NS17-1: Objective 2 “Ensuring a safe and reliable water supply”.</p>

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		<p>mention is made in any form in regards to protecting the clean safe water supply from risks that may be present in consumer side water installations, or from the waste of water that can occur from such installations.</p> <p>It is noted from S.I. No. 106 of 2007, European Communities (Drinking Water) Regulations 2007 that a water suppliers duties in regards to the provision of a wholesome water supply shall be measured for compliance at:</p> <ol style="list-style-type: none"> 1. The point within premises at which it emerges from the tap or taps that are normally used for the provision of water for human consumption; 2. With water used in food production undertaking, at the point where the water is used in the undertaking. <ul style="list-style-type: none"> • It does state at section 6(1) of S.I. 106 that a water supplier shall not be in breach of its obligations under Regulation 4(1) (a water supplier shall ensure that the water is wholesome and clean and meets the requirements of these Regulations) where non-compliance is due to the domestic distribution system in a premises, or the maintenance thereof, and that distribution system is not in the charge or control of the water supplier in its capacity as a water supplier. • It is also stated at S6 (2), that the owner of a premises where water is supplied for human consumption as part of a commercial or public activity (including but not limited to schools hospitals and restaurants) shall maintain the domestic distribution system of the premises in such condition that it does not cause, contribute to, or give rise to a risk of non-compliance of that water with a parametric value specified. • It further states at section 6(3) of S.I. 106 that without 		<p>including cost-effective measures to transfer water from areas that have plentiful water resources to those who will have insufficient to meet demand and to support growth.</p> <p>Irish Water will examine the legal framework around source protection and irrespective of the framework will collaborate with local landowners and stakeholders to effect high levels of protection for our water sources.</p> <p>We will engage with stakeholders including the EPA, CER, planning authorities, landowners, fisheries, our customers and other interested parties and work with all concerned in a collaborative basis.</p>	

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		<p>prejudice to the above 2 paragraphs, that where a non-compliance or a threat of such non-compliance, is present in a premises where water is supplied for human consumption as part of a commercial or public activity (including, but not limited to, schools, hospitals and restaurants) the relevant sanitary authority shall ensure that appropriate action is taken promptly (whether by the owner of the premises or the water supplier, or both, as the sanitary authority may consider appropriate) to –</p> <p>a) Immediately prevent, or restrict as the sanitary authority deems appropriate, the further supply of water for human consumption to the public through the domestic distribution system of the premises until the system is restored to such condition as to no longer be a cause or a risk of non-compliance, and</p> <p>b) To restore the domestic distribution system of the premises to a standard necessary for compliance with the (S.I. 106) Regulations.</p> <p>And, the sanitary authority may issue such directions as it considers necessary for this purpose.</p> <p>In referring to S.I. 106 I am highlighting the attention paid by that document to the risk of contamination occurring within consumer side hot & cold water installations, there is no mention to my knowledge of this in Irish Waters published documents. Depending on the type water installation such risk can be significant and pose a considerable threat to the public water supply system, should backflow of any description occur. The fluid categories that can be contained within consumer side water installations present various categories of risk, these are:</p> <p>1. Fluid category 1 = wholesome water;</p>	<p>NS17-2: Local Authority byelaws relating to undue consumption, misuse or contamination of the water supply within their areas of service provision. As Irish</p>	<p>NS17-2: Submission point is noted. This does not fall under the remit of this Tier 1 Plan.</p>	<p>NS17-2: N/A</p>

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		<p>2. Fluid category 2 = Water in fluid category 1 whose aesthetic quality is impaired owing to a change in temperature or the presence of substances or organisms causing a change in its taste, odour or appearance;</p> <p>3. Fluid category 3 = Fluid which represents a slight health hazard because of the concentration of substances of low toxicity, including any fluid which contains: ethylene glycol, copper sulphate solution, or similar chemical additives; or sodium hypochlorite (chloros and common disinfectants);</p> <p>4. Fluid category 4 = Fluid which represents a significant health hazard due to the concentration of toxic substances, including any fluid which contains: Chemical, carcinogenic substances or pesticides (including insecticides and herbicides); or environmental organisms of potential health significance;</p> <p>5. Fluid category 5 = Fluid representing a serious health hazard because of the concentration of pathogenic organisms, radioactive or very toxic substances, including fluid which contains: Faecal material or other human waste; or butchery or other animal waste; or pathogens from any other source.</p> <p>The full range of risks mentioned above could be contained in any hot and cold water installation presently, whether industrial/commercial or domestic. This is particularly so in domestic premises, particularly due to the installation of Rainwater harvesting systems and Greywater harvesting systems, which both present a fluid category 5 risk when such water systems are augmented from the potable water service pipe.</p> <p>Irish Water is taking over responsibility from 34 Local Water Authorities, each of which should have had some form of Regulation or Byelaw requirements for the purpose of</p>	<p>Water is now the Authority in regards to such matters they should be dealing with this through the enforcement of suitable Regulatory Byelaws which can apply to the whole of the 26 County area of public water supply. These Regulations and Byelaws should, as in the UK, provide national requirements for the design, installation and maintenance of plumbing systems, water fittings and water-using appliances. Their purpose being to prevent misuse, waste, undue consumption or erroneous measurement of water and, most importantly, to prevent contamination of drinking water.</p>		

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		<p>preventing the waste, undue consumption, misuse or contamination of the water supply within their areas of service provision. As Irish Water is now the Authority in regards to such matters they should be dealing with this through the enforcement of suitable Regulatory Byelaws which can apply to the whole of the 26 County area of public water supply. These Regulations and Byelaws should, as in the UK, provide national requirements for the design, installation and maintenance of plumbing systems, water fittings and water-using appliances. Their purpose being to prevent misuse, waste, undue consumption or erroneous measurement of water and, most importantly, to prevent contamination of drinking water. This is particularly important when one considers the different types of water installation practises that may be allowed in what were different areas of water supply pre Irish Water. These differences cause conflict regarding what is approved best practise and can result due to lack of guidance and enforcement an unsatisfactory standard of water installations which can also result in waste of water due to unapproved installation practises. This waste of water can be an inefficient use of the resource and also result in excessive water charges being levied on unsuspecting consumers who are the victims of the poor practise water installations.</p> <p>As I mentioned earlier the purpose of this submission is to highlight the lack of attention by Irish Water in regards to the risk to the public water supply system that can be present from consumer side water installations. There are no Irish Water published Water Installation Regulations or Byelaws in force, there is minimal guidance regarding such matters contained in the Building Regulations 2013, Part D, Materials and Workmanship, Technical Guidance Document and the 2008, Part G, Hygiene Document published by the DOE.</p>			

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		This in my opinion is an oversight or error on the part of Irish Water and is one that should be dealt with as part of their “Strategic Plan” in regards to the protection of drinking water quality.			
NS18	Respondent 26	This submission relates to residential customers in rural areas who have replaced their old-fashioned septic tanks with modern, environmentally-friendly (but expensive) effluent treatment units. These units need to use large quantities of clean water (typically 4000-plus litres) each time they are refilled after periodic desludging. This will add considerably to the cost for residential customers - unfairly so.	NS18-1: Effluent treatment units need to use large quantities of clean water each time they are refilled after periodic desludging. This will add considerably to the cost for residential customers - unfairly so.	NS18-1: Submission point is noted. The Commission for Energy Regulation’s (CER) role is to protect the interests of our water customers, to ensure water services are delivered in a safe, secure and sustainable way and that we operate in an economic and efficient manner. The CER is the body responsible for ensuring that the prices that we charge to customers are fair and reasonable.	NS18-1: Objective 1 “Meeting our customer expectations”
NS19	Respondent 27	Promote the installation of grey water system in new building. The Daintree development in Dublin is a great example. The Cake cafe located within this development has signs indicating that rain water is used to flush their toilets, thus raising awareness. Provide incentives for house holders to use rainwater i.e. free rain water bunts, grants for installation of grey water systems. Encourage adoption of dual flush systems in all buildings. Collaborate with emerging designers to come up with innovative solutions; Irish water could launch a design competition at 2nd or 3rd level.	NS19-1: Promote the installation of grey water system in new building and collaborate with emerging designers to come up with innovative solutions.	NS19-1: Submission point is noted. This will be considered under Objective 6 “Investing in our future”. Irish Water will provide information and education to customers to promote demand reduction and wastewater reuse. Innovation will be integral to delivering benefits in efficiency, customer service and water and environmental quality. We will	NS19-1: Objective 1 “Meeting Customer Expectations” and Objective 6 “Investing in our future”.

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				<p>look for new ways to work with the CER and EPA to ensure that innovative solutions can be deployed.</p> <p>A key part of innovation is investment of our people's time and money into research. We will pursue research in three ways:</p> <ul style="list-style-type: none"> • Collaboration with academic institutions and other organisations to pursue research and innovation opportunities; • Research and pilot innovative technologies, processes and systems for local application to satisfy the specific needs of our business; • Collaboration with other water utilities and become a "fast follower" (i.e. learn best practices) <p>To assist in our drive towards innovation and efficiency we will partner with Third Level Institutions in Ireland and are supporting EPA with their research programme. We will undertake pilot studies for new technologies and if successful</p>	

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				we will implement these on our assets and approve for use in design.	
NS20	Respondent 28	<p>1. As a private company Irish Water is not obliged to publish its accounts, neither has it any remit in its Articles of Association, other than its own best interests. The question arises: to whom is it due?:- this above-mentioned responsible stewardship. The answer would appear to be:- to some Government Minister: that of Environment, that of Energy & Communications or perhaps of Finance. Maybe tomorrow the minister concerned, as sole shareholder will cede this “subsidiary”, as Irish Water is called, to a third party. Who knows, who can tell?</p> <p>2. Public Health, “our health” if you will, has been the driving force behind what used to be called Water Supply and Sanitary Services, now water services.</p> <p>3. The afore-mentioned services heretofore were supplied to our communities in urban areas by Local Authorities and until a generation ago financed by locally raised Domestic Rates duly endorsed by democratically elected representatives.</p> <p>I believe that notwithstanding the complicated nature of the law relating to water and its ownership, the people of Ireland should be deemed the beneficial owners of all the surface water that arrives in the catchments of the State and all ground water contained in the aquifers underlying the territory of the State. Irish Water could thereby be given responsible stewardship to manage this resource on behalf of the people in whose interest, I believe, entirely on the basis of equity, the installation for water meters serves no purpose.</p> <p>Irish Water and its Directors should be obliged by the Constitution of Ireland only to dispose of portions of this natural</p>	<p>NS20-1: As a private company Irish Water is not obliged to publish its accounts, neither has it any remit in its Articles of Association, other than its own best interests. The question arises: to whom is it due?</p> <p>NS20-2: The people of Ireland should be deemed the beneficial owners of all the surface water that arrives in the catchments of the State and all ground water contained in the aquifers underlying the territory of the State. Irish Water could thereby be given responsible stewardship to manage this resource on behalf of the people in whose interest, I believe, entirely on the basis of equity.</p> <p>NS20-3: Metering of water and charging on the basis of usage runs counter to the principle of equity which underpins our communities.</p>	<p>NS20-1: Submission point is noted. This does not fall under the remit of the WSSP.</p> <p>NS20-2: Submission point is noted. The ownership of water does not fall under the remit of the WSSP.</p> <p>NS20-3: Submission point is noted. This does not fall under</p>	<p>NS20-1: N/A</p> <p>NS20-2: N/A</p> <p>NS20-3: N/A</p>

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		<p>resource in ways compatible with the best interest of the people of Ireland; alas, this is not so. I believe that the installation of water meters facilitates the disposal of this natural resource to third party water services providers whereby the people having paid for the meters become hostages to fortune beholden to commercial interests without even the promise of responsible stewardship.</p> <p>I believe that the best interest of the people is well served by an equitable and sufficient means of payment for water services. I believe that metering of water and charging on the basis of usage runs counter to the principle of equity which underpins our communities.</p> <p>I believe that prohibitive water charges based on usage compromise what is referred to as our health: Public Health both physical and mental health is put at risk by anything that compromises personal hygiene. The installation of water meters only facilitates the raising of prohibitive charges for usage thus causing risk to personal hygiene.</p>	<p>NS20-4: Prohibitive water charges based on usage compromise what is referred to as our health. Public Health, both physical and mental health, is put at risk by anything that compromises personal hygiene. The installation of water meters only facilitates the raising of prohibitive charges for usage thus causing risk to personal hygiene.</p>	<p>the remit of this Tier 1 strategic plan</p> <p>NS20-4: Submission point is noted. This does not fall under the remit of this Tier 1 strategic Plan. The impact human health will be addressed in the SEA Environmental Report.</p>	<p>NS20-4: N/A</p>
NS21	Respondent 29	<p>You pose the question in your advert in the Independent on 30th July 2014: how would you like to see your water services evolve over the next 25 years?</p> <p>At present the ten houses in our village source water from pipes in the River White and visit a spring weekly to fill bottles for cooking and drinking water.</p> <p>We have been seeking a potable source of water through Mayo County Council since 2007. We would like to have achieved this in the next 25 years!</p>	<p>NS21-1: A potable source of water has been sought through Mayo County Council since 2007. We would like to have achieved this within the next 25 years.</p>	<p>NS21-1: Submission point is noted. The WSSP will set out the key challenges facing Irish Water in relation to provision of water and wastewater services and environmental compliance, and the high level strategies for meeting these challenges.</p> <p>Extension of the existing water supply network and individual projects will be identified within</p>	<p>NS21-1: Objective 2 “Ensuring a safe and reliable water supply”.</p>

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				subsequent Implementation Plans which will detail how the strategies and measures contained within the WSSP will be carried out at a regional and county level.	
NS22	Respondent 30	<p>1) I'm concerned at the vagueness of the language used in the strategic plan: there are very few deliverables identified, and a lot of aspirations. A case in point: I don't want Irish Water to "aspire to be associated with the characteristics of a high performing utility", I want it to actually possess the characteristics of one, and to actually <u>be</u> one. Don't build the brand around the aspirations, build the utility around the product, then the brand will slot into place.</p> <p>Suggested solution: use action words. Change that text to read "Irish Water will be the best public utility company in the country, and its brand will reflect that."</p> <p>2) There doesn't seem to be a holistic view of the company's challenges, and how to address them. "Best practices" are mentioned twice - both times in reference to sewage - and "Europe" shows up in relation to fines. There's very little about what Irish Water can learn from the water infrastructure in other countries.</p> <p>Suggested solution: Be explicit about the infrastructural goals for the future. "A safe and reliable supply" is the baseline: what is Irish Water aiming for beyond that?</p> <p>3) I'm concerned that there don't seem to be any incentives in place to encourage the company to tackle leaks. An estimated</p>	<p>NS22-1: Vagueness of the language used in the strategic plan</p> <p>NS22-2: There doesn't seem to be a holistic view of the company's challenges, and how to address them. "A safe and reliable supply" is the baseline: what is Irish Water aiming for beyond that.</p> <p>NS22-3: There don't seem to be any incentives in place to encourage the company to tackle leaks.</p>	<p>NS22-1: Submission point is noted. The WSSP sets out the key challenges facing Irish Water in relation to provision of water and wastewater services and environmental compliance and the high level strategies for meeting these challenges.</p> <p>NS22-2: Submission point is noted. The WSSP will set out the key challenges facing Irish Water in relation to provision of water and wastewater services and environmental compliance and the high level strategies for meeting these challenges.</p> <p>NS22-3: Submission point is noted. It is an aim of Irish Water to ensure water availability and water supply resilience now and into the future. The issue of leakage will be dealt with in</p>	<p>NS22-1: N/A</p> <p>NS22-2: N/A</p> <p>NS22-3: Objective 2 "Ensuring a safe and reliable water supply"</p>

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		<p>leakage level of twice that of the UK works out at about 40% given 2010/11 figures, but charging the consumer based on consumption and a 12 year SLA with current LAs doesn't appear to lend itself to infrastructure repairs.</p> <p>I am worried that a "long finger" approach will be continued in this case, and that worry is heightened by references to "stranded assets", "balanced approach to investment", "value for money", etc. There are many more references to (lack of) money than there are to changes in water provision - I'm afraid that this might demonstrate the priority of the company.</p> <p>Suggested Solution: be transparent about any bonus structures in place. I would hope that they would refer directly to the physical act of moving water from one place to another, and not to revenue targets.</p> <p>On a more global level, I would hope that Irish Water will be able to give a concrete statement along the lines of "By 202x, we guarantee potable water will be supplied to region X at a minimum pressure of X bar" within the next 18 months, for at least major urban regions.</p>	<p>NS22-4: I would hope that Irish Water will be able to give a concrete statement along the lines of "By 202x, we guarantee potable water will be supplied to region X at a minimum pressure of X bar" within the next 18 months, for at least major urban regions.</p>	<p>Objective 2 "Ensuring a safe and reliable water supply".</p> <p>Leakage is an immediate priority for Irish Water. Water loss impacts upon our ability to provide water supplies to customers, reducing headroom (any capacity over and above that used under normal operating conditions), depleting resources and increasing the cost to provide water supplies.</p> <p>Through a targeted programme of leakage detection, leakage control, pressure management and leakage repair we will bring leakage down to sustainable economic levels.</p> <p>NS22-4: Submission point is noted. In line with the Ministerial Direction on the WSSP, the plan will include targets for each of the objectives and policies of the plan for the 25 year period with specific targets set for each interim investment period within the overall plan period. Targets relating to water supply will be contained in Objective 2 "Ensuring a safe and reliable water supply".</p>	<p>NS22-4: Objective 2 "Ensuring a safe and reliable water supply"</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
NS23	Respondent 31	<p>Please consider not to cooperate with this human right breach - water fluoridation</p> <p>1) Fluorosis is the most aggressive acid known to human flesh.</p> <p>To pipes as well, so you need to add alkaline substances to counteract that. Those both materials doesn't make water more suitable to bodies</p> <p>2) fluorosis is not medical grade and it has numerous of heavy toxic metals like lead, arsenic, mercury http://www.naturalnews.com/046227_fluoride_heavy_metals_contamination_lab_test_results.html</p> <p>3) pls follow independent voice and group of lawyers putting government to court at FB/Girl against fluoridation</p>	<p>NS23-1: Water fluoridation</p>	<p>NS23-1: Submission point is noted. Water Fluoridation does not fall under the remit of this Tier 1 Plan.</p>	<p>NS23-1: N/A</p>
NS24	Respondent 32	<p>It should be the policy of the newly formed utility to provide free safe to drink water to every citizen of Ireland in whatever quantities his or her family require.</p> <p>Key performance indicators should require management to fire the lowest performing 10 % of staff annually and nobody should be paid more than 3 times the lowest paid person. Cost benefit analysis should be done for all capital projects.</p> <p>Bench marking against international norms of quality should be required to be published and compared. Units of cost should be published and Per line item of expenditure and should be tested by peer review by a private company. It should be regulated by an independent team made up from the private sector.</p> <p>All staff should be expected to adhere to private sector norms of loyalty to the ultimate shareholders us and not the normal civil serves rules of no accountability or required productivity. Currently, the management is appalling with no clear understanding that by paying the types of fees for labor that</p>	<p>NS24-1: It should be the policy of the newly formed utility to provide free safe to drink water to every citizen of Ireland in whatever quantities his or her family require</p> <p>NS24-2: Key performance indicators should require management to fire the lowest performing 10 % of staff annually and nobody should be paid more than 3 times the</p>	<p>NS24-1: Submission point is noted. It will be an Objective of Irish Water to ensure the provision of a safe and reliable water supply to the people of Ireland (Objective 2). Water charges are not determined by Irish Water, they are determined by the regulator and therefore do not fall under the remit of this Tier 1 level WSSP.</p> <p>NS24-2: Submission is note. This does not fall under the remit of this Tier 1 level WSSP.</p>	<p>NS24-1: Objective 2 “Ensuring a safe and reliable water supply”</p> <p>NS24-2: N/A</p>

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		our being paid it is going to make it harder of you to achieve payment despite the fact of using the revenue as your bully boys.	lowest paid person. Cost benefit analysis should be done for all capital projects. NS24-3: Bench marking against international norms of quality should be required to be published and compared. Units of cost should be published (per line item of expenditure) and should be tested by peer review by a private company. It should be regulated by an independent team made up from the private sector.	NS24-3: Submission is noted. This does not fall under the remit of this Tier 1 level WSSP.	NS24-3: N/A
NS25	Respondent 33	Charges are far too high. A family with two adult children being charged €500 is far too high. Reports suggest it is one of the highest in Europe. This is much too high for a country who have taken so much already. My belief was that it would be somewhere around €250 per annum for a family of two plus two adult children. The charges need to be reviewed downwards considering the peoples finances.	NS25-1: Charges are far too high. The charges need to be reviewed downwards considering people's finances.	NS25-1: Submission point is noted. Water charges are determined by the Regulator and do not fall under the remit of this Tier 1 level Plan.	NS25-1: N/A
NS26	Respondent 34	It is noted in the scoping document that Irish Water recognises the requirements of the Water Framework Directive which places obligations on member states to control all impacts physical, polluting or otherwise on water resources. Yet National and Regional planning policy has not been brought into line with this fundamental requirement. Notwithstanding the lengthy lead in to the adoption of the WFD, and these policies do little to reflect the reality that we are now coming to	NS26-1: The Water Framework Directive which places obligations on member states to control all impacts, physical, polluting or otherwise, on water resources. Yet National and Regional planning policy has not been	NS26-1: Submission point is noted. The WSSP will be prepared in accordance with national and regional plans such as the RBMPs and the National Spatial Strategy.	NS26-1: Objective 4 "Protect and enhance the environment" and Objective 5 "Supporting social and economic growth".

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>the conclusion of Phase 1 of the implementation programme for the WFD.</p> <p>While it is recognised that the Planning Policy both nationally and regionally aims to achieve a balance that underpins proper planning and sustainable development across the region much of these policies fail to reflect the fundamental essential that is the proper provision of water infrastructure and the protection and conservation of that resource.</p> <p>The Scoping document refers to the recently published Regional Planning Guidelines Indicators Report, which identifies a current and future deficit in water and waste water infrastructure in many regions. The figure of 37% of identified gateway and hub settlements lacking the capacity to cater for planned populations in 2016 in terms of the provision of water supply and waste water infrastructure is a very alarming prospect.</p> <p>Taken from this viewpoint the Water Services Strategic Plan is an essential provision to address this anomaly. In order to prevent an unmitigated disaster going into the future it is therefore essential that the WSSP becomes a priority consideration for all regional authorities when they are developing the Regional Development Plans.</p> <p>Perhaps in light of this situation we were somewhat fortunate that development growth has been constricted in recent years or we already may find ourselves in the abyss. At the time of the introduction of the WFD many local authorities and in particular their elected members were opposed to the provisions of the River Basin management plans as they were</p>	<p>brought into line with this fundamental requirement.</p>		

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>concerned it would restrict the scope and scale of development in their local authority areas. This led to extended lead in periods being introduced for the achievement of Policy Objectives and a bringing into compliance with the required standards for water quality objectives in many of the plan Areas.</p> <p>We are now paying a heavy price for our previous oversights in relation to water quality and the provision of water services and how this is related to how we develop at local and regional level. The identification of pressures on water quality and the nature of the local environment determines the future availability of water resource.</p> <p>The Scoping Document recognises the impact that climate change will have in the reduction in capacity of receiving waters to assimilate waste water discharges and the flooding of sewers etc. due to high rainfall events. This has to be recognised as imposing an obligation on us to give careful consideration to the type of development infrastructure that we allow and perhaps most importantly the requirement for sensitive location of such development that will take careful consideration of where such infrastructures likely to present pressures on water resources are to be located.</p> <p>Therefore the consideration of our responsibility to the environment and future generations in building assets has got to be a core consideration in the development of this Strategic Plan. Created as a statutory body Irish Water will have to insure that its voice is heard and assume its role in insuring that best practice is applied in regional and local development</p>	<p>NS26-2 Hydraulic fracturing in Ireland.</p>	<p>NS26-2: Submission point is noted. "Fracking" does not come under the remit of this Tier 1 level Plan.</p>	<p>NS26-2: N/A</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>plans are informed by the requirement to protect the essential resource that water is.</p> <p>Therefore I concur fully with the suggestion in the scoping document that Irish Water must consider strategies and Policy to provide for the protection of water resources. Energy and natural resources are prominent in the national debate about our future needs on how this provision is to be met, like water resources we need energy and that requires infrastructure. In common both energy and water requires the delivery of infrastructure to meet the resultant demand where and when needed, and are essential for social and economic growth.</p> <p>Over the past couple of years there has been much debate about potential gas resources that may be available to us or most especially potential for the recovery of unconventional shale gas and the use of unconventional methodology, namely hydraulic fracturing. One of the great concerns expressed by people in the regions which have so far been identified as potential sites for this development is the potential for this unconventional industry to impact on local ground water and human and animal health. The process involved can involve the use of up to one million gallons of water being pumped down a well and which will involve the use of up to 40,000 gallons of toxic chemicals for each well in a process that will generally be repeated every thirty days until all the gas is released. This provides a serious difficulty in that highly contaminated waste water will be returned to the surface for storage and will have to be disposed of. Up to 24 such wells are indicated on single well pads covering an area no greater than 8 acres.</p>	<p>NS26-3: In respect of consumers, creation of Irish Water and the expenses involved is considerable and these costs can only continue to rise unless the Water Service Strategic Plan takes a firm grip of Policy and its implementation at all regional levels to insure that planning policies provide the best form of mitigation in order to conserve and protect water resources and provide adequate and sufficient waste water treatment facilities for the areas required.</p>	<p>NS26-3: Submission point is noted. This will be dealt with in Objectives 2, 3 and 4 “Ensuring a safe and reliable water supply”, “Providing effective waste water management” and “Protect and enhance the environment” of the plan.</p>	<p>NS26-3: Objectives 2, 3 and 4 “Ensuring a safe and reliable water supply”, “Providing effective waste water management” and “Protect and enhance the environment”, respectively.</p>

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		<p>A series of well pads will be developed over a region and this represents a very serious potential impact for local ground and surface waters. In circumstances where mitigation based on current practices will be very near impossible. Irish Water given its remit and stated objectives must consider the responsibility to the environment and oppose the introduction of hydraulic fracturing in Ireland. To do otherwise will render all other policies for the preservation and conservation of water resources redundant, and it is essential that given its remit and its responsibilities it will be vocal to policy makers in this regard.</p> <p>In respect of consumers, creation of Irish Water and the expenses involved is considerable and these costs can only continue to rise unless the Water Service Strategic Plan takes a firm grip of Policy and its implementation at all regional levels to insure that planning policies provide the best form of mitigation in order to conserve and protect water resources and provide adequate and sufficient waste water treatment facilities for the areas required.</p>			
NS27	Respondent 35	<p>You ask recently in the newspaper how the public would like to see water services evolve over the next 25 years. . . surely before any 'evolving' takes place, the basic infrastructure needs to be repaired/replaced? In some areas I believe there is 40% wastage due to leaks and I think it is laughable to expect householders to pay for an antiquated system that is not fit for purpose – this is before we even discuss paying for contaminated supplies.</p> <p>There can be no evolving before the basic infrastructure is put</p>	<p>NS27-1: Before any 'evolving' takes place, the basic infrastructure needs to be repaired/replaced</p> <p>NS27-2: In some areas I believe there is 40% wastage due to leaks and I think it is laughable to expect</p>	<p>NS27-1: Submission point is noted. This will be dealt with under Objective 2 of the WSSP "Ensuring a safe and reliable water supply" of the plan.</p> <p>NS27-2: Submission point is noted. This will be dealt with under Objective 2 of the WSSP "Ensuring a safe and reliable water supply" of the plan.</p>	<p>NS27-1: Objective "Ensuring a safe and reliable water supply".</p> <p>NS27-2: Objective 2 "Ensuring a safe and reliable water supply".</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		in place.	householders to pay for an antiquated system that is not fit for purpose – this is before we even discuss paying for contaminated supplies.	Leakage is an immediate priority for Irish Water. Through a targeted programme of leakage detection, leakage control, pressure management and leakage repair we will bring leakage down to sustainable economic levels.	
NS28	Respondent 36	<p>Monitoring of all sources of water to include Rivers, Streams, Lakes.</p> <p>Monitoring of slurry and other contaminants which pollute the water supply and destroy life.</p> <p>Regulate and enforce culprits who pollute the water supply.</p>	NS28-1: Monitor all sources of water and slurry and contaminants which pollute the water supply and destroy life	NS28-1: Submission point is noted. Monitoring will be considered under Objective 4 of the WSSP “Protect and enhance the environment”. The WFD establishes an integrated approach to the protection, improvement and sustainable use of rivers, lakes, estuaries, coastal waters and groundwater within Europe. We will adopt a multi-agency approach in our thinking and will work in close collaboration with other stakeholders. This integration will extend to the management of water quality, water resources and conservation, fisheries, flood defence, planning and environmental monitoring, seeking catchment wide solutions. Our approach will not	NS28-1: Objective 4 “Protect and enhance the environment”.

