

Consultee	Comment number	Consultee Comment	Response
National Federation of Group Water Schemes (NFGWS)	1	<p>As part of the review of the consultation documentation, the NFGWS identified a total of 4 regulated Group Water Schemes (GWS) which fall into the assessment area:</p> <ul style="list-style-type: none"> <li>· Farran GWS (Ovens)</li> <li>· Ballyglass GWS (Grenagh)</li> <li>· Walterstown GWS (Cobh)</li> <li>· Clonmult GWS (Dungorney) – this may be slightly outside of the study area.</li> </ul> <p>There are also a number of unregulated supplies which fall into the study area. The list is not exhaustive as there may be other supplies, who are not affiliated members of the NFGWS which fall into the study area. GWS who are members who fall within the study area are as follows:</p> <ul style="list-style-type: none"> <li>· Piercetown GWS (White's cross)</li> <li>· Ballymartle (Riverstick)</li> <li>· Ringabella (Minane bridge)</li> </ul> <p>A copy of Zone of Contribution reports can be made available to UE for the regulated supplies. NFGWS suggests that UE also engage with the rural water section of Cork County Council who will have a full list of GWS's who fall within the study area.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the National Federation of Group Water Schemes. All identified GWS within the study area shall be considered as part of a more detailed route and site selection process that will follow on from identified preferred approaches and projects resulting from this strategy. These resulting projects will consider the routing and siting of new wastewater infrastructure and requirements to ensure the protection of drinking water sources and compliance with source protection requirements.</p>
National Federation of Group Water Schemes (NFGWS)	2	<p>Should any GWS be potentially impacted by any of the proposed works (or works that progress to preferred options), NFGWS is requesting/expecting a full technical risk assessment and risk management process to be undertaken by UE in advance of construction to ensure any potential impacts to GWS source(s) &amp; infrastructure are identified and mitigated against.</p>	<p>It is recommended that, should any emerging projects under the Strategy proceed and pose a potential impact on a Zone of Contribution (ZOC) for Groundwater Schemes, a technical risk assessment must be undertaken at a project level during the route and site selection process in advance of any construction works. This assessment should be conducted prior to the siting or routing of any new wastewater infrastructure within or through these sensitive zones, as per best practice and regulatory guidance.</p>
National Federation of Group Water Schemes (NFGWS)	3	<p>NFGWS also requests that individual GWSs and the NFGWS to be consulted with directly as part of this process.</p>	<p>Should any Group Water Scheme Zone of Contribution (ZOC) be potentially impacted by emerging projects which arise out of the recommended strategy, consultation with the National Federation of Group Water Schemes will be initiated as part of the planning process for those individual projects</p>
Inland Fisheries Ireland (IFI)	4	<p>IFI is of the view that any new Wastewater Strategy must consider the protection of the quality of the aquatic environment by addressing not only water quality but also the protection of the physical environment, hydrological processes and biodiversity.</p>	<p>Uisce Éireann acknowledge and welcome Inland Fisheries Ireland's comments. Uisce Éireann acknowledges its responsibilities under the Water Framework Directive and remains fully committed to the protection of the environment and the enhancement of biodiversity, where practicable. These commitments are embedded within the Strategic Environmental Assessment objectives and will be comprehensively addressed during the options appraisal and SEA process.</p>
Inland Fisheries Ireland (IFI)	5	<p>While IFI is conscious of the ever-increasing demand for water services i.e., domestic and industrial supply and waste water treatment, in the Cork Metropolitan area, IFI consider that proper water management, in line with the overall principles expressed in the WFD for water quantity require that a compensation flow should be maintained at all times which will 'ensure the environmental sustainability of the effected waters'.</p>	<p>It is considered that treated wastewater flows should have a minimal impact on the quantity or volume of riverine compensation flows. Decision making from a strategy approach will be focused on maintaining or improving the current water quality status in line with the Water Framework Directive. Impacts on riverine flows can be reviewed as part of a more detailed analysis that will follow on from identified preferred approaches and emerging projects resulting from this strategy.</p>
Inland Fisheries Ireland (IFI)	6	<p>In determining the likely significant effects of any plans or programmes, regard should be given to the need for the sustainable development of the inland and marine fisheries resource including the conservation of fish and other species of fauna and flora, aquatic habitats and the biodiversity of inland and marine water ecosystems.</p>	<p>The protection of freshwater and marine fisheries has been incorporated into the Strategic Environmental Assessment Environmental Report, including within the baseline environmental description. Relevant SEA objectives will guide the options appraisal and contribute to the overall assessment of the strategy, ensuring that fisheries and aquatic ecosystems are appropriately considered throughout the planning process.</p>

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Inland Fisheries Ireland (IFI)	7	The primary aim of the strategy should be to ensure compliance with national and European legislative requirements including the above-mentioned Water Framework Directive and Surface Water Regulations; the Water Pollution Acts, The Fisheries (Consolidation) Acts, and the Urban Wastewater Treatment Directive.	<p>Full compliance with national and European legislative requirements have been considered in the development of the draft strategy, including but not limited to:</p> <p>The Water Framework Directive (WFD) The Surface Water Regulations The Water Pollution Acts The Fisheries (Consolidation) Acts The Urban Wastewater Treatment Directive</p> <p>These legal frameworks are essential for safeguarding water quality, protecting aquatic ecosystems, and ensuring sustainable water and wastewater management practices.</p>
Inland Fisheries Ireland (IFI)	8	To achieve this goal (comment number 7), it is essential that the assimilative capacity of any receiving water is not exceeded. In scenarios where current loadings (regardless of source) are not compatible with meeting legislative requirements IFI find it impossible to see how increased population equivalent loadings resulting from extended wastewater networks can occur. Simply in such cases a cap at current loading levels must occur until such time as long-term data illustrates increased assimilative capacity has occurred or being freed up as a result of overall improved water quality in a catchment.	Uisce Éireann acknowledge that there are multiple pressures impacting our water bodies, including urban wastewater. We have made steady progress in reducing the impact of urban wastewater on receiving water bodies. The number of water bodies where urban wastewater is a significant pressure has reduced from 291 in the second cycle River Basin Management Plan, to 197 in the third cycle Plan. We are committed to making further significant reductions over the period of the third cycle Plan. However, in order to achieve the WFD environmental objectives for Ireland in the most cost-effective way possible, we believe that a collaborative effort is the best way to achieve this outcome as the causes and the solutions to protecting and restoring our water catchments are not within the gift of any one sector. We are committed to playing our part under the WFD and we will work with others to progressively deliver on WFD objectives.
Inland Fisheries Ireland (IFI)	9	In terms of calculating the assimilative capacity of any waterbody it is imperative that the most recent available water quality data is employed as opposed to the use of notional background levels. The current use of a 'notionally clean river approach' is neither sustainable nor appropriate.	<p>Uisce Éireann acknowledge that there are multiple pressures impacting our water bodies, including urban wastewater. We have made steady progress in reducing the impact of urban wastewater on receiving water bodies. Full compliance with national and European legislative requirements have been considered in the development of the draft strategy. Given the current baseline conditions of many water bodies—some of which exhibit poor water quality even before reaching wastewater treatment plant outfalls—it is not possible to dismiss the relevance of the “notionally clean approach.”</p> <p>This approach remains a valid and necessary consideration in catchments where existing pollution pressures compromise water quality upstream of discharge points. In recognition of this, water quality modelling is being implemented to guide the strategy, ensuring that appropriate discharge locations and volumes are identified in a way that supports compliance with environmental objectives and protection of receiving waters.</p>
Inland Fisheries Ireland (IFI)	10	Central to assimilative capacity assessment is the usage of accurate receiving water flow data. Changes in riverine flow patterns have been evident for some time being typified by more frequent rapid short interval high volume events followed by sustained lower flow periods. While the cause of this change may be multi-factorial and open to debate the impact is undeniably increase vulnerability of aquatic species due to extended periods of reduced flows. The calculation of assimilative capacity using historic long term flow data is no longer a justifiable approach. To maintain and improve water quality current realities must be reflected and the duration of various flow ranges considered for a given system.	<p>Water quality modelling has been implemented to guide the strategy in identifying appropriate discharge locations and volumes to water bodies. This modelling ensures that discharges are environmentally sustainable and aligned with legislative requirements.</p> <p>In addition, we have reviewed climate change parameters to adapt the model to the longer-term planning horizons outlined in the strategy. This will help ensure that the strategy remains resilient and responsive to future hydrological and environmental conditions, supporting the long-term protection of water quality and ecosystem health.</p>

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Inland Fisheries Ireland (IFI)	11	While the nutrient value of sewage sludges is recognised, its disposal to agriculture lands should only be carried out in accordance with an up-to-date Nutrient Management Plan based on current soil testing and analysis. As the primary producer of sewage sludge, the onus is on Uisce Éireann (UE) to ensure disposal methodology meets all required standards.	<p>Sludge generated from wastewater treatment plants will be managed and disposed of in accordance with Uisce Éireann's National Wastewater Sludge Management Plan and the Water Services Strategic Plan 2050.</p> <p>A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources.</p> <p>We have aligned the Cork Wastewater Strategy with these overarching national frameworks, supporting a coordinated, sustainable, and compliant approach to sludge treatment, reuse, and disposal.</p>
Inland Fisheries Ireland (IFI)	12	The strategy should aim to ensure that all proposed and existing infrastructure is designed, installed or upgraded to the highest possible standard. More specifically, the use of combined foul and storm water sewers, which results in the discharge of untreated sewage directly to waters, should be discontinued. Pumping stations should be designed in a manner where an overflow to waters cannot occur. Back-up power supplies and emergency alarms should be fitted at each such structure to avoid scenarios where overflows would be required. Similarly foul sewers should be fitted with blockage alarms at regular intervals.	<p>Combined foul and stormwater sewers remain a feature of many existing sewer networks. It is not economically viable to completely remove stormwater from these combined systems therefore stormwater overflows (SWOs) will continue to be required on existing combined networks.</p> <p>However, in this strategy, we have endeavoured to reduce spills to watercourses in line with Uisce Éireann policy. In this context, the UK's Storm Overflows Discharge Reduction Plan 1 and the accompanying Evidence Project 2 have provided valuable guidance. These documents set out stringent targets for reducing discharges, prioritising nature-based solutions, and improving infrastructure to meet environmental and public health standards.</p> <p>The Water Services Strategic Plan (WSSP) 2050 also outlines the use of remote asset management and predictive systems supported by real-time monitoring to improve operational control and reduce the occurrence of overflows.</p> <p>Key elements of our approach in developing this Strategy include:</p> <ul style="list-style-type: none"> <li>- Identifying optimal wastewater treatment plant outfall locations and treatment strategies as a core priority.</li> <li>- Recommending that design of wastewater networks comply with the recast Urban Wastewater Treatment Directive and other relevant standards.</li> <li>- Recommending that all new sewer networks are fully separated.</li> <li>- Referring to the Controlled Discharge Strategy policy to guide the management of SWOs on existing combined sewer networks</li> <li>- Ensuring that all new wastewater pumping stations are designed with emergency storage capacity.</li> <li>- Enhancing monitoring capabilities across the network to improve visibility of system performance and enable real-time alerts when overflows occur.</li> </ul> <p>This integrated approach ensures that the strategy is resilient, future-proofed, and aligned with both national policy and international best practice.</p>

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Inland Fisheries Ireland (IFI)	13	The undertaking of infrastructural works has the potential to result in significant negative impact on fisheries be it from the construction of riverbank outfalls, installation of network sewers beneath watercourses or other related activities. IFI would ask that there be no interference with, bridging, draining, or culverting of any watercourse its banks or bankside vegetation without the prior approval of IFI and that full cognisance is given to IFI “Guidelines on protection of fisheries during construction works in and adjacent to waters - <a href="https://www.fisheriesireland.ie/media/guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters">https://www.fisheriesireland.ie/media/guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters</a> ”	Uisce Éireann will review and consider appropriate mitigation measures for any works that may directly or indirectly impact watercourses. The strategy will remain cognisant of these potential impacts throughout the optioneering process.  However, it is important to note that the level of detail at this stage will remain strategic. Detailed consultation and environmental assessment will typically be undertaken at later project-specific stages, once individual schemes are identified and progressed through planning and design. Full cognisance will be given to the IFI’s “Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters” (IFI, 2006), at project stage, which outline best practices for safeguarding aquatic habitats during construction activities
Environmental Protection Agency (EPA)	14	The relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region should be aligned with the Strategy and considered, as appropriate.	Uisce Éireann acknowledge and welcome comments from the Environmental Protection Agency. This Strategy has been aligned with the relevant objectives and policy commitments of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Southern Region.
Environmental Protection Agency (EPA)	15	To ensure that the Strategy aligns with national commitments on climate change mitigation and adaptation, as well as any relevant sectoral, regional and local adaptation plans.	The Strategy will align with national commitments on climate change mitigation and adaptation, it will also take into account any relevant sectoral, regional, and local climate adaptation plans. These considerations will be integrated into the Strategy, ensuring a coherent and future-resilient approach to infrastructure planning and environmental protection.
Environmental Protection Agency (EPA)	16	EPA welcomed the schematic included in the scoping report outlining the relationships between the Strategy, SEA and appropriate assessment processes and recommends that this schematic to be included in the Strategy and environmental report also to show how these relationships have contributed to the development of the Strategy. (schematic, Figure2.1)	The schematic diagram included in the Scoping Report, which outlines the relationships between the Strategy, the Strategic Environmental Assessment, and the Appropriate Assessment processes will also be included in both the final Strategy and the Environmental Report to clearly demonstrate how these interrelated processes have informed and contributed to the development of the Strategy.
Environmental Protection Agency (EPA)	17	All recommendations from the SEA and Appropriate Assessment processes, including mitigation measures, should be reflected in the Strategy. EPA recommends that the Strategy includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to Strategy objectives/measures, proposed mitigation measures and monitoring programme.	We will include text in the Strategy Report to clearly outline how the Strategic Environmental Assessment has influenced the development of the Strategy. This text will demonstrate the integration of environmental considerations into decision-making and show how SEA findings have shaped the selection of strategic options and mitigation measures.
Environmental Protection Agency (EPA)	18	As the SEA environmental report will set out the proposed approach to mitigation and monitoring, in addition, the Strategy should include a commitment to implement the environmental monitoring programme and associated reporting. EPA suggests including a separate section on ‘Monitoring, Review and Reporting’ in the Strategy, setting out the provisions for monitoring and reporting on the implementation of the Strategy and periodic reviews. There may be merits in aligning the periodic reviews of the Strategy with existing cyclical reporting e.g. Ireland’s Environment, National Planning Framework, Water Framework Directive, Marine Strategy Framework Directive, etc.	A dedicated chapter in the Strategy will outline the Implementation & Monitoring Plan, detailing how the strategy will be executed, tracked, and refined over time
Environmental Protection Agency (EPA)	19	In between review periods for the Strategy, EPA recommends that Strategy - related implementation reports are published annually, or biennially, as appropriate and also, aligning Strategy implementation monitoring and reporting with the environmental monitoring required under the SEA legislation. This will enable the environmental performance of the Strategy to be evaluated and would also provide for increased transparency during implementation.	Uisce Éireann will recommend the publication of Strategy-related implementation reports, with timelines to be agreed, as part of the monitoring framework. These will be aligned with the environmental monitoring requirements under Strategic Environmental Assessment legislation. This alignment will enable evaluation of the environmental performance of the Strategy, ensure coherence between strategic and environmental monitoring processes and support transparency.



