

Water Supply Project- Eastern and Midlands Region

Update on Final Options Appraisal Consultation

Approximately 400 submissions were received in response to the consultation on the Final Options Appraisal Report and Environmental Impact Statement methodology. Of these in the region of 100* were from members of the public. Submissions were also received from national organisations, community groups, landowners and political representatives.

(*Final numbers are still subject to review and audit).

Purpose of this paper

Irish Water has received a small number of enquiries relating to one submission from a member of the public, Ms Emma Kennedy. We are grateful to her for providing a detailed response to the consultation. Our technical specialists have considered the issues raised in her 'individual' submission carefully and we are responding in detail in our *Response to the December 2016 Submission from Emma Kennedy*.

This paper outlines the key points of our response.

Summary of Irish Water's response to December 2016 Submission from Emma Kennedy (a public or 'individual' submission).

A significant number of questions and challenges were posed in relation to the Project Need Report - in particular the background data sets/ evidence and the estimation in future need.

The Project Need Report was published in March 2015. The **report's methodology** was based on established methods developed by the UK water industry and are considered best practice for 'need' based assessments. The background data sets used to underpin the assessments were from recognised and authoritative sources such as the Census and non-domestic metering data. Following international guidance for this stage of need assessments, no 'field based' assessments, such as drilling bore holes, were undertaken.

The Project Need Report 2015 is the first stage of a lengthy process and it has always been our intention to provide an update before submission of a planning application to ensure that planning approval is sought on the most up to date evidence. **We are now updating the Project Need Report to take account of new information** including updated Census data that becomes available in Q2 2017.

The **estimated 'need' for water** in the future (demand) has been queried. It is important to remember that need is more than just water, it also includes resilience, to make sure we are not significantly dependent on a single source. Currently, approximately 84% of Dublin's water comes from a single source, the River Liffey.

For population figures we stand by the base case prepared by AOS Planning and **advised by Dr Brian Hughes**, a member of the Government's expert group on demographics. The growth figures were validated by preliminary 2016 Census results, (which have already been exceeded – particularly in Dublin). The growth in the need for water from a Strategic Industrial Allowance, included in the estimates, is set at a level to **make sure that Irish Water has the capability to support the Country's Economic growth** and we do not believe that limiting this from the current estimate would fulfil our obligations, and could lead to the water supply restricting economic growth and job creation. Furthermore, in 2016 alone, Irish Water received **5 enquiries**

from major businesses for additional water by 2021 - this represents **over 50% of the forecast organic growth** by 2041. We believe our obligation, current enquiries from major business, and evidenced based forecasts strongly reinforce the validity of our Strategic Industrial Allowance.

The definition and calculation of **peaking factors has followed internationally recognised methodology** and is based on recent measurements, over the last ten years, from the Greater Dublin Water Supply Area.

The calculation of **'headroom' the safety net between supply and demand** is robust for the condition of the network and the level of uncertainty in demand vs supply in the near future. As capital projects take a significant amount of time to deliver **this safety net is essential in protecting the future planning horizon (2050)**, to make sure that there is adequate water for all growth scenarios and that no household, business or emergency service is without water in the future.

Water conservation plays its part in all sustainable water networks; however it is not a golden arrow solution for meeting increased demand. Recent initiatives such as *Find and Fix, domestic metering, and First Fix Free Scheme*, have helped reduce unaccounted for water and customer side leakage. However, all the evidence to date tells us that the recovery and conservation of water will not be sufficient to meet future needs due to demand growth. Data from these new initiatives were limited in 2015 and new, more robust data will be used in the revised 2017 Project Need Report. It is considered **highly unlikely that these water conservation activities would adequately supply enough water** to meet future demand. Furthermore, water conservation does not provide the resilience required for the Greater Dublin Water Supply Area. Currently, approximately 84% of Dublin's water comes from a single source, the River Liffey

Suggestions have been made to increase the water available for use from existing **Water Treatment Plants**. Irish Water is committed to improving the existing infrastructure to make sure it operates effectively and efficiently. Under Irish Water's Capital Investment Plan 2017-2021, projects are being progressed to address all the factors that limit the water available for use at existing plants. However these facilities are **limited by the hydrological yield of their sources, or the environmentally sustainable water available, which is not enough to supply** or maintain a robust water supply in the future.

Alternative sources of water, in particular the **use of groundwater, have been suggested**. A robust options generation and appraisal process was undertaken between 2015 and 2017; this work is detailed in the Project Need Report, the Preliminary Options Appraisal Report and the Final Option Appraisal Report. **Ground water was considered as part of this work**, however was not taken forward from preliminary options appraisal stage in 2015. While we understand that members of the public and our wider stakeholders may prefer other options, Irish Water **has not at this stage received compelling evidence** that would lead to a reopening of alternative proposals.

Finally, Irish Water stands fully behind the internationally recognised methodology, base evidence and findings of the 2015 Project Need Report and the options appraisal process undertaken between 2015 and 2017.

In line with best practice, we are undertaking an update to the Project Need Report which will be available before a planning application is made. We remain committed to listening to members of the public and wider stakeholders to make sure we take on board their thoughts and comments in future stages. At present the consultation analysis is ongoing, and we hope to publish the outcome of the recent consultation that will cover submissions from all members of the public, landowners and all stakeholders later this year.