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
			NS28-2: Regulate/enforce pollution.	only look at the direct impacts and costs to Irish Water but also the costs to others and the impacts on the environment. NS28-2: Submission point is noted. Prosecution of polluters does not fall under the remit of the WSSP.	NS28-2: N/A
NS29	Respondent 37	<p>I note that in the WSSP one of the aspects of service that must be addressed is “Existing and reasonably foreseeable deficiencies in the provision of water services”.</p> <p>It is my contention that the present method by which the customer can regularly monitor usage by reading the meter is most unsatisfactory – indeed it will be difficult for some and impossible for many (aged, infirm etc. etc.). The following advice was given in response to an enquiry: ‘To obtain access to the meter box, there are three recesses on the surface of the meter box lid. You can open the lid using a flat headed screw driver. Ensure that you insert the screw driver correctly as there is a rubber seal which protects the meter from rainwater. You then remove the lid and the frost plug.’</p> <p>I believe that the difficulty involved in this process constitutes an easily ‘foreseeable deficiency’ in the service and that thought should have been given to the provision for the householder of a convenient and easily accessible method of monitoring usage.</p> <p>It is also my belief that – despite Irish Water’s denials – the present requirements for customer meter reading may not be compliant with both the Disability Act 2005 and the European</p>	<p>NS29-1: Thought should have been given to the provision for the householder of a convenient and easily accessible method of monitoring usage.</p> <p>NS29-2: The present requirements for customer meter reading may not be compliant with both the Disability Act 2005 and the European Measuring Instruments Directive.</p>	<p>NS29-1. Submission point is noted. This does not however fall under the remit of this Tier 1 level plan.</p> <p>NS29-2: Submission point is noted. This does not however fall under the remit of this Tier 1 level Plan.</p>	<p>NS29-1: N/A</p> <p>NS29-2: N/A</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>Measuring Instruments Directive.</p> <p>Disability Act 2005: 26. —(1) Where a service is provided by a public body, the head of the body shall— where practicable and appropriate, ensure that the provision of access to the service by persons with and persons without disabilities is integrated."</p> <p>European Measuring Instruments Directive: "Whether or not a measuring instrument intended for utility measurement purposes can be remotely read it shall in any case be fitted with a metrologically controlled display accessible without tools to the consumer." I note that in the WSSP one of the aspects of service that must be addressed is "Existing and reasonably foreseeable deficiencies in the provision of water services". It is my contention that the present method by which the customer can regularly monitor usage by reading the meter is most unsatisfactory – indeed it will be difficult for some and impossible for many (aged, infirm etc. etc.). The following advice was given in response to an enquiry: 'To obtain access to the meter box, there are three recesses on the surface of the meter box lid. You can open the lid using a flat headed screw driver. Ensure that you insert the screw driver correctly as there is a rubber seal which protects the meter from rainwater. You then remove the lid and the frost plug.' I believe that the difficulty involved in this process constitutes an easily 'foreseeable deficiency' in the service and that thought should have been given to the provision for the householder of a convenient and easily accessible method of monitoring usage.</p>			

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		<p>It is also my belief that – despite Irish Water’s denials – the present requirements for customer meter reading may not be compliant with both the Disability Act 2005 and the European Measuring Instruments Directive.</p> <p>Disability Act 2005: 26. —(1) Where a service is provided by a public body, the head of the body shall— where practicable and appropriate, ensure that the provision of access to the service by persons with and persons without disabilities is integrated."</p> <p>European Measuring Instruments Directive: "Whether or not a measuring instrument intended for utility measurement purposes can be remotely read it shall in any case be fitted with a metrologically controlled display accessible without tools to the consumer."</p>			
NS30	Respondent 38	<p>Several comments about customer service and queries:</p> <ol style="list-style-type: none"> 1. Have SLA,s that are adhered too. Eg recently water shortages in Greystones, we were told service would be restored at 6/8 am and it was 6 PM. 2. No standard charges only usage charges so if a house is unoccupied they do not have to pay anything. 3. An 01 number. Most mobile phones now cannot dial 1800 or 1890 numbers. 4. A clear and easy complaints process and escalation points. 5. A completely free allowance for medical usages such as dialysis that uses significant amounts daily for hamo machines etc 6. Free drinking water regardless of charges 7. Advance notice of any changes, charges, meter installations etc. 	<p>NS30-1: Have SLAs that are adhered to.</p> <p>NS30-2: No standard charges only usage charges so if a house is unoccupied they do not have to pay anything.</p> <p>NS30-3: An 01 number. Most mobile phones now cannot dial 1800 or 1890 numbers.</p>	<p>NS30-01: Submission point is noted. SLAs do not fall under the remit of this Tier 1 level plan.</p> <p>NS30-02: Submission point is noted. Water charges do not directly fall under the remit of this Tier 1 level Plan.</p> <p>NS30-03: Submission point is noted. Irish Water can be contacted on 01 707 2828</p> <p>NS30-04: Submission point is noted. Objective 1 “Meeting our</p>	<p>NS30-1: N/A</p> <p>NS30-2: N/A</p> <p>NS30-3: Objective 1 “Meeting our customer expectations”.</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>8. To ensure that all the installations are up to European industry standards eg cars can drive over it.</p> <p>9. An agreement that no increases for 10 yrs</p>	<p>NS30-4: A clear and easy complaints process and escalation points.</p> <p>NS30-5: A completely free allowance for medical usages such as dialysis that uses significant amounts daily</p> <p>NS30-6: Free drinking water regardless of charges</p> <p>NS30-7: Advance notice of any changes, charges, meter installations etc.</p> <p>NS30-8: To ensure that all the installations are up to European industry standards e.g. cars can drive over it.</p> <p>NS30-9: An agreement that no increases for 10 yrs.</p>	<p>customer expectations” will contain a policy relating to establishing effective communication channels with customers.</p> <p>NS30-5: Submission point is noted. Water charges does not fall under the remit of this Tier 1 level Plan.</p> <p>NS30-6: Submission point is noted. Water charges does not fall under the remit of this Tier 1 level Plan.</p> <p>NS30-7: Submission point is noted. Objective 1 “Meeting our customer expectations” will contain a policy relating to establishing effective communication channels with customers.</p> <p>NS30-8: Submission point is noted. This does not fall under the remit of this Tier 1 level Plan.</p> <p>NS30-9: Submission point is noted. Water charges do not fall</p>	<p>NS30-4: Objective 1 “Meeting our customer expectations”.</p> <p>NS30-5: N/A</p> <p>NS30-6: N/A</p> <p>NS30-7: Objective 1 “Meeting our customer expectations”.</p> <p>NS30-8: N/A</p> <p>NS30-9: N/A</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
				under the remit of this Tier 1 level Plan.	
NS31	Respondent 39	I am concerned that Irish Water be very clear on the proposed plans of the government to sell licenses for the purpose of exploration and recovery of shale gas. The exploration of shale gas has not been banned by the Irish government, and since water plays a very large part of the process of the recovery of shale gas it is necessary to include this in any Irish Water, Water Services Strategic Plan. Since the Irish government has not banned 'fracking' and since this process involves trillions of gallons of water could you please tell me from where this water will come? How it will be delivered to any proposed 'fracking' site? Once used where and how does Irish Water propose the disposal of contaminated waste water? Which I understand might well be a mixture of toxic chemicals which are very lethal to human, animal and fish health as well as agricultural practice in general. This is of very great concern to me and I look forward, eagerly, to know how Irish Water proposes to deal with this particular issue.	NS31-1: Fracking	NS31-1: Submission has been noted. However, this does not fall under the remit of this high level Tier 1 Plan.	NS31-1: N/A
NS32	Respondent 40	While broadly welcoming the provisions of the consultation and the SEA Document Draft, I am disappointed that while the Scoping Documents provide all the various headings that are considered relevant to the development of the WSSP, including National and Regional Planning Policy, Social and economic growth, energy and natural resources, climate change and the all-encompassing Water Framework Directive, neither the scoping document or the Draft SEA identify pressures or potential sources of polluting or otherwise, on water resources. This I feel is a serious omission. If Irish Water is to succeed in their remit and provide a safe and sustainable source of drinking water to consumers it must consider impacts on	NS32-1: Irish Water should draw heavily on the provisions and requirements of the Water Framework Directive, and clearly identify and seek to address the sources of contamination which have resulted in a disappointing status for the majority of Irish waters. Irish Water must take a primary role in insuring that	NS32-1: Submission point is noted. This will be dealt with under Objective 2 and 4 of the WSSP "Ensuring a safe and reliable water supply" and "Protect and enhance the environment". We will adopt a multi-agency approach in our thinking and will work in close collaboration with other stakeholders. This integration will extend to the management	NS32-1: Objectives 2 and 4 "Ensuring a safe and reliable water supply" and "Protect and enhance the environment", respectively.

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>receiving waters.</p> <p>It should draw heavily on the provisions and requirements of the Water Framework Directive, and clearly identify and seek to address the sources of contamination which have resulted in a disappointing status for the majority of Irish waters.</p> <p>Under the WFD it is a requirement for Ireland to control all impacts on water resources. The local competent Authorities are the first respondents in terms of prevention and mitigation and so much of what enters our waters is as a direct result of permitted planning and development within the regions.</p> <p>It is noted that the Regional Planning Guidelines have identified a serious deficit in infrastructure to cater for projected housing growth in terms of provision of water and waste water infrastructure. That clearly points to the failure in the past to properly plan for the future, while providing for housing infrastructure and settlement patterns we have failed again to insure that the essential provision of water and waste water treatment facilities formed part of that development strategy.</p> <p>This has been all too common an occurrence in development policy over the past two decades. Rural septic tanks and the failure to have proper compliance resulted in the European Court of Justice finding against Ireland in 2009, and while this is just one example we also have to consider our policies in relation to where we permit large infrastructural development, the nature of that development, will it result in the release of polluted waste water back into the environment and if so what is the capacity to deal with that? Where such permitted releases are to be approved, has the carrying capacity of the discharge facilities and treatment plants been properly considered in the event of high rainfall events and increase loading on the system?</p>	<p>WFD policies and objectives are fully implemented.</p> <p>NS32-2 It is noted that the Regional Planning Guidelines have identified a serious deficit in infrastructure to cater for projected housing growth in terms of provision of water and waste water infrastructure. That clearly points to the failure in the past to properly plan for the future, while providing for housing infrastructure and settlement patterns we have failed again to insure that the essential provision of water and waste water treatment facilities formed part of that development strategy.</p> <p>NS32-3: Hydraulic fracturing in Ireland</p>	<p>of water quality, water resources and conservation.</p> <p>NS32-2: Submission point is noted. This will be dealt with at a strategic level in Objective 5 “Supporting social and economic growth”. It is an aim of Irish Water to facility growth in line with national and regional economic and spatial planning policy through the provision of appropriate water services infrastructure in line with development plans and core strategies.</p> <p>NS32-3: Submission point is noted. This does not fall under the remit of this Tier 1 level Plan.</p>	<p>NS32-2: Objective 5 “Supporting social and economic growth”.</p> <p>NS32-3: N/A</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>What of the role of forestry and policies controlling the areas for planting? The implementation of avoidance measures of run off and contaminants entering local surface and ground waters, in other words, the proper and sensitive development of the regions where account is taken of the receiving environment and the reduction or elimination where possible, of pollutants impacting on local water resources. It is only in the preservation of water quality that Irish Water can realistically hope to achieve a balance where it can provide the resources needed for the consumer in a cost effective way and that the essential resource that is drinking water and the maintenance of water quality can be achieved. As we go forward in this century it is anticipated that water resources will come under increased pressure and some larger centres of population may be faced with a scarcity of this essential resource.</p> <p>Conservation and preservation of water quality is the objective of the Water Framework Directive. This Directive was considered an essential part of planning for the future in the European Union. It had a very long lead in period and it is essential that it is given proper recognition by policy maker, that its objectives are recognised as essential planks in providing for our future needs, and in doing so we can facilitate social and economic growth.</p> <p>Irish Water must take a primary role in insuring that its policies and objectives are fully implemented and in order to achieve that it has got to recognise the need for the identification of the pressures that are placed on water quality as a result of existing land uses and planning and development policy.</p> <p>The elephant in the room for Irish water quality issues in a number of regions has got to be the proposal currently under consideration by the EPA and its Northern Ireland counterpart</p>			

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		<p>to introduce hydraulic fracturing in Ireland, for the purposes of recovering unconventional shale gas deposits. The issues of concern around this proposed activity have been well ventilated over the past couple of years. Experience of other countries where this activity has been permitted has proven the disastrous impact that it has had on local water quality and consequently on human and animal health, and rural industries like farming and tourism. Given the hydrological and hydro-geological make up of Ireland this proposed industry has the potential to cause irreversible and unmitigated contamination of our waterways right across the land, and Irish Water should have it identified in its scoping document as a significant threat to water quality and resources. It should form part of the evaluation of the Water Services Strategic Plan in addition to other identifiable pressures on water quality.</p> <p>This Plan is incomplete if it does not identify and in so far as possible evaluate these sources of pollution or potential sources of pollution and develop a series of recommendations towards reducing these impacts or eliminating them all together by avoidance.</p> <p>A series of measures which can be incorporated into regional planning and local planning policies for the future.</p> <p>Irish Water given its remit and role must provide the lead for other agencies in safeguarding our water resources and insuring that all permitted development will have available the necessary infrastructure to properly treat any waste water generated through its operation.</p>			
NS33	Respondent 41	<p>I wish to take this opportunity to make a submission in respect of the damaging effects of the agricultural practice of abstracting water from rivers by (1) slurry tankers and sprayers (2) Pump systems. The following submission has a series of</p>	<p>NS33-1: Abstraction by slurry tanker has been increasing since local authorities started metering and charging for the use of water for agricultural</p>	<p>NS33-1: Submission point is noted. This however does not under the remit of this high level Tier 1 Plan.</p>	<p>NS33-1: N/A</p>

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		<p>questions pertinent to the EU Water Framework Directive and how you propose to implement it.</p> <p>1. Abstraction by Slurry Tanker:</p> <p>1) My observations would suggest that this practice has been increasing since local authorities started metering and charging for the use of water for agricultural and commercial use and is monetary driven. I have observed large tractors and slurry tankers drive into the centre river to fill up with water using the same contaminated tankers which were used to spread slurry.</p> <p>2) Could you confirm if there is such thing as a "clean "slurry tanker?</p> <p>3) Could residue slurry enter the water from the slurry tankers and the tractors and cause nitrate pollution to fish stocks, flora and fauna?</p> <p>4) In addition, is there the added risk of oil leakage from the tractor?</p> <p>5) I have observed this practice in a Special Area of Conservation, close to spawning beds. Could this practice disturb the river bed gravel and deplete the spawning beds?</p> <p>6) I have observed this practice been carried out by farmers who have fenced off watercourses on their own land as a REPS requirement. Is it acceptable for them to go to a nearby river and drive into the body of that river with slurry tankers and other machinery?</p> <p>2. Abstraction by Pump</p> <p>1) Another method I have observed being used is the piping of water from a river by a pumping system to service slatted sheds and slurry pits etc. This also occurs in a SAC area and on a closed river that is subject to Bye-Law CS316.2013for the</p>	<p>and commercial use. I have observed large tractors/slurry tankers fill up with water from the centre river to using the same contaminated tankers which were used to spread slurry. Could you confirm if there is such thing as a "clean "slurry tanker?</p> <p>Could residue slurry or oil enter the water from the slurry tankers/tractors and cause pollution to fish stocks, flora and fauna? I have observed this practice in a Special Area of Conservation, close to spawning beds.</p> <p>NS33-2: Abstraction by pump is being used to pipe water from a river to service slatted sheds and slurry pits etc. This also occurs in a SAC area and on a closed river that is subject to Bye-Law CS316.2013 for the conservation of salmon and sea trout.</p> <p>Will the volume of water abstracted be significant? Will</p>	<p>NS33-2: Submission point is noted. This however doesn't not come under the remit of this high level Tier 1 Plan.</p>	<p>NS33-2: N/A</p>

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		<p>conservation of salmon and sea trout. It is also close to an area where the Inland Fisheries had to introduce more suitable spawning gravels and take measures to improve salmon habitat and oxygenate the water.</p> <p>2) Will the volume of water abstracted by this method even, for an average farming enterprise, be significant? Will multiple abstractions along the length of the whole river be considered? Will this have an adverse environmental effect? As a consequence, will the hydraulic flow of the river and the bed of the river, particularly during dry spells, be affected?</p> <p>3) Will the above practices have an adverse impact upon the status of water bodies and protected areas from changes in the quality, flow and/or morphology?</p> <p>3. General Issues</p> <p>1) My understanding is that Local authorities should not have the discretion to "turn a blind eye to placate any pressure groups and that these practises should already be subject to governance and regulation under Water Pollution legislation.</p> <p>2) Will the driving into a river, lake or stream with tractors and slurry tankers be strictly prohibited by Irish Water?</p> <p>3) Will all abstractions from rivers lakes etc. be subject to a licence application?</p> <p>4) My understanding is that no abstractions should be allowed within a three mile radius of sensitive areas e.g. spawning beds, fresh water pearl mussel etc to protect the good ecological status of the river, particularly to a "closed river" subject to the conservation of salmon and sea trout. Can you confirm this?</p>	<p>multiple abstractions along be considered? Will this have an adverse environmental effect? Will the hydraulic flow of the river and the river bed be affected? Will this have an adverse impact upon the status of water bodies? Local authorities should not have the discretion to "turn a blind eye to placate any pressure groups and that these practises should already be subject to governance and regulation under Water Pollution legislation.</p> <p>NS33-3: Will the driving into a river, lake or stream with tractors and slurry tankers be strictly prohibited by Irish Water?</p> <p>NS33-4: Will all abstractions from rivers lakes etc. be subject to a licence application? My understanding is that no abstractions should be allowed within a three mile radius of sensitive areas. Can you confirm this? How will vulnerability mapping and the</p>	<p>NS33-3: Submission point is noted. This however does not fall under the remit of this high level Tier 1 Plan.</p> <p>NS33-4: Submission point is noted. This does not fall under</p>	<p>NS33-3: N/A</p> <p>NS33-4: N/A</p>

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		<p>5) How will account be taken of vulnerability mapping and the nitrates directive?</p> <p>6) Will applicants for an abstraction licence be required to get an Environment Impact Assessment and hydrometric studies? Will there be a public consultation (along the lines of the planning permission process)?</p> <p>7) Will applicants be required to carry out ecological studies on surface water?</p> <p>8) Will abstractions be metered? Will a standing charge and a unit charge apply?</p> <p>9) Will abstraction licences be subject to annual renewal?</p> <p>I have environmental concerns and, as stated, my submission is a series of questions that require individual and detailed responses. For clarity they are:</p> <p>1. 2), 3), 4), 5), 6),</p> <p>2. 2), 3)</p> <p>3. 2), 3), 4), 5), 6), 7), 8), 9).</p> <p>I would appreciate an explanation as how these questions and concerns will be addressed.</p>	<p>nitrates directive be accounted for?</p> <p>NS33-5: Will applicants for an abstraction licence be required to get an Environment Impact Assessment and hydrometric studies? Will there be a public consultation? Will applicants be required to carry out ecological studies on surface water? Will abstractions be metered? Will a standing charge and a unit charge apply? Will abstraction licences be subject to annual renewal?</p>	<p>the remit of this high level Tier 1 Plan.</p> <p>NS33-5: Submission point is noted. This does not fall under the remit of this high level Tier 1 Plan.</p>	NS33-5: N/A
NS34	Respondents 42 - 44	<p>While the scoping document recognises the role of national and regional planning policy and the aims therein to achieve a balance that underpins proper planning and sustainable development across the region, it does not identify how permitted development or land use has impacted on existing water quality.</p>	NS34-1: Hydraulic fracturing in Ireland	NS34-1: "Fracking" does not fall under the remit of this high level Tier 1 Plan.	NS34-1: N/A

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		<p>The Water Framework Directive is intended to get all our water bodies up to good quality status by 2015. Many of its other provisions are not intended to be realised until much later and possibly not until the conclusion of Phase 2 of the implementing plans for the established River Basin Management plans.</p> <p>While the scoping document identifies the deficit in water and waste water treatment infrastructure across the regions the document is silent on the sources of pollution and therefore cannot propose measures aimed at controlling impacts on our water resources.</p> <p>Of major concern is the failure to comment on proposals to allow hydraulic fracturing in Ireland for the harvesting of unconventional shale gas and oil. This practice has been identified internationally as a major environmental threat and in particular is a grave hazard to ground and surface water quality. The process also involves the use of large quantities of water which are mixed with a range of toxic chemicals and result in highly polluted waste water being recovered from the wells with the potential for unmitigated release back into the environment and catastrophic pollution events resulting from their discharge. This will involve the use of vast resources of water and Ireland does not have the facility to handle or treat this toxic waste. Should these proposals become a reality it has the potential to devastate large areas of the country where the practice is proposed. In such an event all the other proposed measures intended by Irish Water in its Strategic Plan to safeguard water quality and provide for the proper treatment of domestic waste water, will be irrelevant. It is therefore deeply disturbing that the Scoping Document for the</p>			

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards in the Irish context.</p> <p>I therefore ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.</p>			
NS37	Respondent 45	<p>I note that although the scoping document recognises the role of planning policy and the aims of achieving proper planning and sustainable development in Ireland, it does not discuss the impacts of development and land use decisions on water quality. Because existing and potential sources of pollution are not covered, the WSSP cannot propose measures to control the impact on our water resources.</p> <p>I am particularly concerned at the failure to comment on proposals to allow hydraulic fracturing in Ireland to exploit unconventional shale gas and oil resources. This practice is recognised internationally as a major environmental threat and in particular as a grave hazard to ground and surface water quality.</p> <p>The process uses enormous quantities of fresh water which are mixed with a range of toxic chemicals and result in highly polluted and radioactive wastewater being recovered from the wells as "flowback" water. This fresh water, consequently rendered hazardous waste, is removed from the water cycle forever, as it cannot be effectively treated. Ireland certainly does not have the capacity to treat the massive quantities of</p>	NS37-1: Hydraulic fracturing in Ireland	NS37-1: "Fracking" does not fall under the remit of this high lever Tier 1 Plan	NS37-1: N/A

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>toxic and radioactive wastewater that fracking would produce. Experience in other countries such as the US has shown that disposal of fracking wastewater is one of the most serious pollution problems associated with the process, and the potential for uncontrolled release back into the environment (through illegal dumping and accidents) is high. Additionally, the underground migration of dangerous chemicals and methane gas is a significant unknown. Fracking would irrevocably damage Ireland's water environment.</p> <p>If fracking is allowed to go ahead in Ireland, all of the proposed measures to safeguard water quality and provide for the proper treatment of domestic wastewater will be irrelevant. I am therefore concerned that the Scoping Document for the development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards.</p> <p>I ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.</p>			
NS38	Respondent 46	<p>Of major concern is the failure to comment on proposals to allow hydraulic fracturing in Ireland for the harvesting of unconventional shale gas and oil. This practice has been identified internationally as a major environmental threat and in particular is a grave hazard to ground and surface water quality.</p> <p>The EPA in the USA has recently released documentation proving 243 water contamination events that are directly attributable to the process of hydraulic fracturing in one state</p>	NS38-1: Hydraulic fracturing in Ireland	NS38-1: "Fracking" does not fall under the remit of this high lever Tier 1 Plan.	NS38-1: N/A

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>alone.</p> <p>You need to factor in for the additional costs to cope with potentially massive volumes of contaminated water entering the water system. This requires specialist facilities due to the extreme levels of RADIOACTIVITY involved (never mind the brine levels and the other serious contaminants with health implications for your workers and for the environment). Safe drinking water: 5 pCi/L. Fracking flowback water, up to 20,000 pCi/L. Millions of gallons of it per well per frack. Can your systems handle extreme volumes of highly radioactive flowback water I don't think you have taken this into account. It seriously needs to be factored in.</p> <p>I therefore ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.</p>			
NS39	Respondent 47	<p>While the scoping document recognises the role of national and regional planning policy and the aims therein to achieve a balance that underpins proper planning and sustainable development across the region, it does not identify how permitted development or land use has impacted on existing water quality.</p> <p>The Water Framework Directive is intended to get all our water bodies up to good quality status by 2015. Many of its other provisions are not intended to be realised until much later and possibly not until the conclusion of Phase 2 of the</p>	NS39-1: Hydraulic fracturing in Ireland	NS39-1: "Fracking" does not fall under the remit of this high lever Tier 1 Plan.	NS39-1: N/A

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		<p>implementing plans for the established River Basin Management plans.</p> <p>While the scoping document identifies the deficit in water and waste water treatment infrastructure across the regions the document is silent on the sources of pollution and therefore cannot propose measures aimed at controlling impacts on our water resources.</p> <p>Of major concern is the failure to comment on proposals to allow hydraulic fracturing in Ireland for the harvesting of unconventional shale gas and oil. This practice has been identified internationally as a major environmental threat and in particular is a grave hazard to ground and surface water quality.</p> <p>The process also involves the use of large quantities of water which are mixed with a range of toxic chemicals and result in highly polluted waste water being recovered from the wells with the potential for unmitigated release back into the environment and catastrophic pollution events resulting from their discharge. This will involve the use of vast resources of water and Ireland does not have the facility to handle or treat this toxic waste. Should these proposals become a reality it has the potential to devastate large areas of the country where the practice is proposed. In such an event all the other proposed measures intended by Irish Water in its Strategic Plan to safeguard water quality and provide for the proper treatment of domestic waste water, will be irrelevant. It is therefore deeply disturbing that the Scoping Document for the development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards in the Irish context.</p>			

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		I therefore ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.			
NS40	Respondent 48	<p>The Irish Planning Institute welcomes the opportunity to comment on the Irish Water <i>Water Services Strategic Plan</i> Issues Paper. Founded in 1975, the Irish Planning Institute is the all island professional body representing the majority of professional planners engaged in physical, spatial and environmental planning in Ireland and Irish planners practicing overseas. The Irish Planning Institute's mission is to advance planning by serving, improving and promoting the planning for the benefit of the community and the common good.</p> <p>The development of sustainable solutions to the water services demands of Irish society is imperative to the long-term sustainable development of the State's social and economic processes. The Institute, therefore, welcomes the requirement, set out in the Water Services (No. 2) Act 2013, that the Water Services Strategic Plan be consistent with national and regional planning policy and to proper planning and sustainable development.</p> <p><i>Need for Strong and Cohesive National Planning Policy</i></p> <p>The Institute is strongly of the view that the <i>Water Services Strategic Plan</i> should not be prepared in isolation but rather should be part of a suite of strategic plans that are supported by the National Spatial Strategy setting out a clear vision for development in Ireland for the short, medium and long term. The Institute has long called for the review and update the National Spatial Strategy so as to ensure that it is reflective of Ireland's changed economic circumstances, which, in recent</p>	<p>NS40-1: The Institute is strongly of the view that the <i>Water Services Strategic Plan</i> should not be prepared in isolation but rather should be part of a suite of strategic plans that are supported by the National Spatial Strategy setting out a clear vision for development in Ireland for the short, medium and long term.</p> <p>NS40-2: Given that the Issues Paper makes reference to a lack of capacity for populations predicted in gateways and hubs identified in the soon-to-be superseded National Spatial Strategy, the Institute is concerned that formulating</p>	<p>NS40-1: Submission point is noted. The preparation of the draft WSSP is in line the timeframe as stipulated in the Ministerial Direction.</p> <p>It is an aim of Irish Water to support National, Regional and Economic and Spatial Planning Policy and to facilitate growth in line with national and regional economic and spatial planning policy through the provision of appropriate water services infrastructure in line with development plans and core strategies.</p> <p>The WSSP will be reviewed at interim review periods over the 25 year period of the plan. These will be set out in the WSSP.</p> <p>NS40-2: Submission point is noted. See 40-1 above.</p>	<p>NS40-1: Objective 5 "Supporting social and economic growth".</p> <p>NS40-2: Objective 5 "Supporting social and economic growth".</p>

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		<p>years, have forced us to re-examine previous policies and assess their relevance. While it is understood that this process has begun, a draft of the revised Strategy has yet to be published. The National Spatial Strategy must set out a robust planning framework, in conjunction with the National Development Plan, that will inform and provide clear direction at national level for future development. It is these plans that will inform other strategies such as the WSSP and provide clear guidance on driving forces that will affect the provision of water services into the future. In this regard and given that the Issues Paper makes reference to a lack of capacity for populations predicted in gateways and hubs identified in the soon-to-be superseded National Spatial Strategy, the Institute is concerned that formulating the WSSP is premature pending the completion of the on-going review of core national planning policy.</p> <p><i>Sectoral vs Spatial Policy</i></p> <p>The Institute is concerned that the Water Services Strategic Plan will be a strategic spatial policy at national level that is essentially sectoral in its scope. The essence of spatial planning policy is realising the proper planning and sustainable development of the area, which includes economic, social and environmental sustainability. For example, while it is noted that key priorities of the WSSP will be to meet customer expectations (Objective 1) and protect the environment (Objective 4), the very essence of planning is that these diverse interests must be balanced ideally in such a way that maximum synergy becomes possible. That can best be done by simultaneously considering the different interests in relation to specific areas rather than set one as a constraint on the others.</p>	<p>the WSSP is premature pending the completion of the on-going review of core national planning policy.</p> <p>NS40-3: The Institute is concerned that the Water Services Strategic Plan will be a strategic spatial policy at national level that is essentially sectoral in its scope.</p> <p>NS40-4: There must be alignment between local forward planning and the <i>Water Services Strategic Plan</i> to ensure the phased delivery of serviced zoned lands in line with core strategies. The skills and expertise of professional planners within Irish Water and within local government will play a critical role in the delivery of the Irish Water, particularly having regard to the need to align infrastructure development to Development Plans while ensuring long-term value accrues to the Irish exchequer.</p>	<p>NS40-3: Submission point is noted.</p> <p>NS40-4: Submission point is noted. See 40-1 above.</p>	<p>NS40-3: N/A</p> <p>NS40-4: Objective 5 “Supporting social and economic growth”.</p>

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		<p><i>Coordination of Service Delivery with Local Spatial Planning Policy</i></p> <p>The long term sustainable planning and economic development of Ireland requires certainty in accessibility to adequate water services for both domestic and non-domestic users at appropriate locations. The progress made in recent years in “joined up” service delivery should not be lost with the separation of some water and spatial planning functions. There must be alignment between local forward planning and the <i>Water Services Strategic Plan</i> to ensure the phased delivery of serviced zoned lands in line with core strategies. The skills and expertise of professional planners within Irish Water and within local government will play a critical role in the delivery of the Irish Water, particularly having regard to the need to align infrastructure development to Development Plans while ensuring long-term value accrues to the Irish exchequer.</p> <p><i>Conclusion</i></p> <p>The Institute welcomes Irish Water’s stated aim of supporting national planning policy for balanced and sustainable regional development. In order to ensure that delivery of water infrastructure is coordinated with spatial planning so as to secure the efficient delivery of hard infrastructure and value to the exchequer, there must also be a commitment to ensuring that Irish Water is adequately staffed and resourced by those with professional planning qualifications.</p>	<p>NS40-5: In order to ensure that delivery of water infrastructure is coordinated with spatial planning so as to secure the efficient delivery of hard infrastructure and value to the exchequer, there must also be a commitment to ensuring that Irish Water is adequately staffed and resourced by those with professional planning qualifications.</p>	<p>NS40-5: Submission point is noted. It is a policy of Irish Water to establish a robust governance structure and recruit an effective workforce for the provision of water services. The issue of staffing and resourcing <i>per se</i> however does not fall under the remit of this Tier 1 level Plan.</p>	<p>NS40-5: Objective 5 “Supporting social and economic growth”.</p>
NS41	Respondent 49	<p>The first of these legislative acts have been enshrined in Irish law under S.I. No. 625 of 2001, and under EU treat terms Ireland will be obliged to enshrine the second with a short period of time.</p> <p><u>Contextual Basis For Biocide Legislative Inclusion:</u> In broad terms EU legislation mirrors the key critical concerns identified</p>	<p>NS41-1: Requirement for biocide compliance.</p>	<p>NS41-1: Submission point is noted. This will be dealt with under Objective 4 of the WSSP “Protect and enhance the environment”</p>	<p>NS41-1: Objective 4 “Protect and enhance the environment”.</p>

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		<p>in the SEA report. All EU legislation was drafted with protection of Human /Animal health and protection of the environment as the basis of drafting. Biocides are potentially harmful chemicals and processes which are designed to kill. The very word biocide originates from the Greek “bio” meaning life and the Latin “cide” meaning to kill.</p> <p>Water treatment chemicals and or products used to control or inhibit microbial growth are by the terms of EU law classed as biocides. As part of the legislation biocides are divided into separate applications and uses. These are divided into 22 Product Types (PT's) and PT5 is specifically described in the regulation as:</p> <p><i>“Product-type 5: <u>Drinking water</u>-Products used for the <u>disinfection of drinking water</u> for both humans and animals.”</i></p> <p>Further PT4 is of specific relevance to the SEA report as it is described as:</p> <p><i>“Product-type 4: Food and feed area -Products used for the disinfection of equipment, containers, consumption utensils, surfaces or pipework associated with the production, transport, storage or consumption of food or feed (<u>including drinking water</u>) for humans and animals.”</i></p> <p>Thusly under the current EU law, treatment of drinking water is specifically and unequivocally covered by the Biocidal Products Regulation.</p> <p><u>Standard And Risk Basis for Biocide Legislative Inclusion:</u></p> <p>The SEA report cites among many others, the EU Drinking Water Directive, the EU Bathing Water Directive various EU directive and regulations designed to ensure a high standard of environmental protection and protection of Human health. While this is to be welcomed the failure to include specifically</p>		<p>Irish Water will comply with all relevant legislative requirements, including the Biocidal Products Regulation. We must act in an environmentally responsible manner, protect the water sources that we use and the waterways to which we discharge.</p>	

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		<p>the Biocides legislation adds to the risk of failure to comply with other cited legislation.</p> <p>The BPR controls what can be harmful chemicals and processes and limits if appropriate, their use in order to minimise damage to Human Health and the environment. The risk analysis detailed as mandatory for all biocides in the EU legislation is without doubt the most stringent in the world. The risk assessment carried out under the BPD and now BPR are accepted as of the highest quality in terms of data requirements and final risk assessment globally. Indeed the EPA in the US is currently assessing their own risk assessments in light of the BPR in order to raise their standard to the level of the EU. Biocides used to treat drinking water contribute largely to the final quality of waste water and so the effects of these biocides have a knock on effect, from first treatment through to consumption /use and finally on to waste water impact. The importance of controlling and ensuring correct quality treatment chemicals is used in treating Irish water is high. To omit the EU legislation controlling such chemicals from initial report seems to be a serious lapse in foresight. Inclusion on the basis of risk mitigation and control alone warrants inclusion.</p> <p>Standards such as EN, ISO and BSI are referenced largely by drinking water treatment guidelines in Ireland. While these guidelines are not cited directly in the report it would appear that they are used by current water control bodies as reference points for their procurement of biocides used in water treatment. Standards are welcome and certainly do assist in selection of treatment regimes but they are not authoritative, do not take into account biocide regulations and in many instances are not a comprehensive as EU law in terms of risk assessment and mitigation. Standards are guidelines and as</p>			