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Environmental Protection Agency (EPA)	20	The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any environmental issues that may arise. The Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring. To avoid duplication in data collection, the same indicators should be used for the plan-related and SEA-related monitoring where possible.	An environmental monitoring plan will be included in the Strategic Environmental Assessment.
Environmental Protection Agency (EPA)	21	Under SEA Regulations, consultations should be held with: <ul style="list-style-type: none"> <li>Environmental Protection Agency;</li> <li>Minister for Housing, Local Government and Heritage;</li> <li>Minister for Environment, Climate and Communications;</li> <li>Minister for Agriculture, Food and the Marine.</li> </ul>	Uisce Éireann will confirm in a timely manner consultation dates with the environmental authorities for the purposes of Strategic Environmental Assessment.
Environmental Protection Agency (EPA)	22	<i>Integration of SEA into the Strategy</i> The integration of the findings and mitigation measures from the SEA process into the Strategy should reflect the overall objective of the SEA Directive “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes”	We will include text in the Strategy Report to clearly outline how the Strategic Environmental Assessment has influenced the development of the Strategy. This text will demonstrate the integration of environmental considerations into decision-making and show how SEA findings have shaped the selection of strategic options and mitigation measures.
Environmental Protection Agency (EPA)	23	<i>Integration of SEA into the Strategy</i> It is key that the SEA acknowledges the complex and cross cutting nature of climate and biodiversity related issues and includes targets and measures, where relevant and appropriate, that can tackle Ireland’s climate crisis and our biodiversity emergency as part of an integrated approach to tackling environmental problems.	We will ensure adequate consideration is given in the Strategic Environmental Assessment and recognition of the complex and interrelated nature of climate change and biodiversity issues.
Environmental Protection Agency (EPA)	24	<i>Integration of SEA into the Strategy</i> All recommendations from the SEA and AA processes, including mitigation measures and monitoring proposals, should be integrated directly into the Strategy. EPA recommends that the Strategy includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and Strategy policies/measures (same with Integration of SEA and Strategy, comment number 23)	We will include text in the Strategy Report to clearly outline how the Strategic Environmental Assessment has influenced the development of the Strategy. This text will demonstrate the integration of environmental considerations into decision-making and show how SEA findings have shaped the selection of strategic options and mitigation measures.
Environmental Protection Agency (EPA)	25	<i>Integration of SEA into the Strategy</i> Fully integrating the findings and recommendations of the SEA into the Strategy will be key to strengthening its overall positive commitments while ensuring that any potential significant adverse effects of implementing the Strategy are mitigated.	We will include text in the Strategy Report to clearly outline how the Strategic Environmental Assessment has influenced the development of the Strategy. This text will demonstrate the integration of environmental considerations into decision-making and show how SEA findings have shaped the selection of strategic options and mitigation measures.
Environmental Protection Agency (EPA)	26	<i>Integration of SEA into the Strategy</i> The SEA Environmental Report and the Strategy should include a chapter outlining how the recommendations and mitigation measures from the SEA have been incorporated into the Strategy. EPA recommends that the SEA Environmental Report includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Strategy objectives/measures (same with Integration of SEA and Strategy, comment number 23)	We will include text in the Strategy Report to clearly outline how the Strategic Environmental Assessment has influenced the development of the Strategy. This text will demonstrate the integration of environmental considerations into decision-making and show how SEA findings have shaped the selection of strategic options and mitigation measures.

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Environmental Protection Agency (EPA)	27	<p><i>Governance and implementation</i></p> <p>The Strategy should clearly set out the implementation arrangements and governance structures, including lines of responsibility for implementation and delivery as well as provisions for interim review and progress reporting. Implications of the Strategy in the context of existing Local Authority plans/programmes should also be clarified (e.g. will these be required to be reviewed and updated?).</p>	<p>Uisce Éireann will recommend the publication of Strategy-related implementation reports, with timelines to be agreed, as part of the monitoring framework. These will be aligned with the environmental monitoring requirements under Strategic Environmental Assessment legislation. This alignment will enable evaluation of the environmental performance of the Strategy, ensure coherence between strategic and environmental monitoring processes and support transparency.</p>
Environmental Protection Agency (EPA)	28	<p><i>Wastewater considerations</i></p> <p>EPA's Water Quality in 2022 – An Indicators Report (EPA, 2023) highlights that one of the key causes of water pollution is from point sources including discharges from wastewater treatment plants. The need to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and proposed developments is critical.</p>	<p>Strategic Aim 7 as outlined in Uisce Éireann's Water Services Strategic Plan 2050 is "Protecting our Water Environment." This aim is supported by a range of actions, including:</p> <ul style="list-style-type: none"> <li>- Collaborating with regulators and stakeholders to develop a comprehensive Wastewater Strategy Framework;</li> <li>- Developing and implementing Integrated Urban Wastewater Management Plans to ensure sustainable and resilient urban water systems;</li> <li>- Managing water service assets and operations to minimise risks and reduce impacts on water bodies, thereby supporting the achievement of water quality objectives.</li> </ul> <p>This aim will be highlighted in the Strategy to reinforce its importance.</p>
Environmental Protection Agency (EPA)	29	<p><i>Wastewater considerations</i></p> <p>While Uisce Éireann indicates that it will work with stakeholders to plan forward for capacity, it should specifically include a commitment that this planning is done within the constraints of the local receiving environment and in compliance with existing legislative requirements, including those under the WFD to prevent deterioration of water body status.</p>	<p>Strategic Aim 7 as outlined in Uisce Éireann's Water Services Strategic Plan 2050 is "Protecting our Water Environment." This aim is supported by a range of actions, including:</p> <ul style="list-style-type: none"> <li>- Collaborating with regulators and stakeholders to develop a comprehensive Wastewater Strategy Framework;</li> <li>- Developing and implementing Integrated Urban Wastewater Management Plans to ensure sustainable and resilient urban water systems;</li> <li>- Managing water service assets and operations to minimise risks and reduce impacts on water bodies, thereby supporting the achievement of water quality objectives.</li> </ul> <p>This aim will be highlighted in the Strategy to reinforce its importance.</p>
Environmental Protection Agency (EPA)	30	<p><i>Wastewater considerations</i></p> <p>Uisce Éireann's "wastewater treatment capacity registers" give an indication of whether there is adequate wastewater treatment capacity in an area to cater for a proposed development with or without capital upgrades to infrastructure. We recommend that Uisce Éireann continue to promote that, when considering applications for planning permission, local authorities should perform additional assessments of the capacity of wastewater infrastructure to cater for the additional loads that will be generated by the development under consideration. This could be highlighted as a recommendation in the Plan.</p>	<p>Uisce Éireann continues to have ongoing engagement with Local Authorities in relation to wastewater and water connections when considering planning applications. This will be reinforced in the Strategy to highlight its importance.</p>

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Environmental Protection Agency (EPA)	31	<p><i>Other recommendations that could be made in the Strategy</i></p> <p>A commitment to work with local authorities to ensure there is, or will be, sufficient sewage treatment facilities in place and that any connection to a treatment plant will not cause or contribute to non-compliance with existing legislative requirements.</p>	<p>Strategic Aim 7 as outlined in Uisce Éireann's Water Services Strategic Plan 2050 is "Protecting our Water Environment." This aim is supported by a range of actions, including:</p> <ul style="list-style-type: none"> <li>- Collaborating with regulators and stakeholders to develop a comprehensive Wastewater Strategy Framework;</li> <li>- Developing and implementing Integrated Urban Wastewater Management Plans to ensure sustainable and resilient urban water systems;</li> <li>- Managing water service assets and operations to minimise risks and reduce impacts on water bodies, thereby supporting the achievement of water quality objectives.</li> </ul> <p>This aim will be highlighted in the Strategy to reinforce its importance. Uisce Éireann continues to have ongoing engagement with Local Authorities in relation to wastewater and water connections when considering planning applications and this will be reinforced in the Strategy to highlight its importance.</p>
Environmental Protection Agency (EPA)	32	<p><i>Other recommendations that could be made in the Strategy</i></p> <p>Uisce Éireann should work with local authorities to remind them to always check the designation of the receiving water and its status on the EPA WFD Application</p>	<p>Uisce Éireann note the EPA's comments. Planning authorities in Ireland play a critical role in supporting the objectives of the EU Water Framework Directive, particularly in relation to maintaining and improving the ecological status of water bodies.</p>
Environmental Protection Agency (EPA)	33	<p><i>Other recommendations that could be made in the Strategy</i></p> <p>Local authorities, supported by Uisce Éireann, should establish the assimilative capacity of the receiving water, establish whether an additional effluent load from a proposed development can be catered for without deteriorating the Water Framework Directive status of the river and prevent it meeting its environmental objectives and ensure compliance with the obligations as set out in S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009 (as amended). In this regard, key enforcement information is available on the EPA website – see LEAP Online   Environmental Protection Agency (epa.ie). Particular regard should be had to the Annual Environmental Reports (AER) for specific plants, which provide an overview of compliance with EPA licence requirements. The "Operational Performance Summary" section in the AER contains information on the peak and the most recent hydraulic capacity of the plant. Any non-compliances recorded in the AERs should be factored into the decision-making process as should the hydraulic capacity of the plant.</p>	<p>Water quality modelling has been implemented to guide the strategy in identifying appropriate discharge locations and volumes to water bodies. This modelling ensures that discharges are environmentally sustainable and aligned with legislative requirements. In addition, we have reviewed the historical AER reports for each of the identified wastewater treatment plants with the defined strategy area to record non-compliances and hydraulic capacity.</p> <p>In addition, we have reviewed climate change parameters to adapt the model to the longer-term planning horizons outlined in the strategy. This will help ensure that the strategy remains resilient and responsive to future hydrological and environmental conditions, supporting the long-term protection of water quality and ecosystem health.</p>
Environmental Protection Agency (EPA)	34	<p><i>Other recommendations that could be made in the Strategy</i></p> <p>Agglomerations with no treatment or poorly performing (or at capacity) treatment plants are highlighted in the Urban Waste Water Treatment in 2022 (EPA, 2023). A commitment to support the provision of appropriate measures to address these issues as a priority, in collaboration with Uisce Éireann should be considered where relevant.</p>	<p>The strategy will include targeted recommendations for improvement measures in agglomerations within the study area that have been identified as having poorly performing wastewater infrastructure, as highlighted in the Urban Waste Water Treatment Report. It is also noted that there are no remaining untreated agglomerations within the study area.</p>
Environmental Protection Agency (EPA)	35	<p><i>Other recommendations that could be made in the Strategy</i></p> <p>Measures to ensure that combined storm water overflows, sewers and trade effluent in the area covered by the Plan is also managed properly should also be included as appropriate.</p>	<p>There has been positive progress in addressing wastewater network issues specific to Cork City, an area recognised for its high-profile and complex infrastructure challenges. While full resolution will require time and sustained effort, significant steps have already been taken, particularly through the development of strong partnerships. In developing the Cork Wastewater Strategy, we have endeavoured to build on this momentum and to reduce spills to watercourses in line with Uisce Éireann policy.</p> <p>The Water Services Strategic Plan (WSSP) 2050 also outlines the use of remote asset management and predictive systems supported by real-time monitoring to improve operational control and reduce the occurrence of overflows.</p> <p>The Network Modelling Report is included as an Appendix to the Strategy and an overview included in Chapter 8 of the strategy provides more context on this.</p>