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		<p>such differ from the BPR in as much also that the BPR is a legal requirement while standards are at best pointers. Compliance with standards can be claimed by any firm while compliance with the BPR requires that a manufacturer of a biocide complies with tight requirements in terms of dosing, chemical purity, classification and labelling and scope of use. Thusly reliance on standards alone for water treatment is not a policy which could be considered as correct.</p> <p><u>Historical Use of Biocides in the Treatment of Drinking Water in Ireland:</u></p> <p>Under the BPD (98/8/EC) and S.I No 625 of 2001 it became a legal requirement of biocide suppliers to notify the Department of Agriculture Food and Marine of any and all biocides prior to their sale on the Irish market. This requirement allows the Department as Competent Authority, to check prior to open availability the compliance of biocides allowed for sale in Ireland.</p> <p>As both the EU law and the Irish S.I are what could be considered obscure and complex pieces of legislation said compliance would appear to be limited only to larger and more knowledgeable industry members. We believe that a similar lack of knowledge on the part of end users, as witnessed indeed by the omission of the required compliance in the SEA report, has led to a large degree of use of non-compliant biocides in the treatment of drinking water in Ireland. This is likely compounded by the fractured and diverse nature of the current drinking water supply in Ireland, which is populated by many small treatment schemes who may not have the technical information required to ensure compliance. A history search of government etenders web site (web link below) for water treatment chemicals shows that few tenders for the supply of water treatment biocides are lodged in the public</p>			

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		<p>domain and of those published none stipulate compliance with EU biocide law. Indeed one highlighted compliance with US EPA legislation from the 1980's which in itself was outdated and relied on old levels of impurity values which could now be considered dangerous.</p> <p>Historically the EPA in Ireland and local authorities have been responsible for the issue of guidelines for the treatment of drinking water in Ireland. Currently these guidelines include:</p> <ol style="list-style-type: none"> 1. The EPA Water Treatment Manual: Disinfection 2. The Hand Book on implementation for Water Services Authorities for public water supplies. <p>While both of the above are broadly speaking well written documents with merit neither set out in any frame or reference mention of the biocide regulations. To continue advising and advocating disinfection technologies without such mention is not what could be considered wise. Changes in biocide law recently have brought into scope of compliance many more biocidal products such as the insitu generation of biocides like chlorine and ozone, Ultra Violet and more. Indeed the EPA Water Treatment Manual cites the DWI drinking water guidelines from the UK which actually references chemicals and applications for disinfection which are illegal under the BPR. This, in essence, would cause a huge issue in terms of legal compliance as a user depending on the published guidelines would assume that purchase of systems and chemicals there in mentioned are safe for use and legal. This is not the case and will lead to possible issues in the future.</p> <p>We note that the SEA report states that consultation occurred with the Department of Agriculture and while we don't doubt this consultation we feel it likely that the scope of consultation relied on the Departments role in farming and agriculture and</p>			

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		<p>did not take into account the remit of the Department over the control of drinking water biocides.</p> <p>Ireland has a poor record of adequate supply of drinking water. This is reinforced by the SEA report and despite the relevant recommendations made in the report this will only continue if compliance with biocide regulations is ignored further.</p> <p><u>Recommendations on Current and Future Actions:</u> We note the following:</p> <ul style="list-style-type: none"> • Under Irish law the use of any chemical or treatment which disinfects or otherwise inhibits microbial, algal, fungal or other organism growth is deemed to be a biocide and subject to control under both Irish and EU law. • That currently the SEA report and present guidelines for water treatment in Ireland are not adequate in ensuring compliance with biocide law. <p>We would recommend that the following be immediately incorporated into policy and guidance:</p> <ul style="list-style-type: none"> • Inclusion in all guidance and reports of the legal requirements of biocide use. • Explanation of the reasons for these legal requirements within said guidance. • The fully inclusion of the legal requirement of notification to the Department of Agriculture all biocide sale prior to marketing in Ireland. • Noting in guidance that notification of biocides in Ireland results in the issue of a PSC number from the department and that only biocides with a current and valid PSC number should be used in biocidal water treatment. <p>We would recommend that the following actions occur:</p>			

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		<ul style="list-style-type: none"> • That immediate engagement between the Biocides Section of the Department of Agriculture and Irish Water occur. • That all Irish Water Staff are educated in the legal requirements of biocide use. <p>We would warn Irish Water on the following: Biocides are one of the most tightly regulated industries in the EU. The current law issued in 2012 is forcing changes to the structure of biocide sale and manufacture. As and from September 2015 it will be a further legal requirement of biocide sale that any and all biocides being placed on the EU market be only so placed following EU notification. This will involve the EU wide compilation of a list of Authorised Suppliers. While not currently in force this will mean that in the near future all currently use biocides will require EU compliance in full. Further, the change in law has brought into scope many disinfection modalities previously exempt. As treatment system on the scale required for large scale water treatment are costly we would urge that Irish water take steps now to audit their current inventory for biocide compliance. This has the potential to cost millions of euro in removal and replacement of non- compliant systems and or chemicals if not monitored and addressed.</p> <p>Final Summary: Inclusion and incorporation of biocide regulation into policy and future procurement is of vital economic and environmental concern. Compliance with biocide regulations more-over are a legal requirement of chemical and processes used in the treatment of drinking water. Failure to include biocide compliance in water policy leads to a risk of:</p> <ul style="list-style-type: none"> • The use of illegal and potentially dangerous biocides 			

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<ul style="list-style-type: none"> The installation of economically costly non-compliant chemicals runs the risk of said substances being subject to enforcement and thus wasted expenditure occurring. Runs the risk of enforcement at EU level on Irish water for failure to include for all relevant legislation in their processes. <p>We express surprise that consultation with the Department of Agriculture did not result in the inclusion of Biocides in the scoping document.</p> <p>We stress that compliant use of biocides is vital in ensuring safe treatment of Drinking Water, water used in Agriculture and Animal rearing and most relevantly to the Department of Agriculture in the processing of products from the Agri-Food sector compounding the lack of consultation on this with the relevant section within the Department of Agriculture.</p> <p>Steps should also be taken to ensure that policy and guidance issued by the EPA includes for biocide regulation. Further it should be ensured that all procurement and tendering issued by Irish Water, the EPA or other relevant authority includes as standard a requirement for biocide compliance.</p> <p>Finally to summarize what is a complex issue and state the simplicity of the process of end user compliance: All that is needed is that biocide end users check that the product they are purchasing is notified to the Department of Agriculture. This simply involves asking for confirmation of a PSC number or Department Authorisation. This simplicity in compliance check makes inclusion all the more important and simple.</p>			
NS42	Respondent 50	<p><u>Positioning and Customer Engagement</u></p> <p>If costs are to be passed on to customers, there must be an independent, competent and regular auditing of those costs.</p>	NS42-1: There must be an independent, competent and regular auditing of costs. The	NS42-1: Submission point noted. This does not fall under the remit of the WSSP.	NS42-1: N/A

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>The CER should not, and cannot, be assumed to have either the professional integrity or technical competence for this task, in the obvious absence of any similar oversight of the CER itself. External (EU or international) auditing is deemed essential, as is the provision of sufficient information to stakeholders (such as the paying customers) who might wish to audit aspects of the costs themselves. If one employs a plumber, one obtains quotations, checks the bill and the work. Customer representation (preferably with relevant qualifications) on the audit committees is recommended.</p> <p><u>Water quality and hard water</u> Lime most certainly has an impact on the effective life of some equipment and the use, by households, of chemicals to combat this or to regenerate softeners, may have a deleterious impact on effluent treatment systems. It would be far cheaper and less damaging environmentally for such treatment to be centralized and controlled. Disposal of damaged white goods also has environmental impacts.</p> <p><u>Supplying enough water to meet demands</u> Obviously this does not consider excessive leaks from badly designed, installed and maintained public water supply systems. If these are corrected, margins increase dramatically.</p> <p><u>Addressing leakage and wastage of water</u> See previous comment. The location and cause of the majority of leaks are already well known. Improved design and engineering procedures - and proper enforcement - would be a good start.</p> <p><u>Objective 3: Providing effective waste water management</u></p>	<p>CER should not, and cannot, be assumed to have either the professional integrity or technical competence for this task.</p> <p>NS42-2: Lime has an impact on the effective life of some equipment and the use, by households, of chemicals to combat this or to regenerate softeners, may have a deleterious impact on effluent treatment systems. Treatment should be centralized.</p> <p>NS42-3: Address leakage and water wastage</p>	<p>NS42-2: Submission point noted. Water quality compliance will be addressed under Objective 2 “ensuring a safe and reliable water supply”.</p> <p>NS42-3: Submission point noted. This will be dealt with in Objective 2 of the WSSP “Ensuring a safe and reliable water supply”.</p> <p>Leakage is an immediate priority for Irish Water. Water loss impacts upon. Through a targeted programme of leakage</p>	<p>NS42-2: Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS42-3: Objective 2 “Ensuring a safe and reliable water supply”</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>The EPA does not have the Public's confidence, with good reason. Again, a trustworthy auditor would be a good start.</p> <p><u>Identifying and rehabilitating deficient sewers</u> It would again help if existing procedures, let alone improved ones, were properly employed and checked. Improved installation systems are available, which would cut costs, but local contractors are invariably only capable of employing traditional methods.</p> <p><u>Delivering best practice approach to sewer refurbishment and replacement</u> See previous comment.</p> <p><u>Maximising capacity of existing sewers</u> Surface water should never be, and never needs to be, discharged to sewer. Rainwater harvesting is to be encouraged.</p> <p><u>Addressing overloaded waste water treatment facilities</u> This is an appalling condemnation of the EPA, which has been responsible for overseeing this area for years. In many cases this should not require significant capital expenditure to resolve.</p> <p><u>Balancing Cost and benefits of investment in waste water</u> This is waffle. All that is required is some intelligence and expertise in the conceptual design effort. No wheels need to be re-invented.</p> <p><u>Challenge of current and future standards</u> This technology has been available for years in industry.</p>	<p>NS42-4: Identify and rehabilitate deficient sewers</p> <p>NS42-5: Surface water should never be discharged to sewer. Rainwater harvesting is to be encouraged.</p>	<p>detection, leakage control, pressure management and leakage repair we will bring leakage down to sustainable economic levels. We will introduce pressure management measures, provide incentives to reduce customer side leakage and replace or rehabilitate water pipelines. We will prioritise our leakage management activities based on need and adopt a 'risk based' approach to provide sufficient capacity in the water supply system to meet acceptable levels of service to our customers.</p> <p>NS42-4: Submission point is noted. The strategies and measures for Identifying and rehabilitating deficient sewers will be dealt with in Objectives 2 and 6.</p> <p>NS42-5: Submission point is noted. This will be dealt with a Tier 2 or Tier 3 as appropriate.</p>	<p>NS42-4: Objectives 2 and 6 "Ensuring a safe and reliable water supply" and "Supporting social and economic growth", respectively.</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p><u>Maximising the value of sludge</u> All the options have been available for years - and often proposed. It has simply been impossible to get approvals and commitments from the many bodies that have had to be involved.</p> <p><u>Impact of increasing environmental constraints</u> Increased standards do not necessarily imply increased costs.</p> <p><u>Objective 4: Protecting the environment</u> Nobody has accepted responsibility for groundwater up till now and many (or most) of the other resources have been poorly managed. Remediation of groundwater is expensive, so that prevention of contamination is essential. Penalties for such contamination should be severe - and properly enforced (and not merely financial).</p> <p>“Irish Water will work with all stakeholders involved in the WFD process to ensure that the investment that we make delivers the maximum environmental benefit possible. We must also ensure that Irish Water customers are not unfairly burdened with the cost of achieving environmental objectives disproportionate to our potential impact and as such will work with all stakeholders to ensure that we achieve the objectives of the WFD in the most cost effective way possible.” Again, any such broad statement requires proper auditing.</p> <p>Energy and Natural Resources The EU has agreed to reduce greenhouse gases by 20% by 2020 and will increase the target to 30% if a global agreement is reached. The National Climate Change Strategy 2007-2012</p>	<p>NS42-6:Address overloaded waste water treatment facilities</p> <p>NS42-7: Remediation of groundwater is expensive, so that prevention of contamination is essential. Penalties for such contamination should be severe - and properly enforced.</p> <p>NS42-8: Irish Water has a corporate objective to achieve a 5% reduction in energy use</p>	<p>NS42-6: Submission point noted. Wastewater infrastructure will be dealt with in Objectives 3 and 5 “Provide effective waste water management” and “Supporting social and economic growth”.</p> <p>NS42-7: Submission point noted. Penalties/Fines for pollution events do not fall under the remit of this Tier 1 Plan.</p> <p>NS42-8: Submission point is noted. This will be contained under Objective 4 of the WSSP</p>	<p>NS42-5: N/A</p> <p>NS42-6: Objectives 3 and 5 “Provide effective waste water management” and “Supporting social and economic growth”, respectively.</p> <p>NS42-7: N/A</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>states that the public sector should achieve a reduction in greenhouse gas emissions equivalent to a 33% saving in energy use by 2020. In line with this requirement, Irish Water has a corporate objective to achieve a 5% reduction in energy use per annum over the next 5 years.</p> <p>“Learn to write clearly - is this to be 5% total, over 5 years, or a reduction of 5% each year, over the previous year, for 5 years, some 22.6%? The former would be pathetic, the latter unlikely.”</p> <p>Objective 5: Supporting future social and economic growth</p> <p>“Seasonality of demand also poses significant challenges in tourist resorts. Projecting future demands, particularly industrial loading, is complex and has a significant bearing on optimal use of resources.”</p> <p>Actually this is not true - the correct procedure is to first inform the developer of the available supply. If it is inadequate, the development must be re-located elsewhere. As supplies are allocated then, and only then, are increased supplies to be planned, to ensure a suitable margin for new projects. Much development could be sustained by reducing leakage.</p> <p>“Irish Water are committed to providing strategic capacity to cater for domestic demand arising from population growth and domestic type demand associated with this growth (e.g. demand from education, hospital and commercial facilities serving these populations). Planning policies coupled with the activities of the Industrial Development Authority, Enterprise Ireland and the agricultural sector support investment in our</p>	<p>per annum over the next 5 years.</p> <p>Write clearly - is this to be 5% total, over 5 years, or a reduction of 5% each year, over the previous year, for 5 years, some 22.6%?</p> <p>NS42-9: Inform the developer of the available water supply. If it is inadequate, the development must be re-located.</p>	<p>“Protect and enhance the environment”.</p> <p>Our target, as part of our national commitment to reduce carbon emissions is a 5% reduction year on year for the first five years of this WSSP.</p> <p>NS42-9: Submission point noted. This does not fall under the remit of this high level Tier 1 Plan.</p>	<p>NS42-8: Objective 4 “Protect and enhance the environment”.</p> <p>NS42-9: N/A</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>economy, however, there will always be uncertainty in determining when and where development will take place. We will need to assess how growth can be appropriately supported within existing funding constraints”</p> <p>Substantial capabilities exist for reducing agricultural usage by requiring more efficient usage on farms and in food processing.</p>			
NS43	Respondent 51	<p>Customer Expectations Irish water customers will demand low prices, top quality and minimum associated capital and resourcing investment. Where there is to be a major capital expenditure investment, its merit will need to be clear to see and easy to understand.</p> <p>Safe & Reliable Supply Heavy rains causing flooding and mayhem in winter followed by water rationing in summer time will be deemed unacceptable by Irish Water customers.</p> <p>The critical balance between supply and demand described by John Tierney, Chief Executive - Irish Water, at the Water Ireland conference this year, must be addressed to mitigate flooding and rationing risks. The massive capital investment project, to pump water from the Shannon to the East coast, is unnecessary and loaded with political, economic and other risks.</p> <p>Waste Water Management In Europe and beyond, visionary water utilities and planners are looking to move in the direction of water neutral planning. Irish Water, being a young company, can more readily become early adaptors for new paradigm shifting methods of water and waste treatment.</p>	<p>NS43-1: Customer Expectations: Irish water customers will demand low prices, top quality and minimum associated capital and resourcing investment. Where there is to be a major capital expenditure investment, its merit will need to be clear to see and easy to understand.</p> <p>NS43-2: The critical balance between supply and demand must be addressed to mitigate flooding and rationing risks.</p> <p>NS43-3: Waste Water Management: In Europe and beyond: visionary water utilities and planners are looking to move in the direction of water neutral planning. Irish Water, being a young company, can more</p>	<p>NS43-1: Submission point is noted. Major capital expenditure investment in terms of water services infrastructure will be detailed in the relevant lower Tier plans and projects.</p> <p>NS43-2: Submission point is noted. This will be addressed in Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS43-3: Submission point is noted. It will be a policy of Irish Water to promote research and innovative technical solutions so as to drive efficiencies. Research and innovation will be dealt with in Objective 6 “Investing in our future”.</p>	<p>NS43-1: N/A</p> <p>NS43-2: Objective 2 “Ensuring a safe and reliable water supply”.</p> <p>NS43-3: Objective 6 “Investing in our future”.</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
		<p>Social & Economic Growth Ireland took a global lead with the introduction of the cigarette smoking ban and the mandatory charge for plastic bags in supermarkets. With the opportunity to start afresh, Irish Water can set a goal for itself, to lead the world in water management. In the process, this can lead to job creation and environmental tourism that will benefit us all.</p> <p>Investing in our future Are the people of Ireland ready to support a major project to pipe and pump water over 100 miles from the Shannon to the east coast with all the ensuing topographic, carbon deficit, environmental, political, economic and social challenges that will invariably arise. In making this submission, a new way is proposed that will be easily understood, will be welcomed and supported by the Irish people, will create jobs and will again – as we did with plastic bags and banning cigarettes in public spaces – see us lead the world.</p>	<p>readily become early adaptors for new paradigm shifting methods of water and waste treatment.</p> <p>NS43-4: Irish Water can set a goal for itself, to lead the world in water management. In the process, this can lead to job creation and environmental tourism that will benefit us all.</p>	<p>NS43-4: Submission point is noted. It is a strategic policy of Irish Water to develop and implement a Sustainability Policy and Framework which ensures that Irish Water services are delivered in a sustainable manner balancing the need for water services to support the social and economic development of the country with the need to protect water resources and the water environment. After the adoption of the WSSP, a Tier II National Water Resources Plan will be prepared and implemented on a phased basis.</p>	<p>NS43-4: Objectives 2 and 6 “Ensuring a safe and reliable water supply” and “Investing in our future”, respectively.</p>
NS44	Respondent 52	<ol style="list-style-type: none"> 1. Irish water needs to urgently outline its early proposals in "boil" water areas 2. Charges need to be realistic and simple 3. Irish water needs to outline its short, medium and long term plans 4. Irish water needs to reassure the public that they are not just interested in money 	<p>NS44-1: Irish water needs to urgently outline its early proposals in "boil" water areas</p>	<p>NS44-1: Submission point is noted. The issue of boiled water notices will be addressed in “Ensuring a Safe and Reliable Water Supply” section of the plan. An overall aim of the plan and its implementation is to provide a water supply that is clean, safe and reliable and</p>	<p>NS44-1: Objective 2 “Ensuring a safe and reliable water supply”.</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
			<p>NS44-2: Charges need to be realistic and simple</p> <p>NS44-3: Irish water needs to outline its short, medium and long term plans</p>	<p>represents good value for money. It is a policy of the WSSP to remove all Boiled Water Notices. Improvements to the operation and maintenance of our plant and water supply networks or upgrade treatment processes will enable all existing boil notices to be removed.</p> <p>NS44-2: Submission point is noted. The CER is the body responsible for ensuring that the prices that we charge to customers are fair and reasonable. Objective 1 of the plan "Meeting customer expectations" contains a strategy to ensure that we work with the CER and other stakeholders to satisfy customers that they are paying a fair amount for the water services that they are being provided with by putting an effective tariff structure in place.</p> <p>NS44-3: Submission point is noted. The preparation of this WSSP is required under Section 33 of the Water Services (No. 2) Act 2013 with the purpose of</p>	<p>NS44-2: Objective 1 "Meeting our customer expectations"</p> <p>NS44-3: This will be addressed for each</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
			<p>NS44-4: Irish water needs to reassure the public that they are not just interested in money.</p>	<p>stating the objectives and the means to achieve those objectives for the incoming 25 year period. In line with the Ministerial Direction, targets and indicators will be set for the 25 year period with specific targets and indicators for each interim investment period within the overall plan period.</p> <p>NS44-4: It is an aim of the plan to outline the high level strategies to meet our Customer Expectations and to set out the broad commitments in relation to improving the levels of service standards including environmental and quality standard, meeting expected demands for water services and investing in our water services infrastructure over the period of the plan.</p> <p>Section 6 of the plan "Investing in Our Future" will address Irish Water's balanced approach to investment in order to meet objectives partnering with industries, assess management capability, achieving best value for money and promoting</p>	<p>Objective of the plan.</p> <p>NS44-4: Objectives 1 and 6 "Meeting our customer expectations" and "Investing in our future".</p>

Sub. No.	Customer Name	Relevant Submission Text	Key Submission Points relating to the WSSP	Response	Where Submission is Addressed in WSSP
				research and innovation for the water industry.	
NS45	Respondent 53	<p>This submission relates to draft objective no.5: Supporting future social and economic growth.</p> <p>Submission notes that in order to ensure appropriate compliance with the legislation that requires the WSSP to have regard to the proper planning and sustainable development at a county and local level, it is recommended that Irish Water's key objectives in supporting future social and economic growth are revised as follows (new text identified in red):</p> <ul style="list-style-type: none"> • "Provision and expansion of water services in line with demographic change, <i>including targeted growth as identified in the Core Strategy of County Development Plans.</i>" • "Support the economic development of the nation, <i>in line with the strategy for economic development set out in the Core Strategy of County Development Plan.</i> 	<p>NS45-1: In order to ensure appropriate compliance with the legislation that requires the WSSP to have regard to the proper planning and sustainable development at a county and local level, WCC recommend that Irish Water's key objectives in supporting future social and economic growth are revised as follows (new text identified in red):</p> <ul style="list-style-type: none"> • "Provision and expansion of water services in line with demographic change, <i>including targeted growth as identified in the Core Strategy of County Development Plans.</i>" • "Support the economic development of the nation, <i>in line with the strategy for economic development set out in the Core Strategy of County Development Plan.</i> 	<p>NS45-1: It is an aim of Irish Water to support population and economic growth in line with national and regional spatial planning objectives.</p> <p>It is a sub objective of Irish Water to facilitate growth in line with national and regional economic and spatial planning policy through the provision of appropriate water services infrastructure in line with development plans and core strategies (Objective 5).</p>	<p>NS45-1: Objective 5 "Support social and economic growth".</p>

Appendix D: Responses on the Draft SEA Scoping Report

Submission No. 1: Environmental Protection Agency

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>Guidance on the SEA Scoping Process is available on the EPA website and should be considered in the preparation of the SEA. This can be accessed at the following address: http://www.epa.ie/pubs/advice/ea/</p>	<p>Submission point is noted. This guidance will be consulted throughout the SEA process, as relevant.</p>	<p>N/A</p>
B	<p>Section 4 –Preliminary Identification of Environmental Baseline Content</p> <p>Figure 4.2 - Trends in Surface Water Status for the period 2009-2011 is stated to be reproduced from the Regional Indicators Report Monitoring Framework for Implementation (2013) and data from the EPA (2013). The exact source of the surface water trends should be clarified.</p> <p>Figure 4.2 data appears to be based on rivers exclusively. This should be clarified.</p>	<p>Figure 4.2 has been taken from the Regional Indicators Report Monitoring Framework for Implementation of the Regional Planning Guidelines. The footnote to this figure (in the Regional Indicators Report Monitoring Framework) states that the data has been sourced and adapted from (a) status assessments carried out by the Environmental Protection Agency on behalf of the various River Basin Districts for their respective River Basin Management Plans; and (b) Surface water trends data for the period 2009 - 2011 (EPA, 2013). The exact EPA source is not provided in the Regional Indicators Report Monitoring Framework and therefore cannot be confirmed.</p>	<p>N/A</p>
C	<p>Figure 4.4 - Status of Coastal Waters and Estuarine Water 2009–2011 is stated to be sourced from EPA Data 2009 – 2011 (from epa.ie/Envision). This relates to ecological status and not overall surface water status. The data on the Envision reflect the 2007-2009 assessment. The 2007-2012 data has been prepared but not published yet. The 2010-2012 Trophic Status Assessment Scheme (TSAS) assessment are now on the EPA's external viewer. http://gis.epa.ie/Envision</p>	<p>Agreed. Supporting text to Figure 4.4 to be amended.</p> <p>2007-2012 data will be utilised if it is made publicly available during the preparation of the SEA Environmental Report.</p> <p>The availability of Trophic Status Assessment Scheme data is noted and will be included in the final Scoping Report.</p>	<p>Supporting text to Figure 4.4 to be amended to state: "Ecological status of coastal and estuarine waters on the island of Ireland for 2009-2011 is mapped on Figure 4.4".</p> <p>Additional figure to be included in the final Scoping Report showing Trophic Status Assessment Scheme data.</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
D	Section 4.7.2.1 – Drinking Water Compliance - This section refers to the Remedial Action List (RAL). It is recommended that the Plan should reflect a move from the RAL approach, which is reactive, to the Drinking Water Safety Plans approach, which is proactive. The plan should reflect Irish Waters strategic approach to implementing Drinking Water Safety Plans (DWSP's).	Comment noted. Reference to the RAL is for the purposes of baseline analysis only.	
E	The Plan should set out the systems, links and agreements in place between Irish Water and local authorities in relation to the source protection work required to develop and implement DWSP's. Specific actions and associated Programme of Measures for each abstraction should be defined and responsibilities allocated along with timeframes where appropriate.	Submission point is noted.	
F	Section 5.1 - Legislation and Guidelines, the relevant Planning Acts should read Planning and Development Act 2000 – 2013.	Agreed, although it should be noted that the consolidated Act now includes all Acts and Statutory Instruments as of May 2014.	Section 5.1 to be amended to read: <i>“The Planning and Development Act 2000 - 2014”</i>
G	Section 5.2 – Environmental Sensitivities - Climate should be examined in the context of the need to ensure that drinking water plants are resilient and able to operate in changing and extreme climatic conditions. The impact of climate on raw water used for treatment should also be considered where relevant and appropriate.	Agreed. Climate change adaptation and resilience are likely to be important considerations in the SEA of the draft WSSP and should therefore be highlighted in the Scoping Report and, additionally, included in the assessment framework.	Section 5.2 to be amended to include the following: <ul style="list-style-type: none"> <i>“Resilience of water supply and treatment infrastructure to the impacts of climate change;</i> <i>Impact of climate change on water resource availability.”</i> <p>Air and climatic factors Draft Strategic Environmental Objective to be amended to read: <i>“Minimise the contribution to climate change and emissions to air (including greenhouse gas emissions) as a result of Irish Water activities and ensure the resilience of water supply and treatment infrastructure to the effects of climate change.”</i></p>
H	In Section 5.3 - Relationship with Legislation and Other Plans and Programmes reference should be made to the recently published European Union (Water Policy) Regulations 2014, S.I. No. 250 of 2014.	Submission point is noted. Whilst the European Union (Water Policy) Regulations 2014 S.I. No. 250 of 2014 should be included in the Scoping Report,	Section 5.3 and Appendix II to be amended to include the <i>European</i>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>In addition, Drinking Water Safety Plans (DWSP's) and other relevant plans and studies that Irish Water has committed to undertaking in their Capital Investment Plan should also be referred to here and considered where appropriate in the Plan and the SEA. These include for example;</p> <ul style="list-style-type: none"> • National Water Resource Management Plan, • Region Based Plans for Leakage Reduction in Water Networks • Strategy for Drinking Water Compliance Lead • Critical Assets Studies and Asset Data Aggregation • Strategy for Drinking Water Compliance – THM's • National Sludge Management Plan • Climate Mitigation and Adaptation Strategy 	<p>it is not considered appropriate to include within the SEA at this stage plans that are currently being prepared by Irish Water but which have not yet been made publicly available (either as draft or finalised documents) since the objectives of those plans are not yet known. Notwithstanding, the status of Irish Water plans will be reviewed as the SEA progresses and any plans published prior to the publication of the Environmental Report will be considered.</p>	<p><i>Union (Water Policy) Regulations 2014, S.I. No. 250 of 2014.</i></p>
I	<p>Section 5.4 Selection of Strategic Environmental Objectives, Indicators and Targets</p> <p>Consideration should be given to the inclusion in the Plan of relevant Key Performance Indicators that are measurable, tracked and reported on by Irish Water.</p>	<p>Performance indicators will be presented in the plan in relevant sections.</p>	<p>N/A</p>
J	<p>Section 5.5 Potential Environmental Effects</p> <p>The risk to public health from the provision of drinking water that isn't clean and wholesome should be highlighted as a key relevant environmental consideration.</p>	<p>Submission point is noted. Section 5.5 of the Scoping Report identifies interactions with human health including water as a potentially significant effect (if unmitigated). The interaction between human health and provision of water services through environmental vectors is also identified as a key environmental sensitivity in Section 5.2. The Draft Strategic Environmental Objective "Protect and reduce risk to human health in undertaking water management activities" will ensure that consideration is given during the SEA process (as appropriate) to risks to human health associated with drinking water quality. The proposed amendment is therefore not considered to be necessary.</p>	<p>N/A</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
K	<p>Appendix I Additional Information on the Content of the WSSP</p> <p>Consideration should be given to having a separate Section in the Plan on the Drinking Water Safety Plan approach to protecting drinking water.</p>	<p>Submission point is noted. Water Safety Plan will be dealt with in Objective 2. "Ensuring a safe and reliable water supply".</p>	N/A
L	<p>As part of an EPA STRIVE Research project - Developing and Assessing Alternatives in Strategic Environmental Assessment - Good Practice Guidance, an Inventory of SEA Spatial Environmental Information Sources was prepared. See Link below. : http://www.epa.ie/pubs/advice/ea/seaspatialinfomationsourcesmarch2014.html</p> <p>This spatial environmental inventory can be used to inform the preparation of SEA Environmental Reports and the associated environmental assessments. Data sources include the following environmental topics - Air Quality, Climate, Biodiversity, Flora, Fauna, Geology, Soils, Hydrology, Water Quality, Flooding, Socio-Economic, Material Assets, Planning Data, and other Sectoral Datasets. Note the database includes Marine related Data Sources,</p> <p>This inventory was compiled in March 2014 and may not be exhaustive. The inventory will be updated at regular intervals, subject to resources. It is a matter for the user to ensure the most recent relevant environmental data has been consulted in undertaking SEA. See Disclaimer associated with this Database.</p> <p>The relevant databases should be consulted, as appropriate, during the SEA process.</p>	<p>Submission point is noted. This information source will be referenced throughout the SEA process as relevant.</p>	N/A

Submission No. 2: Respondent 2

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>Respondent welcomes the current consultation on both the issues paper and the Strategic Environmental Assessment (SEA) process. We further welcome the next phase of consultation on the WSSP and SEA in October.</p>	<p>Submission point is noted.</p>	N/A
	<p>It is regrettable, that what is currently being provided for the Tier 1 of the 25 year WSSP, is primarily minimum and minimal written consultations. For a plan of such significance it is important that there is meaningful active public participation, as defined by the Aarhus Convention which requires that 'Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public'.</p>	<p>Submission point is noted. Further consultation on the SEA and the draft WSSP will be undertaken during PC2. In addition, there will be further consultation at all other levels of the Planning and Environmental Assessment Hierarchy for Water Services (see Figure 2.1 in the Draft Scoping Report).</p>	N/A

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
B	Figure 2.1 provides a very useful overview of the tiered approach to water services planning and implementation and the further opportunities for input via the SEA and AA for the National Water Resources Management Plan and other implementation plans.	Submission point is noted.	
C	The importance of the catchment-based approach to water resource management cannot be over-estimated and the commitment in the draft scoping report to reflect this in the WSSP and its SEA Environment Report is to be welcomed. The references to catchment protection and 'catchment-based solutions' in various proposed sections of the WSSP, as set out in Appendix I are welcomed by Respondent. However, there is only one mention of source protection in the WSSP Issues Paper, when it is a key issue for improving the quality of raw water. Integrated catchment management and the catchment-based approach are vital to achieving sustainable water management but they are complex and further research is needed in Ireland. It is vital therefore that Irish Water sets its priorities for this more specifically in the WSSP and SEA Environmental Report and makes a specific commitment in terms of resources so that this catchment based approach is not just limited to a theoretical aspiration but imbedded in Irish Water's programmes and activities via the WSSP. Respondent is looking forward to reading in the SEA Environmental Report how the catchment-based approach, including the consideration of cumulative pressures, is to be incorporated into the WSSP and associated implementation plans.	Submission point is noted. This approach is consistent with that detailed in the SEA Scoping Report. Aspects of catchment based approach have been integrated into the SEA alternatives as well as into the emerging content of the WSSP. The SEA includes a specific Strategic Environmental [assessment] Objective concerning water quality (Prevent deterioration of the status of water bodies with regard to quality and quantity and improve water body status for rivers, lakes, transitional and coastal waters and groundwaters to at least good status, as appropriate to the WFD). This will enable the assessment to consider the likely significant effects of the WSSP on water quality including consideration of factors relevant to water catchments. The SEA Environmental Report will detail the findings of the SEA with respect to the alternatives and the content of the draft WSSP, including addressing cumulative effects.	
D	On a more immediate note, we would also be very grateful if Irish Water could issue the timeline for the remaining consultation on the WSSP SEA, so that we may plan our work programme and resources around it. This is especially the case if it is likely to take place during the holiday months as we are dependent on one staff member responding to it.	Submission point is noted.	
E	<p>Content and context of the WSSP</p> <p>The proposed National Water Resources Management Plan is to be welcomed. However, the initial draft description refers only to balancing the supply and demand of water. This implies that the Plan will look at quantitative issues only. Respondent seeks clarification as to whether water quality issues will be addressed also. It is vitally important that this Plan addresses water</p>	Submission point is noted. This response does not relate specifically to the WSSP or SEA thereof. However, Irish Water will take the comment into account in its preparation of the National Water	

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>quality and source protection issues in the context of an integrated catchment management Water Safety Plan approach.</p> <p>The National Sludge Management Strategy will also need to take into account the additional loading from the extra maintenance and cleaning Domestic Waste Water Treatment Systems.</p>	<p>Resources Management Plan and National Sludge Management Strategy.</p> <p>The in combination effects of the above Plans with the WSSP will be addressed in the SEA ER.</p>	
F	<p>Preliminary identification of environmental baseline content: Water</p> <p>In addition to the RBD offices and EPA as sources of data, IW needs to include data from local authority discharge licensing and monitoring under the Water Pollution Acts. If cumulative impacts and assimilative capacity are to be assessed, discharges licensed by the Local Authorities under the Water Pollution Acts, to bodies of water to which IW is also discharging, need to be taken into account and their potential synergistic impacts assessed. This is particularly the case for Section 4 licenses.</p>	<p>Submission point is noted. Where publicly available and in a form suitable for inclusion within a strategic assessment of effects arising from the WSSP, consideration will be given to the inclusion of relevant local authority datasets. Local authorities may also be identified within any subsequent monitoring proposals contained within the Environmental Report.</p>	<p>Potential for inclusion of additional local authority data regarding discharge licenses where publicly available and in a form suitable for inclusion within a strategic assessment.</p>
G	<p>Respondent agrees that it is especially important to 'identify likely interactions with the River Basin Management Plans and associated Programmes of Measures'. The SEA Environmental Report must recognise that the full implementation of the Urban Waste Water Treatment Directive is considered to be a Basic Measure in the WFD and thus must be included as such in its River Basin Management Plans and Programmes of Measures. This obvious interaction and key legal requirement must be to the forefront when determining water services investment priorities and finalising the WSSP.</p>	<p>Agreed. The Urban Wastewater Treatment Directive has been considered in the review of other plans and programmes in Section 5.3 and at Appendix II of the Draft Scoping Report.</p> <p>The SEA (and AA) will take account of Irish Water's obligation to comply with the River Basin Management Plans and associated Programmes of Measures and the Urban Waste Water Treatment Directive (91/271/EEC) as appropriate.</p>	

Submission No. 3: Respondent 3

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>SEA and AA of the Water Strategic Services Plan and Implementation Plans must consider ecological impacts – e.g. those on water-dependent European or otherwise protected sites</p>	<p>Agreed. The SEA and AA will consider the ecological impact of the draft WSSP. In this respect, the framework that will be</p>	

	<p>must be assessed; as well as numerous other likely significant impacts. Should this process (and consultation on same) not be carried out in tandem with investment plan preparation?</p>	<p>used to assess the draft WSSP as part of the SEA process (as set out in Section 5.4 of the Draft Scoping Report) includes the following Strategic Environmental Objective: Prevent damage to terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species.</p> <p>The AA will consider the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant, consistent with the requirements of the European Communities (Birds and Natural Habitats) Regulations 2011.</p>	
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Submission No. 4: Respondent 4

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>The “Draft SEA Scoping Report” states that “water conservation plans” will be part of the WSSP Future Implementation Plans (Pg 4). Water demand management should be mentioned here to include attention to consumption-side considerations to complement upstream considerations of leakage reduction.</p>	<p>Submission point is noted. As set out at Page 4 of the Draft Scoping Report, the list of plans is not exhaustive. Water demand management is likely to be a key feature of Irish Water plans including, for example, the National Water Resources Management Plan.</p>	
C	<p>A “balanced approach to demand management” is mentioned in Appendix 1 pg 45 of the Draft SEA Scoping Report the “Ensuring a Safe and Reliable Water Supply”. We welcome this and urge its inclusion in the WSSP to reflect this priority.</p>	<p>Submission point is noted.</p>	

Submission No. 5: Respondent 5

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>The CSO has a legal obligation to ensure that Ireland is able to complete Eurostat questionnaires on water and waste water statistics. These questionnaires request national (and sometimes River Basin District level) data on topics such as:</p> <ul style="list-style-type: none"> - Renewable freshwater resources; - Annual freshwater abstraction; - Water use; - Waste water treatment plants capacity; - Sewage sludge production and disposal; - Generation and discharge of waste water; and - Water quality. <p>The Draft Scoping Report and Issues Paper highlight many topics that have a relevance to these areas. Additional areas that we would be interested in developing statistics on include:</p> <ul style="list-style-type: none"> - Expenditure on water conservation measures; - Capital expenditure on water and waste water infrastructure; and - Economic sector and socio-demographic analyses of your customers (both residential and non-residential) - the collection of reference numbers such as CRO/VAT number for enterprises and postcodes would facilitate us in matching your data with the CSO Business Register to get NACE code and with the Census of Population to get information on household characteristics - any such analyses would be conducted under the Statistics Act, 1993 and for statistical purposes only. <p>We consider that there is scope for Irish Water, the EPA, CSO, etc. to work together to ensure that a reliable time series of statistics on these topics is available for policy research and to meet statistical obligations.</p>	<p>Submission point is noted. This will be addressed under Objective 5 "Investing in our future" of the WSSP.</p>	

Submission No. 6: Respondent 6

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>The Competent Authority for biocidal products would like to input in to the draft SEA scoping report for water services by Irish Water and would like to indicate that there are legal responsibilities of Irish Water with respect of the Biocidal Products Regulation (528/2012) as amended (334/2014). These Regulations are directly applicable in the state. The control and enforcement measures relating to biocidal products are provided for by SI 427 of 2013 (as Amended).</p> <p>In particular biocidal products used by Irish Water must be either notified or authorised by this office. To use products that are not notified or authorised is illegal and will result in enforcement action.</p> <p>In particular, some of the products that are directly relevant include:</p> <ol style="list-style-type: none"> 1. Product-type 4: Food and feed area disinfection products - Products used for the disinfection of equipment, containers, consumption utensils, surfaces or pipework associated with the production, transport, storage or consumption of food or feed (including drinking water) for humans and animals. Products used to impregnate materials which may enter into contact with food. 2. Product-type 5: Drinking water disinfection products - Products used for the disinfection of drinking water for both humans and animals. <p>Other biocidal products that may be utilised on water facilities or procured by Irish Water are likely to include:</p> <ol style="list-style-type: none"> 1. Product-type 14: Rodenticides - Products used for the control of mice, rats or other rodents, by means other than repulsion or attraction, in or around water treatment facilities. 2. Product-type 16: Molluscicides, vermicides and products to control other invertebrates - Products used for the control of molluscs (such as zebra mussels at water intake pipes or water treatment facilities), worms and invertebrates not covered by other product-types, by means other than repulsion or attraction. 3. Product-type 17: Piscicides - Products used for the control of fish, by means other than repulsion or attraction. <p>It may be useful that the scoping document addresses these requirements especially given the importance of delivering potable water to the public through water disinfection (e.g. by chlorine based products or ozonation/ionisation/electrolysis systems).</p>	<p>Irish Water notes the requirements of the biocidal regulations and recognises its responsibilities in this regard.</p> <p>Reference to relevant biocidal regulations should be included in the review of plans and programmes as part of the SEA process.</p> <p>Broadly, the Draft Strategic Environmental Objectives presented in Section 5.2 of the Draft Scoping Report seek to avoid adverse impacts on the natural environment and on human health as a result of water management activities. In consequence, it is expected that, where appropriate, due consideration will be given to the use of biocidal products as part of the assessment of the draft WSSP, although it is assumed that any proposals contained in the plan will not result in the failure of Irish Water to meet its responsibilities under the biocidal regulations.</p>	<p>Section 5.3 and Appendix II to be amended to include the following regulations:</p> <ul style="list-style-type: none"> • Biocidal Products Regulation (528/2012) as amended (334/2014) • S.I. No. 427 of 2013 European Union (Biocidal Products) Regulations 2013

Submission No. 7: Respondent 7

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	I concur fully with the suggestion in the scoping document that Irish Water must consider strategies and policy to provide for the protection of water resources.	Submission point is noted.	

Submission No. 8: Respondent 8

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>While broadly welcoming the provisions of the consultation and the SEA Document Draft, I am disappointed that while the Scoping Documents provide all the various headings that are considered relevant to the development of the WSSP, including National and Regional Planning Policy, Social and economic growth, energy and natural resources, climate change and the all encompassing Water Framework Directive, neither the scoping document or the Draft SEA identify pressures or potential sources of polluting or otherwise, on water resources.</p> <p>Given the hydrological and hydro-geological make up of Ireland this proposed industry [unconventional oil and gas exploration and production] has the potential to cause irreversible and unmitigated contamination of our waterways right across the land, and Irish Water should have it identified in its scoping document as a significant threat to water quality and resources. It should form part of the evaluation of the Water Services Strategic Plan in addition to other identifiable pressures on water quality.</p>	<p>Submission point is noted. The Draft SEA Scoping Report provides an overview of the baseline in respect of the quality of water resources including drinking water. The SEA includes a specific Strategic Environmental [assessment] Objective concerning water quality (Prevent deterioration of the status of water bodies with regard to quality and quantity and improve water body status for rivers, lakes, transitional and coastal waters and ground waters to at least good status, as appropriate to the WFD). This will enable the assessment to consider the likely significant effects of the WSSP on water quality. The SEA Environmental Report will also consider the likely evolution of baseline conditions including future pressures on water resources which may include unconventional oil and gas exploration and production.</p> <p>The SEA will consider the potential impacts of the draft WSSP on water</p>	

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
		resources and on the provision of water supply and treatment infrastructure to meet future demand. In this respect, the assessment framework presented in Section 5.2 of the Draft Scoping Report includes the Strategic Environmental Objective: Provide new, and upgrade existing, water and waste water management infrastructure to protect human health and ecological status of water bodies. However, it is not the purpose of the SEA of the WSSP to assess the potential impact of unconventional oil and gas exploration and production activity on water resources in Ireland.	

Submission No. 9: Respondent 9

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>While the scoping document recognises the role of national and regional planning policy and the aims therein to achieve a balance that underpins proper planning and sustainable development across the region, it does not identify how permitted development or land use has impacted on existing water quality.</p> <p>The Water Framework Directive is intended to get all our water bodies up to good quality status by 2015. Many of its other provisions are not intended to be realised until much later and possibly not until the conclusion of Phase 2 of the implementing plans for the established River Basin Management plans.</p> <p>While the scoping document identifies the deficit in water and waste water treatment infrastructure across the regions the document is silent on the sources of pollution and therefore cannot propose measures aimed at controlling impacts on our water resources.</p> <p>Of major concern is the failure to comment on proposals to allow hydraulic fracturing in Ireland for the harvesting of unconventional shale gas and oil. This practice has been identified internationally as a major environmental threat and in particular is a grave hazard to ground and surface water quality. The process also involves the use of large quantities of water which are mixed with a range of toxic chemicals and result in highly polluted waste water being</p>	Submission point is noted. The Draft SEA Scoping Report provides an overview of the baseline in respect of the quality of water resources including drinking water. The SEA includes a specific Strategic Environmental [assessment] Objective concerning water quality (Prevent deterioration of the status of water bodies with regard to quality and quantity and improve water body status for rivers, lakes, transitional and coastal waters and ground waters to at least good status, as appropriate to the WFD). This will enable the assessment to consider the likely significant effects of the WSSP on water quality. The SEA Environmental Report will also consider the likely evolution of baseline conditions including future	

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>recovered from the wells with the potential for unmitigated release back into the environment and catastrophic pollution events resulting from their discharge. This will involve the use of vast resources of water and Ireland does not have the facility to handle or treat this toxic waste. Should these proposals become a reality it has the potential to devastate large areas of the country where the practice is proposed. In such an event all the other proposed measures intended by Irish Water in its Strategic Plan to safeguard water quality and provide for the proper treatment of domestic waste water, will be irrelevant. It is therefore deeply disturbing that the Scoping Document for the development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards in the Irish context.</p> <p>I therefore ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.</p> <p>Please take this into consideration</p>	<p>pressures on water resources which may include unconventional oil and gas exploration and production as well as other developments.</p> <p>The SEA will consider the potential impacts of the draft WSSP on water resources and on the provision of water supply and treatment infrastructure to meet future demand. In this respect, the assessment framework presented in Section 5.2 of the Draft Scoping Report includes the Strategic Environmental Objective: Provide new, and upgrade existing, water and waste water management infrastructure to protect human health and ecological status of water bodies. However, it is not the purpose of the SEA of the WSSP to assess the potential impact of unconventional oil and gas exploration and production activity on water resources in Ireland since it is not within the scope of the plan to set the framework for such development.</p>	

Submission No. 10: Respondent 10

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>While the scoping document recognises the role of national and regional planning policy and the aims therein to achieve a balance that underpins proper planning and sustainable development across the region, it does not identify how permitted development or land use has impacted on existing water quality.</p> <p>The Water Framework Directive is intended to get all our water bodies up to good quality status by 2015. Many of its other provisions are not intended to be realised until much later and possibly not until the conclusion of Phase 2 of the implementing plans for the established River Basin Management plans.</p>	<p>Submission point is noted. The Draft SEA Scoping Report provides an overview of the baseline in respect of the quality of water resources including drinking water. The SEA includes a specific Strategic Environmental [assessment] Objective concerning water quality (Prevent deterioration of the status of water bodies with regard to quality and quantity and</p>	

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>While the scoping document identifies the deficit in water and waste water treatment infrastructure across the regions the document is silent on the sources of pollution and therefore cannot propose measures aimed at controlling impacts on our water resources.</p> <p>Of major concern is the failure to comment on proposals to allow hydraulic fracturing in Ireland for the harvesting of unconventional shale gas and oil. this practice has been identified internationally as a major environmental threat and in particular is a grave hazard to ground and surface water quality.</p> <p>The process also involves the use of large quantities of water which are mixed with a range of toxic chemicals and result in highly polluted waste water being recovered from the wells with the potential for unmitigated release back into the environment and catastrophic pollution events resulting from their discharge. This will involve the use of vast resources of water and Ireland does not have the facility to handle or treat this toxic waste. Should these proposals become a reality it has the potential to devastate large areas of the country where the practice is proposed. In such an event all the other proposed measures intended by Irish Water in its Strategic Plan to safeguard water quality and provide for the proper treatment of domestic waste water, will be irrelevant. It is therefore deeply disturbing that the Scoping Document for the development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards in the Irish context.</p> <p>I therefore ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.</p>	<p>improve water body status for rivers, lakes, transitional and coastal waters and ground waters to at least good status, as appropriate to the WFD). This will enable the assessment to consider the likely significant effects of the WSSP on water quality. The SEA Environmental Report will also consider the likely evolution of baseline conditions including future pressures on water resources which may include unconventional oil and gas exploration and production as well as other developments.</p> <p>The SEA will consider the potential impacts of the draft WSSP on water resources and on the provision of water supply and treatment infrastructure to meet future demand. In this respect, the assessment framework presented in Section 5.2 of the Draft Scoping Report includes the Strategic Environmental Objective: Provide new, and upgrade existing, water and waste water management infrastructure to protect human health and ecological status of water bodies. However, it is not the purpose of the SEA of the WSSP to assess the potential impact of unconventional oil and gas exploration and production activity on water resources in Ireland since it is not within the scope of the plan to set the framework for such development.</p>	

Submission No. 11: Respondent 11

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>I wish to make a few short comments in relation to this consultation on the policies and objectives intended to form the WSSP.</p> <p>While the scoping document recognises the role of national and regional planning policy and the aims therein to achieve a balance that underpins proper planning and sustainable development across the region, it does not identify how permitted development or land use has impacted on existing water quality.</p> <p>The Water Framework Directive is intended to get all our water bodies up to good quality status by 2015. Many of its other provisions are not intended to be realised until much later and possibly not until the conclusion of Phase 2 of the implementing plans for the established River Basin Management plans.</p> <p>While the scoping document identifies the deficit in water and waste water treatment infrastructure across the regions the document is silent on the sources of pollution and therefore cannot propose measures aimed at controlling impacts on our water resources.</p> <p>Of major concern is the failure to comment on proposals to allow hydraulic fracturing in Ireland for the harvesting of unconventional shale gas and oil. this practice has been identified internationally as a major environmental threat and in particular is a grave hazard to ground and surface water quality.</p> <p>The process also involves the use of large quantities of water which are mixed with a range of toxic chemicals and result in highly polluted waste water being recovered from the wells with the potential for unmitigated release back into the environment and catastrophic pollution events resulting from their discharge. This will involve the use of vast resources of water and Ireland does not have the facility to handle or treat this toxic waste. Should these proposals become a reality it has the potential to devastate large areas of the country where the practice is proposed. In such an event all the other proposed measures intended by Irish Water in its Strategic Plan to safeguard water quality and provide for the proper treatment of domestic waste water, will be irrelevant. It is therefore deeply disturbing that the Scoping Document for the development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards in the Irish context.</p> <p>I therefore ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.</p>	<p>Submission point is noted. The Draft SEA Scoping Report provides an overview of the baseline in respect of the quality of water resources including drinking water. The SEA includes a specific Strategic Environmental [assessment] Objective concerning water quality (Prevent deterioration of the status of water bodies with regard to quality and quantity and improve water body status for rivers, lakes, transitional and coastal waters and ground waters to at least good status, as appropriate to the WFD). This will enable the assessment to consider the likely significant effects of the WSSP on water quality. The SEA Environmental Report will also consider the likely evolution of baseline conditions including future pressures on water resources which may include unconventional oil and gas exploration and production as well as other developments.</p> <p>The SEA will consider the potential impacts of the draft WSSP on water resources and on the provision of water supply and treatment infrastructure to meet future demand. In this respect, the assessment framework presented in Section 5.2 of the Draft Scoping Report includes the Strategic Environmental Objective: Provide new, and upgrade existing, water and waste water management infrastructure to protect human health and ecological status of water bodies. However, it is not the purpose of the SEA of the WSSP to assess the potential impact of unconventional oil and gas exploration and production activity on water resources in</p>	

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
		Ireland since it is not within the scope of the plan to set the framework for such development.	

Submission No. 12: Respondent 12

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>I note that although the scoping document recognises the role of planning policy and the aims of achieving proper planning and sustainable development in Ireland, it does not discuss the impacts of development and land use decisions on water quality. Because existing and potential sources of pollution are not covered, the WSSP cannot propose measures to control the impact on our water resources.</p> <p>I am particularly concerned at the failure to comment on proposals to allow hydraulic fracturing in Ireland to exploit unconventional shale gas and oil resources. This practice is recognised internationally as a major environmental threat and in particular as a grave hazard to ground and surface water quality.</p> <p>The process uses enormous quantities of fresh water which are mixed with a range of toxic chemicals and result in highly polluted and radioactive wastewater being recovered from the wells as "flowback" water. This fresh water, consequently rendered hazardous waste, is removed from the water cycle forever, as it cannot be effectively treated. Ireland certainly does not have the capacity to treat the massive quantities of toxic and radioactive wastewater that fracking would produce. Experience in other countries such as the US has shown that disposal of fracking wastewater is one of the most serious pollution problems associated with the process, and the potential for uncontrolled release back into the environment (through illegal dumping and accidents) is high. Additionally, the underground migration of dangerous chemicals and methane gas is a significant unknown. Fracking would irrevocably damage Ireland's water environment.</p> <p>If fracking is allowed to go ahead in Ireland, all of the proposed measures to safeguard water quality and provide for the proper treatment of domestic wastewater will be irrelevant. I am therefore concerned that the Scoping Document for the development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards.</p> <p>I ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it</p>	<p>Submission point is noted. The Draft SEA Scoping Report provides an overview of the baseline in respect of the quality of water resources including drinking water. The SEA includes a specific Strategic Environmental [assessment] Objective concerning water quality (Prevent deterioration of the status of water bodies with regard to quality and quantity and improve water body status for rivers, lakes, transitional and coastal waters and ground waters to at least good status, as appropriate to the WFD). This will enable the assessment to consider the likely significant effects of the WSSP on water quality. The SEA Environmental Report will also consider the likely evolution of baseline conditions including future pressures on water resources which may include unconventional oil and gas exploration and production as well as other developments.</p> <p>The SEA will consider the potential impacts of the draft WSSP on water resources and on the provision of water supply and treatment infrastructure to meet future demand. In this respect, the assessment framework presented in Section 5.2 of the Draft Scoping Report includes the Strategic Environmental</p>	

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.	Objective: Provide new, and upgrade existing, water and waste water management infrastructure to protect human health and ecological status of water bodies. However, it is not the purpose of the SEA of the WSSP to assess the potential impact of unconventional oil and gas exploration and production activity on water resources in Ireland since it is not within the scope of the plan to set the framework for such development.	

Submission No. 13: Respondent 13

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>I wish to make a few short comments in relation to this consultation on the policies and objectives intended to form the WSSP.</p> <p>While the scoping document recognises the role of national and regional planning policy and the aims therein to achieve a balance that underpins proper planning and sustainable development across the region, it does not identify how permitted development or land use has impacted on existing water quality.</p> <p>The Water Framework Directive is intended to get all our water bodies up to good quality status by 2015. Many of its other provisions are not intended to be realised until much later and possibly not until the conclusion of Phase 2 of the implementing plans for the established River Basin Management plans.</p> <p>While the scoping document identifies the deficit in water and waste water treatment infrastructure across the regions the document is silent on the sources of pollution and therefore cannot propose measures aimed at controlling impacts on our water resources.</p> <p>Of major concern is the failure to comment on proposals to allow hydraulic fracturing in Ireland for the harvesting of unconventional shale gas and oil. this practice has been identified internationally as a major environmental threat and in particular is a grave hazard to ground and surface water quality.</p>	<p>Submission point is noted. The Draft SEA Scoping Report provides an overview of the baseline in respect of the quality of water resources including drinking water. The SEA includes a specific Strategic Environmental [assessment] Objective concerning water quality (Prevent deterioration of the status of water bodies with regard to quality and quantity and improve water body status for rivers, lakes, transitional and coastal waters and ground waters to at least good status, as appropriate to the WFD). This will enable the assessment to consider the likely significant effects of the WSSP on water quality. The SEA Environmental Report will also consider the likely evolution of baseline conditions including future pressures on water resources which may include unconventional oil and gas</p>	

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>The process also involves the use of large quantities of water which are mixed with a range of toxic chemicals and result in highly polluted waste water being recovered from the wells with the potential for unmitigated release back into the environment and catastrophic pollution events resulting from their discharge. This will involve the use of vast resources of water and Ireland does not have the facility to handle or treat this toxic waste. Should these proposals become a reality it has the potential to devastate large areas of the country where the practice is proposed. In such an event all the other proposed measures intended by Irish Water in its Strategic Plan to safeguard water quality and provide for the proper treatment of domestic waste water, will be irrelevant. It is therefore deeply disturbing that the Scoping Document for the development of this Strategic Plan fails to give recognition to the likely introduction of this industry and its potential hazards in the Irish context.</p> <p>I therefore ask that you amend your outline plan to include consideration of this potential hazard and that you use the statutory remit afforded to you to oppose such a development on the basis that it poses an unacceptable risk to Ireland's water resources and consequently to human and animal health.</p> <p>Please take this into consideration</p> <p>We are aware about the situation here in Ireland and we are taking the necessary actions to ensure that due process is being followed by each and every Department that has responsibility.</p>	<p>exploration and production as well as other developments.</p> <p>The SEA will consider the potential impacts of the draft WSSP on water resources and on the provision of water supply and treatment infrastructure to meet future demand. In this respect, the assessment framework presented in Section 5.2 of the Draft Scoping Report includes the Strategic Environmental Objective: Provide new, and upgrade existing, water and waste water management infrastructure to protect human health and ecological status of water bodies. However, it is not the purpose of the SEA of the WSSP to assess the potential impact of unconventional oil and gas exploration and production activity on water resources in Ireland since it is not within the scope of the Plan to set the framework for such development.</p>	

Submission No. 14: Respondent 14

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>In general terms, the draft scoping report appears to be a well-rounded and thought out document. The majority of relevant legislation has been identified and it appears that attempts at consultations with relevant Authorities within the state have been made. With regard to water treatment the report identifies key critical concerns:</p> <ol style="list-style-type: none"> 1. To ensure adequate and proper protection of human health. 2. To ensure adequate and proper protection of the environment. 	Comment noted.	

	<p>3. To ensure that any and all water treated prior to human consumption complies with all relevant legislation both in treatment and in final result.</p>		
B	<p>While these key concerns are welcome and certainly warranted the report completely ignores what is perhaps the most relevant and critical EU legislations regarding water treatment these being the Biocidal Products Directive (Directive 98/8/EC of the European Parliament and of the Council) and the Biocidal Products Regulation (Regulation (EU) No 528/2012 of the European Parliament and of the Council) and various additions and amendments to same.</p> <p>The first of these legislative acts have been enshrined in Irish law under S.I. No. 625 of 2001, and under EU treat terms Ireland will be obliged to enshrine the second with a short period of time.</p>	<p>Submission point is noted. Reference to relevant biocidal regulations will be included in the review of plans and programmes as part of the SEA process.</p>	<p>Section 5.3 and Appendix II to be amended to include the following regulations:</p> <ul style="list-style-type: none"> • Biocidal Products Regulation (528/2012) as amended (334/2014) • S.I. No. 427 of 2013 European Union (Biocidal Products) Regulations 2013

Appendix E: Responses to the Initial Draft SEA Scoping Report

(Received in June 2014 and Evaluation Prepared by AoS Planning Consultants)

Submission No. 1: Dept of Environment, Community & Local Government

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>The Water Services Strategic Plan is a very high level plan and therefore it is difficult to assess the likely environmental impact its implementation will have. If possible, the SEA should attempt to assess potential impacts of the plan at a gross level (e.g. additional water abstraction and waste water treatment demands over the plans 25 year lifetime). At very least the criteria to be assessed in the Tier 2 SEAs should be clearly defined. The following suggestions are made with this in mind.</p>	<p>Noted.</p> <p>The SEA will assess the likely significant effects of implementing the WSSP, including any content which relates to water abstraction and waste water demands (see in particular the content under Chapter 4 and 5 of the WSSP Table of Contents provided at Appendix I of the SEA Scoping Report).</p> <p>Criteria to be assessed in the SEAs of Tier II Plans (see Figure 2.1 contained in the SEA Scoping Report) will be detailed by the SEA.</p>	<p>To add the following bullet point to the text contained in Section 3.3 'Outcomes of the SEA (and AA)' and Section 4.6 'Mitigation'.</p> <p>The identification of criteria to be assessed in the SEAs and AAs of Tier II Plans.</p>
B	<p>Irish Water is the largest single abstractor of water in the State and one of the most significant sources of pollutant discharges to the aquatic environment. Therefore, it will be important for Irish Water to assess through the SEA process the future impact of its services (arising from increases/decreases in abstractions and pollutant loads) on water status as accurately as possible under alternative management strategies. This, in my view, will require Irish Water to adopt a modelling approach. Modelling can support management decisions at the implementation stage in line with the "customer centred strategic approach" described on page 10 of the draft SEA scoping report (dated May 2014).</p> <p>The holistic approach referred to in the report is in keeping with the catchment management approach promoted by the Water Framework Directive. It involves catchment scale assessment of the likely impacts of alternative management strategies addressing, for example, pollutant loadings to waters arising from various sources but particularly from urban waste water discharges and agricultural sources. Under the new water governance arrangements for preparing river basin management plans the Minister for the Environment,</p>	<p>Noted.</p> <p>Irish Water is committed to complying with all environmental legislation in its actions and aligning with and cumulatively contributing towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management led by the WFD and implemented by the RBMPs.</p> <p>Emerging information from the review of the River Basin Management Plans including any examination of the interactions between and cumulative</p>	<p>None.</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>Community and Local Government will be responsible for making river basin management plans with the assistance of a high level National Water Policy Advisory Committee. It will be particularly beneficial to model the potential impact of alternative management strategies to support policy decisions when finalising river basin management plans.</p> <p>Modelling will be particularly relevant to Tiers 2 and 3 in the Water Services planning and assessment hierarchy referred to on page 2 of the draft SEA scoping report. I would strongly urge Irish Water to work closely with the EPA in developing a modelling approach to ensure consistency and coherence with the WFD Article 5 environmental risk assessment being undertaken by the Agency.</p>	<p>effects of water usage by all sectors and users (including cross-River Basin District interactions) will be taken into account by Irish Water.</p> <p>Modelling will be considered for use as part of lower tier assessments where both the detail of the plan/programme/project being assessed and the availability of relevant information makes this appropriate.</p> <p>As detailed under Section 3.3 'Outcomes of the SEA (and AA)' and Section 4.6 'Mitigation' of the SEA Scoping Report one of the potential outcomes of the SEA identified is for 'commitments for ongoing co-operation with other organisations'.</p>	
C	<p>The SEA process will need to take account of the Priority Substances Directives (Directive 2008/105/EC as amended by Directive 2013/39/EU) and subsequent amendments given that the WSSP covers a 25 year period. Urban waste water discharges are the main sources of many of the Priority Substances (PS) and Priority Hazardous Substances (PHS) designated in the Priority Substance Directives. The Directives include very stringent environmental water quality standards for these substances. Urban waste water discharges will need to be managed effectively to ensure that standards are not breached in receiving waters. The next review of the PS/PHS list (to be completed by the end of 2016) will likely include consideration of several pharmaceuticals as candidate PS/PHS. This has significant implications for urban waste water discharges which are the primary source of many of pharmaceuticals which end up in receiving waters.</p>	<p>Noted. The SEA (and AA) will take account of Irish Water's obligation to comply with the Priority Substances Directives (Directive 2008/105/EC as amended by Directive 2013/39/EU) and the scoping report will be updated accordingly.</p>	<p>To add details on the following to Section 4.3 'Relationship with Legislation and Other Plans and Programmes':</p> <p>Priority Substances Directives (Directive 2008/105/EC as amended by Directive 2013/39/EU)</p>
D	<p>The preparation of Water Services Implementation Plans will need to be coordinated with the preparation of river basin management plans as acknowledged in the draft SEA scoping report. However, the preparation of RBMPs is approximately 24 months behind schedule. Irish Water will need to liaise closely with the EPA which has responsibility for preparing the environmental risk assessments under Article 5 of the WFD.</p>	<p>Noted.</p> <p>As detailed under Section 3.3 'Outcomes of the SEA (and AA)' and Section 4.6 'Mitigation' of the SEA Scoping Report one of the potential outcomes of the SEA identified is for 'commitments for ongoing co-operation with other organisations'.</p>	<p>None.</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
E	Water Service Strategic Plans and their implementation will constitute a key measure under the WFD programme of measures. Ireland will be required to report on performance indicators to the EU Commission to demonstrate progress in implementing programmes of measures. These performance indicators (e.g. gaps to achieving environmental objectives and costs of individual measures) are currently under development at EU level through the WFD Common Implementation Strategy (CIS). It will be critical that preparations are made at the earliest opportunity to capture these indicators to facilitate electronic reporting to the EU Commission. In any event best practice will require such performance indicators to be captured for management purposes and to inform the SEA process related to Water Services Strategic Plans and their sub-plans.	Noted. The cited performance indicators will be taken into account as relevant once available and finalised.	To add the following text to Section 4.7 'Monitoring': Once available and finalised, performance indicators which are currently under development at EU level will be examined for integration into the SEA Monitoring Programme as appropriate.
F	While the draft SEA scoping report refers to relevant EU legislation (e.g. page 7) it does not refer to the respective domestic legislation. The relevant domestic legislation should be cited.	Noted.	Section 4.3 'Relationship with Legislation and Other Plans and Programmes' will be updated to include relevant domestic legislation.
G	The SEA scoping report does not include reference to the Priority Substances Directives. As mentioned above these directives are particularly relevant to the Water Services Strategic Plans and should be included within the scope of the SEA.	See response under C above.	See updates to SEA Scoping Report arising under C above.