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Environmental Protection Agency (EPA)	36	<i>Other recommendations that could be made in the Strategy</i> Should be also consulted the 2021 Code of Practice for Domestic Waste Water Treatment Systems, (EPA, 2021) and the National Inspection Plan for Domestic Wastewater Treatment Systems 2022-2026 (EPA, 2021), as appropriate.	Domestic Wastewater Treatment Systems currently fall outside the statutory responsibilities of Uisce Éireann. UÉ will consider this suggestion and include recommendations where appropriate at strategy level.
Environmental Protection Agency (EPA)	37	<i>Comments on the approach to the Strategic Environmental Assessment (SEA) of the CWS</i> The methodology proposed seems appropriate to the level at which the Strategy is being developed. While the SEA describes that the construction and operation stages of wastewater and associated infrastructure are covered, we also suggest that maintenance aspects are also considered. The need for ongoing maintenance and monitoring of associated infrastructure is required over the lifetime of the Strategy.	The ongoing maintenance and monitoring of wastewater infrastructure is an integral part of the Asset Management Life Cycle process. This ensures that infrastructure performance is sustained over time and that risks are proactively managed. In addition, monitoring requirements are mandated under the Wastewater Discharge Authorisation process, ensuring compliance with environmental standards and supporting continuous improvement in wastewater management practices.
Environmental Protection Agency (EPA)	38	<i>Comments on the approach to the Strategic Environmental Assessment (SEA) of the CWS</i> Where specific measures will be implemented directly, further detail should be provided in the Environmental Report and Strategy on the relevant environmental assessments to be carried out at the project stage and relevant mitigation measures to be applied, as appropriate.	At a project level, environmental assessments will be undertaken in accordance with relevant legislation and best practice. Where appropriate, mitigation measures will be identified and applied to avoid, reduce, or offset potential environmental impacts. This ensures that individual projects contribute to the overall environmental objectives of the strategy and comply with regulatory requirements.
Environmental Protection Agency (EPA)	39	In relation to comment number 38: There may be merit in exploring this issue further with the relevant SEA Environmental Authorities during the Strategy preparation and SEA processes.	At a project level, environmental assessments will be undertaken in accordance with relevant legislation and best practice. Where appropriate, mitigation measures will be identified and applied to avoid, reduce, or offset potential environmental impacts. This ensures that individual projects contribute to the overall environmental objectives of the strategy and comply with regulatory requirements. UÉ will consider this suggesting and include recommendations where appropriate at strategy level.
Environmental Protection Agency (EPA)	40	<i>Comments on key considerations for the environmental assessment of the CWS and the proposed scope of the assessment summarised in Section 3.20 (Section 3 sets out the current baseline environment conditions and future trends)</i> If it was possible to put this baseline in the context of the Strategy, it will help understand how any potential for likely significant effects associated with the Strategy can be taken into account. This could include where specific mitigation measures are needed, or where further monitoring is required.	Uisce Éireann acknowledge that placing the environmental baseline in the context of the Strategy is essential for understanding the potential for likely significant effects that may arise from its implementation.
Environmental Protection Agency (EPA)	41	<i>Comments on key considerations for the environmental assessment of the CWS and the proposed scope of the assessment summarised in Section 3.20 (Section 3 sets out the current baseline environment conditions and future trends)</i> In terms of land use, The EPA-Tailte Éireann national land cover map could be referenced here also for further detailed habitats and land use information.	The National Land Cover 2018 dataset has been referenced in the Land Use (Natural Assets) section of the baseline information to provide a consistent national overview of land cover types.  At a project level, the National Land Cover dataset will be used to inform more detailed habitat and land use assessments. These assessments will be supplemented by site-specific surveys and mapping, ensuring that local environmental characteristics are accurately captured. This approach supports the identification of potential environmental impacts and the development of appropriate mitigation measures tailored to the specific conditions of each site.
Environmental Protection Agency (EPA)	42	<i>Data &amp; Knowledge Gaps</i> The SEA environmental report should identify any significant data and knowledge gaps and include commitments to help address these on a priority basis during the implementation phase of the Strategy. This is with a view to strengthening the evidence base for future reviews and iterations of the Strategy.	The SEA environmental report will identify any data and knowledge gaps and include commitments to help address these on a priority basis during the implementation phase of the Strategy.



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Environmental Protection Agency (EPA)	43	<i>State of the Environment Report</i> The EPA will be publishing the next iteration of our State of the Environment Report later in 2024. Once published, this report should be considered and integrated as appropriate, in implementing the plan or programme over its lifetime.	The new updated EPA State of the Environment Report 2024 will be considered and referenced as appropriate in the Strategy.
Environmental Protection Agency (EPA)	44	<i>Any further plans, policies and programmes not identified in Section 4 or in Appendix B that should be considered</i> We welcome the inclusion of Figure 2.1 showing the hierarchy and interaction of plans and projects. One additional plan to consider could be Failte Ireland's draft Cork City – Harbour- East Cork Destination Experience Development Plan, which is currently being prepared and undergoing SEA.	Uisce Éireann acknowledge the omission in error. Failte Ireland's draft Cork City – Harbour- East Cork Destination Experience Development Plan, which is currently being prepared and undergoing SEA will be added to Figure 2.1 showing the hierarchy and interaction of plans and projects.
Environmental Protection Agency (EPA)	45	<i>Any further plans, policies and programmes not identified in Section 4 or in Appendix B that should be considered</i> Additionally, the references in the scoping report to the proposed Nature Restoration Law can be updated, following its recent adoption.	References in the Scoping Report to the proposed Nature Restoration Law will be updated to reflect its formal adoption in 2024.
Environmental Protection Agency (EPA)	46	<i>Comments on the SEA approach to considering plan alternatives at this stage and provide specific recommendations for changes if possible</i> EPA acknowledges the approach to identifying and assessing alternatives as described in the scoping report. The EPA guidance document Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA) (EPA, 2015) should be referred to and considered in preparing the SEA Environmental report.	Uisce Éireann will refer to and consider the EPA guidance document Developing and Assessing Alternatives in Strategic Environmental Assessment (EPA, 2015) in preparing the SEA Environmental report and identifying and assessing alternatives.
Environmental Protection Agency (EPA)	47	<i>Additional or specific plans or programmes that should be considered within the cumulative impact assessment</i> The public consultation is due to commence shortly on the National Planning Framework and associated SEA ER. This should be reviewed to ensure the Strategy aligns with the NPF in preparing and in implementing the Strategy.	The updated National Planning Framework will be considered and integrated as appropriate in the strategy.
Environmental Protection Agency (EPA)	48	Communication between the UE and the EPA All communication with EPA in relation to the SEA should be sent electronically to sea@epa.ie	Acknowledged. Uisce Éireann will continue to engage with the EPA as an environmental authorities for the purposes of Strategic Environmental Assessment.
Environmental Protection Agency (EPA)	49	<i>Available Guidance &amp; Resources</i> EPA's website contains various SEA resources and guidance, including: - SEA process guidance and checklists - Inventory of spatial datasets relevant to SEA Topic specific SEA guidance (including Good practice note on Cumulative Effects Assessment (EPA, 2020), Guidance on SEA Statements and Monitoring (EPA, 2020), Developing and Assessing Alternatives in SEA (EPA, 2015)). These and other resources are available at: <a href="https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-topic-and-sector-specific-guidance/">https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-topic-and-sector-specific-guidance-/</a>	Acknowledged. Uisce Éireann appreciate the resources and guidelines made available by the EPA and will continue to utilise such resources as the strategy is developed where appropriate. At a project level, these resources will be used to inform more detailed habitat and land use assessments. These assessments will be supplemented by site-specific surveys and mapping, ensuring that local environmental characteristics are accurately captured. This approach supports the identification of potential environmental impacts and the development of appropriate mitigation measures tailored to the specific conditions of each site.

Consultee	Comment number	Consultee Comment	Response
Environmental Protection Agency (EPA)	50	<i>EPA WFD Application</i> EPA's WFD Application provides a single point of access to water quality and catchment data from the national WFD monitoring programme. The application is publicly available data can be accessed via the Catchments.ie website.	Acknowledged. Uisce Éireann appreciate the resources and guidelines made available by the EPA and will continue to utilise such resources as the strategy is developed where appropriate.
Environmental Protection Agency (EPA)	51	<i>EPA SEA WebGIS Tool</i> Our SEA WebGIS Tool has been updated recently and is now publicly available at <a href="https://gis.epa.ie/EPAMaps/SEA">https://gis.epa.ie/EPAMaps/SEA</a> . It allows public authorities to produce an indicative report on key aspects of the environment in a specific geographic area. It is intended to assist public authorities in SEA screening and scoping exercises.	Acknowledged. Uisce Éireann appreciate the resources and guidelines made available by the EPA and will continue to utilise such resources as the strategy is developed.
Environmental Protection Agency (EPA)	52	<i>EPA Appropriate Assessment (AA) GeoTool</i> EPA's AA GeoTool application has been developed in partnership with the NPWS. It allows users to select a location, specify a search area and gather available information for each European Site within the area. It is available at: <a href="http://www.epa.ie/terminalfour/AppropAssess/index.jsp">http://www.epa.ie/terminalfour/AppropAssess/index.jsp</a>	Acknowledged. Uisce Éireann appreciate the resources and guidelines made available by the EPA. The EPA's AA GeoTool application has been used as part of the desk-based assessment. Uisce Éireann appreciate the resources and guidelines made available by the EPA and will continue to utilise such resources as the strategy is developed.
Department of Agriculture, Food and the Marine	53	<i>With regards to managing wastewater services throughout the asset lifecycle to achieve regulatory requirements. The role of biorefinery within the context of upgrading wastewater treatment plants should be considered in line with EU and national circular economy and bioeconomy policy developments.</i>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of Agriculture, Food and the Marine. The biorefinery example referenced represents an integrated approach to managing wastewater, domestic waste, and trade waste. It includes hydrolisation of the waste streams, capture of the methane gas produced and use as an energy source. From a wastewater treatment perspective, this can include advanced digestion plants (e.g. larger WwTPs (&gt;90,000 PE approx)). Uisce Éireann is actively advancing this area through its planned programme of works focused on Bioresource Centres and Biogas Optimisation Programme which aims to identify new bioresources centre opportunities and optimise existing ones and alignment of these initiatives with sustainability goals, climate action, and the national net zero emissions target.</p> <p>A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.</p>
Department of Agriculture, Food and the Marine	54	<i>With regards to Sustainable Services Fit for the Future and adopting circular approaches, bioeconomy alongside circular economy approaches should be considered with regards to implementing the National Wastewater Sludge Management Plan. This would be in line with the participation of Uisce Eireann in the Irish Bioeconomy Forum. In particular, biorefinery should be part of the consideration of advanced technologies and processes to extract even more value from sludge, potentially creating new biobased products or energy sources. There is a need to outline not only the continuation to incorporate anaerobic digestion into the sludge treatment process and use the biogas produced for energy recovery but also to examine the development of biorefinery. Examples of such developments are now emerging in EU MS such as Denmark - Billund Biorefinery (BBR) – turning urban wastes into sustainable profitable resource streams (stateofgreen.com). The development of a circular economy design standard is a very useful and important development and should take account of emerging developments in relation biorefinery.</i>	A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.

Consultee	Comment number	Consultee Comment	Response
Department of Agriculture, Food and the Marine	55	<i>In relation to comment number 54:</i> <i>The indication in the Bioeconomy Action Plan 2023-2025 of the need to develop bioeconomy demonstration initiatives and to develop initiatives involving urban biowaste including sewage sludge from waste water should be referenced.</i>	A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.
Department of Agriculture, Food and the Marine	56	Additionally gaining value from innovation is an important, there is a lot of emerging knowledge on biorefinery and waste water treatment that should be considered with the Draft Cork Wastewater Strategy Consultation and actions should be identified to move from this knowledge base to piloting/scaling and maturing the uptake of this biorefinery/advanced technological development on a phased basis.	A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.
Cork Chamber	57	<i>Recommendation 1: Alignment of wastewater infrastructure with delivery plans</i> The development of residential sites often faces delays and challenges due to the lack of synchronised delivery of essential infrastructure including wastewater services. To facilitate seamless development, there must be enhanced coordination and alignment among local councils, state and semi-state bodies and developers.	Uisce Éireann acknowledge and welcome comments made by Cork Chamber. Uisce Éireann will continue to actively engage with local authorities, state and semi-state bodies, and developers to ensure that the planning and delivery of wastewater infrastructure is aligned with broader development and service delivery plans.
Cork Chamber	58	<i>Recommendation 2: Network capacity</i> The current wastewater network in Cork operates at 58% capacity, but with projected population growth, it is crucial to identify and address potential pinch points that could hinder efficient service delivery. It is vital that the draft strategy provides a detailed analysis of the network capacity.	<p>A key priority of the Strategy is the identification of optimum wastewater treatment plant outfall locations, ensuring that discharges are environmentally sustainable and compliant with regulatory requirements.</p> <p>The design of wastewater networks will be guided by compliance with the Urban Waste Water Treatment Directive and other relevant national and EU standards. Appropriate sizing of infrastructure to accommodate both current and projected future loadings, supporting long-term serviceability and resilience.</p> <p>It is important to note that the Strategy does not provide a detailed analysis of network capacity. Instead, this level of detail is addressed through Agglomeration-specific Drainage Area Plans (DAPs) and Capital investment projects.</p> <p>These detailed assessments are actively informing the development of the Cork Wastewater Strategy, ensuring that strategic decisions are underpinned by robust, site-specific data and planning.</p>
Cork Chamber	59	<i>Recommendation 3: Circular economy</i> Traditional decommissioning of wastewater plants often overlooks the potential for recycling and repurposing materials and components, which can contribute to sustainability goals. When decommissioning plants, Uisce Éireann should consider opportunities for reusing and recycling materials. This could include repurposing plant infrastructure, recovering valuable materials, and integrating waste-to-energy solutions where feasible. Assessments of decommissioned facilities to identify recyclable materials should be undertaken. Develop guidelines and best practices for the sustainable decommissioning of wastewater plants, ensuring minimal environmental impact and maximum resource recovery.	Uisce Éireann is working to ensure that circular economy opportunities are considered in the development, upgrade and decommissioning of our infrastructure. This includes, where feasible, reusing or recycling materials or assets from decommissioned plants, and repurposing sites for alternative community or environmental uses and minimising waste and maximising resource recovery during decommissioning processes. Uisce Éireann has internal procedures and guidance to ensure that unavoidable waste materials are managed in accordance with relevant waste management legislation and to minimise any environmental impact.