Submission No. 2: Dept of Communications, Energy and Natural Resources (Inland Fisheries Ireland)

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	Under section 7(3) of the IFI Act it is stated that <i>without prejudice to subsection (1), IFI shall in the performance of its functions have regard to:</i> <i>(g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems),</i> <i>(h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995).</i>	Noted.	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
B	<p>Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Also article 28(2) of the said Regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015.</p>	<p>Noted. The SEA (and AA) will take account of Irish Water's obligation to comply with the Surface Water Regulations and the scoping report will be updated accordingly.</p>	<p>To add details on the following to Section 4.3 'Relationship with Legislation and Other Plans and Programmes':</p> <ul style="list-style-type: none"> • European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272/2009)
C	<p>Inland Fisheries Ireland is also the competent authority for fish and has significant responsibilities and powers under S.I. 477 of 2011 whereby Ireland transposed into Irish law its responsibilities under the European Communities (Birds and Natural Habitats) regulations – the habitats directive. Furthermore the Eel is now endangered and additional protection measures have also been introduced in that regard and it is incumbent on Ireland to ensure that the eel and its range and habitat is properly protected.</p>	<p>Noted. The SEA (and AA) will take account of these Regulations and the scoping report will be updated accordingly.</p>	<p>To add details on the following to Section 4.3 'Relationship with Legislation and Other Plans and Programmes':</p> <ul style="list-style-type: none"> • The European Communities (Birds and Natural Habitats) Regulations 2011(S.I. No. 477/2011)
D	<p>We believe that priority should be given to IW structures as follows:</p> <ul style="list-style-type: none"> - Easy fix issues such as pumping stations, leaky structures, etc. A proper alarm system should be installed in such structures to record any illegal discharges to waters. Some of these structures have serial discharges that may be easily remedied. - Wastewater Treatment plants that are overloaded should receive priority funding where they are having a deleterious effect on receiving waters. - Wastewater Treatment plants that are about to become overloaded should be prioritised for upgrading as soon as possible, especially in urban areas that may undergo an expansion in building in the near future as the economy recovers. 	<p>The SEA will assess the likely significant effects of implementing the WSSP, including any content which relates to these issues. See in particular the content of the WSSP Table of Contents provided at Appendix I of the SEA Scoping Report under the following: Chapter 4 (including C24 and S21), Chapter 5 (including C29 and C30), Chapter 6 (including S31 and S35), Chapter 7 and Chapter 8.</p>	<p>None.</p>
E	<p>IW should revisit all abstraction rights granted under the Planning Acts, Fisheries Acts and Water Supplies Act with the view to reassessing the sustainability of same,</p> <p>IW should take cognisance of potential practices such as <i>ad hoc</i> water abstraction (e.g. to water crops) and practices such as cattle access to waters, land spreading of waste that may be having a detrimental effect on waters upstream of your water treatment plants. IW should also make an active contribution to national and EU draft policies that may become Government Policy e.g. REPS, GLAS, Nitrates Regulations.</p>	<p>The SEA will assess the likely significant effects of implementing the WSSP, including any content which relates to these issues (see in particular the content under Chapter 4, including C22, and Chapter 5 of the WSSP Table of Contents provided at Appendix I of the SEA Scoping Report).</p>	<p>To add the following text to Section 4.3 of the Draft SEA Scoping Report:</p> <p>The SEA (and AA) will take account of Irish Water's obligation to comply with all environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>IW should take cognisance of any Guidelines produced by IFI or any other relevant body in the planning any IW infrastructural works.</p>	<p>The SEA (and AA) will take account of Irish Water's obligation to comply with the Nitrates Regulations and align with and cumulatively contribute towards – in combination with the RES and AEOS schemes – the achievement of the objectives of the regulatory framework for environmental protection and management led by the WFD and implemented by the RBMPs. The scoping report will be updated accordingly.</p>	<p>regulatory framework for environmental protection and management led by the Water Framework Directive and implemented by the River Basin Management Plans.</p> <p>To add details on the following to Section 4.3 'Relationship with Legislation and Other Plans and Programmes':</p> <ul style="list-style-type: none"> • REPS and AEOS schemes • Nitrates Regulations (S.I. No. 610/2010) <p>To insert the following text into Section 4.3:</p> <p>The specific provisions of the Draft WSSP have not yet been developed. Some issues addressed by these provisions will be similar to those contained in other plans/programmes e.g. the River Basin Management Plans.</p> <p>As per the SEA Directive, the SEA will, with a view to avoiding duplication of the assessment, take into account the fact that assessments will be carried out, in accordance with the Directive, at different levels of the hierarchy. As part of this process, assessments undertaken for other plans/programmes/etc. will be taken into account.</p>

Submission No. 3: Dept of the Environment Northern Ireland (I)

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	We would expected to see some references to the Urban Waste Water Treatment Directive within the environmental report (it was not included in section 4.3 of the scoping report), and in particular 'sensitive areas' to eutrophication, designated under this Directive. The Republic of Ireland has sensitive areas (eutrophic) under that Directive, and it is critical, with the reform of water services that this is not lost.	Noted. The SEA (and AA) will take account of Irish Water's obligation to comply with the Urban Waste Water Treatment Directive (91/271/EEC) and the scoping report will be updated accordingly.	To add details on the following to Section 4.3 'Relationship with Legislation and Other Plans and Programmes': <ul style="list-style-type: none"> Urban Waste Water Treatment Directive (91/271/EEC)
B	We would recommend that under Section 4.5, Table, Water – substitute 'Bathing Waters' with protected areas, to ensure that all protected areas are considered (bathing waters, shellfish waters, sensitive areas- eutrophic, etc.)	Noted. Table 4.2 'Environmental Components and Potential Effects' will be updated to take account of protected areas.	To update text from Table 4.2 'Environmental Components and Potential Effects' as follows: <p>Adverse impacts upon the status of water bodies and entries to the WFD Register of Protected Areas, arising from changes in quality, flow and/or morphology</p>

Submission No. 4: Dept of the Environment Northern Ireland (II)

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	Thank-you for the letter dated 14 th May 2014 from Mr Jerry Grant regarding the Water Services Strategic Plan (Uisce Eireann). The Northern Ireland Environment Agency (NIEA) welcomes the opportunity to comment on the SEA Scoping Report (SR) for the Strategic Plan and generally supports the approach taken in the document; however, some comments are suggestions for consideration are set out below.	Noted.	None.
B	Where the Republic of Ireland has a land border with Northern Ireland, there is the potential for impacts in Northern Ireland, particularly where there is a hydrological pathway within a shared International River Basin. <p>NIEA welcomes that the potential for trans-boundary impacts are acknowledged in the SR. There is the potential for adverse impacts on habitats, water quality and biodiversity, in particular pollution impacts arising from flooding of sewers (may be linked to climate change events), inadequate aging infrastructure, waste water treatment works and diffuse pollution</p>	Noted. Additional text will be added to Section 4.5 'Potential Environmental Effects' to highlight that potential effects, if unmitigated, include those which may be transboundary.	To add the following text to Section 4.5 'Potential Environmental Effects': <p>The potential effects identified on Table 4.2 include those which may be transboundary. Where the Republic of Ireland has a land border with Northern Ireland, there is the potential for impacts, if</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>from rural septic tanks particularly in sensitive water catchment areas, for example, Lough Melvin on the Leitrim Fermanagh border.</p>		<p>unmitigated, in Northern Ireland, particularly where there is a hydrological pathway within a shared International River Basin.</p>
C	<p>NIEA notes that there are no natural heritage designations, for example Special Areas of Conservation, Special Protection Areas or Areas of Special Scientific Interest, illustrated in Northern Ireland in the SR. NIEA would suggest that to facilitate a robust trans-boundary analysis of environmental impacts that national and international designations in NI are considered. More information may be found at https://www.daera-ni.gov.uk/articles/special-areas-conservation (associated digital datasets can be found at: http://www.doeni.gov.uk/niea/other-index/digital-intro.htm)</p>	<p>As stated in the SEA Scoping Report, the SEA will consider available information on designated ecological sites and protected species, ecological connectivity and non-designated habitats.</p> <p>It is proposed to update the text in Section 5.2 of the SEA Scoping Report to take account of this part of the submission.</p>	<p>To update the following text in Section 5.2 'Biodiversity and Flora and Fauna':</p> <p>National and international (to take account of Northern Ireland designations) Ecological Constraints Rating mapping (providing, through GIS, an indication of the areas that are most ecologically sensitive to development) will be used by the assessment and provided in the SEA Environmental Report.</p>
D	<p>NIEA would suggest that to ensure that there are no adverse environmental impacts on Northern Ireland that adequate mitigation and monitoring measures are highlighted in the Environmental Report and built into the Water Services Strategic Plan.</p> <p>We would anticipate that the transboundary nature of any likely significant adverse effects on the environment of the Republic of Ireland that would remain after measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects are incorporated into the Plan would be of particular relevance to consider in relation to Northern Ireland.</p> <p>We would like the SEA Environmental Report to contain a clear statement indicating the opinion (and the reasons for it), of Irish Water about whether or not the implementation of the Plan, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment, is likely to have a significant effect on Northern Ireland.</p>	<p>Noted. As per the requirements of the SEA Directive, the SEA Environmental Report will include detail on mitigation and monitoring measures.</p>	<p>To add the following text to Section 4.5 'Potential Environmental Effects':</p> <p>The SEA Environmental Report will identify both likely significant positive effects and any likely significant adverse residual effect (taking into account any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment) of implementing the WSSP. This will include effects with respect to Northern Ireland.</p>
E	<p>For information: A couple of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level are:</p> <p>Northern Ireland State of the Environment Reports</p>	<p>Noted – these sources will be consulted as appropriate throughout the SEA process.</p>	<p>None.</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report</p> <p>State of the Seas Report.</p> <p>https://www.daera-ni.gov.uk/publications/state-seas-report</p> <p>Northern Ireland Environmental Statistics Reports</p> <p>https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report</p> <p>Details of River Basin Management Plans in Northern Ireland can be found at: https://www.daera-ni.gov.uk/topics/water/river-basin-management</p>		
F	The SEA Team hope these comments are useful in assisting with the iterative SEA process to inform the development of the Water Services Strategic Plan. Please contact the SEA Team at seateam@doeni.gov.uk should you have any queries or require clarification.	Noted.	None.

Submission No. 5: Environmental Protection Agency

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>We welcome the opportunity to make an initial submission at this stage of Plan development and SEA process. We will continue to contribute, as appropriate, at subsequent key stages with a view to informing the on-going development of the Plan and the associated SEA process.</p> <p>We attach for information, EPA's observations on Irish Water's Proposed Capital Investment Plan 2014-2016 which should be considered as part of this submission. The relevant aspects under the following headings: Key Performance Indicators, Environmental Priorities, Drinking Water Capital Investment and Waste Water Agglomeration Capital Investment, should be considered in the context of the Strategic Plan and the associated SEA.</p>	<p>Noted.</p> <p>The Capital Investment Plan 2014-2016 submission from the EPA provides advice under a number of headings. Responses to the general issues raised under each are provided below.</p> <p>Key Performance Indicators</p> <p>These comments relate to Key Performance Issues for implementation of the CIP.</p> <p>Sections 4.4 'Selection of Strategic Environmental Objectives, Indicators and Targets' and Section 4.7 'Monitoring' provide details on indicators with regard to the monitoring of environmental effects of implementing the WSSP.</p>	<p>Key Performance Indicators</p> <p>None.</p> <p>Environmental Priorities, Drinking Water</p> <p>To update Section 5.7 of the SEA Scoping Report to include information on priorities identified in the EPA's reports on drinking water and waste water.</p> <p>Drinking Water Supply Capital Investment</p> <p>To update Section 5.7 of the SEA Scoping Report to include information on compliance with respect to THM's and Turbidity in drinking water supplies.</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
		<p>Environmental Priorities</p> <p>This section provides information on priorities identified in the EPA's reports on drinking water and waste water. This information will be integrated into the SEA Scoping Report.</p> <p>Drinking Water Supply Capital Investment</p> <p>Much of these comments relate to the Capital Investment Programme.</p> <p>Information is provided under this heading on compliance with respect to THM's and Turbidity in drinking water supplies. This information will be integrated into the SEA Scoping Report.</p> <p>Waste Water Agglomerations Capital Investment</p> <p>In addition to comments on the CIP, information on waste water related compliance is provided under this heading. This information will be integrated into the SEA Scoping Report.</p>	<p>Waste Water Agglomerations Capital Investment</p> <p>To update Section 5.7 of the SEA Scoping Report to include information on waste water related compliance.</p>
B	<p>The primary objectives associated key challenges and themes likely to be included in the proposed Strategic Plan along with the Key headings including:</p> <ul style="list-style-type: none"> • Challenges and Strategic Priorities; • Meeting Customer Expectations; • Ensuring a Safe and Reliable Water Supply; • Providing Effective Management of Waste Water; and, • Protecting and enhancing the environment <p>are noted. There would also be merits in considering including an additional section on Implementation and Monitoring.</p>	<p>Noted. The SEA will assess the likely significant effects of implementing the WSSP, including any content which relates to implementation and monitoring (see in particular the content under Chapter 1, including S2 and S5, and Chapter 2, including S12, of the WSSP Table of Contents provided at Appendix I of the SEA Scoping Report).</p> <p>It is also noted that the SEA ER will recommend commitments to be integrated into the plan regarding monitoring.</p>	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
C	In order to further inform the scope of the assessment, the role, and scope of the Plan will need to be further defined. This should inform on-going more focussed input from the relevant statutory environmental authorities during the formulation of the Plan.	<p>Noted.</p> <p>The description of the plan at Section 2 of the Draft Scoping Report was expanded upon following an SEA Workshop which was held with environmental authorities. The detailed Table of Contents for the WSSP, which includes Primary Objectives, Legislation Referenced, Key Challenges and Strategies, was also expanded upon.</p> <p>Further consultation on the SEA Scoping Report and the Draft WSSP and associated SEA and AA documents will be undertaken in the coming months.</p>	None – see also revised Draft SEA Scoping Report Section 2 and Appendix I (<i>Additional Information on Content of Water Services Strategic Plan</i>).
D	The Key Environmental Sensitivities in Section 4.2 and the Preliminary Identification of Environmental Baseline in Section 5 are noted. These should be reviewed with a view to focussing the scope of the assessment on key potential likely significant effects of implementing the Plan. The relevant environmental aspects described in the SEA Environmental Report should be set in the context of the potential environmental implications of the implementation of the Strategic Plan. The scope of the assessment should reflect the level at which the plan will operate. The key relevant inter relationships between the environmental topics should also be considered and described in the Environmental Report.	Noted. Environmental sensitivities and potential effects in the SEA Scoping Report will be tiered with a view to focusing the scope of the SEA.	Environmental sensitivities and potential effects in the SEA Scoping Report will be tiered into ' Most Relevant ' and ' Less Relevant ' with a view to focusing the scope of the SEA.
E	The commitment to the preparation of more detailed Tier II Level Implementation Plans is welcomed. These include- a National Water Resource Management Plan, a National Sludge Management Plan and a Climate Change Adaptation and Mitigation Strategy. These Plans should be subject to SEA, the scope of which should take into account other relevant Plans- e.g. Land Use, WFD River Basin Management Plans, Flood Risk Management Plans, and relevant related sector Plans (e.g. Agriculture, Fisheries, Forestry, Biodiversity). Where appropriate, these plans should reflect a catchment based approach and incorporate a spatial dimension. The requirement for Habitats Directive Appropriate Assessment should also be considered for these Plans.	<p>Noted. The SEA Scoping Report provides details on the legislative requirements in relation to the undertaking of SEA and AA at footnote No. 2 under Section 2.2.</p> <p>Criteria to be assessed in the SEAs of Tier II Plans (see Figure 2.1 contained in the SEA Scoping Report) will be detailed by the SEA.</p>	<p>To add the following bullet point to the text contained in Section 3.3 'Outcomes of the SEA (and AA)' and Section 4.6 'Mitigation'.</p> <ul style="list-style-type: none"> • The identification of criteria to be assessed in the SEAs and AAs of Tier II Plans.
F	<p><i>Section 4.3 Key Plans/ Programmes</i></p> <p>The relevant aspects of the legislation, plans and programmes in Section 4.3 should be set in the context of their relevance to particular aspects of the Strategic Plan. Additional key</p>	Noted. The SEA (and AA) will take account all the cited key legislation, plans and programmes as appropriate and the scoping report will be updated accordingly.	To add details on all of the cited key legislation, plans and programmes to Section 4.3 'Relationship with Legislation and Other Plans and Programmes'.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>legislation, Plans and Programmes which should be taken into account, as appropriate, include the following:</p> <ul style="list-style-type: none"> <i>International EU Level:</i> Urban Waste water Treatment Directive; Nitrates Directive; Groundwater Directive; Environmental Quality Standards Directive; Environmental Liabilities Directive; A Blueprint to Safeguard Europe's Water Resources; EU Biodiversity Strategy <i>Transboundary:</i> International RBMPs; Northern Ireland Water Resources Management Plan 2012 <i>National:</i> Regulations transposing the WFD; Draft National Rural Development Plan; Forest Policy Review Plan; Draft Forestry Programme – (DAFM -in preparation); Draft National Peatland Strategy; Draft National Raised Bog SAC Management Plan; National Strategic Aquaculture Plan <i>Sub- Regional:</i> Sludge Management Plans; Greater Dublin Strategic Drainage Strategy; Water Supply Project - Dublin Region; Dublin City Sewerage Scheme Study (recently commenced); Local/County Water Services Strategic Plans; Local Catchment Flood Risk Management Plan 	<p>The SEA (and AA) will take account of Irish Water's obligation to comply with environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management led by the WFD and implemented by the RBMPs. The scoping report will be updated accordingly.</p>	
G	<p><i>Section 4.5 Potential Environmental Effects</i></p> <p>The full range of key relevant likely significant effects, including secondary, cumulative, synergistic, short, medium and long -term, permanent, and temporary, positive and negative effects should be addressed. Where significant effects are identified, appropriate mitigation measures should be proposed and relevant commitments should be included in the Strategic Plan. The potential for cumulative/ in-combination effects should be considered in the context of both the SEA Directive and the Habitats Directive- Appropriate Assessment, taking into account other key relevant plans / programmes and projects.</p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report.</p>	<p>To add the following text to Section 4.5 'Potential Environmental Effects'</p> <p>The potential for cumulative/ in-combination effects will be considered in the context of both the SEA Directive and the Habitats Directive, taking into account other key relevant plans and programmes.</p> <p>To add the following text to Section 4.6 'Mitigation'</p> <p>Where significant effects are identified, appropriate mitigation measures will be proposed and relevant commitments will be included in the Strategic Plan alongside responsibilities for implementing these measures.</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
H	<p><i>Section 4.7 Monitoring</i></p> <p>The proposed environmental monitoring programme should be linked with the monitoring and reporting on implementation of the Plan. The proposed monitoring should reflect existing relevant environmental monitoring programmes. Where possible, EU and national recognised indicators should be linked with Plan related environmental objectives and targets.</p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report.</p>	<p>To add the following text to Section 4.7 'Monitoring Measures':</p> <p>The SEA monitoring programme will be linked with any monitoring and reporting on implementation of the WSSP. Where possible, relevant EU and national recognised indicators will be linked with environmental objectives and targets identified by the SEA.</p>
I	<p><i>Section 4.8 Alternatives</i></p> <p>The Categories of Alternatives envisaged for the Plan Relevant alternatives/scenarios should be considered and assessed taking into account obligations under relevant water and wider environmental legislation.</p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report.</p>	<p>To add the following text to Section 4.8 'Alternatives':</p> <p>The assessment of environmental effects, if unmitigated, arising from the alternatives will be undertaken using mapping of environmental sensitivities, descriptions of the existing environment and Strategic Environmental Objectives – including those relating to obligations under relevant water and wider environmental legislation.</p>
J	<p>Guidance on the SEA Scoping Process is available on the EPA website and should be considered in the preparation of the SEA. This can be accessed at the following address: http://www.epa.ie/pubs/advice/ea/</p> <p>We would welcome the opportunity to discuss the Strategic Plan in more detail with a view to facilitating more targeted input to the development of the Plan and the on-going SEA Scoping exercise.</p> <p>Following issue of an updated Scoping Report we will review and provide further input. On receipt of the Draft Strategic Plan and associated SEA Environmental Report, we will make further comments and observations.</p> <p>Should you have any queries or require further information in relation to the above please contact the undersigned.</p>	<p>Noted. This guidance, which includes a number of the entries listed under Section 4.1 of the Scoping Report, will be consulted throughout the SEA process as relevant.</p> <p>Further consultation on the SEA Scoping Report and the Draft WSSP and associated SEA and AA documents will be undertaken in the coming months.</p>	

Submission No. 6: Dept of Agriculture, Fisheries and the Marine

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>The purpose of the SEA screening is to identify the full range of potential significant environmental effects arising from the implementation of a plan/programme. Therefore the focus of this response will be to ensure that the strategic plan adequately recognises the extent and potential growth of the seafood sector and in particular the negative impact that poor water quality and supply can have on the quality of the seafood produced in Ireland.</p> <p>All aspects of the seafood sector rely on safe high quality water. To guarantee food safety, the growing waters must attain certain standards, which is of relevance to the fishing and aquaculture sectors. In freshwater aquaculture, a continuity of supply is important to ensure animal welfare and quality. Water supplies in this instance are sourced from rivers, wells and occasionally from mains supplies. The seafood processing sector is the largest user of mains freshwater within the seafood sector and it also requires a safe and reliable water supply to support its operations. To achieve this, the WSSP, while it may not refer directly to the seafood sector, should be based upon an understanding and recognition of the range of technologies employed by the different sections of the seafood sector in its use of water and the treatment and discharge of wastewater.</p> <p>In general, the area of seafood legislation requirements with respect to bi-value molluscs and other aquaculture are lacking and need to be made a key part of the document. Failure to maintain the highest standards in the bays and estuaries directly impacts on the classification process for determining water quality and then directly impacts on those producers who are using the estuaries to grow and place on the market bi-value molluscs and other aquaculture products. The Sea Fisheries Protection Authority (SFPA) is prepared to share data which it has gathered over many years which might facilitate the creation of a map similar to the bathing water map.</p>	<p>Noted.</p> <p>The consultation being undertaken is with respect to the scoping of an SEA to be undertaken on the WSSP. It is not a screening exercise. The purpose of the report is to help communicate and define the scope of the assessment.</p> <p>Later in the process an SEA Environmental Report will be prepared which will detail potential significant environmental effects that would arise from the implementation of the WSSP, if unmitigated.</p> <p>Section 4.3 of the Draft SEA Scoping Report (as updated on foot of the SEA Scoping Workshop and other submissions received) provides details on the 'Likely Interactions with Legislation and Other Plans and Programmes'.</p> <p>It is intended that datasets which have been published in response to the requirements of the Water Framework Directive (including monitoring datasets, e.g. the status of estuarine and coastal waters, and entries to the WFD Register of Protected Areas, e.g. shellfish areas and water bodies) will be used in the assessment.</p>	None.
B	<p>4.2 Environmental Sensitivities & 4.5 Potential Environmental Effects</p> <p>I would suggest that within the Population and Human Health Section, the role of water quality and supply in the provision of safe healthy food (particularly seafood) is acknowledged. Human health concept seems to be linked to water through environmental factors, but should also</p>	Noted.	To update the following text on Table 4.2 'Environmental Components and Potential Effects' as follows:

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>mention potential interaction via shellfish and other seafood. As the population concept seems to be about the population of humans, but might also usefully incorporate awareness of population of terrestrial animals who might be contributing to environment and water contamination in an area.</p>		<p>Potential Interactions with human health (e.g. food including seafood, water)</p>
C	<p>4.3 Likely interaction with other Plans, Programmes and Projects</p> <p>This will also interact with existing obligations within food regulations, notably classification, monitoring and sanitary surveys. This should be explicitly mentioned in the bulleted list. There are ambitions to grow the Irish seafood sector both in terms of primary production and in the level and scale of value-added processing. Current national seafood targets are included in Food Harvest 2020 and further development is guided and supported (financially under European Maritime Fisheries Fund (EMFF)) by the National Seafood Operational Programme currently under preparation for the 2014 – 2020 period. A National Strategic plan for aquaculture is also under preparation.</p> <p>Given the potential impact water discharges to the marine environment, it would also be important to acknowledge Harnessing Our Ocean Wealth – the national integrated marine plan for Ireland. Aquaculture licenses are an example of the existing and permitted infrastructure that should be acknowledged.</p>	<p>Noted. The SEA (and AA) will take account of Irish Water’s obligation to comply with environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management led by the WFD and implemented by the RBMPs. The scoping report will be updated accordingly.</p>	<p>To add details on the following to Section 4.3 ‘Relationship with Legislation and Other Plans and Programmes’:</p> <ul style="list-style-type: none"> • Food Regulations • National Seafood Operational Programme • National Strategic plan for aquaculture • Harnessing Our Ocean Wealth – the national integrated marine plan for Ireland
D	<p>4.6 Mitigation</p> <p>Mitigation of potential shellfish safety concerns is also a reasonable possibility, if there were to be e.g. meaningful outcomes regarding tertiary sewage treatment to manage norovirus discharge into shellfish production areas.</p>	<p>Detailed mitigation will not be considered until later in the process however SEA Scoping submissions will be considered throughout the process.</p>	<p>None.</p>
E	<p>4.7 Monitoring & 5.5 Water</p> <p>In addition to EPA monitoring it might be useful for Sea Fisheries Protection Agency (SFPA) monitoring of microbial loads in shellfish production areas to contribute to the overall picture here.</p> <p>There is also a possibility of norovirus monitoring soon under food legislation. SFPA are prepared to share any data, for example, to create a map analogous to the bathing water map.</p>	<p>Detailed monitoring will not be considered until later in the process however SEA Scoping submissions will be considered throughout the process.</p>	<p>None.</p>
F	<p>5.2 Biodiversity, Flora and Fauna</p> <p>Designated shellfish waters (now part of the WFD) are very important to the shellfish aquaculture sector in Ireland working to maintain standards in product safety and quality and enabling sale for direct consumption from many areas, reducing production costs and contributing to the good international reputation of the products. The role of filter-feeding shellfish as a nutrient sink thus helping to reduce eutrophication potential and improve water quality is also important.</p>	<p>Noted. As detailed under Section 5.4 ‘Water’</p> <p>Entries to the Water Framework Directive Register of Protected Areas (including</p>	<p>To add the following text to Section 5.2 ‘Biodiversity and Flora and Fauna’:</p> <p>Entries to the Water Framework Directive Register of Protected Areas (including SAC and SPA Rivers and Waterbodies, Shellfish Areas and Water Bodies, Salmonid</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
		Shellfish Areas and Water Bodies) will be considered by the SEA.	Rivers and Lakes) will be considered by the SEA.
G	<p>5.3 Population and Human Health</p> <p>As mentioned previously it is important to acknowledge the importance of water quality and supply in the production of safe healthy food (particularly seafood).</p>	Noted.	<p>To update the following text from Section 5.3 'Population and Human Health': With regard to human health, impacts relevant to the SEA are those which arise as a result of interactions with environmental vectors (i.e. environmental components such as air, water, food or soil through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings).</p>
H	<p>Appendix 1</p> <p>The following proposed sections of the WSSP have the potential to consider the needs and impacts of the seafood sector:</p> <ul style="list-style-type: none"> • Ensuring a safe and reliable water supply. <ul style="list-style-type: none"> ○ Acknowledge growth targets for the seafood sector ○ Understanding and acknowledging how the seafood production uses water in different ways. Of particular interest are marine water environments impacted by discharges affecting the quality of the seafood harvested or caught from it, and flow through systems in freshwater aquaculture which do not abstract water in the traditional sense. • Providing effective management of waste water <ul style="list-style-type: none"> ○ Recognition of the importance of good water quality to the seafood sector especially in licensing discharges to the marine environment. ○ Wastewater treatment methods employed by the seafood sector. • Protecting and enhancing the environment <ul style="list-style-type: none"> ○ Implementation of pollution reduction programmes for designated shellfish waters. • Supporting growth 	Noted.	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	In particular this section identifies an uncertainty in non-domestic demand. The seafood sector is one sector which relies on a safe and reliable water supply.		
I	<p>Compliance with National Legislation</p> <p>In addition to the Planning and Development Acts 2000 to 2011, reference should be made to the Foreshore Acts 1933 to 2011.</p>	Noted. The SEA (and AA) will take account of Irish Water's obligation to comply with the Planning and Development Acts 2000 to 2011 and the Foreshore Acts 1933 to 2011 as appropriate and the scoping report will be updated accordingly.	<p>To add details on the following to Section 4.3 'Relationship with Legislation and Other Plans and Programmes':</p> <ul style="list-style-type: none"> • Planning and Development Act 2000 as amended • Foreshore Act 1933 as amended
J	<p>Issues for consideration</p> <p>In the development of any plans or programmes due consideration should be given to the following:</p> <ul style="list-style-type: none"> • Potential impacts, both positive and negative, on marine environmental quality including potential impacts on designated shellfish growing waters • Potential impacts, both positive and negative, on the microbiological quality of shellfish in classified shellfish production areas • Potential impacts on human health resulting from the placing on the market of microbiologically contaminated shellfish • Potential impacts on commercially important fish and shellfish stocks and areas of importance for fish/shellfish and fisheries e.g. spawning grounds, nursery areas • Potential impacts on freshwater aquaculture operations including the requirement for water abstraction and capacity of the receiving waters to assimilate discharges • Future designations of areas of importance to the aquaculture and fisheries sector • Relevant EU Directives and National Legislation in the area of marine spatial planning 	<p>Noted. Updates will be made to the text in Table 4.2 as detailed under the following column. Later in the process an SEA Environmental Report will be prepared which will detail potential significant environmental effects that would arise from the implementation of the WSSP, if unmitigated.</p> <p>The SEA (and AA) will take account of Irish Water's obligation to comply with Relevant EU Directives and National Legislation in the area of marine spatial planning and the scoping report will be updated accordingly.</p>	<p>To update the following text on Table 4.2 'Environmental Components and Potential Effects' as follows:</p> <p>Potential Interactions with human health (e.g. food including seafood, water).</p> <p>Adverse impacts upon the status of water bodies and entries to the WFD Register of Protected Areas, arising from changes in quality, flow and/or morphology¹.</p> <p>To add details on Relevant EU Directives and National Legislation in the area of marine spatial planning to Section 4.3 'Relationship with Legislation and Other Plans and Programmes'.</p>
K	Sources of Marine Data	Noted.	None.