Consultee	Comment number	Consultee Comment	Response
Cork Chamber	60	<p><i>Recommendation 4: Renewable Energy usage</i></p> <p>Wastewater treatment plants are energy-intensive, and their energy sources significantly impact their overall sustainability footprint. This strategy should incorporate how renewable energy sources will be developed and used to power wastewater treatment plants. Anaerobic digestion is particularly relevant in this regard; not only does it treat organic waste, but it also produces biogas, which can be used to generate electricity and heat.</p>	<p>Uisce Éireann has set an ambitious target to achieve Net Zero greenhouse gas emissions by 2040. This commitment includes the development of a Process Emissions Strategy, which will address emissions arising directly from wastewater treatment processes. While no specific targets for process emissions have been set to date, this area is recognised as a key component of the utility's broader climate action framework.</p> <p>The Strategy will also be cognisant of the requirements under the recast Urban Waste Water Treatment Directive</p> <p>The Uisce Éireann Energy Efficient Design Process requires project stakeholders to assess all aspects of reducing energy and associated carbon emissions, improving energy efficiency, reducing the costs of energy, and utilisation of energy from renewable and low carbon sources. This Standard follows the energy hierarchy of;</p> <p><b>Use Less Energy:</b> the best energy and associated carbon saving is achieved by avoiding use</p> <p><b>Use Energy More Efficiently:</b> maximise energy productivity with the use of highefficiency equipment and smart control strategies.</p> <p><b>Use Energy When It Costs Less / Is Low Carbon:</b> take advantage of lower tariff periods and low carbon periods (when renewable energy supply to the electricity grid is high) and eliminate the use of fossil fuels.</p> <p><b>Use Renewable Energy:</b> use green electricity / biofuels, generated onsite or nearby, and/or procure 'green' energy from renewable sources.</p> <p>This structured approach ensures that energy and carbon considerations are embedded from the earliest stages of project planning through to operation, supporting Uisce Éireann's Net Zero 2040 ambition.</p>
Streamscapes the Waters and the Wilds	61	<p><i>Suggestions for the Cork Wastewater Strategy</i></p> <p>We commend Uisce Éireann for undertaking this comprehensive assessment. We suggest incorporating nature-based solutions such as constructed wetlands and riparian buffers in the strategy. These solutions can enhance biodiversity, provide flood mitigation, and improve water quality naturally.</p>	<p>Uisce Éireann acknowledge and welcome comments made by Streamscapes the Waters and the Wild. An assessment of sites where NbS could potentially be implemented has been undertaken which will inform elements of the decision making and fine screening of options process. The efficacy of these solutions will be evaluated further following the completion of the strategy and identification of optimal recommended approaches to address future wastewater treatment demand in a sustainable and cost beneficial manner. The feasibility and design of NbS within the CMA will be rigorously tested at later project/design development stages.</p>
Streamscapes the Waters and the Wilds	62	<p><i>Comments on the Study Area</i></p> <p>The inclusion of the Cork Harbour and Cork Outer Harbour Water Framework Directive waterbodies is crucial given their ecological significance. We recommend a detailed assessment of the potential impacts on these waterbodies, especially considering future urban expansion and industrial development.</p>	<p>The Cork Harbour and Cork Outer Harbour Water Framework Directive waterbodies are included in the Water Quality Modelling prepared for the Strategy and as such, potential impacts on these waterbodies will be assessed.</p>
Streamscapes the Waters and the Wilds	63	<p><i>Approach to the Strategic Environmental Assessment (SEA)</i></p> <p>We support the rigorous approach outlined in the SEA. It is essential to incorporate adaptive management strategies that can respond to unforeseen environmental changes and technological advancements over the 50-year period.</p>	<p>Uisce Éireann welcome the positive feedback on the approach to the Strategic Environmental Assessment</p>



Consultee	Comment number	Consultee Comment	Response
Streamscapes the Waters and the Wilds	64	<p><i>Comments on the Objectives of the Cork Wastewater Strategy</i></p> <p>The objectives outlined in Section 2.1 of the SEA Scoping Report are comprehensive. However, we suggest adding specific targets for reducing greenhouse gas emissions from wastewater treatment processes, aligning with national climate action goals.</p>	<p>Uisce Éireann has set an ambitious target to achieve Net Zero greenhouse gas emissions by 2040 in our Sustainability Framework. The strategy has taken account of these targets as well as the requirements under the new Urban Wastewater Treatment Directive.</p> <p>Uisce Éireann's key sustainability targets related to GHG Emissions, Net Zero Carbon and Energy Demand met by installed Renewables have been considered as part of the Optioneering approach in developing options for the strategy. Further details can be found in the Optioneering and Solution Development Report which forms part of the Appendices and in Section 10.2.4 of the Strategy.</p>
Streamscapes the Waters and the Wilds	65	<p><i>Additional Plans, Policies, and Programmes to Consider</i></p> <p>In addition to those reviewed in Chapter 4 of the SEA Scoping Report, we recommend considering the EU Biodiversity Strategy for 2030, the Irish National Biodiversity Action Plan, and the Marine Protected Area (MPA) legislation. MPAs play a critical role in conserving marine ecosystems, protecting biodiversity, and ensuring sustainable use of marine resources. The wastewater strategy should align with the objectives of MPAs to minimise adverse impacts on marine and coastal</p>	<p>EU Biodiversity Strategy for 2030, the Irish National Biodiversity Action Plan, and the Marine Protected Area legislation are considered as part of the Strategic Environmental Assessment.</p>
Streamscapes the Waters and the Wilds	66	<p><i>Comments on Current Baseline Environmental Conditions and Future Trends</i></p> <p>Table 3.16 summarises the environmental issues well. However, more emphasis should be placed on the potential impacts of microplastics and emerging contaminants such as pharmaceuticals, which pose increasing risks to aquatic ecosystems.</p>	<p>Uisce Éireann recognises that the presence of microplastics and pharmaceuticals in wastewater is not solely an 'end-of-pipe' issue. Effective mitigation requires a comprehensive, source-to-treatment approach, with a strong emphasis on upstream interventions to reduce the entry of these contaminants into the wastewater stream.</p> <p>While source control remains the most effective strategy, Uisce Éireann acknowledges the important role of wastewater treatment plants in reducing the transmission of these substances to the environment.</p> <p>The recast UWWTD requires wastewater treatment plants greater than 100,000PE to implement monitoring for microplastics and micropollutants that fall under Category 1 and Category 2 substances. The use of quaternary treatment may be required to remove or address these contaminants. The recast UWWTD are actively informing the development of the Cork Wastewater Strategy, ensuring that strategic decisions are underpinned and guided by new legislation.</p> <p>Uisce Éireann is committed to playing our part in meeting the requirements of the recast UWWTD, upgrading treatment infrastructure, and collaboration with stakeholders to tackle pollution at source and enhancing treatment capabilities.</p>
Streamscapes the Waters and the Wilds	67	<p><i>Comments on Environmental Objectives (Table 5.1)</i></p> <p>The environmental objectives are well-structured. We suggest the addition of specific indicators for monitoring water quality improvements and biodiversity enhancement outcomes. This will help track the effectiveness of the strategy over time.</p>	<p>A dedicated chapter in the Strategy will outline the Implementation &amp; Monitoring Plan, detailing how the strategy will be executed, tracked, and refined over time</p>
Streamscapes the Waters and the Wilds	68	<p><i>Preferred Communication Methods</i></p> <p>We would appreciate regular updates through email and access to a dedicated online portal where stakeholders can view progress, submit feedback, and access relevant documents.</p>	<p>Uisce Éireann plan to publish the draft plan and consultation on it via a dedicated portal on the organisational website. This will be reviewed closer to the launch date.</p>

Consultee	Comment number	Consultee Comment	Response
Streamscapes the Waters and the Wilds	69	<p><i>Marine Coastal Implications</i></p> <p>The coastal and marine environments within the Cork Harbour and Cork Outer Harbour are critical areas that could be significantly impacted by wastewater discharges. The strategy must consider the implications of wastewater management on these coastal areas, particularly in relation to the habitats and species protected under the MPA legislation. Efforts should be made to prevent contamination and eutrophication, which can degrade marine habitats and negatively affect marine biodiversity. Enhancing wastewater treatment processes to remove nutrients and contaminants more effectively will be essential in protecting these sensitive marine areas.</p>	<p>The Cork Harbour and Cork Outer Harbour Water Framework Directive waterbodies are included in the Water Quality Modelling prepared for the Strategy and as such, potential impacts on these waterbodies has been assessed.</p>
Construction Industry Federation	70	<p><i>Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Cork Wastewater Strategy?</i></p> <p>It is critical that Uisce Éireann's Cprl Wastewater 50-year strategy carefully defines the requirements for wastewater drainage and treatment capacity which will be required to meet the demands of the study area in the context of the Current Development Plans, the NPF, the RSES and longer term development potential of the area up to 2080. The strategy must ensure the provision of a safe, sustainable, secure and reliable water supply to the region with consideration of a plan led system where water infrastructure can be put in place to service lands for development and economic growth.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Construction Industry Federation. The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Construction Industry Federation	71	<p><i>Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Cork Wastewater Strategy?</i></p> <p>A key objective of the NPF is balanced regional development with an increase focus on the regions. The NPF recognises that "investment in water services infrastructure is critical to the implementation of the National Development Plan". As a result, it is welcome to hear that Uisce Éireann's CWS has been developed to ensure that water infrastructure can support the proposed growth policies of the NPF and the RSES and County Development Plans. These infrastructure investments must facilitate smaller settlements as well as the larger urban areas.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Construction Industry Federation	72	<p><i>Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Cork Wastewater Strategy?</i></p> <p>As acknowledged in the draft CWS documentation, development in many areas in the region is constrained by capacity limitations in UÉ's existing wastewater infrastructure, not to mention the growth impact with regard to the alteration to the geographical extent of serviced lands. It is imperative that these constraints are addressed in a plan-led strategy.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Construction Industry Federation	73	<p><i>Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Cork Wastewater Strategy?</i></p> <p>UÉ's infrastructure projects will be subject to planning which as we have seen recently can take a long time to achieve. They will require individual environmental assessments in support of planning applications. These applications will also be subject to further rounds of public consultation. The further investment needed to deliver these must also be identified and quantified through UÉ's economic regulatory process in line with government policy.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p> <p>This Strategy will inform long-term planning and investment in wastewater infrastructure and will play a critical role in identifying priority needs and potential projects necessary to deliver sustainable wastewater infrastructure with the Cork Metropolitan Area. These outputs will directly inform Uisce Éireann's Strategic Funding Plan, ensuring that investment decisions are aligned with both regional needs and national policy objectives. It is noted however that any decisions made on potential projects will be subject to Uisce Eireanns investment planning cycles where decisions are made in line with regulatory obligations, national priorities and funding availability.</p>

Consultee	Comment number	Consultee Comment	Response
Construction Industry Federation	74	It is important for residential developers to know what Irish Water infrastructure projects have planning, the required funding, and the project delivery schedule. Similarly, a clear line of sight of upcoming projects with certainty around budget funding is needed for Civil Construction companies to invest in the required plant, skills and equipment.	The Cork Wastewater Strategy will play a critical role in identifying potential projects necessary to deliver sustainable wastewater infrastructure within the Cork Metropolitan Area. These outputs will inform Uisce Éireann's Strategic Funding Plan, ensuring that investment decisions are aligned with both regional needs and national policy objectives. It is noted however that any decisions made on potential projects will be subject to Uisce Éireann's investment planning cycles where decisions are made in line with regulatory obligations, national priorities and funding availability.
Construction Industry Federation	75	We acknowledge that it will take a number of investment cycles to deliver the preferred approach to meet Cork's water treatment needs, however the ambition to build these critical infrastructure projects in order to facilitate the growing population must remain strong.	Uisce Éireann is fully committed to the delivery of Cork's Wastewater Strategy, a key initiative aimed at supporting sustainable growth, environmental protection, and climate resilience across the region. This study will inform long-term planning and investment in wastewater infrastructure, ensuring that Cork's drainage systems are fit for purpose, now and into the future.
Construction Industry Federation	76	<i>The Cork Wastewater Strategy study area comprises the Cork Metropolitan Area and the Cork Harbour and Cork Outer Harbour receiving waters and the Water Framework Directive waterbodies. Do you have any comments on this?</i> The CIF are concerned that growth projections used within the draft CWS are based on best available data from the NPF and RSES at the time of compiling the draft plan. The 2022 census shows that the ESRI population predictions that were used in the NPF and RSES underestimated the actual growth in population that was experienced by over 7,000 people. The actual population of Cork reflected in the 2022 census was 581,231, a figure which is not indicative of population growth relating to migration such as that associated with the war in Ukraine.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Construction Industry Federation	77	As the CWS is finalised, the CIF require Uisce Éireann's commitment to incorporate the increasingly refined growth rates into the demands forecast. It is essential that the CWS will be formally updated every five years with baseline forecasts and data feeding into the CWS being reviewed annually inline with actual population increases in the CMA. The strategy document must also allow for an ongoing review of population projections and possible expansion of the CMA. This will ensure the data prediction used in reference to population changes is current and accurate; the plan can then reflect these changes to ensure the occurrence of the infrastructure delivery needed to future proof the UÉ network and meet population needs.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Construction Industry Federation	78	It is paramount that UÉ reference long-term and reliable projection figures and implement a targeted strategy to deliver water and wastewater infrastructure provision accordingly. This should be carried out in line with a plan-led, focused approach to providing infrastructure for housing supply, to ensure that the needs of the future population can be met.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Construction Industry Federation	79	The CIF Southern Region recommends that future growth and development opportunities are identified in a targeted manner on a location basis, with relevant stakeholders being part of this review process. Establishing this early in the strategy and plan will again enable a well-planned approach to water and wastewater infrastructure delivery, which is a key part of housing supply and economic development in the region.	Future growth and development opportunities are identified in the relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Construction Industry Federation	80	Determining these locations and priorities should be completed with relevant stakeholder engagement and include the CIF. This will enable a targeted infrastructure planning approach to be taken and unlock opportunities for FDI, housing delivery and economic growth.	Future growth and development opportunities are identified in the relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.