¹ including SAC and SPA Rivers and Waterbodies; Shellfish Areas and Water Bodies; Salmonid Rivers and Lakes; Nutrient Sensitive Water Bodies; Bathing Water Areas; and drinking Water Rivers, Lakes and Groundwater

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>Details of designated shellfish growing areas which are protected by law (2006/113/EC) are available at http://www.environ.ie/en/Environment/Water/WaterQuality/ShellfishWaterDirective/</p> <p>Details of classified shellfish production areas (classified for food safety and consumer protection purposes under Regulation (EC) No 854/2004) are available on the Sea-Fisheries Protection Authority website at http://www.sfpa.ie/</p> <p>The Marine Institute publishes a range of corporate reports, scientific and technical reports, peer reviewed articles and conference papers which are relevant to the SEA process which can be found on the Marine Institute website at http://www.marine.ie/home/Publications/or http://oar.marine.ie/</p> <p>Relevant reports and on line GIS include:</p> <ul style="list-style-type: none"> • Shellfish Stocks and Fisheries Review: An Assessment of Selected Stocks • Atlas of Commercial Fisheries around Ireland • Atlas of Commercial Discarding • Ireland's Marine Atlas <p>Information on the Initial Assessment of Ireland's marine waters, required under the Marine Strategy Framework Directive, is available at http://www.environ.ie/en/Environment/Water/WaterQuality/Marine/</p>		

Submission No. 7: Department of Communications, Energy and Natural Resources (Geological Survey of Ireland)

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A	<p>Datasets</p> <p>The Geological Survey of Ireland, as the national earth science agency, has datasets on Bedrock Geology, Quaternary Geology, Mineral deposits, Groundwater Resources, Geological Heritage, Landslides and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration, groundwater, site investigation boreholes, karst features, wells and springs.</p> <p>To assist with an Environmental impact Assessment (EIA), and especially the "Soils & Geology" and "Surface Water & Groundwater" parts, maps/databases are available on the GSI website under "Online Mapping"- direct link: http://www.gsi.ie/Mapping.htm with datasets currently</p>	<p>The availability of these datasets is acknowledged. The SEA Scoping Report has identified a number of datasets under the headings of soil and water which will be used in the SEA.</p> <p>The SEA will consider all available, relevant environmental datasets from the GSI and other authorities in the identification and development of: strategic environmental constraints mapping;</p>	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>available for Bedrock, Geological Heritage, Groundwater, Karst, Geotechnical boreholes, Mineral locations. More recent viewers accessible from the same link include the National Landslide Viewer, the Aggregate Potential Mapping and the Geotechnical Viewer.</p> <p>Please note that Geological Heritage data can now be viewed online on the GSI Public Data Viewer at: http://spatial.dcenr.gov.ie/imf/imf.jsp?site=GSI_Simple</p> <p>There are two map layers under 'Geological Heritage':</p> <p>1. 'Geological Heritage Sites Boundaries': a national dataset (one shapefile with boundary polygons) showing the nine County Geological Sites audits to date (Carlow, Clare, Kildare, Sligo; and Meath, Kilkenny, Fingal, Waterford and Roscommon, at July 2013).</p> <p>County Geological Sites audit data are still available for download (as individual county shapefiles and site report pdfs; with direct links to individual reports in the most recent 5 audits) at: http://www.gsi.ie/Programmes/Heritage+and+Planning/County+Geological+Sites+Audits/</p> <p>2. 'Geological Heritage Sites No Boundaries': a national dataset (one shapefile with buffer polygons) covering all the other counties not yet audited, indicating the provisional location/extent of sites. These sites have buffers appropriate to their type (or theme), ranging between 200m, 500m and 1000m (for the largest landscape/glacial features). These are not 'mitigation' buffers, but an attempt to encompass the extent of the particular type of site.</p> <p>These will all be available to download as well in the next few weeks from: http://www.dccae.gov.ie/natural-resources/en-ie/Geological-Survey-of-Ireland/Pages/Data-Downloads.aspx</p>	<p>project selection criteria for use in lower tier planning and environmental assessment; and criteria to be assessed in the SEAs and AAs of Tier II Plans.</p>	
B	<p>Data Updates</p> <p>The 'No Boundaries' data is provisional data only. As each county's geological heritage is audited, the 'No Boundaries' data will be replaced with the audited 'Boundaries' data, so please re-visit the viewer regularly for updates. There can also be <i>ad hoc</i> updates of individual site data at any time.</p> <p>We anticipate that with necessary funding and the ongoing good partnerships of local authorities and the Heritage Council, that it will be possible to complete the remaining county audits within the next 5 years.</p> <p>Please note that all the above sites are of, at least, County Geological Site (CGS) status (some are also recommended for designation as Natural Heritage Areas) and are included in the relevant County Development Plan with associated protection policy/ies.</p>	Noted.	None.
C	<p>Other comments</p>	Noted.	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>Should you identify a Geological Heritage Site with buffer within your study area, please contact Sarah Gatley, Head of the Geological Heritage and Planning Programme at sarah.gatley@gsi.ie, for further information and possible mitigation measures if applicable.</p> <p>As GSI's karst dataset is far from comprehensive due to important data gaps, GSI would welcome complementary data collected during any EIA; data which would be added to the national database. If you wish to contribute data, please contact Caoimhe Hickey for details (caimhe.hickey@gsi.ie).</p> <p>At a later stage, GSI would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to GSI's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Beatriz Mozo (beatriz.mozo@gsi.ie, 01-678 2795).</p> <p>I hope that these comments are of assistance, and if the GSI can be of any further help, please contact me.</p>		

Submission No. 8: Department of Arts, Heritage and the Gaeltacht

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
A i	<p>Nature Conservation</p> <p>The Department of Arts, Heritage and the Gaeltacht refers to the correspondence from Irish Water of 14th May 2014 inviting observations in relation to the scope of the Strategic Environmental Assessment for Irish Water's Water Services Strategic Plan (WSSP). The Department also refers to the correspondence received on 6th June on the outcomes of the SEA Scoping Workshop (attended by NPWS of this Department), which includes some additional detail on the scope of the WSSP itself.</p>	Noted.	None.
A ii	<p>While additional context as to the scope of the WSSP has kindly been provided by Irish Water (6th June), this is still rather general in nature, and the observations below are also general in nature, as a result. Some of the observations below concern the screening for, and appropriate assessment of the Plan, as well as the SEA. As Irish Water develops its strategies in the coming period, the Department would welcome further opportunities for discussion on the scope and content of the assessments to be undertaken.</p>	<p>Noted. The WSSP is at the highest tier (Tier I) of water services planning. The WSSP will set out Irish Water's high level strategies for providing water services to their customers over a 25 year horizon and how they will meet their environmental compliance commitments.</p> <p>All comments made (including those with respect to the SEA process) will be taken into account as relevant and appropriate</p>	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
		<p>by Appropriate Assessment (the process of which will be integrated into the SEA process).</p> <p>Further consultation on the SEA Scoping Report and the Draft WSSP and associated SEA and AA documents will be undertaken in the coming months.</p>	
A iii	<p>It is the Department's understanding that Irish Water funding will be obtained from the exchequer, the customer and any borrowings that can be accessed. As a point of information for Irish Water, as this Department is responsible for the monitoring of the status of habitats and species protected under the Birds and Habitats Directives, the European Investment Bank requires a declaration from this Department that any project for which EIB funding is sought, is in compliance with Article 6 (3) of the Habitats Directive.</p>	Noted.	None.
A iv	<p>With regard to the Summary of Scoping Workshop Outcomes circulated on the 6th June, it is stated "<i>Relevant Stage 2 AA mitigation measures may relate to approaches/guidelines for particular activities developed by Irish Water e.g. instream works</i>". Please note that any mitigation measures will need to be demonstrated to be effective in addressing the identified significant effects on a European site, and ensure that no adverse effects on integrity arise.</p>	<p>Noted.</p> <p>The AA will demonstrate that any Stage 2 mitigation measures will need to be effective in addressing the identified significant effects on a European site, and ensure that no adverse effects on integrity arise.</p>	None.
B	<p>Environmental Sensitivities:</p> <p>With regard to the environmental sensitivities to be considered, a number of key sensitivities have not yet been included, including birds listed on the Annexes of the Birds Directive, locally important biodiversity areas that may be identified within County Development Plans and species protected under the Flora Protection Order.</p> <p>The following important ecological receptors should be taken into account in assessing the Plan's likely effects:</p> <ul style="list-style-type: none"> _ Sites with nature conservation designations, and their conservation objectives, including NHAs, proposed NHAs, National Parks and Nature Reserves _ Annex IV (Habitats Directive) species of fauna and flora, and their breeding sites and resting places, which are strictly protected under the European Communities (Birds and Natural Habitats) Regulations, 2011 _ Other species of fauna and flora which are protected under the Wildlife Acts, 1976- 2000 and the Flora Protection Order 	<p>Noted. Table 4.1 will be updated to reflect the range of ecological receptors identified.</p>	<p>To edit as follows the first bullet point on Table 4.1 'Environmental Sensitivities':</p> <ul style="list-style-type: none"> • Designated sites including Natura 2000 Sites, National Parks, Ramsar Sites, Salmonid Waters, Shellfish Waters, Freshwater Pearl Mussel Catchments and Wildlife Sites (including Nature Reserves, Natural Heritage Areas and proposed Natural Heritage Areas), all relevant protected habitats and/or species including those listed on Annex IV of the Habitats Directive, on the Annexes of the Birds Directive in the Wildlife Act 1976 as amended, on the Flora Protection Order, those defined in the Environmental Liability

No. Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
<p>_ 'Protected species and natural habitats', as, including:</p> <ul style="list-style-type: none"> o Birds Directive – Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur), (i.e. including birds in the wider countryside) o Habitats Directive – Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur) <p>_ Other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans).</p> <p>_ Features of the landscape which are of major importance for wild flora and fauna, such as those with a “stepping stone” and ecological corridors function, as referenced in Article 10 of the Habitats Directive.</p>		<p>Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations 2008 and Water Framework Directive entries to the Register of Protected Areas and Groundwater Dependent Terrestrial Ecosystems.</p>
<p>C Likely Interactions with Other Plans, Programmes and Projects:</p> <p>With regard to “likely interactions with other plans, programmes and projects”, and as discussed at the Scoping workshop, it is recommended that the following are also considered for potential interactions:</p> <ul style="list-style-type: none"> - European Union Biodiversity Strategy to 2020 - National Forestry Programme 2014-2020 - Rural Development Programme 2014-2020 and agricultural policies - Office of Public Works Arterial Drainage Maintenance and other programmes of Work - National Peatlands Strategy (draft), Raised Bog SAC Management Plan and Review of Raised Bog Natural Heritage Areas (Department of Arts, Heritage and the Gaeltacht) <p>With particular regard to the draft National Peatlands Strategy, the Strategy aims to ensure that the implications of management choices for water levels, quantity and quality are fully explored, understood and factored into policy making and land use planning. Also with regard to the proposed Climate Change Adaptation Strategy, there may also be opportunities for synergies with the Peatlands Strategy. The Department would welcome further opportunities to discuss the Peatland Strategy with Irish Water and the opportunities that may arise for integration of key actions into Irish Water’s Plans.</p>	<p>Noted. The SEA (and AA) will take account of Irish Water’s obligation to comply with environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management led by the WFD and implemented by the RBMPs. The scoping report will be updated accordingly.</p>	<p>To add details on the following to Section 4.3 ‘Relationship with Legislation and Other Plans and Programmes’:</p> <ul style="list-style-type: none"> • European Union Biodiversity Strategy to 2020 • National Forestry Programme 2014-2020 • Rural Development Programme 2014-2020 and agricultural policies • Office of Public Works Arterial Drainage Maintenance and other programmes of Work • National Peatlands Strategy (draft), Raised Bog SAC Management Plan and Review of Raised Bog Natural Heritage Areas (Department of Arts, Heritage and the Gaeltacht)
<p>D Strategic Environmental Objectives, Indicators, and Targets</p> <p>It is recommended that these be updated in line with the comments on the sensitive environmental receptors listed above. This Department’s reporting on the conservation status</p>	<p>Discussion at Section 4.4 ‘Strategic Environmental Objectives, Indicators and Targets’ to be expanded to address how Strategic Environmental Objectives</p>	<p>Discussion at Section 4.4 ‘Strategic Environmental Objectives, Indicators and Targets’ to be expanded to address how Strategic Environmental Objectives</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	of habitats and species listed on the annexes of the Habitats Directive and on bird species listed on the annexes of the Birds Directive may also be usefully considered here for the indicators, as the River Basin Plan and WFD reporting will not include these receptors.	(SEOs), indicators and targets should be developed with examples of Strategic Environmental Objectives be provided. Strategic Environmental Objectives, indicators and targets, will focus on the sensitivities detailed on Table 4.1. These sensitivities will be updated as per B above.	(SEOs), indicators and targets should be developed with examples of Strategic Environmental Objectives be provided.
E i	<p>Potential Environmental Effects:</p> <p>Irish Water has stated that the WSSP will include high-level strategies rather than individual projects, including a Climate Change Adaptation and Mitigation Strategy, National Water Resources Management Plan and a National Sludge Plan/Strategy. As such, it is anticipated that a hierarchical approach to further ecological assessments will be required to ensure compliance with the relevant Directives and national legislation.</p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report. A hierarchical approach to further ecological assessments will be followed.</p> <p>Note that the WSSP will identify that these strategies and plans will be prepared in the future but will not include them.</p>	None.
E ii	<p>Section 4.5 of the scoping document lists potentially significant effects on the environment, if the Plan were to be unmitigated. While recognising and welcoming that the Plan should lead to improvements in water quality generally, the Department notes that the following impacts and effects may also arise from a Plan such as this, at the various levels of implementation.</p> <ul style="list-style-type: none"> - Other types of damage to protected species that occur outside designated sites, in addition to disturbance - Loss of habitats of protected species outside designated sites - Loss of/damage to riparian habitats, with implications for riparian species - Deterioration to water quality on which protected and unprotected species depend e.g. through mobilisation of silt and sediment - Damage to in-stream habitats, both protected habitats and habitats of protected and unprotected species - Changes to hydrological flow e.g. as a result extraction of water - Impacts on groundwater and surface waters, with implications for designated sites. 	<p>These types of impacts are noted and will be considered by SEA and AA for the WSSP as well as for assessments at all levels of the hierarchy.</p> <p>The high level impacts listed on Table 4.2 'Environmental Components and Potential Effects' at Section 4.5 of the Draft Scoping Report will be updated to ensure that they encompass these impacts.</p> <p>In addition, as noted under Section 4.2 of the Draft Scoping Report, the SEA will consider interrelationships between the various environmental components and, in addition to being identified under each environmental topic in the SEA Environmental Report, interrelationships will be given a specific sub-section and an interrelationships matrix will be included.</p>	<p>To update as follows the text from Table 4.2 'Environmental Components and Potential Effects':</p> <p>Biodiversity and flora and fauna:</p> <ul style="list-style-type: none"> • Loss of/damage to biodiversity with regard to designated sites and species (including Natura 2000 Sites, Wildlife Sites and species listed on Schedule 5 of the Wildlife Act 1976 as amended) • Loss of/damage to biodiversity with regard to ecological connectivity • Loss/damage to of non-designated habitats • Disturbance to biodiversity and flora and fauna <p>Water</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
E iii	<p>Noting that the Plan will also be screened for appropriate assessment, Irish Water is advised that this Department has set generic conservation objectives for all European sites. In addition, site-specific conservation objectives (SSCOs), and associated supporting documents, are available for some sites on the NPWS website. The conservation objectives for sites are generally to maintain and/or restore the habitats and/or species for which the site was designated to favourable condition. The setting of the first site-specific objectives for annexed lake and river habitats, which are particularly relevant to the Plan, is currently in progress and can be provided to Irish Water at a later date. As a point of information, the attributes that are to be established for an annexed lake habitat, and that would need to be considered in appropriate assessments, are likely to include the following:</p> <ul style="list-style-type: none"> - Habitat Area - Habitat distribution <p><i>Structure and functions:</i></p> <ul style="list-style-type: none"> - Vegetation Composition (typical species) - Vegetation composition: characteristic zonation - Vegetation distribution: maximum depth - Hydrological regime: water level fluctuations - Lake substratum quality - Water quality: transparency - Water quality: nutrients - Water quality: phytoplankton biomass - Water quality: phytoplankton composition - Water quality: attached algal biomass - Water quality: macrophyte status - Acidification Status - Water colour - Dissolved organic carbon – Turbidity - Fringing habitat. 	<p>The AA will consider all relevant information available from the Department including the generic conservation objectives and site-specific conservation objectives (SSCOs), and associated supporting documents.</p>	<ul style="list-style-type: none"> • Adverse impacts upon the status of water bodies and entries to the WFD Register of Protected Areas, arising from changes in quality, flow and/or morphology
F	<p>Mitigation:</p> <p>According to the Scoping Report, it is intended that the SEA and AA process will contribute towards objectives relating to environmental protection for integration into the WSSP. Other outcomes may include:</p> <ul style="list-style-type: none"> - The adoption of procedures for the integration of planning and environmental considerations into water services planning - The use of strategic environmental constraints mapping and assimilative capacity data - Commitments for ongoing co-operation with other organisations 	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report.</p>	<p>To add the following text to Section 4.5 'Potential Environmental Effects'</p> <p>The potential for cumulative/ in-combination effects will be considered in the context of both the SEA Directive and the Habitats Directive, taking into account other key relevant plans and programmes.</p> <p>To add the following text to Section 4.6 'Mitigation'</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>- The adoption of project selection criteria for use in lower tier planning and environmental assessment.</p> <p>Mitigation will need to be designed to address any identified significant environmental effect, as well as where responsibility lies for its implementation.</p>		<p>Where significant effects are identified, appropriate mitigation measures will be proposed and relevant commitments will be included in the Strategic Plan alongside responsibilities for implementing these measures.</p>
G	<p>Monitoring:</p> <p>As a general point, it is advised that qualitative as well as quantitative data should be used to monitor the Plan. It is proposed that these will generally to be taken from existing sources such as RBMPs, WFD and EPA drinking water quality. However, these monitoring programmes will not necessarily deliver or collect data relevant to all effects of the Plan on the environment, such as those relating to habitats and species. This</p> <p>Department's monitoring programmes, as referenced above, may be useful in this regard.</p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report and qualitative and quantitative data will be included in the Monitoring Programme when prepared later in the process. The monitoring programmes of the DAHG as well as those of other Departments will inform the development of the Monitoring Programme.</p>	None.
H	<p>Alternatives:</p> <p>It is proposed that alternatives will consider capital and current costs and environmental implications (mitigation by avoidance, reduction or remedy) and the consideration of alternatives will lead to the selection of preferred alternatives which will inform a decision-making framework for future projects. It is expected that there will be 3 categories of alternatives for the WSSP</p> <ul style="list-style-type: none"> - The type of overall strategy - Drinking water - Waste water. <p>It is stated that the assessment of environmental effects, if unmitigated, arising from the alternatives will be undertaken using mapping of environmental sensitivities, descriptions of the existing environment and Strategic Environmental Objectives. The Department recommends that consideration be given to exploring how the restoration of certain habitats may contribute to the identification of alternatives for reaching the required the improvements in drinking water quality (as per the Peatlands Strategy).</p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report.</p> <p>As identified under Section 4.8 'Alternatives', "The holistic approach would examine, for example, how managing phosphates at the catchment scale could affect wastewater and drinking water infrastructural needs and associated construction and operation costs and environmental implications. If organic matter is trapped in the catchment drinking water treatment costs and energy usage (and associated emissions) could be reduced." The restoration of habitats will be considered as a technique for managing phosphates at the catchment scale when these alternatives are being further developed.</p>	None.
I	<p>Preliminary Identification of Environmental Baseline Content:</p> <p>Irish Water is advised to consult the National Parks and Wildlife Service website (www.npws.ie) as a key source of data, information and publications on nature conservation sites² and biodiversity issues of potential relevance to the area and associated environmental</p>	<p>These sources of information are noted and will be considered by SEA and AA for the WSSP as well as for assessments at all levels of the hierarchy.</p>	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>assessment(s). NPWS presents and holds data that is not currently available from the National Biodiversity Data Centre. NPWS-owned spatial data are freely available when formally requested. Some datasets (SAC, SPA, NHA boundaries; Protected species data) may be viewed or downloaded from http://npws.ie/mapsanddata; https://www.npws.ie/maps-and-data/designated-site-data and https://www.npws.ie/maps-and-data/habitat-and-species-data. To submit a request for data, please complete and submit the Data Request Form, available at https://www.npws.ie/maps-and-data/open-data-policy.</p> <p>GIS datasets associated with site-specific conservation objectives are also available for download: https://www.npws.ie/maps-and-data/habitat-and-species-data</p> <p>The most recent information on the current status of species and habitats protected under the Habitats Directive is available in this Department's 2013 Article 17 Conservation Status report, available at www.npws.ie, while this Department's recent (2014) report on the conservation of birds protected under the Birds Directive, as required under Article 12 is available at: http://cdr.eionet.europa.eu/Converters/run_conversion?file=ie/eu/art12/envuvesya/IE_birds_reports-14328-144944.xml&conv=343&source=remote. The national habitat surveys that have been undertaken or are underway, and their resulting reports, should also be consulted, including for information regarding the definitions and evaluations that have been developed for Annex I habitat types in Ireland.</p> <p>Other sources of information relating to habitats and species, which may be impacted upon by the Programme, may also be available from the National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie) and BirdWatch Ireland (www.birdwatchireland.ie) and Bat Conservation Ireland (www.batconservationireland.org).</p> <p>Consideration should also be given to the European Court of Justice judgments against Ireland with regard to the Birds and Habitats Directives, including, but not only C/418-04 (the Birds Case) and their relevance to the Plan.</p>		
J i	<p>Archaeological Heritage</p> <p>The National Monuments Service (NMS) of the Department of Arts, Heritage and the Gaeltacht has responsibility in relation to the implementation of the National Monuments Acts. In addition the NMS is a statutory consultee in relation all planning matters including SEA which may affect the cultural heritage. In consultation with our colleagues in the National Museum of Ireland we oversee all aspects of the licensing and issuing of consents for prospection for archaeological purposes. Since the late 1990's the National Monuments Service has developed a range of Code of Practices with infrastructure providers such as the NRA, Bord Na Móna, Coillte, Bord Gáis, Eirgrid etc. to develop a framework within which archaeological issues relating to the roll-out of national infrastructure can be developed. Unfortunately we were not in a position to attend your Scoping Workshop on the 27th of May but seek at the earliest available opportunity a meeting with Irish Water and your planning consultants AOS in relation to the proposed</p>	Noted.	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>Water Services Strategic Plan. We would be grateful if you could contact nationalmonuments@ahg.gov.ie at the Department to co-ordinate a meeting with our officials in the Planning and Licensing Unit and the Underwater Archaeology Unit (Margaret Keane, Senior Archaeologist, P and L Unit and Karl Brady, Archaeologist, UAU).</p>		
J ii	<p>It should be noted that in accordance with the EIA Directive 2001/41/EC Annex 1 Article 5(1) subject to Article 5(2) and (3) an SEA must have include information in relation to the following:</p> <p><i>f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter relationship between the above factors;</i></p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report which addresses all of these components.</p>	<p>None.</p>
J iii	<p>4.2 Table Environmental Sensitivities</p> <p>While there are obvious Key sensitivities in relation to Cultural heritage designations (RMP's Monuments included in the SMR, Historic Monuments, National Monuments, WHS) there are also parts of the landscape which due to their topographical, locational, hydrological characteristics (i.e. coasts, river and lake edges, bogs, hilltops etc.) have a high potential for the survival of previously unrecognised archaeological monuments. Potential impacts of the current proposals need to be considered in relation to these landscapes of high archaeological potential in this scoping exercise.</p>	<p>Noted. Table 4.1 which identifies high level 'Environmental Sensitivities' will be updated to take account of unknown archaeology.</p>	<p>To update as follows the text from Table 4.1 'Environmental Sensitivities':</p> <p>Cultural Heritage</p> <ul style="list-style-type: none"> • Cultural heritage designations and contexts • Unknown archaeology
J iv	<p>4.5 Table 4.2 Environmental Components and Potential Effects</p> <p>Please include all national and international designations in relation to archaeology in this list: Record of Monument and Places, Register of Historic Properties, National Monuments, World Heritage Sites and Underwater Heritage Orders and Wrecks. It would be best to also include the SMR or Sites and Monuments Record (a regularly updated list of identified monuments not yet afforded protection under the National Monuments Acts).</p>	<p>Noted. Table 4.2 which identifies high level 'Environmental Components and Potential Effects' will be updated to take account of the cited designations.</p>	<p>To update as follows the text from Table 4.2 'Environmental Components and Potential Effects':</p> <p>Cultural Heritage</p> <ul style="list-style-type: none"> • Effects on archaeology including entries to the Record of Monuments and Places, Register of Historic Properties, National Monuments, World Heritage Sites and Underwater Heritage Orders and Wrecks
J v	<p>5.8.1</p> <p>The following text is inaccurate:</p>	<p>This sentence will be omitted from the report.</p>	<p>To omit the following sentence from Section 5.8.1 'Archaeological Heritage':</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p><i>All monuments in existence before 1700 AD are automatically considered to be historic monuments within the meaning of the National Monuments Acts.</i></p> <p>NMS would be grateful if you could amend this sentence.</p>		
J vi	<p>Our monuments and wrecks are many (+130,000 monuments known currently) and are dispersed throughout our territorial lands and seas, in particular densities close to sources of water rivers coasts and in boglands. There is a high potential for impacts upon this irreplaceable resource in the action outputs from the Water Services Strategic Plan, therefore the protection of this resource needs to be fully integrated within the proposed plan. NMS welcomes the opportunity to discuss this at greater length with Irish Water and AOS their planning consultants.</p>	Noted.	None.
K	<p>architectural heritage observations, if any, will follow in due course.</p>	Noted.	None.

Submission No. 9: Respondent 9

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
B	<p>INTRODUCTION TO SUBMISSION</p> <p>Respondent welcomes the opportunity to comment on the Initial Draft Scoping Report for the Water Services Strategic Plan (WSSP) Strategic Environmental Assessment (SEA). Well managed water is essential for sustaining healthy and vibrant rural and urban communities and, as recognised in the draft scoping report, business, industry, nature and human health all depend on the integrity of our rivers, lakes and groundwater to provide clean and plentiful water supplies. There is an urgent need to address pressing issues for managing our natural water environment by protecting our water supply sources and the water bodies into which waste water is discharged. The need to do this is reinforced by the EU Water Framework Directive (WFD), which imposes a statutory obligation on all EU member states to achieve good water status by 2015.</p> <p>It is therefore to be welcomed that the environmental effects of the WSSP are considered.</p>	Noted.	None.
C	<p>CHALLENGES OF MEETING LEGAL OBLIGATIONS: URBAN WASTEWATER TREATMENT DIRECTIVE (UWWTD) & WATER FRAMEWORK DIRECTIVE (WFD)</p>	Noted.	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>According to the most recent EPA State of the Environment Report², <i>'meeting the requirements of the Water Framework Directive (WFD) and protecting our water resources ... are pressing challenges for Ireland.'</i> The Water Framework Directive (WFD) establishes in law a comprehensive set of environmental objectives for Irish and EU aquatic resources which require them to be managed in a sustainable manner³. It requires all surface and ground waters to achieve 'good' status by 2015⁴ (with limited application of exemptions) and in addition prohibits any deterioration in the current status of our waters. The most recent EPA water quality report⁵ finds just 52% of river water bodies achieving WFD standards, with 41% of lakes failing those standards, illustrating the scale of activity that will be required in order to meet the objectives of the Directive.</p> <p>More recently, the 2013 Integrated Water Quality (IWQ) report for the SE⁶ show that the south-east region of the country is suffering from high phosphate and nitrate levels: 59% did not attain good status with respect to nitrates. Similar was reported in the Louth/Monaghan region for 2011⁷, with only 5 river sites obtaining high quality status, with elevated levels of phosphate and nitrate being of particular concern in the remaining areas. Nitrates are of particular significance in terms of public health of drinking water supplies.</p> <p>According to the EPA's March 2014 report <i>'Focus on Urban Waste Water Treatment in 2012'</i>, urban waste water is still one of the principal causes of pollution of water resources in Ireland. The Urban Waste Water Treatment Directive (UWWTD) sets specific requirements for waste water treatment plants and specifies limits for certain parameters in associated discharges. The EPA report emphasises the fact that Irish Water is now responsible for ensuring compliance with this legislation. The report found that 83% of discharges to sensitive areas are not compliant with the Directive and that seven large urban areas did not meet the requirements of the directive to provide the requisite secondary treatment or equivalent treatment:</p> <ul style="list-style-type: none"> • of these 7 sites have an Urban Area Population Equivalent (UA PE) > 15,000 and therefore (per Article 4) should have been compliant by 31 Dec 2000: Killybegs (Estuarine); Ringaskiddy/Crosshaven/Carrigaline (Coastal); Arklow (Coastal); • 1 of the sites has an UA PE 10,000 - 15,000 and therefore should have been compliant by 31 Dec 2005: Cork Cobh (Estuarine); 		

² EPA (2012) 'Ireland's Environment 2012 - An Assessment', EPA, Wexford

³ It applies to surface waters, i.e. lakes, rivers, transitional waters (estuaries) and coastal waters (up to one nautical mile from land) and to ground waters

⁴ Defined as biological conditions deviating only 'slightly' from those found under undisturbed conditions

⁵ McGarrigle, M., Lucey, J. & O' Cinnéide, M. (2010) 'Water Quality in Ireland 2007-2009'. EPA, Wexford

⁶ EPA (2013) Integrated Water Quality Report 2012, South East Ireland. Environmental Protection Agency, Wexford

⁷ EPA (2012) Integrated Water Quality Report Monaghan and Louth 2011. Environmental Protection Agency, Wexford

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<ul style="list-style-type: none"> of the sites have an UA PE bet 2,000 - 10,000 and discharge to estuaries. Therefore they should have been compliant by 31 Dec 2005: Clifden (Estuarine); Youghal (Estuarine); Passage West/Monkstown (Estuarine); <p>In the context of this current unsatisfactory situation and the existence of the European Court of Justice case against Ireland regarding the UWWTD, provision of secondary treatment for these areas and wider compliance with the UWWTD should therefore be progressed by Irish Water as a matter of priority and this must be reflected in the WSSP.</p>		
D	<p>4. OVER-ARCHING COMMENTS</p> <p>4.1 Public Participation & the WSSP</p> <p>In light of the importance of a clean and healthy water environment and the ongoing non-compliance issues and risks set out above, the 25-year Water Services Strategic Plan is an extremely significant document of national importance. Respondent welcomes the consultation on this via the SEA process. However, it is also vital that there is full public participation in the wider decision-making around the Plan beyond the SEA process, including investment prioritisation to address <i>inter alia</i> current inadequacies in urban waste water treatment. Whilst we acknowledge that there is no requirement in the Water Services (No. 2) Act for such participation, we believe that this omission runs counter to the requirements of the Aarhus Convention which requires that <i>'Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public'</i>.</p> <p>Closely related to this are the welcome references to stakeholder involvement and engagement in the themes for proposed sections of the WSSP, as set out in the table in Appendix I. According to the table, the Introductory Section of the WSSP will include the theme of <i>'planning around you'</i> with <i>'Stakeholders centre-stage regarding priorities....'</i>. However it is unclear how such a central role for stakeholders in deciding priorities is to be facilitated, without a dedicated programme of public participation <i>'during the preparation of the plan'</i>, as required by the Aarhus Convention. The Irish Water Stakeholder Forum so far has been very much a high-level information exchange forum and due to its format and infrequent meetings, it doesn't effectively facilitate this central role for stakeholders.</p> <p>In this context, Respondent would strongly urge Irish Water to initiate a full programme of public participation on the wider WSSP, to compliment the more top-down, limited consultation on the SEA. We would also advocate an amendment to the primary legislation to enshrine this in law.</p>	<p>Further consultation on the SEA Scoping Report and the Draft WSSP and associated SEA and AA documents will be undertaken in the coming months.</p> <p>In addition, there will be further consultation at all other levels of the Planning and Environmental Assessment Hierarchy for Water Services (see Figure 2.1 in the Draft Scoping Report).</p>	None.
E	<p>4.2 Source protection and the catchment-based approach</p>	<p>Noted. This approach is consistent with that detailed in the SEA Scoping Report. Aspects of catchment based approach</p>	None.