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Construction Industry Federation	81	<p><i>Do you have any comments on the approach to the Strategic Environmental Assessment for the Cork Wastewater Strategy?</i></p> <p>In the SEA, the CIF welcomes the references made to forthcoming policies and legislative changes, including the Planning &amp; Development BILL, the National Development Plan, the National Planning Framework – Project Ireland 2040 and the Regional Spatial and Economic Strategy for the Southern Region of Ireland (RSES) 2020-2032 as well as the Local Development Plans. We particularly support the reference to population and economic growth and the level of housing development to meet future population demands.</p>	<p>Uisce Éireann welcome positive feedback on the approach to the Strategic Environmental Assessment</p>
Construction Industry Federation	82	<p>As outlined in the recent ESRI report on Structural Housing Demand, Ireland has seen exponential population growth link nowhere else in Europe. It is therefore vital that services and particularly infrastructure and utilities provide for this growth and are aligned with the relevant policies, plans and legislation.</p>	<p>Future growth and development opportunities are identified in the relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Construction Industry Federation	83	<p><i>Section 2.1 in chapter 2 of the SEA Scoping Report outlines the objectives of the Cork Wastewater Strategy. Do you have any comments on these objectives?</i></p> <p>Broadly speaking, the strategic objectives are acceptable.</p> <p>We recommend including <b>plan-led development as part of objective 2</b> to ensure sustainable infrastructure unlocking various developments (commercial, schools, hospitals, housing). This will create sustainable communities and facilitate regional growth in Cork. In addition, for objective 2 it is crucial to consider population growth with accurate data and ambitious targets, reflecting the increases seen in Cork dsince the previous census in Ireland.</p> <p>The CIF would suggest the inclusion of <b>plan-led development and infrastructure delivery targets in Objective 3</b> – ‘Identification of alternative solutions for effective management of wastewater to protect and enhance the environment, support social and economic growth’.</p> <p>Government support and prioritisation are essential to overcome delays, UÉ requires multi-annual budget certainty with ring-fenced funding for critical infrastructure, separate from other areas like leakage repairs and Local Authority/Village Schemes. Objective 5 should reflect security in attaining this funding directly for infrastructure delivery.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>



Consultee	Comment number	Consultee Comment	Response
Construction Industry Federation	84	<p><i>Section 2.1 in chapter 2 of the SEA Scoping Report outlines the objectives of the Cork Wastewater Strategy. Do you have any comments on these objectives?</i></p> <p>Contingency plans should be developed to improve reliability of water supplies linked to unknown or unforeseen events that put pressure on water supplies. Such contingency plans should be ambitious enough to cater for worst case scenarios, this could be linked to objective 6. A further challenge which should be included is delivering new infrastructure in the face of legislative uncertainty. This relates to the forthcoming Planning &amp; Development Bill and ongoing challenges to planning applications for the delivery of critical infrastructure projects. Such projects are often delayed and should be given emergency powers to be delivered given their role in supporting development. Furthermore, the Minister must make greater use of their emergency powers during the planning process to ensure that adequatecritical water and wastewater infrastructure is being delivered.</p>	<p>Uisce Éireann remains committed to delivering critical water and wastewater infrastructure, while recognising the systemic barriers that continue to impede timely and efficient delivery. Legislative uncertainty—particularly in the context of evolving EU directives and national environmental standards—adds complexity to an already challenging landscape. Barriers such as lengthy consenting timelines, inconsistent land acquisition procedures, and limited prioritisation of strategic infrastructure contribute to delays and increased delivery risk. Uisce Éireann strongly believes that prioritising strategic infrastructure through these processes and systems is in the interest of the common good for Ireland’s communities, environment and prosperity.</p> <p>To address these challenges and enable greater ease in infrastructure delivery, Uisce Éireann continues to advocate for and is actively working with Government and State bodies on:</p> <ul style="list-style-type: none"><li>•Expanded planning exemptions for essential infrastructure;</li><li>•Streamlined and time-bound consenting processes;</li><li>•Prioritisation of strategic infrastructure by An Coimisiún Pleanála;</li><li>•Clear and consistent land acquisition frameworks.</li></ul>
Construction Industry Federation	85	<p><i>Uisce Éireann has reviewed plans, policies and programmes relevant to the Cork Wastewater Strategy in chapter 4 of the SEA Scoping Report. Are there any others that should be considered?</i></p> <p>The CIF welcomes the review which has been undertaken to identify how the CWS relates to the key national, regional and local level plans, policies and strategies. As mentioned in question 3, the CIF support references to forthcoming policies and legislative changes, including the Planning &amp; Development Bill, the National Development Plan, the National Planning Framework, and the RSES as well as the Local Development Plans.</p> <p>The reference to the Flood Risk Management Plans for areas of existing and future significant floof risk is extremely relevant to the CMA. Flooding has become a greater issue in Cork with the frequency of flood events increasing and expected to increase further. The OPW’s implementation of the Floods Directive (2007.60/EC) through the Catchment based Flood Risk Assessment and Management (CFRAM) Programme is very important. CFRAM mapping has identified fove areas for further assessment in the CMA – Cork City, Glanmire, Carrigaline, Tower, Midleton and Ballynacorra. More budget certainty is required to address these high risk areas and to put flood relief measures in place. It is essential that the required funding and resources are applied to the strategy document with regard to flood risk planning and management for Cork. The uncertainty has the potential to undermine regional economic activity, employment and job growth, impacting the delivery of housing schemes in Cork and more specifically the CMA. UÉ must adopt a commercially viable model to attract and retain skilled operators and implement advanced technologies so that the industry can develop, innovate, attract talent and implement leading technologies.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p> <p>Areas prone to the risk of flooding have been identified and assessed in the Strategy in the context of siting new wastewater infratructure and protecting existing infrastructure through the optioneering process.</p> <p>Flood protection measures for Cork City and its environs are outside the scope of this strategy and fall under the remit of the Office of Public Works. This exclusion is consistent with the scope definition stage of the Solution Optioneering process, where responsibilities and boundaries were established.</p>

Consultee	Comment number	Consultee Comment	Response
Construction Industry Federation	86	<p><i>Chapter 3 of the SEA Scoping Report sets out the current baseline environment conditions and future trends. The environmental issues are summarised in table 3.16. Do you have any comments on these?</i></p> <p>We welcome the inclusion of “Population, Economy and Tourism &amp; Recreation and Human Health” within section 3 of the SEA and agree with the challenges referenced here. The CMA us a major regional metropolitan area, identified as such in the NPF 2040 and in the Southern RSES 2020-2032 to ensure long term economic, environmental and social progress. A number of proposed infrastructural projects are listed in section 3.3.6, however, delays in planning and constraints relating to funding are impacting on their delivery.</p>	<p>Uisce Éireann welcome positive feedback on the approach to the Strategic Environmental Assessment</p>
Construction Industry Federation	87	<p><i>Chapter 3 of the SEA Scoping Report sets out the current baseline environment conditions and future trends. The environmental issues are summarised in table 3.16. Do you have any comments on these?</i></p> <p>Section 3.12 refers to Material Assets identifying them as ‘natural and built assets and resources required to enable society to function as a place to live and work in giving them intrinsic economic value’. The CIF Southern Region agree that these assets all need to be considered in new water services, resource planning and infrastructure development. With reference to a previous point within this submission, we reiterate the importance of a plan-led system where future growth and development opportunities are identified in a targeted manner on a location basis, with relevant stakeholders being part of this review process. Emphasising this within the CWS in relation to material assets will again enable a well-planned approach to water and wastewater infrastructure delivery, which is a key part of housing supply and economic development in the region.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Construction Industry Federation	88	<p><i>Chapter 3 of the SEA Scoping Report sets out the current baseline environment conditions and future trends. The environmental issues are summarised in table 3.16. Do you have any comments on these?</i></p> <p>The SEA refers to the elimination of raw sewage discharges from Whitegate-Aghada by 2024 in section 3.12.3, the CIF would recommend the completion timeline of this work be included in the strategy document.</p>	<p>This Strategy will inform long-term planning and investment in wastewater infrastructure and will play a critical role in identifying priority needs and potential projects necessary to deliver sustainable wastewater infrastructure with the Cork Metropolitan Area. These outputs will directly inform Uisce Éireann’s Strategic Funding Plan, ensuring that investment decisions are aligned with both regional needs and national policy objectives. It is noted however that any decisions made on potential projects will be subject to Uisce Eireanns investment planning cycles where decisions are made in line with regulatory obligations, national priorities and funding availability. Ongoing projects, such as the Whitegate Aghada Sewerage Scheme, that are at construction / commisioning stage are considered as completed within the context of this strategy.</p>
Construction Industry Federation	89	<p><i>Chapter 3 of the SEA Scoping Report sets out the current baseline environment conditions and future trends. The environmental issues are summarised in table 3.16. Do you have any comments on these?</i></p> <p>CIF Southern Region agree with the challenges referenced in the relevant sections around environmental conditions and issues outlines in Chapter 3 of the SEA, however, further reference should be made to how each of these challenges will be addressed and overcome. Currently, the SEA suggests opportunities such as ‘achieve wider environmental benefits, infrastructure and service resilience and cost efficiency alongside contributing to meeting climate targets.’ These opportunities could be expanded with a methodology as to how the opportunities could be converted into actionable items.</p>	<p>Uisce Éireann welcome these comments on the environmental issues. They will form part of the Strategy Outputs where appropriate.</p>

Consultee	Comment number	Consultee Comment	Response
Construction Industry Federation	90	<p><i>Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</i></p> <p>CIF Southern Region support the environmental objectives listed to assess the Wastewater Strategy and its potential effect on the environment. Some of these objectives such as Flood Risk, Population, Economy, Tourism &amp; Recreation and Human Health, Climate Change and Material Assets have already been referenced in our submission.</p>	<p>Uisce Éireann welcome positive feedback on the approach to the Strategic Environmental Assessment</p>
Construction Industry Federation	91	<p><i>Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</i></p> <p>Water infrastructure (or lack of the same) is currently one of the biggest barriers to housing delivery in the region. Metropolitan Cork, and indeed the wider county, has huge capacity to grow and act as a counterbalance to Dublin. Thus, investment in water and wastewater infrastructure in the Region will be key to Cork realising its potential. The population is continuing to grow, demand is increasing on the existing water infrastructure, failure to invest in the region's water infrastructure will have far more negative consequences on the environment.</p>	<p>Uisce Éireann is fully committed to the delivery of Cork's Wastewater Strategy, a key initiative aimed at supporting sustainable growth, environmental protection, and climate resilience across the Cork Metropolitan Area. This study will inform long-term planning and investment in wastewater infrastructure, in the Cork Metropolitan Area.</p>
Construction Industry Federation	92	<p><i>How would you like Uisce Éireann to communicate with you as the plan progresses?</i></p> <p>It is essential to Cork's success that infrastructure, through effective and efficient planning, is provided in a balanced but targeted regional basis, and under-pinned by a delivery model that is built on the principle of putting the necessary infrastructure in first. Communication with regard to the development and evolution of Cork and more specifically, infrastructure in the Cork Metropolitan Area, is vital to this success. Relevant stakeholder engagement must be part of the process and as such, the CIF Southern Region request ongoing communication and feedback from the earliest stage of the strategy and plan to enable a well-planned approach to water and wastewater infrastructure delivery.</p> <p>Regular engagement and communication will realise a targeted infrastructure planning approach to be taken unlocking opportunities for FDI, housing delivery and economic growth.</p>	<p>Uisce Éireann will ensure that relevant stakeholder engagement is part of the process and as such, the CIF Southern Region will be engaged with from the earliest stage of the strategy to enable a well-planned approach to water and wastewater infrastructure delivery.</p>
Construction Industry Federation	93	<p><i>Conclusion</i></p> <p>The CIF is concerned with the projected levels of capital budget allocations to Uisce Éireann which will not be adequate to address population growth, housing and FDI. To support the delivery of water quality and wastewater infrastructure provision, it is vital that adequate funding is provided. A targeted approach, as outlined in the draft strategy to identify what future investment will be required to support the future growth of the Cork Metropolitan Area will help to deliver this in a strategic manner.</p> <p>Forward planning and investment in infrastructure is vital to meet the anticipated population growth in the region. The plan must consider housing supply a core pillar in its strategy. Taking into account what projects will unlock housing delivery is an important consideration.</p> <p>The water supplies in the CMA require significant transformation and investment to meet the requirements of the future population of the region. A substantial deficit in regional infrastructure from water to wastewater services, and from roads to rail, is impacting the ability of the region to grow and become an economic counterbalance to Dublin, envisaged by the NPF. A modern, dynamic and competitive economy needs a plan led approach to infrastructure.</p>	<p>This Strategy will inform long-term planning and investment in wastewater infrastructure and will play a critical role in identifying priority needs and potential projects necessary to deliver sustainable wastewater infrastructure with the Cork Metropolitan Area. These outputs will directly inform Uisce Éireann's Strategic Funding Plan, ensuring that investment decisions are aligned with both regional needs and national policy objectives. It is noted however that any decisions made on potential projects will be subject to Uisce Éireann's investment planning cycles where decisions are made in line with regulatory obligations, national priorities and funding availability.</p>

Consultee	Comment number	Consultee Comment	Response
Construction Industry Federation	94	We thank you for the opportunity to comment on the strategy and for taking the time to consider this submission. Infrastructure and housing provision are interconnected, and it is essential that a plan led approach with continued reference to the anticipated population increase is taken as part of UÉ's future investment strategy.	Uisce Éireann welcome positive feedback and submission on the approach to the Strategic Environmental Assessment
Dr Simon Harrison - School of Biological, Earth and Environmental Sciences, University College Cork.	95	Summary of chemical/biological survey of the River Glen, Cork city: The River Glen is seriously polluted along its entire length. The source of the pollution in the Glen itself is three, but likely five, sewage inputs entering the river in its upper sections near Mayfield. These upstream sewage inputs account for the high tryptophan readings in the river and the poor ecological quality of the river downstream. The sources of pollution in the Ballyvolane river have not been identified, but likely can be attributed to organic inputs from domestic and agricultural sources in their upper reaches. In order to return the River Glen to a good ecological state, and to remove the potentially hazardous input of organic wastes and microbial organisms into the stream, the sewage inputs into the river need to be removed entirely or seriously reduced to a level where they do not cause undue harm to the river.	Uisce Éireann acknowledge and welcome comments made Dr. Simon Harrison and note the concerns around the ecological status fo the River Glen.  Uisce Éireann acknowledge that there are multiple pressures impacting our water bodies, including urban wastewater. We have made steady progress in reducing the impact of urban wastewater on receiving water bodies. The number of water bodies where urban wastewater is a significant pressure has reduced from 291 in the second cycle River Basin Management Plan, to 197 in the third cycle Plan. We are committed to making further significant reductions over the period of the third cycle Plan. However, in order to achieve the WFD environmental objectives for Ireland in the most cost-effective way possible, we believe that a collaborative effort is the best way to achieve this outcome as the causes and the solutions to protecting and restoring our water catchments are not within the gift of any one sector. We are committed to playing our part under the WFD and we will work with others to progressively deliver on WFD objectives.
Private Individual	96	I am contacting you as a member of the Crossbarry community in relation to the ongoing public consultation for the draft Cork Wastewater Strategy. Firstly, I welcome a study of this nature, as it will greatly assist in planning our wastewater infrastructure in the wider Cork City catchment area for the coming generations. The village of Crossbarry has a population of approximately 350 people with no public wastewater infrastructure. The village has a number of Developer Provided Infrastructure (DPI) wastewater units which were installed as part of individual planning applications for housing estates (pre-Uisce Eireann establishment), with the intention that a municipal sewerage scheme would be delivered in the future, removing the 'temporary' treatment units in each estate. Unfortunately, this has not materialised which has led to a number of issues within the catchment: <ul style="list-style-type: none"> <li>· DPI's not working or not being maintained leading to significant operational issues (e.g. sewage flooding upstream in private property during heavy rainfall periods);</li> <li>· Some DPI's are acting as holding tanks only and Cork Co Co are required to de-sludge the system on the grounds of public health risks;</li> <li>· It is likely that there is no treatment occurring in these systems, leading to possible pollution of the receiving environment;</li> <li>· No development can occur in the village due to this public infrastructure deficit, with significant potential for residential development, within commuting distance to Cork City.</li> </ul>	This Strategy will inform long-term planning and investment in wastewater infrastructure and will play a critical role in identifying priority needs and potential projects necessary to deliver sustainable wastewater infrastructure with the Cork Metropolitan Area. These outputs will directly inform Uisce Éireann's Strategic Funding Plan, ensuring that investment decisions are aligned with both regional needs and national policy objectives. It is noted however that any decisions made on potential projects will be subject to Uisce Eireanns investment planning cycles where decisions are made in line with regulatory obligations, national priorities and funding availability.  However as Crossbarry does not currently fall within the boundary of the Cork Metropolitan area it cannot be included for assessment within the strategy. In addition, private wastewater treatment systems do not form part of the public wastewater network and are therefore not considered within the scope of this strategy. Uisce Éireann has a programme in place for estates, including those with DPI, where the solution is their connection to public wastewater or water network and taking the DPI out of use.
Private Individual	97	Crossbarry is located under 5km from the village of Halfway, which is included in the study area. Considering the proximity of the village to the proposed catchment study area and the above identified issues, I would request that Crossbarry be considered for inclusion in the overall Cork Wastewater Strategy study.	This Strategy will inform long-term planning and investment in wastewater infrastructure and will play a critical role in identifying priority needs and potential projects necessary to deliver sustainable wastewater infrastructure with the Cork Metropolitan Area. These outputs will directly inform Uisce Éireann's Strategic Funding Plan, ensuring that investment decisions are aligned with both regional needs and national policy objectives. It is noted however that any decisions made on potential projects will be subject to Uisce Eireanns investment planning cycles where decisions are made in line with regulatory obligations, national priorities and funding availability.  However as Crossbarry does not currently fall within the boundary of the Cork Metropolitan area it cannot be included for assessment within the strategy.