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>The importance of the catchment-based approach to water resource management cannot be over-estimated and the commitment in the draft scoping report to reflect this in the WSSP and its SEA Environment Report is to be welcomed. The references to catchment protection and 'catchment-based solutions' in various proposed sections of the WSSP, as set out in Appendix I are welcomed by Respondent. Integrated catchment management and the catchment-based approach are vital to achieving sustainable water management but they are complex and further research is needed in Ireland. It is vital therefore that Irish Water sets its priorities for this more specifically in the WSSP and SEA Environmental Report and makes a specific commitment in terms of resources so that this catchment based approach is not just limited to a theoretical aspiration but imbedded in Irish Water's programmes and activities via the WSSP. Respondent is looking forward to reading in the SEA Environmental Report how the catchment-based approach, including the consideration of cumulative pressures, is to be incorporated into the WSSP and associated implementation plans.</p>	<p>have been integrated into the SEA alternatives as well as into the emerging content of the WSSP. The SEA Environmental Report will detail the findings of the SEA with respect to the alternatives and the content of the Draft WSSP, including addressing cumulative effects.</p>	
F	<p>4.3 Consultation & Stakeholder participation: Timeline & Capacity Issues</p> <p>Respondent welcomes the further opportunity to input when the draft WSSP and SEA Environmental Report are published. Figure 2.1 also provides a very useful overview of the tiered approach to water services planning and implementation and the further opportunities for input via the SEA and AA for the National Water Resources Management Plan and other implementation plans. However, it is important for Irish Water to note that notwithstanding Respondent's promotion of active stakeholder engagement, full participation in the Irish Water planning process is posing increasing capacity challenges for Respondent and Respondent members. It would be reasonable to assume that this is also the case for other not-for-profit / voluntary stakeholder sectoral interests. In order to facilitate full engagement of the environment and other such stakeholder groups there is a strong argument for the consideration of funding to address such capacity issues if full participation of key stakeholder groups is to be achieved.</p> <p>On a more immediate note, we would also be very grateful if Irish Water could issue the timeline for the remaining consultation on the WSSP SEA, so that we may plan our work programme and resources around it. This is especially the case if it is likely to take place during the holiday months as we are dependent on one staff member responding to it.</p>	Noted.	None.
G	<p>5. SECTION-SPECIFIC COMMENTS</p> <p>Section 3.3: Outcomes of the SEA</p> <p>Respondent supports the additional outcomes (in addition to objectives relating to environmental protection) of the SEA process, as set out in this section: '<i>The adoption of procedures for the integration of planning and environmental considerations into water services planning</i>' and '<i>[t]he use of strategic environmental constraints mapping and assimilative capacity data</i>'. However, these are mooted as '<i>other outcomes</i>' which '<i>may</i>' be included. Respondent believes that procedures for integration of environmental considerations into water</p>	<p>It is not possible so early in the SEA process to definitively commit to such measures however the wording of Section 3.3 'Outcomes of the SEA' will be updated.</p>	<p>To update the wording of Section 3.3 as follows:</p> <p>It is intended that the SEA (and AA) process will contribute towards objectives relating to environmental</p>

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>services are vital, as are the consideration of assimilative capacity in receiving waters. We would therefore propose a change of language to reflect a firmer commitment to both of these.</p>		<p>protection for integration into the WSSP. Other intended outcomes include:</p> <ul style="list-style-type: none"> • The adoption of procedures for the integration of planning and environmental considerations into water services planning; • The use of strategic environmental constraints mapping and assimilative capacity data; • Commitments for ongoing co-operation with other organisations; and • The adoption of project selection criteria for use in lower tier planning and environmental assessment.
H	<p>Section 3.5: What happens next?</p> <p>Given the capacity constraints outlined above, Respondent requests that a timeline for remaining SEA consultation be issued for the purpose of stakeholder work planning.</p>	See Response under F above.	See Response under F above.
I	<p>Section 4.2 Environmental Sensitivities</p> <p>The inclusion of the ‘<i>Status and quality of rivers, lakes, transitional, coastal, ground and bathing waters</i>’; the register of protected areas under the WFD and Freshwater Pearl Mussel Catchments are important - and welcome - as identified water-related environmental sensitivities. Respondent proposes that Groundwater Dependent Terrestrial Ecosystems under the WFD also be included. Because water status under the WFD includes the holistic ecological health of a water body, including its quantitative and hydro-morphological status, it is vital that in the full SEA Environmental Report these sensitivities are dealt with comprehensively. The physical (as well as water quality) impacts of infrastructure development related to the WSSP must be addressed, in addition to the environmental impacts of abstractions for water supply. These are particular risks / threats and must be identified as such in the SEA Environmental Report, due to the lack of a system of prior authorisation for either abstraction or physical modifications, both of which are required as basic measures under the WFD, but both of which are regrettably not yet in place in Ireland.</p> <p>Respondent agrees that it is especially important to ‘<i>identify likely interactions with the River Basin Management Plans and associated Programmes of Measures</i>’. The SEA Environmental Report must recognise that the full implementation of the Urban Waste Water Treatment</p>	<p>Noted. It is proposed to update text at Tables 4.1 and 4.2 to take account of this part of the submission.</p> <p>As noted under Section 4.2 of the Draft Scoping Report, the SEA will consider interrelationships between the various environmental components and, in addition to being identified under each environmental topic in the SEA Environmental Report, interrelationships will be given a specific sub-section and an interrelationships matrix will be included.</p> <p>The SEA (and AA) will take account of Irish Water’s obligation to comply with the River Basin Management Plans and associated Programmes of Measures (already included in the Scoping Report)</p>	<p>To edit as follows the first bullet point on Table 4.1 ‘Environmental Sensitivities’:</p> <ul style="list-style-type: none"> • Designated sites including Natura 2000 Sites, National Parks, Ramsar Sites, Salmonid Waters, Shellfish Waters, Freshwater Pearl Mussel Catchments and Wildlife Sites (including Nature Reserves, Natural Heritage Areas and proposed Natural Heritage Areas), all relevant protected habitats and/or species including those listed on Annex IV of the Habitats Directive, on the Annexes of the Birds Directive, in the Wildlife Act 1976 as amended, on the Flora Protection Order, those defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental

No.	Relevant Submission Text	SEA Response	Updates to SEA Scoping Report arising, if any
	<p>Directive is considered to be a Basic Measure in the WFD and thus must be included as such in its River Basin Management Plans and Programmes of Measures. This obvious interaction and key legal requirement must be to the forefront when determining water services investment priorities and finalising the WSSP.</p>	<p>and the Urban Waste Water Treatment Directive (91/271/EEC) as appropriate and the scoping report will be updated accordingly.</p>	<p>Liability) Regulations 2008 and Water Framework Directive entries to the Register of Protected Areas and Groundwater Dependent Terrestrial Ecosystems.</p> <p>To update text from Table 4.2 'Environmental Components and Potential Effects' as follows:</p> <p>Adverse impacts upon the status of water bodies and entries to the WFD Register of Protected Areas, arising from changes in quality, flow and/or morphology</p> <p>To add details on the following to Section 4.3 'Relationship with Legislation and Other Plans and Programmes':</p> <ul style="list-style-type: none"> Urban Waste Water Treatment Directive (91/271/EEC)
j	<p>Section 4.5 Potential Environmental Effects</p> <p>The inclusion of cumulative and synergistic environmental impacts is vital and their inclusion and assessment in the SEA Environmental Report is to be welcomed. This must take into account the assimilative capacity of receiving waters in the context of pressures from other sectors (agriculture, industry etc.). Respondent understands that research on this approach in Ireland is limited to date. Respondent proposes that Irish Water commissions research on cumulative and synergistic impacts for all receiving waters for which a significant risk of such impacts is identified, taking into account the precautionary principle.</p>	<p>Noted. Irish Water obey all environmental legislation in their actions and will comply with and contribute towards the achievement of (in combination with other users and bodies) RBMP objectives for protecting and enhancing the status of all waters.</p> <p>The SEA will address the full range of environmental effects including synergistic and cumulative impacts.</p>	None.
K	<p>Section 4.8 Alternatives</p> <p>Respondent obviously favours the <i>'holistic, partnering approach'</i> over the <i>'Asset Centred Strategy'</i> outlined in this section, since this is very much in keeping with position, articulated earlier in this submission, regarding stakeholder participation and the catchment-based approach.</p>	Noted.	None.

Appendix F: Responses to WSSP Challenges and Strategies Template

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
<p><u>General comments/observations –</u></p> <p><u>CER</u></p> <p>The CER considers that it may be useful to set out in user friendly terms the product(s) that IW is providing to customers. This description could be included in the introduction section which has the stated objective of “setting the scene”.</p> <p>Inclusion of simple diagrams setting out how water is collected and treated by IW and supplied to customers would be informative for customers as would provision of an overview of the key activities of IW.</p> <p>It would be beneficial to set out some key metrics, where robust information is available, on the status quo to give a snapshot of readers of the plan, of the current situation and the challenges faced in that context.</p> <p>The CER trusts that the next plan will build on these and show the change in the metrics over time. The provision of information regarding the timelines of IW’s strategic plans and investment plans in the context of the timelines relating to the publication of other key documents such as the river basin management plans, the NSS and the Regional planning guidelines – would provide necessary context to the reader.</p> <p><u>Environmental Protection Agency (EPA):</u></p> <p>The provision of information to stakeholders on all aspects of the water cycle will be necessary to support the work of Irish Water. Irish Water’s high-level strategy on the future use of information and communications technology to inform and educate water stakeholders should be set out in the plan.</p> <p>Some other general areas that should be considered for the plan include;</p> <ul style="list-style-type: none"> • A strategy for innovation in treatment technologies • A strategy for the sustainable use of resources (energy, water conservation, reduction in chemical use and maximising beneficial reuse of bio solids) • A strategic plan for regulatory information systems (efficient data retrieval and collation, paperless systems, data integration and reporting, framework for interaction of regulatory issues) <p>While Irish Water’s commitment to an integrated catchment approach; the prevention of pollution from urban waste water discharges; flood risk management; and drinking water source protection are acknowledged, it is necessary for the plan to provide a strategic level plan on how these will be achieved.</p> <p><u>Local Authorities:</u></p> <p>Current suggested strategies focus on strategies for capital investment – the WSSP should also include strategies for operation of services</p> <p>LAs have worked closely with the HSE in the past regarding water quality – IW should include the HSE as a key stakeholder</p> <p>WSSP presents an opportunity to set out strategies and cooperation between LAs and IW on areas of shared interest including;</p>			

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
	<ul style="list-style-type: none"> • Economic development • Surface water drainage and flood management • Catchment management and source protection • WFD <p><u>Regional Planning Authorities:</u></p> <p>Commentary based on the following:</p> <ul style="list-style-type: none"> • Spatial Planning & the Provision of Water Services • Security of Water Supply • Facilitating Economic Development • Compliance with EU Directives • Monitoring of Cumulative Impacts • Improved Energy Efficiency • Education and Awareness <p>The regional authorities transmitted a submission to Irish Water earlier this year on the Capital Investment Plan. This submission emphasised the need for investment to align with spatial planning policy at national, regional and sub-regional level, rather than being solely commercially driven. This is reiterated in the context of the investment plan which will form the basis of future capital plan iterations.</p>		
Introduction	Setting the Scene	<p><u>CER:</u></p> <p>-CER considers the WSSP document Important, presenting IW with an opportunity to engage and communicate with its customers and other stakeholders at critical juncture in the transformation to a utility model and the introduction of water charging for domestic customers.</p> <p>-It is important that the messages in the plan are unambiguous and the CER is of the view that certain phrases may be subject to differing interpretations – notably the phrase “enhancing the environment” <i>as discussed at our meeting on the scoping plan.</i></p> <p><u>Environmental Protection Agency (EPA):</u></p>	

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
		<p>-From the EPA's perspective the Plan should clearly show that Irish Water is committed to achieving quality outcomes for waste water and a safe and secure drinking water supply. It would also need to include details on how and when the organisation will achieve these goals.</p> <p>Local Authorities:</p> <ul style="list-style-type: none"> -Building of Partnership in the context of the SLA -Management of Staffing and Resources Regulatory Context Building a Sustainable Water Service Compliance with Standards Customer focus <p>Provision of Investment Plans to ensure Balanced Regional Development.</p> <p>-Ireland's abundant water resources could give the country strong strategic economic competitiveness, facilitate employment creation and support the future success of water dependent industries, thereby encouraging future economic growth. Ireland needs to exploit this competitive advantage in order to position itself soundly to continue economic recovery.</p> <p>-However, on a national level, the availability of these resources does not correspond with the areas of greatest demand. Ensuring availability of water services and security of water supply across the country will be a significant challenge in the coming years.</p> <p>-In many locations the scale of investment in new facilities has only just kept pace with the levels of growth experienced or indeed is becoming a barrier to delivering the national spatial plan, regional planning hierarchy and development plan objectives.</p> <p>-This necessitates the need to address the legacy issues for water investment as well as planning for the future. As a result, the need for investment in facilities remains a priority. Continued investment in waste water treatment such as the long term water supply to the Greater Dublin Area is needed to ensure High water quality standards in line with EU Directives; and, economic</p>	<p>Local Authorities:</p> <ul style="list-style-type: none"> Shared vision of Irish Water and Local Govt Sector Partnership Areas (WFD, Flooding, Strategic Planning, Catchment Management) Responsibilities of Both Parties Current Operating Conditions and Asset Base Be Consistent with National Spatial Strategy. <p>Vision/Strategies: <i>Need to set out clear deliverable vision and strategies which are measurable</i></p> <ul style="list-style-type: none"> -Emphasis that water services planning must transcend traditional county/region boundaries to provide a sustainable solution to the needs of the country as a whole. -In the short term, remedial works which are required to address environmental risks must be prioritised. -However, outside of this and for the medium to long term, water services planning must be directly tied into spatial planning policy to ensure that infrastructure is available to serve agreed growth scenarios. <ul style="list-style-type: none"> Develop collaborative approach as set out in the SLA with Local Authorities including with CCMA & WSTO. Need to set out clear deliverable vision and strategies which are measurable Use simple language that can be understood by all consumers Review headings on Template for meaningful outcomes Continued investment in significant WTW and WWTP upgrades, network upgrades and water conservation strategy works.

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
		<p>development and population growth can take place in the most optimal locations, particularly the continued consolidation of the Gateway and major growth towns within the Greater Dublin Area.</p> <p>To provide and maintain, in a sustainable manner, a Water Supply and Drainage Network capable of meeting the needs of domestic, commercial and industrial consumers in Galway City & Environs</p> <p>Operating effectively and efficiently as agents for Irish Water under the terms of the Service Level Agreement.</p> <p>Working within a change environment and a new regional approach to service delivery</p> <p>The initial impression of the template contents is that for a Plan covering the next 25 years of which 12 at least will involve local authorities working under an SLA arrangement there is absolutely no mention of the local authority system as a partner, stakeholder, agent, etc. It would be imagined that some of the challenges IW will face in achieving their objectives will be the whole culture shift from this being a local authority service to the public utility model and part commercial outfit that is now being implemented. Surely then the management of that culture shift and the strategic relationship with local authorities is a challenge. Similarly the arrangements for delivery of water services post the SLA period will have to be addressed to some extent in the document.</p> <p>Regional Planning Authorities:</p> <p>The submission addresses under the following headings:-</p> <ol style="list-style-type: none"> 1. Structures and Engagement 2. Environment and Climate Change 3. Catchment planning 4. Modelling and Projection 5. Specific Issues <p>An opportunity exists to ensure that the complementary progression of both areas can be mutually beneficial and</p>	

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
		<p>contribute to the achievement of balanced sustainable development at National, Regional and Local level.</p> <p>Current NSP aims to achieve balanced regional development</p>	
<p>Challenges and Strategic Priorities</p>	<p>Structuring the document and how the challenges/ priorities and the sections within the document interrelate.</p>	<p>Local Authorities:</p> <ul style="list-style-type: none"> Demographic Change Climate Change Service Resilience Compliance (against existing and increasing environmental standards) Drinking Water Quality Customer expectation Funding availability/ affordability <p>Compliance with all appropriate regulations and policies, commitments, including Health and Safety</p> <p>Agreement and Implementation of Transformational Plan</p> <ul style="list-style-type: none"> -Main challenges in GDA -Catering for current demand and future growth <p>Meeting national obligations for collecting wastewater</p> <p>Adapting to climate change (raw-water availability, flooding)- drier in east, wetter in West</p> <p><i>Economic & Social Development (IW key role is providing the critical water and wastewater infrastructure to support this)</i> <i>Ensuring ASP's reflect key priorities</i></p> <p><i>Ringsend Wastewater Treatment Works (WWTW) Expansion;</i> <i>Water Supply Project Dublin Region (WSPDR)</i></p> <p><i>Greater Dublin Drainage Project (GDD)</i></p> <p>Importance of Water Conservation</p> <p>Demand for Water Services – Equitable solutions for all regions</p> <p>Arrangements for Group Water Scheme Sector</p>	<p>Local Authorities:</p> <p>Balancing Priorities (Balancing Objectives; Principles underlying Investment Planning & Options Selection; Stakeholder Engagement; Strategic Priorities (including Critical National Infrastructure, NSS, RPGs and County Development Plans)</p> <p>Working Together (Customer, CER, EPA, HSE, stakeholders, together with Cross Border Agencies)</p> <p>Building Capability (within Irish Water and the Local Authorities to meet the challenges of the future through adopting best in class approaches).</p> <p>Understanding Investment Needs (including understanding the condition and operational requirements of existing assets, data to support decisions)</p> <p>Performance Monitoring (including provision of information on levels of service indicators to customers and other key stakeholders)</p> <p>WSP-DR is a priority to support socio-economic growth and Foreign Direct Investment – adequate headroom needed – phased basis - 10% to 2022 and 20% by 2040; integrate strategies, maximise water production, minimise demand, minimise UFW, continue current upgrades at Leixlip and Ballymore E</p> <p>Progress GDD project</p> <p><i>Draft Dublin Region Water Services Strategic Plan</i></p> <p><i>Fingal's Assessment of Water Services Needs</i></p> <p>Balanced approach to reduce leaks, replace defective mains to achieve required UFW.</p> <p>Fair and reasonable approach to share reduced resources across all region.</p> <p>Engage with Group Water Scheme sector to meet their needs.</p>

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
		<p>1. Demand for water services in Ireland does not, and is not likely in the future, to correspond spatially with the areas that benefit from capacity in water resources. This mismatch must be addressed.</p> <p>2. The NSS is now a dated document, over ten years old, and in need of review. Irish Water will have a future critical role in the necessary re-negotiation and delivery of the new NSS to facilitate the creation of the re-aligned regional dimension set out in 'Putting People First'.</p> <p>3. The Metropolitan Area is the national Gateway and is thus targeted for development under the NSS. IDA policy for Foreign Direct Investment (FDI) favours the marketing of such centres. Critically also the NSS identifies the special significance of the county town as being worth of special consideration and promotion. The guaranteed delivery of water and drainage services is the critical component and Irish Water has thus a vital part to play.</p> <p>4. The targeted provision of increased water supply and enhanced waste water treatment capacity has been identified as the critical component in the roll out of the National Spatial Strategy. Enterprise Ireland has responsibility for the carriage of the critical investment to realise capacity to enable economic development and job creation in the NSS designated gateways and hubs, including the National Gateway of Dublin.</p> <p>5. In addition, provision of new and upgraded water service infrastructure is needed in smaller towns and villages of the county, to ensure compliance with public health and environmental standards, including the legal imperative of compliance with the obligations arising from River Basin Management Plans developed in compliance with the Water Framework Directive.</p> <p>6. The interface of Irish Water's objectives for future service improvements will have largely positive implications for plan led growth models favoured by modern planning guidance. Consequently the planning process is a critical dimension in the integrated delivery of the new service and particularly so in the</p>	<p>1. Provide for Demographic Changes :</p> <p>Have regard to population and demographic changes and trends as supplied by CSO.</p> <p>2. Climate Change: Plan for climate change. Carry out Risk Assessment of existing and planned water services infrastructure on effects of Climate Change having regard to "The National Climate Change Adaptation Framework 2012" EPA " Irelands Environment 2012" OPW/DOECLG, "CFRAMS" etc. Critical infrastructure should be "Climate Proofed" to include for climate risk considerations and cope with more frequent and severe Climate Change (eg. flooding events).</p> <p>3. Service Resilience: Assess capacity of existing and proposed Water Service Infrastructure to meet current and future demand and comply with all environmental requirements.</p> <p>- Engage with EPA and agree strategy for progressive improvements on a phased prioritised basis without compromising overall objectives and meeting standards.</p> <p>4. Flood Risk: - Carry out Flood Risk Assessment of existing and planned Water Services Infrastructure on effects of flooding having regard to the DOECLG/OPW CFRAMS studies.</p> <p>- Develop and implement measures to reduce risk of flooding</p> <p>5. EPA Licensing/Certificates</p> <p>- Liaise/engage with EPA and agree cost effective approach to licensing/ certificates for existing and planned WWTPs and agree strategy for progressive incremental improvements on a phased prioritised basis without compromising overall objectives of meeting standards.</p> <p>Identify areas for attention and develop strategy for solution</p> <p>Prepare plans for waste water infrastructure to deal with problem.</p> <p>Continuing with upgrades to strategic WTP, WWTP and networks.</p>

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
		<p>context of preparation of investment programmes for effective regional and local planning models.</p> <p>7. Furthermore the interface of the planning process with the environmental protection of water resources residing within or in proximity to designated European sites is a significant aspect for future consideration. The protection of groundwater quality in well-fields and aquifers will also become an issue for Irish Water given their role as the National Water Services Authority.</p> <p>8. Capacity, where it exists, should be prioritised for economic development given the scale of outward commuting and the clearer need to generate sustainable employment counties surrounding Dublin.</p> <p>9. Will the effective nationalisation of water and waste water facilities and infrastructure enable counties easier access to the infrastructure services.</p> <p>Risks associated with Global Warming.</p> <p>Additional Wastewater Treatment requirements when Mutton Island reached ultimate capacity.</p> <p>Encourage additional Foreign Direct Investment to Western Region – Requirement to have all major water/wastewater infrastructures in place.</p> <p>Establishing a Commercially Viable Public Utility (Irish Water) within known constraints.</p> <p>Compliance with all Environmental standards.</p> <p>Meeting Customer expectation with the introduction of Domestic Metering.</p> <p>Adequate resources to meet all relevant environmental standards.</p> <p><u>Regional Planning Authorities:</u></p> <p>How will Irish Water interact with the new Regional Assemblies in the context of the preparation of the new Regional Spatial and Economic Strategies – there is no reference to these in the documentation submitted. In this regard, what structures does Irish Water envisage between the new Regional Assemblies and specifically their Regional Planning role?</p>	

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<p>Meeting Customer Expectations</p>	<p>Relating to 32 (2) Code of practice in relation to the interests of customers</p>	<p><u>CER:</u></p> <p>CER notes the Referencing to and the emphasis on customers, including the need for customer focus and the proposed section on “meeting customer expectations and needs”. It is important to note that the matters set out in the codes of practice are requirements rather than expectations. We note that funding and affordability are going to be addressed in various aspects of the document. CER considers that both of these issues are important ones which merit due consideration here.</p> <p><u>Environmental Protection Agency (EPA):</u></p> <p>Meeting customer expectations is focused very much on the drinking water. Many customers will be paying for both provision of drinking water and the treatment of waste water.</p> <p><u>Local Authorities:</u></p> <p>Now that paying – higher demand for service from customers.</p> <p>CER expectations in relation to code of practice content.</p> <p>(Managing) Customer Expectations & actual requirements</p> <p>Agreement of Transformational Programme</p> <p>Agreement of Baselines and KPI's</p> <p>Cost/ Funding availability and affordability</p> <p>Risk (to services and the business as a whole due to condition of assets and their resilience to provide customers with acceptable Level of Service)</p> <p>Prioritisation of investment</p> <p>Balanced Regional Approach to meet future demands</p> <p>Water Conservation</p> <p>Source Protection</p> <p>Managing customer demands for code of practice</p> <p>Matching demand with funding availability</p>	<p><u>Environmental Protection Agency (EPA):</u></p> <p>The Plan should provide a clear understanding to customers as to the service they will receive for the complete water cycle and the regulatory responsibilities Irish Water has to achieve for both water supply and waste water collection for treatment.</p> <p><u>Local Authorities:</u></p> <p>Supply a reliable high quality and reliable supply of drinking water to customers ensuring value for money, expanding to cater for new customers where viable.</p> <p>Provide high quality collection and treatment of wastewater – with no negative impact on the environment.</p> <p>Provide prompt responses to customer queries through Irish Water Customer Service Centre and by LA staff.</p> <p>Ensure cost and efficiency – provide at lowest possible costs while ensuring adequate investment and operational efficiency.</p> <p>Communications- inform customers at local, national and regional level on on-going water services development.</p> <p>Customer Service Standards</p> <p>Customer and stakeholder communication strategy</p> <p>Focus on Outcomes (to the customers rather than prescribing the actual work)</p> <p>Objective Decisions (on investment, based on asset life cycle costs/ Value for Money)</p> <p>Balance needs and funding (listening to you the customer re</p>

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		<p>Managing Customer Demands when Paying for Services.</p> <p>With the introduction of water/wastewater charges for domestic users, customer expectations are set to rise even higher than they are at present. Key customer expectations will be:</p> <ul style="list-style-type: none"> - Good service (consistently good quality water, good water pressure, secure/reliable supply). - Good value - Good Customer Service <p>Balance Funding Availability with Environmental Compliance</p> <p>Availability of Resources to adequately meet Consumer Expectation</p> <p>On-going commitment to improving efficiencies in service provision</p> <p>Providing Water Services function in accordance with the Codes of Practice, Customer Charter and Terms & Conditions set out in the Irish Water Customer Handbook.</p>	<p>preferences, whilst also meeting legal/ regulatory obligations/ best choices for Ireland)</p> <p>Keeping you informed (the information that you will receive)</p> <p>Fair and reasonable approach to share reduced resources across all regions.</p> <p>Working effectively with all sectors to improve source protection e.g. agricultural and industrial sectors.</p> <p>Engage with CER and customers to produce fair and reasonable code of practice.</p> <p>Balancing priority list based on agreed objectives.</p> <p>Continue high level of capital investment in upgrading/replacing WS's infrastructure.</p> <ul style="list-style-type: none"> - Continue to invest in necessary operation & maintenance and move to asset based management. - Develop policies for dealing with common customer concerns regarding, hard water (limescale), lead and fluoridation. - Inform and educate customers regarding leakage in order to dispel current misconceptions regarding UfW rates. <p>Managing Customer Demands when Paying for Services: Prepare Code of Practice for meeting customer service standards. Set out measurable objectives/targets with associated "Performance Indicators" e.g.: Debt collection rate; Customer Satisfaction rate; Compliance with EPA Discharge Licence Requirements.</p> <p>Emphasise "Balanced" approach to provision of Water Services rather than "Demand Driven".</p> <p>Adapt co-ordinated approach to provision of Water and Waste Water Infrastructure. Consult with LAs and other Agencies/Service Providers to co-ordinate activities where works are proposed in an area thus achieving value for money and minimise disruption.</p> <p>Support provision of Water and Waste Water services to currently unserved rural areas in conjunction with DOECLG Rural Water Programme, by extending treatment plants / headworks and</p>

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
			<p>networks to facilitate proposed GWSs which are deemed to be financially unviable.</p> <p>Provide assurances to customers of quality product by adapting good marketing plans and advertising campaigns</p> <p>Continue high level of capital investment in upgrading/replacing WS's infrastructure.</p> <p>Continue to invest in necessary operation & maintenance and move to asset based management.</p> <p>Develop policies for dealing with common customer concerns regarding, hard water (limescale), lead and fluoridation.</p> <p>Inform and educate customers regarding leakage in order to dispel current misconceptions regarding UfW rates.</p> <p>Irish Water Customer Handbook</p>
<p>Ensuring a Safe and Reliable Water Supply</p>	<p><i>Provide secure (continuous) high quality drinking water</i></p>	<p><u>Regional Planning Authorities</u></p> <p>Extensive debate relating to security of water supply in large urban areas especially with regard to Dublin Water Supply.</p> <ul style="list-style-type: none"> - Challenge is the reallocation of resources from areas of lower demand to supply large urban centres. <p>The reallocation of resources from areas of lower demand to supply large urban centres.</p> <p>Important to ensure the SP for Water Services in Ireland does not contribute to an over-concentration of development in single urban centre to the detriment of other regions around the country.</p> <p>In Service Towns & smaller settlements there is a need to ensure there are sufficient water and wastewater services available to accommodate future growth.</p> <p><u>Local Authorities:</u></p> <p>Resilience of supply</p> <p>Uncertainty of Demand</p> <p>Providing for National and Regional Growth Targets</p>	<p><u>Regional Planning Authorities:</u></p> <p>It's suggested that formal structures are established to develop a strong interface with water service provision and regional planning priorities. Any such structure should incorporate the recently formed WFD Implementation element of the EPA in order to fully integrate water quality issues.</p> <p><u>Local Authorities:</u></p> <p>Management of existing assets (to maximise performance)</p> <p>System Resilience (to meet customer requirements/ outcomes rather than try to bullet proof everything)</p> <p>Balanced approach to Demand Management (including</p>

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		<p>Abstraction (quality and quantity of water available).</p> <p>Protection of sources in partnership with Local Authorities</p> <p>Impacts of Climate change (reduced summer flows, extreme high flow events)</p> <p>Leakage and Demand Management</p> <p>Compliance with Standards</p> <p>Aging assets requiring investment</p> <p>Water Stagnancy at dead ends – aggravated by creation of DMA boundaries. Plumbosolvency and renewal of lead connection/service. Programme of Reservoir cleaning. Critical need for Major New Source for Dublin.</p> <p>Urgent need for a new major water source to ensure resilience of supply and manage the uncertainty of demand which currently prevails.</p> <p>Water Conservation: need to increase network rehabilitation rate. Water Conservation measures other than network rehabilitation, such as demand management, pressure management, and local leak repairs must also be supported.</p> <p>Investment in best available technology, to mitigate against the risk to water quality, such as UV treatment, will be essential in the provision of potable water to over 1.5 million customers in the Dublin Region.</p> <p>An ageing non homogenous network which contains lead services will need to be taken out of service in accordance with current regulations and to ensure the highest quality standards are maintained.</p> <p>Ongoing investment and support for the Dublin Region Central Laboratory should form part of the 25 year strategic plan.</p> <p><i>Protection of Resources</i></p> <p><i>Minimising Leakage</i></p> <p>Security of water services is critical for future FDI and indigenous industry. Key challenges;</p>	<p>leakage reduction)</p> <p>Ensuring water availability (for customers including provision of longer term strategic supplies)</p> <p>Drinking Water Quality Standards</p> <p>Helping you to help us (Educating on the water usage and quality (e.g. hardness) and engagement with industries, landowners – Be aware of and influence behavioural changes)</p> <p>Source Protection (Protecting our national asset in partnership with Local Authorities)</p> <p>Requirement for scour hydrants and flushing programme (as is practice in UK). Best programmed in conjunction with mains rehabilitation. To secure existing supplies, to support planned growth and to provide strong incentive for further water-reliant industry.</p> <p>Resilience of supply, Continuity and Efficiencies:</p> <p>Assess resilience and head room of water supplies for future development and prioritise investment needs.</p> <p>Provide interconnectivity between existing schemes for security of supply</p> <p>Extend existing schemes to supplement capacity deficient schemes.</p> <p>Source Management & Protection:</p> <p>Support the preparation of Water Safety and Source Protection Plans for the protection of the public and private water supply schemes.</p> <p>Establish source management and protection zones around drinking water supplies (ground and surface water sources) and develop appropriate management and maintenance for same.</p> <p>Take account of Water Safety Plans and Source Protection Plans already in place.</p> <p>Water Conservation:</p>

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
		<ul style="list-style-type: none"> - To satisfactorily deal with all RAL schemes. - To upgrade/replace infrastructure as necessary to provide the necessary level of treatment and headroom. - To deal with numerous small PWS's which to date there has not been investment available to deal with. - To continue to improve training and skill levels of key operations personnel. - To develop and roll out widespread SCADA/telemetry system. - To develop and collaboratively roll out, an out of hours response system. <p>Implement the Drinking Water Incident Response Plan (DWIRP). Implement the Water Conservation Programme and Rehabilitation Strategy. Implement the River Basin District Management Plan. Catering for new developments in accordance with the Development Plans.</p> <ul style="list-style-type: none"> • Security of Water Abstraction location • Security of Supply - Requirement to identify 2033 demands • Replacement of ageing Water Infrastructure • Source Protection • Continued Resources & Investment <p>Notes in relation to the local authority carrying out the role as a Fire Service.</p> <ul style="list-style-type: none"> - DWIRP to continue to be in place and available to use in the event of an incident - Planning for the provision of water to particular types of customer in the event of a major mains outage - e.g. Healthcare, hotels, restaurant, supermarkets and similar - Availability of IW personnel in the event of an emergency, including major emergencies 	<p>Support LA's in implementing and roll-out of water conservation policies/plans including leak detection, leak repairs, pressure management, network management plans, mains rehabilitation, etc.</p> <p>Review LA's leakage/repairs targets and mains rehabilitation strategy for long-term water conservation measures.</p> <p>Advance critical mains rehabilitation contracts to construction for effective cost saving measure.</p> <p>Engage with LA's and complete Taking in Charge process for GWS</p> <p>DWIRP: Develop Drinking Water Incident Response Plans (DWIRP) and develop strategy for implementation</p> <p>Prioritise Water Services Needs:</p> <p>Carry out review of Assessment of Needs prepared by LAs and prepare programmes for delivery on priority basis.</p> <p>Irish Water and LAs to work closely and collaboratively to target capital investment towards upgrading / replacing assets so as to improve treatment processes where necessary but also to provide adequate source, treatment, storage and distribution headroom to ensure security of supply and to provide for planned economic and associated residential growth.</p> <p>Irish Water to develop a policy and programme for the investment in and management of small PWS's and private package WTP's.</p> <p>Irish Water to work with LA's and WSNTG to identify operator training/upskilling needs and to then assist with the funding and delivery of training.</p> <p>To resource LA's to allow for the preparation and roll out of WSP's.</p> <p>Extend existing regional water supply schemes.</p> <p>Take cognisance of the Rural Water Plan and continue the policy of connection to public sources and the takeover of group water schemes with a view to being the sole water provider by the end of the plan.</p> <p>Complete water safety plans for all public schemes and deliver the investment required to minimise associated risks.</p>

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		<ul style="list-style-type: none"> - Provision of water and infrastructure (mains & fire hydrants) for firefighting purposes, including adequate flows and pressures - Ongoing Maintenance of infrastructure (mains and fire hydrants) - Costing of the provision of water for firefighting purposes - in Clare, Fire Service water carrying vehicles are replenished from hydrants within the Fire Station curtilages, this cost should not have to be carried by either the Fire Service or the Local Authority. <p>Number of issues were highlighted from an operational point of view including pressures, markings and maintenance.</p> <p>Question over Section 29 of the Fire Services Acts 1981 & 2003 which states:</p> <p><i>(1) The functions of a sanitary authority for the provision of a supply of water shall extend to the supply of water for fire-fighting purposes and the provision and maintenance of fire hydrants at such places as the fire authority requires.</i></p> <p><i>(2) Where a fire authority represents to a sanitary authority that reasonable provision has not been made for a supply of water for fire-fighting purposes, the sanitary authority shall consult with the fire authority as to the measures required and shall take such measures as may be agreed.</i></p>	<p>Upgrades to large WTPs; Water Conservation Rehabilitation Strategy Water Safety Plan.</p>
<p>Providing effective management of waste water</p>	<p><i>Deal effectively and sustainably with Waste Water (meeting appropriate standards of wastewater treatment)</i></p>	<p><u>CER:</u></p> <p>Extreme weather events are a significant challenge for water utilities worldwide, with potentially considerable cost implications. In the current document, high flow events are discussed purely within the context of climate change. While climate change would be expected to increase the frequency of such events, the system's ability to weather such incidences would also speak to it's over resilience.</p> <p><u>Environmental Protection Agency (EPA):</u></p> <p>A holistic, resource efficient water cycle approach should be considered to provide for all aspects of water management throughout the water cycle. Drinking water safety plans form part</p>	<p><u>CER</u></p> <p>CER expects to demonstrate consideration of extreme weather events.</p> <p><u>Environmental Protection Agency (EPA):</u></p>

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		<p>of this holistic approach but this system thinking can be expanded to the full water cycle.</p> <p>Local Authorities</p> <p>Receiving waters assimilative capacity</p> <p>Designation of ecologically sensitive sites</p> <p>Aging assets requiring investment</p> <p>Achieving compliance in context of available funds</p> <p>Population dispersion and growth</p> <p>Providing for National and Regional Growth Targets</p> <p>Incomplete information on existing assets</p> <p>Meeting the requirements of the UWWTD and the WFD</p> <p>Critical lack of Waste Water Treatment facilities in the Dublin Region.</p> <p><i>Contamination from leaking sewers</i></p> <p>Providing for Climate Change adaptation</p> <p>Environmental Compliance</p> <p>Source Protection</p> <p>Wastewater availability</p> <p>Key challenges for IW include,</p> <ul style="list-style-type: none"> - To fund the necessary investment upgrading/replacing necessary wastewater infrastructure, including addressing capacity / process issues at WWTP's. - To provide adequate headroom / capacity to provide adequate treatment and to facilitate economic development in designated areas. 	<p>Research, development and future technologies should form a key element of this long-term plan. Technological advances will inform key investment decisions to provide sustainable and efficient water supply and waste water management services. This may include increasing the efficiency and effectiveness of existing infrastructure through innovative technologies. Contributing to developing research in this area by working with research bodies should be noted in the plan.</p> <p>Local Authorities</p> <p>Holistic Solutions (not simply looking at asset replacement)</p> <p>Understanding Demand (including new techniques and models)</p> <p>Making best use of existing assets (Freeing up capacity in existing assets, including storm water separation to increase capacity of sewer networks)</p> <p>Alignment of Regulatory Demands (development of mature and open relationship with the Regulators to help balance priorities/ investment)</p> <p>National Strategies (developed for sludge treatment and disposal. Promote the understanding of what goes into the sewer has impact on land and water)</p> <p>Investment in major WWTP infrastructure and the sewerage network.</p> <p>Removal or redesign of CSOs</p> <p>Modelling networks</p> <p>Provision of sufficient headroom in network and treatment capacity.</p> <p>Strategy as devised in the GDSDS to be implemented, which includes the provision of new WWT facilities in the Dublin Region.</p> <p><i>Greater Dublin Strategic Drainage Study</i></p>

WSSP Table of Contents	Primary Objectives	Key Challenges	Strategies
		<ul style="list-style-type: none"> - To upgrade networks, CSO's, provide storm detention and reduce infiltration and storm water flows. - To deal with small public WWTP's and private package plants. - To continue to improve operator skill and competence and hence help optimise process operation. - To develop and roll out an extensive SCADA / telemetry system. - To introduce an out of hours on call response system. - To meet the objectives and targets of the WFD. - Compliance with the Urban Waste Water Directive - Ensure adequate treatment capacity to cater for 2033 population - Protection of Receiving Waters ensuring compliance with the Water Framework Directive - Robust measures to deal with Fats, Oil, & Grease (FOG) <p>Surface & Foul Sewer separation</p> <p>Regional Planning Authorities:</p> <p>The WSSP should recognise the importance of collaboration – not just LA's and RA's but also with community groups and educational institutions. Collaboration is vital to achieve water conservation and reduced water consumption and to generally raise awareness of importance of water as a national resource.</p>	<p><i>SEA of the GDSDS</i></p> <p>Use Renewable Energy systems to supply energy to treatment plants.</p> <p>Construct new plants and extend existing networks to deliver effective wastewater treatment.</p> <ul style="list-style-type: none"> - Work closely and collaboratively to target capital investment so as improve treatment processes where necessary, to improve networks where required and to introduce SCADA/telemetry to help protect the environment through improved wastewater handling and treatment and also to provide headroom / capacity for planned economic development and associated economic residential growth. - IW to develop policy and programme for investment in and ongoing management of small public treatment facilities and privately developed package plants. - Irish Water to work collaboratively with LA's to develop and resource an out of hours call out service. - Irish Water to work with LA's and WSNTG to identify operator training / upskilling needs and to then assist with the funding and delivery of training. - Irish Water to work with LA environment Depts and other relevant stakeholders with the aim of realising the objectives of the WFD. <p>Managing Assets: Promote use of Information Technology (SCADA System) for data collection and management of Waste Water Infrastructure and upgrade systems as required. Assess existing WWTPs and provide upgrades in a phased manner to meet existing and short-term demand with provision to expand to meet future needs. Examine and pilot new technology for cost effective solutions. Investment in surface water separation to free up capacity in existing WWTPs and networks thus reducing need for capital investment in new WWTPs and networks. Examine existing WWT systems and introduce new emerging technologies for achieving higher outputs/standards.</p> <p>Use of Chemicals: Assess existing treatment systems and adjust, where required, for efficient use of chemicals. Adopt central procurement of chemicals to achieve value for money while still</p>

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			<p>achieving the supply of chemicals to small to small plants at reasonable cost.</p> <p>Energy Management/Energy Reduction: Promote energy efficient plant and equipment. Review energy consumption for all plants and develop and implement energy efficient systems with maximum payback.</p> <p>Prepare Irish Water Energy Management Strategy to include: energy reduction measures and reduced Carbon footprint. Promote and implement renewable energy systems in line with EU and national targets.</p> <p>Sludge Management: Prepare and adapt new National Sludge Management Plan. Review existing National, Regional and Local Sludge Management Plans.</p> <p>SUDS: Develop policy for implementation of Sustainable Drainage Systems (SUDS) for efficient management of surface water having regard to EPA “Guidance on Authorisation of Discharges to Ground Water 2011” and other relevant documents. Encourage use of SUDS to separate out surface water and free up capacity of existing waste water infrastructure.</p> <p>Continue with network and WWTP upgrades and extensions.</p>
<p>Protecting and enhancing the Environment</p>	<p><i>Through responsible stewardship protect (and enhance) our water environment</i></p>	<p><u>Environmental Protection Agency (EPA):</u> Climate change mitigation and adaptation.</p> <p>Abstraction rates and discharge volume and quality.</p> <p>Sludge management practices and initiatives for both water treatment and waste water treatment sludge.</p> <p><u>Local Authorities:</u> Flooding of sewers due to severe rainfall events – surface water input/ adaptation to climate change</p>	<p><u>Environmental Protection Agency (EPA):</u> The influence and impact of climate change over this period also needs to be included. Specific reference is needed to the particular actions that Irish Water plans to take to mitigate future risk from climate change.</p> <p>To protect the environment it is the treatment works plus the collection systems and the receiving waters that need to be taken into consideration. Similarly, the Plan must set out the company strategy for improving sludge management practices and initiatives for both water treatment and waste water treatment sludge. A holistic water cycle approach would capture all these related aspects.</p> <p><u>Local Authorities:</u> Operation and maintenance focus (on treatment works to</p>

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		<p>Compliance with Water Framework Directive in partnership with Local Authorities</p> <p>Multiple sources of impacts on water quality (all polluters needs to bear a significant degree of responsibility)</p> <p>Funding availability and affordability</p> <p>Climate Change adaptation, including reducing river flows</p> <p>Compliance with consent standards</p> <p>Protection of designated sites.</p> <p>Rehabilitation of decrepit water mains.</p> <p>Specialist arterial/trunk main leak detection and repair programme.</p> <p><u>Unsewered Villages</u></p> <p>Kerry County Council Wastewater Scheme Priorities include the servicing of villages which do not yet have public sewerage schemes.</p> <p>In addition to ensuring continuous service to all its existing customers whilst providing additional capacity for future population growth and industrial development, Irish Water should have an objective to assess and plan how currently unsewered villages should be serviced.</p> <p><u>Regional Planning Authorities:</u></p> <p>SEA and AA of the Water Strategic Services Plan and Implementation Plans must consider ecological impacts – e.g. those on water-dependent European or otherwise protected sites must be assessed; as well as numerous other likely significant impacts. Should this process (and consultation on same) not be carried out in tandem with investment plan preparation?</p> <p>Climate-change modelling is critical for strategic planning – how is this being achieved, e.g. Impact of low water levels or extreme high flow events in part of the country on drinking water supplies and environmental impacts (e.g. water abstraction from high</p>	<p>reduce likelihood of pollution to the environment)</p> <p>Work effectively with others (using catchment based solutions. Engage with Local Authorities, agricultural and industrial sectors, to improve the water environment)</p> <p>Control inputs to sewerage system (to remove chemicals, metals etc. that impact on treatment and ultimate disposal)</p> <p>Sustainable Solutions (including the use of SUDS. Consider carbon impacts in decisions. Low carbon approach to capital investment and operational activities)</p> <p>Efficient use of water (including promotion of rainwater harvesting, controlling leakage and demand management)</p> <p>Pressure management is an inadequate response for mains well beyond their useful life which have an onerous, costly and disruptive maintenance burden. They also display myriad small leaks which are uneconomic to fix but elevate UFW. There is huge potential benefit in linking Water main replacement to road maintenance program.</p> <p>There is evidence that substantial quantities of water are lost from large mains but it's difficult to ascertain the extent due to insufficient metering precision. The skills and specialist equipment for this may be worthwhile for Irish Water.</p> <p><i>Eastern River Basin District River Management Plan</i></p> <p>Risk of Prosecution:</p> <p>Carry out Risk Assessment of all Waste Water Treatment Plants and implement measures to reduce likelihood of water pollution</p> <p>Develop plans to implement recommendations outlined in RBD Catchment Management Plans</p> <p>Adopt “Guidelines on Ground Water Protection Schemes” to support Planning and Licensing Authorities in carrying out their functions in decision making on the location, nature and control of developments and activities in order to protect ground water.</p> <p>Adapt Integrated Catchment Management approach to protecting and enhancing the Environment.</p> <p>Water Conservation:</p>

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		<p>water quality status sites; and impact on achievement of WFD objectives – identified in CIP).</p> <p>The climate change modelling calibration process being undertaken in the CFRAM process – although different emphasis, outcomes and lessons could be observed, modified and applied to whole-cycle water planning.</p> <p>Will Irish Water be taking an active role in catchment management? In the UK, water companies have evolved over the years and now take a leading role in catchment management e.g. upstream thinking. Removing pollutants at water treatment works involves using costly chemicals and so the aim of the Upstream Thinking projects is to help improve land management so that water quality and quantity is improved at source, long before it reaches water treatment works. This has a direct effect on Irish Water and their commitment towards playing a strong role in catchment management would greatly assist in implementing the Water Framework Directive.</p> <p>Potential impacts on the communities in the areas from which water will be abstracted and the assessment and mitigation of potential environmental impacts must be properly addressed. If reallocation is to take place – commitment must be made to a transparent system of community gain – to ensure affected communities can accrue – benefit from the loss of resources in their region.</p> <p>Compliance with EU Directives: The majority of centres identified for such growth in the NSS have, or will require, wastewater treatment systems that discharge to river systems. Natura 2000 sites that are vulnerable to inadequately treated wastewater discharges. In the Mid-West region significant development will be directed to the identified Gateway (Limerick/Shannon) and hub (Ennis) and the resultant treated wastewater will discharge to the Fergus and Shannon Estuaries, both of which are designated Natura 2000 sites.</p> <p>Quality of treatment of the wastewater must be such as not to impact on habitat status. These issues are commonly reflected in other identified growth areas nationally and it is essentially that these issues are recognised and addressed in the WSSP to</p>	<p>Establish a replacement programme to delivery 2% per year rehabilitation to include water mains and fittings</p> <p>Sustainable use of Energy</p> <p>Develop renewable energy generation from existing water assets.</p> <p>Develop carbon reduction programme with a view to being carbon neutral by the end of the plan.</p> <p>Use Renewable Energy systems to supply energy to treatment plants.</p> <p>Additional Capacity to deal with ever increasing extreme weather events</p> <p>Equitable water charges based on the " Polluter Pays Principle "</p> <p>Compliance with EC Directives</p> <p>Compliance with Planning Consent Standards</p> <p>Promotion of Water Conservation</p> <p>Promotion of Rainwater Harvesting</p> <p>Promotion of Sustainable Urban Drainage Standards (SUDS)</p> <p><u>Unsewered Villages</u></p> <p>This objective would be in line with Irish Water's key objectives for protection of aquatic ecology and habitats, drinking water resources and bathing water (<i>ref Objective 4 – Protecting the environment</i>). It is considered that the objective of servicing unsewered villages could be best advanced by a partnership approach between the IW and the Department of the Environment, Community and Local Government.</p> <p><u>Maximising capacity of existing sewers</u></p> <p>Greater emphasis should be given to mitigating sewer capacity problems (<i>ref Objective 3- providing effective waste water management</i>) through removal of CSOs and installation of SUDS through the planning process.</p>

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		<p>ensure that settlement growth can be accommodated and ensuing EU directive compliance.</p> <p><i>Monitoring of Cumulative Impacts</i> – Many small settlements are served by wastewater treatment facilities that are being operated beyond capacity. Upgrading existing infrastructure may not be appropriate based on current population of settlements & envisaged extent of future growth, cumulatively the discharges from smaller settlements may be impacting negatively on water quality and the status of EU designated habitats and species – this issue will have to be addressed.</p> <p><i>Improved Energy Efficiency</i> - Opportunity exists for IW to make a significant contribution to the reduction of greenhouse gas emissions nationally and it is recommended that this is reflected in the objectives set out in the WSSP. Investments in wastewater treatment infrastructure should focus on energy efficiency and sustainable technology such as anaerobic digestion and biogas extraction thereby reducing greenhouse gas emission-reduction targets.</p>	
Supporting Growth	<p>Support population and economic growth(in line with national & regional spatial planning policies)</p>	<p><u>Regional Planning Authorities</u></p> <p>Arrangements for points of contact between Irish Water and regional/ local authority planners in the preparation of land use plans, SEAs and AAs are required to gather data as well as a steer on future development opportunities and well as priorities within regions and local authority areas - What provisions are to be made over and above statutory consultation provisions, particularly in relation to the enhanced relationship between developers/landowners and local authorities (active land management) envisaged in the construction 2020 strategy.</p> <p>How do we plan for those areas where there are likely to be long-term deficiencies in water and wastewater infrastructure (due to lack of commercial viability/ priority) - There are numerous smaller settlements which require wastewater treatment infrastructure or upgraded infrastructure in order to meet the requirements of the WFD and ensure public health and safety is achieved – how are these to be addressed in the medium to long term?</p> <p>What metrics are being used to forecast and model service demand across the 25 year timeframe – is the demand model</p>	

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		<p>similar to other utilities such as Gas and electricity? If so, what specific provisions are made for remedial/legacy issues (would the RI baseline be useful in this regard)?</p> <p>Have commercial and industrial considerations been factored in, demand flexibility/peaks/troughs?</p> <p>Process of hierarchical settlement structure has been identified and formed a basis for population growth, employment and service related development at all levels of policy formation.</p> <p>It is important to ensure that water services is prioritised in settlements that have been identified for growth in the NSS, and subsequently the RPG's, City and County DP's and LAP's</p> <p>The impact of precedent on balanced regional development – in the interest of sustainability is preferable for population growth and economic development to take place in areas where ample resources exist to service such growth.</p> <p>Systems with the capacity to accommodate large-scale business development must be provided at a minimum – in identified hubs throughout Country. Lack of facilities will compromise Ireland's economic recovery and future growth. This could restrict achievement of balanced regional development.</p> <p>Currently deficiencies in water and wastewater treatment facilities in many towns and villages throughout the Mid-West which proves to be an obstacle to the region in terms of balanced development. <i>–this is a similar situation in other Regions in the Country and the provision of Water Services.</i> This is fundamental to the future of sustainable growth.</p> <p><u>Local Authorities:</u></p> <p>Providing for National and Regional Growth Targets</p> <p>Uncertainty in population projections and changing demography</p> <p>Uncertainty in non-domestic demand</p> <p>Investment priorities</p> <p>Funding availability and affordability</p>	<p><u>Local Authorities:</u></p> <p>Understanding Needs and Challenges (of the Irish economy and how Irish Water has a major role in supporting the growth in population and economic development of the State, water demands and sewerage services to achieve sustainable economic growth of the Nation)</p> <p>Coordination of strategies between Irish Water and Local Authorities</p> <p>Actively engage in the debate (taking active role in Planning</p>

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		<p>Clearly communicate the customer benefits of investing into Ireland Inc. (jobs, standard of living etc.)</p> <p>Providing future infrastructure in context of uncertainty in future growth forecasts.</p> <p>Provision of Water Services to ensure balanced regional development.</p> <ol style="list-style-type: none"> 1. Water supply and wastewater treatment and disposal are critical infrastructure requirements for development. The provision of such services should complement and facilitate the sustainable development of the county in line with the Council's adopted Development Plan. The strategic assessment of water services must also be cognisant of water quality status in surface waters designated to serve development centres. 2. The existing (sustainability focused) planning model of linkage between priority water services needs, settlement strategy, economic strategy and public transport, will be continued based on what is known on sustainable economic grounds. For maximum impact this will force planning authorities to be ruthlessly efficient in their decision making. Centralisation of water supply will make this operation of the model more effective. 3. It is important that Irish Water be prepared to front load investment now to facilitate the growth of county towns in terms of population and also the concomitant economic, social and commercial development. 4. The goal of the economic strategy contained in the County Development Plan states "<i>To build on and enhance the competitiveness and attractiveness of County Meath in order to make it one of Ireland's prime locations for indigenous and foreign economic and employment generating investment.</i>" This strategy advocates the development of a number of key strategic, integrated and specialised employment centres which provide different types of functions to each other. 5. It is vital that adequate services are available to facilitate the sustainable economic growth of County Meath. The core principles of the Meath County Development Plan 2013-2019 recognise that the achievement of the Development Plan vision require inputs from other services. Thus the delivery of 	<p>to develop consistent perspective on investment priorities)</p> <p>Critical National Infrastructure (existing and new to be maintained and enhanced to support Growth)</p> <p>Water Services Resource Planning (including Demand Planning to ensure water is available where it is needed)</p> <p>Affordability (looking not only at the capital costs but also operational, carbon, benefits assessment, whole life cost etc., to get best whole life cost solution).</p> <p>Be consistent with NSS</p> <p>Take cognisance of county and local area plans. Consult with the local authority and Local Enterprise Office.</p> <p><i>-Fingal County Development Plan(s) and LAP's including Dublin Airport LAP/Master plan.</i></p> <p>Support National Spatial Strategy:</p> <p>Provide the necessary Water and Waste Water Infrastructure to support economic development in accordance with Regional the National Spatial Strategy.</p> <p>Provide Water Services Infrastructure to meet requirements of National, Regional and Local Development Plans.</p> <p>Support Forward Planning:</p> <p>Support the implementation of the Core Strategy as set out in the County Development Plan having regard to deficiencies in water Services provision in the Settlements identified for growth.</p> <p>Provide the Water Services Infrastructure necessary to support the development of settlements in accordance with the Housing Strategy and other population projections.</p> <p>Support the provision of Water Services Infrastructure to encourage Foreign Direct Investment through liaison with IDA, LA's, FORFAS etc</p> <p>Advance provision of water and waste water infrastructure to designated industrial parks.</p>

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		<p>supporting services for development, particularly water services, will be critical. Meath County Council has sought to direct growth towards centres where capacity is available and will strive to seek the expansion of services necessary to support the development strategy in the Development Plan, in accordance with the sustainable management of water resources. Core strategy compatibility with available services is critical in order to deliver residential commercial and employment lands. However, the provision of services is a major challenge for the plan making process, resulting in the need for pragmatism and certainty regarding the delivery of infrastructure.</p> <p>6. As provided for under 'Putting People First', Meath County Council is currently preparing an Economic Development Strategy for County Meath. This strategy will include an Economic Action Plan, a Spatial Plan and a Marketing Plan. As part of the Spatial Implementation Plan, strategic sites and locations will be identified for economic development. It is pivotal that such sites are serviced or planned to be serviced when identified. Meath County Council respectfully requests that this element be a priority.</p> <p>7. There is an historic mismatch between the locations in which developers are expressing interest and locations which have infrastructural capacity e.g. Dunboyne which is an access rich environment close to the city centre and airport but has limited infrastructural services and Navan, asset rich in water, M3, Future Rail, broadband, power. Irish Water will ultimately become centrally involved in resolving these issues which have to date restricted the economic and social development of Meath.</p> <p>8. The implementation of core strategy legislation has resulted in Development Plans containing a more focused, specific and prioritised development strategy. Meath must be able to guarantee that the now more limited residential, commercial and employment lands identified as part of the core strategy can be delivered with certainty. Until such time as the investment priorities of Irish Water are clear, there could be uncertainty regarding the capacity of local authorities to deliver Development Plan objectives. There is a statutory obligation on planning authorities to take such steps as are necessary to achieve these objectives. However, the provision of water services is now outside of the control of planning authorities and</p>	<p>Support provision of Water Services Infrastructure to SDZs, Strategic Economic Development Sites and other emerging development areas identified.</p> <p>Support provision of water services infrastructure to un-serviced towns and villages to assist in the proper planning and sustainable development of the area and promote better quality of life for all citizens.</p> <p>LA's to engage and consult with Irish Water in preparing County Development Plan and Local Area Plans at early stage to ensure deliverable objectives.</p> <p>Irish Water to consider Regional Planning Guidelines when preparing plans for Water Services infrastructure</p> <ol style="list-style-type: none"> 1. The WSSP should set out a programme for capital investment and remedial works and a clear timeline for the delivery for all projects specified. The programme should support the spatial framework of the National Spatial Strategy and Regional Planning Guidelines. This would assist planning authorities in determining appropriate growth patterns at Development Plan level. 2. The WSSP should set out a framework to guide the fair allocation of water resources between multiple counties which share infrastructure. This should take into account the role of the relevant urban settlements in national and regional spatial planning strategies. 3. More generally, the WSSP should set out a framework for the allocation of capacity in water services between different land uses, ensuring that sufficient reservation is made for strategic employment uses. This framework should be represented in spatial planning documents such as Regional Planning Guidelines which will then be translated to Development Plans and actioned through the development management process. <p>Strategic investment in both water and waste water services in line with the City and Local Development Plans. Expectant changes to the Development Plans resulting from changes to population growth.</p> <p>The I.W. issues paper references the CSO national projections and consequently regional projections as a steer for investment direction. Difference between regional growth projections and local City projections.</p>

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		<p>thus the implications for this statutory obligation are not clear. A lack of confidence and evidence of certainty in the deliverability of core strategy and Development Plan objectives could lead to political pressure being applied for development in less strategic locations where water services are more readily available.</p> <p>9. Occasions may arise where local priorities (e.g. importance of rural economic development) are not shared by a national supplier such as Irish Water. There must be a means of recognising instances such as these, where they are also in accordance with national and regional planning policy.</p> <p>10. The adoption of the Development Contributions Scheme (DCS) inclusive of water and wastewater infrastructure is a reserved function. MCC are therefore historically committed to the delivery of key elements of infrastructure contained therein. MCC would appreciate if this critical matter could be addressed within the context of the strategic plan as same are also contained within the County Development Plan and Local Area Plans.</p> <p>It is acknowledged that there is a requirement for the Water Services Act for Irish Water to be consistent as far as is practicable with national and regional planning policy. The City Council Development Plan strongly reflects National planning policy in particular with regard to the strategic and sustainable development of Galway as a Gateway City. In addition the Regional Planning Guidelines (West) acknowledge the unique role of the city within the region as an economic catalyst and correspondently includes for a wide range of policies to support this role including the policy to</p> <p><i>EDO1: Support the provision of adequate water, wastewater and other infrastructure in all areas but particularly in urban areas to support economic development</i></p> <p>pg. 37:- Regional Planning Guidelines for the West Region 2010-22</p>	<p><u>Support National Spatial Strategy:</u></p> <p>Provide the necessary Water and Waste Water Infrastructure to support economic development in the Gateway Cities identified in the National Spatial Strategy</p> <p><u>Support Forward Planning:</u></p> <p>Provide Water Services Infrastructure to meet requirements of National, Regional and Local Development Plans</p> <p>Support the implementation of the Core Strategy as set out in the County Development Plan having regard to deficiencies in water Services provision in the Settlements identified for growth.</p> <p>Provide the Water Services Infrastructure necessary to support the development of settlements in accordance with the Housing Strategy and other population projections.</p> <p>Support the provision of Water Services Infrastructure to encourage Foreign Direct Investment through liaison with IDA, LA's, FORFAS etc</p> <p>Advance provision of water and waste water infrastructure to IDA industrial parks</p> <p>Support provision of Water Services Infrastructure to SDZs, Strategic Economic Development Sites and other emerging development areas identified.</p> <p>Support provision of water services infrastructure to un-serviced towns and villages to assist in the proper planning and sustainable development of the area and promote better quality of life for all citizens.</p> <p>LA's to engage and consult with Irish Water in preparing County Development Plan and Local Area Plans at early stage to ensure deliverable objectives.</p> <p>Irish Water to consider Regional Planning Guidelines when preparing plans for Water Services infrastructure</p> <p><u>Support Island Communities:</u></p> <p>Provide for the sustainable development of off-shore Islands in line with National Policies.</p>

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			<p>Support LA's in the provision of reliable Water and Wastewater Infrastructure on off-shore Islands to sustain Island Communities and developing /expanding tourist industry.</p> <p>No issues with format and reference to need to have regard to/be consistent with relevant planning policies. It is recognised that its a Strategic Plan so it is not going to contain a whole pile of detail pertaining to Clare but commitments to NSS Gateways and Hubs (Shannon & Ennis in our case) and their successors would be welcome.</p> <p>Ideally Irish Water will take its lead from the Settlement Strategy/Hierarchy in our County Development Plan and future reviews and over time try and deliver services to settlements having regard to spatial distribution and priority.</p>
Invest in our future	<i>Manage our water services assets to ensure the delivery of high quality</i>	<p><u>CER:</u></p> <p>The need to prioritise investment, referenced in the documents provided to us, is in turn linked to IW's balancing of its legal requirements in seeking to achieve the key objectives for the twenty five year period of the plan. CER trusts that the text which pertains the issue of prioritisation of investment set out in the plan in due course will be consistent with other documents which address this issue such as the Capital Investment Plan submitted to the CER and the investment plan published further to section 34 of the Water Services (No.2) Act 2013.</p> <p><u>Environmental Protection Agency (EPA):</u></p> <p>The alignment of regulatory demands is listed as a heading (under the management of waste water chapter) and it makes reference to balancing priorities and investment.</p> <p><u>Regional Planning Authorities:</u></p> <p>What is the long-term approach for the 'Dublin Water Supply Scheme' project which has major implications for other regions, Midlands, Mid-West and West in particular? The Regional Authorities have taken part in consultation with An Bord Pleanála in this regard.</p> <p>Relationship to RSES</p>	<p><u>CER:</u></p> <p>Efficiency and value for money are referred to in one section of the document, the CER considers that these are key matters that should permeate all activities of Irish Water and should be reflected in the plan. Conservation, including demand side measures as appropriate and innovation cut across many areas being addressed should be considered in the plan.</p> <p><u>Environmental Protection Agency (EPA):</u></p> <p>In the scale of a 25 year plan, the Plan should be focus on achieving regulatory compliance and setting out the milestones to achieve this at the earliest time. The Plan must include, for instance, a strategic level timetable for meeting the requirements of waste water discharge licences and for investment in drinking water to achieve a safe and secure supply. While there is a requirement to prioritise resources within the short to medium term, it is necessary to set out the full roadmap to compliance within the context of this long-term plan.</p>

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		<p>Relationship to NREAP and energy efficiency/renewables considerations.</p> <p><i>Facilitating Economic Development:</i> Ensuring competitive advantage Nationally & Regionally. Vital WSSP commits to ensuring that sufficient capacity exists in water and wastewater treatment facilities – to accommodate enterprise development and economic growth.</p> <p><u>Local Authorities:</u></p> <p>Metering</p> <p>Relationship with CER & EPA Funding availability and affordability Efficiency & value for money?</p> <p>Agreement of Strategy for Staffing Levels under SLA Operation.</p> <p>Clearly communicate the customer benefits</p> <p>It should be an explicit objective of the Irish Water Services Strategic Plan that the aims and objectives relating to Water Services in County Development Plans, including the Kerry County Development Plan 2015-2021, will be taken into account when IW is formulating Capital Investment Plans.</p> <p><i>Capital investment Priorities</i></p> <p>It is assumed that all existing water and wastewater schemes in Kerry will require capital investment by 2040, the overall time frame of the WSSP. There are however short to medium time frame requirements for water services capital investment in County Kerry which should be included in IW strategic planning and these are set out in the tables as:-</p> <ul style="list-style-type: none"> a) Kerry County Council Water Supply Scheme Priorities b) Kerry County Council Wastewater Scheme Priorities. 	<p><u>Local Authorities:</u></p> <p>Engagement with customers and stakeholders</p> <p>Balanced Approach to Investment (to meet objectives/ outcomes, including environmental compliance)</p> <p>Partnering with Industries (including opportunities in energy from waste/ sludge, holistic catchment based solutions)</p> <p>Asset Management Capability (to be enhanced with systems and tools to support the business and promote/ embrace innovative solutions)</p> <p>Development of Staffing Strategy in partnership with Local Government Sector</p> <p>Affordability (to ensure that services are provided and that the business remains viable with sufficient funding, using whole life cost approaches and value for money techniques)</p> <p>System Resilience (to meet long term needs whilst maintaining services to customers)</p> <p>Data Collection:</p> <p>Maximise use of best available technology for data collection and automation through SCADA.</p> <p>Install On-line systems for data collection in water sources to be used for abstraction and receiving water for treated waste water discharges.</p> <p>Link all meters for Billing to Water Conservation/Network Management System to address UFW.</p> <p>Balancing Supply and Demand:</p>

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			<p>Encourage consumers to reduce peak demand for water usage with resultant reduced energy costs and maximise treatment plant and network capacity and savings in Capital Investment.</p> <p>Advancing Technology:</p> <p>Provide for well trained staff to adapt and implement “<i>World Class</i>” and “<i>Best in Class</i>” Standards</p> <p>Develop a reliability centred maintenance approach to include reactive, predictive & preventative Maintenance and well as an assets replacement programme.</p>