Consultee	Comment number	Consultee Comment	Response
Private Individual	98	Can you please make sure that your wastewater strategy review for the Cork Metropolitan area includes a review of the current inadequacy of the Killeens waste water treatment facility. Many of the older private houses not in estates are unable to connect to the current treatment plant because it wasn't originally built to cater for all the houses in the village & it's also hindering the development of the area.	<p>Killens settlement is already included in the Study Area and will be evaluated as part of the Strategy.</p> <p>Older, currently unserved homes that wish to connect to the public wastewater network are required to apply through Uisce Éireann's standard connection process. This ensures that all connections are assessed consistently and in line with technical and regulatory requirements.</p> <p>As part of the Cork Wastewater Strategy, loading figures for all existing homes within an existing catchment boundary—including those currently unconnected—have been considered. This ensures that the planned infrastructure has sufficient capacity to accommodate both current and future demand, supporting equitable access to wastewater services across the region.</p>
Southern Regional Assembly	99	The SRA welcome inclusion of reference to the RSES and important role of the Cork Metropolitan Area (CMA) to national growth targets in both the Issues Paper and Strategic Environmental Assessment: Scoping Report.	<p>Uisce Éireann acknowledge and welcome comments made by the Southern Regional Assesmbly. Uisce Éireann welcome positive feedback on the approach to the Strategic Environmental Assessment</p>
Southern Regional Assembly	100	<p><i>Delivering on Balanced Growth</i></p> <p>The strategy for the CMA in the RSES is set out in the Cork Metropolitan Area Strategic Plan (MASP). A guiding principle for the MASP is to identify infrastructure capacity issues and ensure wastewater needs and capacity issues are met by national projects. MASP Policy Objective 1 and Policy Objective 5, seek coordinated infrastructure investment and delivery to realise the Metropolitan Area Goals. In addition, the Regional Policy Objectives (RPOs) in the RSES support prioritizing infrastructure such as wastewater to deliver on the growth targets for the region. RPO 8 emphasizes prioritizing investment for compact growth in Metropolitan Areas and RPO 212 supports sustainable development of strategic wastewater treatment facilities by Irish Water and investment plans that align with the RSES objectives.</p>	<p>The Strategy has been developed taking full account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Southern Regional Assembly	101	<p><i>Delivering on Balanced Growth</i></p> <p><i>The SRA welcome the 'in-progress' schemes for new wastewater</i> infrastructure at Whitegate/Aghada and Midleton, and the recently completed wastewater treatment plants in Innishannon and Dripsey. It is also highlighted in the SEA that works to the wastewater network at Midleton, Cork City (Silversprings storm water overflow) and Ringaskiddy have recently been completed to address UWWT noncompliance associated with stormwater overflows in the study area, and further works to Cork City (Little Island, Glanmire and Pinecroft, Mahon, Tramore Valley, Bishopston, Blackpool, Shandon and Sundays Well) are currently ongoing.</p>	<p>Acknowledged. Uisce Éireann welcome positive feedback on the 'in-progress' schemes for new wastewater infrastructure within the Cork Metropolitan Area.</p>
Southern Regional Assembly	102	<p><i>Delivering on Balanced Growth</i></p> <p>As highlighted in the SEA Report a key challenge for the CMA is upgrading and maintaining wastewater treatment plants to address existing and new contaminants and to meet existing and future standards and protect the environment. This is reflected in the MASP which highlights that upgrades to Wastewater Treatment Plants are necessary and a key priority for Strategic Residential Growth Nodes, Metropolitan Towns, and Strategic Employment Locations within the CMA.</p>	<p>The Strategy has considered the requirements of the recast Urban Waste Water Treatment Directive and other relevant EU directives as part of its forward planning horizons. This ensures that infrastructure planning and investment decisions are aligned. The Strategy has been developed taking full account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>

Consultee	Comment number	Consultee Comment	Response
Southern Regional Assembly	103	<i>Delivering on Balanced Growth</i> Significant investment and infrastructure in wastewater will be required to sustainably delivery the Strategic Investment Priorities identified by the NDP and RSES for the CMA. This will require co ordination between the principal stakeholders including the SRA for delivery to achieve the vision and objectives identified in the MASP. The CWS must reflect this planned growth and its national importance.	The development of the Strategy has been informed by key national and regional policy frameworks, including the National Development Plan and the Regional Spatial and Economic Strategy.
Southern Regional Assembly	104	<i>Environment</i> The SEA identifies that a key challenge to be taken account of in the assessment of the CWS is Stormwater management: separating the wastewater and stormwater network, reducing the number of combined sewer overflows and potential to increase the use of Sustainable Urban Drainage Schemes (SUDS) in new development.	Combined foul and stormwater sewers remain a feature of many existing sewer networks. It is not economically viable to completely remove stormwater from these combined systems therefore stormwater overflows (SWOs) will continue to be required on existing combined networks. However, in this strategy, we have endeavoured to reduce spills to watercourses in line with Uisce Éireann policy.  The Water Services Strategic Plan (WSSP) 2050 also outlines the use of remote asset management and predictive systems supported by real-time monitoring to improve operational control and reduce the occurrence of overflows.  Key elements of our approach in developing this Strategy include: - Recommending that design of wastewater networks comply with the recast Urban Wastewater Treatment Directive and other relevant standards. - Recommending that all new sewer networks are fully separated. - Referring to the Controlled Discharge Strategy policy to guide the management of SWOs on existing combined sewer networks - Ensuring that all new wastewater pumping stations are designed with emergency storage capacity.
Southern Regional Assembly	105	The SRA recommend reference to key stormwater management policies within the RSES, this includes: · RPO 112 which supports commitments to achieve and maintain “At Least Good” status, except where more stringent obligations are required, and no deterioration of status for all water bodies Water Quality. · RPO 208 which supports the role of Irish Water Investment Plans in taking into account seasonal pressures on critical service infrastructure, climate change implications, and leakage reduction in the design of all relevant projects. · RPO 215 which supports strategic wastewater treatment infrastructure investment and separation of foul and surface water networks to accommodate the future growth of the Region. · RPO 217, RPO 218, and the SRA's Blue Green Infrastructure (BGI) And Nature Based Solutions (NBS) Framework support improvements in stormwater infrastructure, incorporation of SUDS in all public and private developments in urban areas and guide the implementation of BGI and NBS.	Uisce Éireann acknowledge and welcome comments made by the Southern Region Assembly in relation to key stormwater management policies within the RSES.
Southern Regional Assembly	106	The SRA support the CWS principles of enhancing and protecting the environment through effective wastewater management and prioritising sustainable options for effective wastewater management that deliver multiple benefits. These principles align with the objectives of the RSES and will ensure positive environmental outcomes.	Uisce Éireann acknowledge and welcome comments made by the Southern Region Assembly.
Southern Regional Assembly	107	<i>Consultation</i> Development and delivery of the CWS will require co-ordination between stakeholders including the SRA to ensure that it supports the ambitious vision and objectives identified in the MASP. The SRA welcome follow up consultation and look forward to further engagement on the strategy.	Uisce Éireann acknowledge and welcome comments made by the Southern Regional Assembly. There will be opportunities for further engagement during the second round of consultation in the coming months. Uisce Éireann plan to publish the draft plan and consultation on it via a dedicated portal on the organisational website. This will be reviewed closer to the launch date.

Consultee	Comment number	Consultee Comment	Response
Department of the Environment, Climate and Communications (DECC)	108	<p>We welcome the inclusion of the following reports for the assessment of the climatic factors of the Plan:</p> <ul style="list-style-type: none"> <li>· The Government's Draft Updated National Energy &amp; Climate Plan 2021-2023 (which will be finalised in the coming months)</li> <li>· The Government's new National Adaptation Framework, which was approved by Government in June 2024</li> <li>· Sectoral Emissions Ceilings</li> <li>· Sectoral Adaptation Plans made under the NAF</li> <li>· EPA's reports Climate Change in the Irish Minds (CCIM)</li> <li>· The Clean Air Strategy</li> <li>· The Climate Action Plan 2024</li> </ul>	Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications.
Department of the Environment, Climate and Communications (DECC)	109	<p>We suggest that you take into account a range of national and sectoral policies, plans and strategies in the carrying out of the SEA. The documents set out in the list below, can provide a relevant baseline and benchmarks for quantitatively assessing the climate and environmental impacts of the proposed Plan.</p> <ul style="list-style-type: none"> <li>· EPA's report on Ireland's Provisional Greenhouse Gas Emissions 1990-2022 SEAI's report on the National Energy Projections 2023 and associated article.</li> <li>· The outputs from the National Dialogue on Climate Action (NDCA)</li> </ul> <p>We encourage the inclusion of the above listed reports as data sources and suggest they be included in the assessments to be set out in the Environmental Report. It is suggested that the Plan should be assessed against its effects on the projections in the reports in a detailed a manner as possible, by quantifying the impact of the plan and its effects on the environment and climatic factors in order to underpin;</p> <ul style="list-style-type: none"> <li>· current Government policies and measures on energy use and related greenhouse gas emissions.</li> <li>· the achievement and otherwise of climate policy at national level.</li> </ul> <p>how the plan contributes to or works against the achievement of the national climate objective.</p>	Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications.
Department of the Environment, Climate and Communications (DECC)	110	<p>In terms of EU Legislation, we recommend including reference to the Directive (EU) 2023/2413 (the latest recast Renewable Energy Directive), Council Regulation (EU) 2022/2577 (laying down a framework to accelerate the deployment of renewable energy), the EIA Directive 2014/52/EU (assessment of the effects of certain public and private projects on the environment) and the Public Participation Directive 2003/35/EC (public participation in the process of drawing up certain plans and programs related to the environment).</p>	Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. These EU Directives have been considered in the development of SEA.
Department of the Environment, Climate and Communications (DECC)	111	<p>Please see our website for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'. The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site-specific assessments.</p> <p>With reference to your email received on the 27 May 2024, concerning the Draft Cork Wastewater Strategy – SEA Scoping, Geological Survey Ireland would encourage use of and reference to our datasets. This data can add to the content and robustness of the SEA process. With this in mind, please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.</p>	Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Website <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx</a> has been referenced in the Sources section of the SEA and informed the baseline of the report and considered in the SEA assessment where applicable.

Consultee	Comment number	Consultee Comment	Response
Department of the Environment, Climate and Communications (DECC)	112	<p><i>Geoheritage</i> Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.</p> <p>County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online Map Viewer.</p> <p>The audit for Cork City was completed in 2022. The full report details can be found here. Regarding Section 3.15 'Geology and Soils' of the SEA Report, please note the audit for County Cork was completed and recently published in 2024. The full report details can be found here.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Website <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx</a> has been referenced in the Sources section of the SEA and informed the baseline of the report and considered in the SEA assessment where applicable. Detailed assesment of Geological heritage sites shall be considered as part of a more detailed route and site selection process that will follow on from identified preferred approaches and projects resulting from this strategy.</p>
Department of the Environment, Climate and Communications (DECC)	113	<p><i>Groundwater</i> Geological Survey Ireland's Groundwater and Geothermal Unit, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.</p> <p>Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer which should include wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps.</p> <p>For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.</p> <p>GWClimate is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the Map viewer.</p> <p>Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. The Cork Groundwater Protection Response overview and link to the main reports is at: Cork Groundwater Protection Scheme Reports (<a href="https://www.gsi.ie">gsi.ie</a>).</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Website <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx</a> has been referenced in the Sources section of the SEA and informed the baseline of the report and considered in the SEA assessment where applicable.</p> <p>Detailed groundwater modelling and assesment shall be considered where appropriate at project level, as part of a more detailed analysis that will follow on from identified preferred approaches and projects resulting from this strategy.</p>



Consultee	Comment number	Consultee Comment	Response
Department of the Environment, Climate and Communications (DECC)	114	<p><i>Geological Mapping</i> Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found here, in your future assessments.</p> <p>Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the Data &amp; Maps section of our website. Our 3D models can help stakeholders visualize, understand and characterise geology, for deposit and resource mapping, for flooding and for urban geology applications including basement impact assessment, Sustainable Drainage Systems (SuDS), and subsurface management. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation.</p> <p>Further information and download instructions for the Quaternary 3D model of Cork are available on the Geological Mapping programme dedicated here and here.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Website <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx</a> has been referenced in the Sources section of the SEA and informed the baseline of the report and considered in the SEA assessment where applicable. Detailed assesment of subsoil geological mapping shall be considered as part of a more detailed route and site selection process that will follow on from identified preferred approaches and projects resulting from this strategy.</p>
Department of the Environment, Climate and Communications (DECC)	115	<p><i>Geotechnical Database Resources</i> Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our Geotechnical Map Viewer. We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Detailed assesment of available geotechnical information shall be considered as part of a more detailed analysis that will follow on from identified preferred approaches and projects resulting from this strategy.</p>
Department of the Environment, Climate and Communications (DECC)	116	<p><i>Geohazards</i> Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.</p> <p>Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated Map Viewer. Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.</p> <p>Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans and is described in more detail under 'Groundwater' above.</p> <p>Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our marine and coastal unit information below.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Website <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx</a> has been referenced in the Sources section of the SEA and informed the baseline of the report and considered in the SEA assessment where applicable. Detailed assesment of geohazards shall be considered as part of a more detailed analysis that will follow on from identified preferred approaches and projects resulting from this strategy.</p>

Consultee	Comment number	Consultee Comment	Response
Department of the Environment, Climate and Communications (DECC)	117	<p><i>Natural Resources (Minerals/Aggregates)</i></p> <p>Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer.</p> <p>We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach, we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Website <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx</a> has been referenced in the Sources section of the SEA and informed the baseline of the report and considered in the SEA assessment where applicable. Detailed assesment of aggregates hall be considered as part of a more detailed analysis that will follow on from identified preferred approaches and projects resulting from this strategy.</p>
Department of the Environment, Climate and Communications (DECC)	118	<p><i>Geochemistry of soils, surface waters and sediments</i></p> <p>Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <a href="https://www.gsi.ie/en-ie/dataand-maps/Pages/Geochemistry.aspx">https://www.gsi.ie/en-ie/dataand-maps/Pages/Geochemistry.aspx</a>.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications.</p>
Department of the Environment, Climate and Communications (DECC)	119	<p><i>Geophysical data:</i></p> <p>Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gammaray radiation) of soils &amp; rocks as part of the Tellus programme. These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Detailed assesment of available geotechnical information shall be considered as part of a more detailed analysis that will follow on from identified preferred approaches and projects resulting from this strategy.</p>
Department of the Environment, Climate and Communications (DECC)	120	<p><i>Historic Mines</i></p> <p>The EPA, Geological Survey Ireland and the former Exploration &amp; Mining Division undertook a joint project entitled "Historic Mine Site - Inventory and Risk Characterisation (HMS - IRC)". This project carried out detailed site investigations and characterisation on priority historic mine sites in the country.</p> <p>A risk ranking methodology was developed which categorised the sites according to the risks posed to human and animal health and the environment. The project commenced in January 2006 and was completed in December 2008. A final report and a GIS geodatabase was produced on completion of the project. Reports and maps available here. The project provides an understanding of the impacts of historic mining sites in Ireland and their status at the time of the study.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications.</p>

Consultee	Comment number	Consultee Comment	Response
Department of the Environment, Climate and Communications (DECC)	121	<p><i>Marine and Coastal Unit</i></p> <p>Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping &amp; Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure &amp; Tourism and Coastal Behaviour.</p> <p>INFOMAR data such as bathymetry, backscatter, sediment classification, shipwrecks and survey metadata can be downloaded free of charge in a variety of formats at the INFOMAR Marine Data Download Portal:  <a href="https://experience.arcgis.com/experience/9213db3d963d4f3cab3a220323d7cd4e/page/Page-1/?views=Download-Vector">https://experience.arcgis.com/experience/9213db3d963d4f3cab3a220323d7cd4e/page/Page-1/?views=Download-Vector</a></p> <p>The Marine and Coastal Unit also participate in coastal change projects and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found here.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. This information is included in the assessment and Water Quality Model.</p>
Department of the Environment, Climate and Communications (DECC)	122	<p><i>National Coastal Change Assessment</i></p> <p>Geological Survey Ireland is undertaking a National Coastal Change Assessment. As part of this initiative two mapping products will be delivered for the entire Irish coastline: coastal vulnerability mapping and shoreline change.</p> <p>Coastal vulnerability maps will provide an insight into the relative susceptibility of the Irish coast to adverse impacts of sea level rise through the use of a Coastal Vulnerability Index (CVI). Currently the project is being carried out on the east coast and will be rolled out nationally over the next couple of years, detailed information and maps are available here. Shoreline change rates for the period 2000 to 2023 are being prioritised and will be released by county on a rolling basis over the next 12 months. Shoreline change rates database and reports will be accessible from GSI web mapping viewers. These suite of coastal mapping products are aimed at coastal managers to prioritise or concentrate efforts on adaptation.</p>	<p>Acknowledged. Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications.</p>
Department of the Environment, Climate and Communications (DECC)	123	<p><i>Geoheritage and Planning Programme</i></p> <p>Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Department of the Environment, Climate and Communications. Website <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx</a> has been referenced in the Sources section of the SEA and informed the baseline of the report and considered in the SEA assessment where applicable. Specific datasets and mappers mentioned in the suggested table will be considered and reviewed at a project level for identified preferred approaches and projects resulting from this strategy.</p>

Consultee	Comment number	Consultee Comment	Response
Environmental Forum	124	<p><i>Timeline &amp; Ambition</i></p> <p>Whilst 3 Horizon dates are mentioned, 2030, 2055 and 2080 there is also a <b>very significant date in 2027 when Ireland is tasked with being compliant with the Water Framework Directive (WFD)</b>. As the Strategy covers such a vast area and relatively high population, including the Cork Metropolitan Area and the Cork Harbour and Cork Outer Harbour Water Framework Directive waterbodies, it is an opportunity for this strategy to increase the ambition to at least comply with the WFD and the UWWT Directive and Regulations for the region by addressing current deficiencies and non-compliance with the Directives.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Environmental Forum. A critical component of the analysis includes alignment with the Water Framework Directive and the River Basin Management Plan. Uisce Éireann recognises the importance of these frameworks, particularly in addressing significant pressures such as urban wastewater discharges. Compliance with the Urban Waste Water Treatment Directive and RBMP objectives is a key driver for investment planning.</p> <p>The urban wastewater discharges, while still a significant pressure, has shown a positive trajectory over the past two RBMP cycles:</p> <p>Cycle 1 (2016 baseline) : 291 water bodies impacted Cycle 2 (2021 baseline) : 208 water bodies impacted Cycle 3 (2023 baseline) : 197 water bodies impacted</p> <p>Although UWW is a significant pressure in only 4% of water bodies nationally, it remains a priority for UÉ. The focus is on deploying the right measures in the right places, guided by strategic assessments such as those being developed in the Cork Wastewater Strategy.</p>
Environmental Forum	125	<p><i>Timeline &amp; Ambition</i></p> <p>Cork City is listed on the EPA website as one of the priority areas which has failed to comply with EU Regulations due to inadequate sewers which is putting pollution pressure on waterbodies. There is no date given to complete those improvements, as stated “Completion dates required from Uisce Éireann” on the most recent report in April 2024.</p>	<p>The EPA PAL states Network Improvements Needed for Cork City agglomeration. The Cork City Drainage Area Plan was completed in 2023. The Cork City Wastewater Network Upgrade is currently at Preliminary Business Case. Separate Preliminary Business Cases will cover 37nr. sub-catchments, with almost 150 SWOs, and will be delivered through the Cork City Feasibility Study Programme in 2025-2029. This programme will consider and identify the optimum source prevention, asset management and additional mitigation measures that may be required in each sub-catchment. An average of 7-8 Preliminary Business Cases will be completed each year, with all scheduled to be complete by 2029.</p>
Environmental Forum	126	<p><i>Timeline &amp; Ambition</i></p> <p>The assessment work being carried out to develop this strategy allows for data gaps in relation to untreated discharges, overflows, poorly functioning wastewater plants and septic tanks to be collected. Thereby allowing a plan of action and measures to be put in place to address these deficiencies and bring Cork City into compliance with the Directives as is required by 2027 not 2030. This could serve as a model and help strengthen compliance on a Countrywide basis.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Environmental Forum.</p>
Environmental Forum	127	<p><i>Timeline &amp; Ambition</i></p> <p>The wider aims of the Strategy beyond 2027 vis a vis increased capacity and alternative solutions to meet the needs of an increasing population/ industry needs can still be set out for the Horizon dates as outlined.</p>	<p>Due to the scale and complexity of the solutions involved, once the Preliminary Business Cases are developed further, it will be possible to give an accurate date for the completion of all capital works necessary in Cork City to ensure compliance.</p>
Environmental Forum	128	<p><i>Location of wastewater infrastructure</i></p> <p>Current locations are a legacy of past land-use planning with some sited too close to coastal areas and waterbodies such as rivers. Location of new treatment facilities should be a key consideration and need to take account of the changing climate with increased incidences of flooding as well as the risk predicted from sea level rise over the next 50 years.</p>	<p>Areas prone to the risk of flooding have been identified and assessed in the Strategy in the context of siting new wastewater infrastructure and protecting existing infrastructure through the optioneering process. Detailed FRA's within the study area shall be considered as part of a more detailed route and site selection process that will follow on from identified preferred approaches and projects resulting from this strategy</p>



Consultee	Comment number	Consultee Comment	Response
Environmental Forum	129	<p><i>Location of wastewater infrastructure</i></p> <p>A barrage to protect Cork City and the harbour from flooding may well be needed/in place by then, which might also impact on wastewater treatment locations.</p>	<p>Flood protection measures for Cork City are outside the scope of this strategy and fall under the remit of the Office of Public Works (OPW). This delineation aligns with the scope definition phase of the Optioneering Process, as outlined in the Strategic Environmental Assessment (SEA) Scoping Report, where flood risk is acknowledged as a contextual factor of wastewater infrastructure planning. Areas prone to the risk of flooding have been identified and assessed in the Strategy in the context of siting new wastewater infrastructure and protecting existing infrastructure through the optioneering process.</p>
Environmental Forum	130	<p><i>Location of wastewater infrastructure</i></p> <p>There needs to be an avoidance of estuarine &amp; coastal discharges most especially near sensitive habitats, not just those existing designated sites. Ireland must designate 30% land and marine area to restoration by 2030, the study area may well contain some of this area. Sensitivity mapping already carried out for the marine area by NUIG/ Marine Institute should be referenced. Important features such as seagrass and saltmarsh which provide multiple eco-system services need to be protected. As well as the many important terrestrial habitats and features such as wetlands, bogs, native tree stands etc.</p>	<p>Identification and avoidance of sensitive habitats has been considered as part of the development of the Strategy in the context of siting new wastewater infrastructure through the optioneering process.</p>
Environmental Forum	131	<p><i>Location of wastewater infrastructure</i></p> <p>Grassland, saltmarsh and swamp are bundled together as an area, Table 3.12. However, they are very different habitat types with different functioning and value from an environmental perspective. It would be good to see the grassland area separated from the saltmarsh and swamp.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Environmental Forum and note that this will be considered as relevant through the SEA process.</p>
Environmental Forum	132	<p><i>Resource use &amp; nutrient recovery</i></p> <p>Given the need to become more resource efficient and reduce energy use and GHGs to meet our climate obligations all avenues of resource reuse need to be explored.</p>	<p>A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.</p> <p>Sustainability considerations, including alignment with the principles of the EU Energy Efficiency Directive, shall be addressed within the Strategy.</p>
Environmental Forum	133	<p><i>Resource use &amp; nutrient recovery</i></p> <p>Resource and nutrient recovery is mentioned but without any great detail. We understand that some reuse of phosphorus to struvite is being carried out at Ringsend, however, whether it is being reused is unclear. Companies such as Herr Ltd. provide systems for the recovery of phosphorus.</p>	<p>A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.</p> <p>Each WWTP upgrade will go through a full appraisal and assessment process at project level which will include an assessment of nutrient recovery potential in line with the requirements of the recast Urban Wastewater Treatment Directive.</p>
Environmental Forum	134	<p><i>Resource use &amp; nutrient recovery</i></p> <p>Grey water recycling offers opportunities which need to be explored in more detail. Hydrogen production may have potential. More detail on research Uisce Éireann is engaged with or if outcomes of research have been put into practice such as nitrogen and ammonia recovery. Further examination of fugitive GHGs from the treatment process and possibilities of biogas/biomethane production could be developed further in the Strategy.</p>	<p>Greywater reuse opportunities shall be considered in alignment with the principles outlined in the Regional Water Resources Plan, the Draft National Bioresources Strategy, and the Water Services Strategic Plan. These frameworks collectively support sustainable water management, resource recovery, and innovation in line with national and EU environmental objectives.</p>

Consultee	Comment number	Consultee Comment	Response
Environmental Forum	135	<i>Resource use &amp; nutrient recovery</i> There needs to be a shift in using very harmful toxic chemicals for treatment. We have seen the damage done to the receiving environment of errors in application to a river system such as the sizeable fish kill and devastation to other species in the recent incident in the River Allow. A waterbody which had benefitted from the work locally under an expensive LIFE programme. Within the study area a similar incident happened in August 2023 in the Glashaboy.	Chemicals are essential to the operation of water and wastewater treatment plants. Minimal chemical usage is employed in the wastewater treatment process to reduce environmental impact and operational risk. To further enhance safety, chemical handling and storage risk assessments are currently being conducted across all Uisce Éireann sites. These assessments aim to prevent incidents similar to past chemical spills and ensure compliance with best practice standards.
Environmental Forum	136	<i>Resource use &amp; nutrient recovery</i> Monitoring and treatment of PFAS, pharmaceuticals and antibiotics entering the system from poorly operating plants, where there is no system e.g. Aghada and from septic tanks need to be included in the Strategy. It is not really helpful to exclude harmful substances as they damage the water and are a risk to human health as per Pg. 17 of the SEA Scoping Report "The EPA 2022 assessment also identified that 88% of surface waterbodies achieved good chemical status when ubiquitous substances were excluded (for example mercury and polycyclic aromatic hydrocarbons (PAHs))".	Private wastewater treatment systems do not form part of the public wastewater network and are therefore not considered within the scope of this strategy. Monitoring of PFAS (per- and polyfluoroalkyl substances) and other emerging pollutants will be carried out in accordance with the requirements of the recast Urban Waste Water Treatment Directive, ensuring compliance with evolving EU environmental standards
Environmental Forum	137	<i>2. The Cork Wastewater Strategy study area comprises the Cork Metropolitan Area and the Cork Harbour and Cork Outer Harbour receiving waters and the Water Framework Directive waterbodies. Do you have any comments on this?</i> It is good to see the inclusion of the adjacent WFD waterbodies. The noncompliance with the WFD with a high proportion of waterbodies in the moderate category is detailed. However, the trend of estuaries and transitional waters to continue to have the lowest number of good status waterbodies urgently needs to be addressed.	We acknowledge that wastewater discharges are a pressure on the Cork Estuary. Uisce Éireann is developing this Strategy to ensure that wastewater infrastructure is compatible with the objectives of the Water Framework Directive, supporting the protection and improvement of water bodies including rivers, estuaries, and coastal waters.  Water quality in the Lee Estuary and Cork Harbour is influenced by multiple pressures. Through the Water Action Plan, Uisce Éireann is committed to implementing targeted measures that deliver meaningful environmental outcomes and contribute to achieving good ecological status in line with WFD goals
Environmental Forum	138	<i>2. The Cork Wastewater Strategy study area comprises the Cork Metropolitan Area and the Cork Harbour and Cork Outer Harbour receiving waters and the Water Framework Directive waterbodies. Do you have any comments on this?</i> The encouragement of very large cruise liners to Cobh may be adding to the load on the waste water systems whilst discharging in Port. Perhaps activities such as this that ultimately have a cost to the environment and exchequer greater than the benefit should be deterred as has happened in Italy, Iceland and other countries.	There is currently no provision for cruise liners to discharge wastewater to the public network at Cobh, and there are no plans to introduce such a facility. Any future proposals to alter this arrangement would require a full assessment through Uisce Éireann's New Connections process and, where applicable, the Trade Effluent Licensing process to ensure compliance with environmental and operational standards.
Environmental Forum	139	<i>2. The Cork Wastewater Strategy study area comprises the Cork Metropolitan Area and the Cork Harbour and Cork Outer Harbour receiving waters and the Water Framework Directive waterbodies. Do you have any comments on this?</i> After agriculture, hydromorphology is the second highest pressure, a consideration which requires to be factored in. The planned removal of obstacles in some waterbodies may alleviate some pressures and we should try to implement nature based solutions for flooding rather than hard engineered solutions only. Many other countries are addressing these same issues and some learnings can be taken into account when developing this strategy.	Uisce Éireann acknowledge and welcome comments made by the Environmental Forum. We would note that the strategy is focused on wastewater and will identify priority wastewater projects within the Cork Metropolitan Area.
Environmental Forum	140	<i>2. The Cork Wastewater Strategy study area comprises the Cork Metropolitan Area and the Cork Harbour and Cork Outer Harbour receiving waters and the Water Framework Directive waterbodies. Do you have any comments on this?</i> To address more rural, difficult to serve areas especially all along the coast and adjacent to rivers and lake the use of reed bed filtration as is being used in isolated cases already such as Carlow could be accelerated in the 1st phase of the Strategy.	The Cork Wastewater Strategy study area comprises the Cork Metropolitan Area and the Cork Harbour and Cork Outer Harbour. For settlements within this study area nature-based solutions will be considered as part of the Solution Optioneering process, where appropriate, to support sustainable and resilient wastewater infrastructure planning.

Consultee	Comment number	Consultee Comment	Response
Environmental Forum	141	<p>3. Do you have any comments on the approach to the Strategic Environmental Assessment for the Cork Wastewater Strategy?</p> <p>Maybe just to point to 2 aspects which should be of greater importance in the overall Strategy, not just the SEA, these are Water Governance and Public Participation.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Environmental Forum.</p>
Environmental Forum	142	<p>3. Do you have any comments on the approach to the Strategic Environmental Assessment for the Cork Wastewater Strategy?</p> <p><i>Water Governance &amp; Policy Coherence</i></p> <p>The documents articulate the complex interrelated areas that overlap and have an effect on the provision and delivery of wastewater services against policy and regulatory requirements.</p> <p>To date despite efforts in recent years we do not have good governance on water. Responsibility has been fragmented and greater policy coherence is required. In order to successfully formulate and deliver a wastewater strategy fit for purpose some of the systemic barriers much also be addressed. These include our current land use and some of our economically driven policies which conflict with delivery of services that do not cause harm to the environment.</p> <p>To have any hope of being implemented in a timely manner such strategies must have an aligned budget.</p>	<p>Uisce Éireann was established as the single national authority responsible for the delivery of public water and wastewater services in Ireland. Its role is to ensure the provision of safe, sustainable, and efficient water services, consolidating responsibilities that were previously managed by local authorities.</p> <p>The Strategy has considered all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Environmental Forum	143	<p>3. Do you have any comments on the approach to the Strategic Environmental Assessment for the Cork Wastewater Strategy?</p> <p><i>Opportunity for greater public participation</i></p> <p>There are many people in communities that care deeply about water quality, from anglers to swimmers, and are great advocates and activists that are already supporting local catchment work but can also engage with this strategy as it develops.</p> <p>Many groups are working at a very local scale on their local streams and rivers, examining culverted areas, where discharges occur and testing the water quality through citizen science initiatives. It is crucial there is a re-balancing of expertise with local knowledge and more resources channelled to support the work of such local groups who are taking real and concrete positive action in protecting water bodies, engaging their communities and having a lasting positive impact.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Environmental Forum.</p> <p>Stakeholder engagement is a core component of the strategy development process. Uisce Éireann is committed to engaging with communities, local authorities, regulators, and other key stakeholders to ensure that the strategy reflects local needs, environmental priorities, and regulatory requirements. Feedback gathered through public consultation and targeted engagement will inform and support the delivery of sustainable and inclusive outcomes.</p>
Environmental Forum	144	<p>4. Section 2.1 in chapter 2 of the SEA Scoping Report outlines the objectives of the Cork Wastewater Strategy. Do you have any comments on these objectives?</p> <p>As Cork has such a significant harbour and the WFD estuarine/ coastal waterbodies are also taken into account perhaps it would be appropriate to reference the National Marine Planning Framework, particularly in Figure 2.1 showing the interaction of plans. Whilst it looks as if there will be development of offshore wind first off the Waterford coast it is expected the energy landfall and much of the supporting infrastructure will be based in Cork. Meeting the obligations of the NMPF is a cross-cutting challenge.</p>	<p>The National Marine Planning Framework has already been referenced within the main body of this document and is included in Appendix B: 'Plans, Programmes and Policies'. It has been considered as part of the Strategic Environmental Assessment .</p>

Consultee	Comment number	Consultee Comment	Response
Environmental Forum	145	<p>5. Uisce Éireann has reviewed plans, policies and programmes relevant to the Cork Wastewater Strategy in chapter 4 of the SEA Scoping Report. Are there any others that should be considered?</p> <p>The Cork City Development Plan is mentioned, which includes the Green/ Blue Infrastructure Strategy an important more localised study.</p> <p>There does not appear to be mention of Abstractions. The Abstraction Bill is an important piece of legislation and likely to be of greater relevance going forward as we experience more droughts and floods, both presenting their own challenges. As this Strategy is long-term and also aiming to meet the economic needs of new businesses and industries there should be greater articulation of the needs as regards water usage requirements.</p>	<p>The Water Environment (Abstractions and Associated Impoundments) Bill, 2022 (The Abstractions Bill)' is already included in the Appendix A 'Relevant Legislation, Plans and Programmes'.</p> <p>Abstractions from surface waters are only relevant to this strategy where they impact the assimilative capacity of the receiving waterbody to accept wastewater discharges. In such cases, the interaction between abstraction pressures and wastewater loading will be considered to ensure compliance with environmental quality standards and the objectives of the Water Framework Directive.</p>
Environmental Forum	146	<p>8. How would you like Uisce Éireann to communicate with you as the plan progresses?</p> <p>Notification of further consultative phases and opportunities to engage as well as any relevant revisions.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Environmental Forum. There will be opportunities for further engagement during the second round of public consultation in the coming months.</p>
The Land Development Agency	147	<p>The LDA fully supports the four principal considerations and the six key objectives underpinning the proposed Strategy. These provide an appropriate baseline for establishing a proactive, agile and long-term series of infrastructure interventions to ensure there is sufficient wastewater treatment capacity and improvements to meet future environmental and societal needs.</p>	<p>Uisce Éireann acknowledge and welcome comments made by the Land Development Agency.</p>
The Land Development Agency	148	<p>The LDA recognises and supports the long-term nature of the strategy and notes the proposed project horizons of 2030, 2055 and 2080. Given the National Development Plan, National Planning Framework (NPF) and draft revised NPF (July 2024) extend to 2040 and many Development Plans already look forward to a 2040 horizon, it is suggested a new Project Horizon date of 2040 should be considered. This would also allow for a more graduated transition across the Strategy with 5-year (2030), 10-year (2040), 15-year (2055) and 25-year horizons (2080).</p>	<p>The implementation of projects under this strategy will be guided by a separate Implementation Plan, which will outline the phasing and delivery of infrastructure in alignment with Uisce Éireann's investment planning cycles.</p> <p>Design horizons referenced in this strategy relate specifically to projected growth and loading forecasts, and do not imply fixed timelines for delivery. Project delivery will be prioritised based on need, environmental risk, and alignment with available funding within the relevant investment cycle.</p>
The Land Development Agency	149	<p>In summary, the LDA is supportive of the strategic, long-term approach being pursued by Uisce Éireann through the emerging Wastewater Strategy for the Cork Metropolitan Area. In scoping the content of the proposed Strategy, we suggest a new project horizon of 2040 is introduced to reflect existing national, regional and local growth milestones to 2040. We are grateful for Uisce Éireann's engagement with the LDA in discussing water infrastructure needs to support new homes and we look forward to continuing this engagement into the future.</p>	<p>The implementation of projects under this strategy will be guided by a separate Implementation Plan, which will outline the phasing and delivery of infrastructure in alignment with Uisce Éireann's investment planning cycles.</p> <p>Design horizons referenced in this strategy relate specifically to projected growth and loading forecasts, and do not imply fixed timelines for delivery. Project delivery will be prioritised based on need, environmental risk, and alignment with available funding within the relevant investment cycle.</p>
Cork City Council	150	<p>In supporting Uisce Éireann's role in preparing this major strategy, Cork City Council request that there is a strong level of early engagement between key stakeholders, and throughout the process. This will enable important information such as local level data, monitoring and forecasting, to be shared and discussed as part of an evidence-based approach to the preparation and implementation of the strategy.</p>	<p>Uisce Éireann acknowledge and welcome comments made by Cork City Council. Stakeholder engagement is a core component of the strategy development process. Uisce Éireann is committed to engaging with communities, local authorities, regulators, and other key stakeholders to ensure that the strategy reflects local needs, environmental priorities, and regulatory requirements. Feedback gathered through public consultation and targeted engagement will inform and support the delivery of sustainable and inclusive outcomes.</p>



Consultee	Comment number	Consultee Comment	Response
Cork City Council	151	<i>National Planning Context</i> With a population of over 224,000, Cork City is an emerging international city of scale and a national driver of economic and urban growth. Project Ireland 2040 designates the city for significant additional growth and large-scale infrastructure led investment. This infrastructural investment will be critical in delivering many of the 10 National Strategic Objectives (NSO's) set out in the National Planning Framework (NPF 2040), in particular Compact Growth, Sustainable Mobility and Transition to a Low Carbon and Climate Resilient Society.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Cork City Council	152	<i>National Planning Context</i> The National Planning Framework 2040 envisages that Cork will become the fastest-growing city region in Ireland with a projected +60% increase in population in the period up to 2040. The recently published Draft Revision of The National Planning Framework (NPF) is currently seeking public submissions and observations. The draft issued focuses on critical areas of review for the revised NPF, such as climate transition, regional development, demographics, investment and investment prioritisation.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Cork City Council	153	<i>National Planning Context</i> Key relevant elements to waste water infrastructure planning include revised population and employment growth targets and a new focus on delivering Transport Orientated Development (TOD). As a result of this targeted growth, the current wastewater drainage infrastructure is being challenged to keep pace with the increased demand for new serviced land for housing, commercial developments, and industry, all in the right areas planned for long term growth.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Cork City Council	154	<i>National Planning Context</i> Uisce Éireann's current Strategic Funding Plan (2019-2024) sets out multi-annual strategic funding of €11bn to 2024 (€6.1bn infrastructural investment and €4.9bn in operating costs). Uisce Éireann's current Capital Investment Plan (2020-2024) for water and wastewater assets and infrastructure aims to deliver "...improvements to water and wastewater services throughout Ireland where they are needed most urgently...". Both plans are in line with Uisce Éireann's funding model to "...provide as much funding certainty as possible, in the absence of domestic water charges, and aligning with the cost recovery aspects of the EU Water Framework Directive...."	Uisce Éireann acknowledge and welcome comments made by Cork City Council.
Cork City Council	155	<i>National Planning Context</i> Given Uisce Éireann's current strategic plans are now nearing the end of their cycles, Cork City Council very much welcomes the approach of preparing a new strategy for wastewater investment and management in the Cork Metropolitan Area (CMA) aligned with national planning objectives for the medium (2030) to long term (2055 and 2080).	Uisce Éireann acknowledge and welcome comments made by Cork City Council.
Cork City Council	156	<i>Cork City Development Plan 2022-2028</i> The National Planning Framework sets a +60% population growth target for the city from 2016 to 2040. Cork City's Development Plan 2022-2028 sets out a growth plan for Cork City that includes population targets and locations for future growth up to 2028 and 2040. Growth objectives for each area are detailed in the City Plan.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.
Cork City Council	157	<i>Cork City Development Plan 2022-2028</i> The Cork Metropolitan Area Transport Strategy 2040 (CMATS) sets out the phased delivery of a new transport network designed to deliver an integrated multimodal system to enable Transport-Orientated Development (TOD) for the area. The Cork City Development Plan 2022-2028 (the City Development Plan) builds on this by providing a clear land use strategy that can best enable a 15-Minute City, while continuing to be an innovative, vibrant, healthy and resilient city.	The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.

Consultee	Comment number	Consultee Comment	Response
Cork City Council	158	<p><i>Cork City Development Plan 2022-2028</i></p> <p>The regeneration of City Docks and Tivoli Docks along with other brownfield sites are identified as key regeneration areas to deliver compact liveable growth by 2040. In the City Centre, regeneration and expansion of residential, employment, cultural and community uses is needed to increase vibrancy in key central neighbourhoods and decrease underutilised buildings and sites. Strategic growth is designated within key areas of the City Suburbs serviceable by public transport such as Blackpool, Ballyvolane, Mahon and South Ballincollig. Longer term strategic planning areas such as Tramore Road, Blarney / Stoneview and Carrigrohane will further enhance the delivery of TOD in Cork City and align with the National Planning targets up to 2040.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Cork City Council	159	<p><i>Cork City Development Plan 2022-2028</i></p> <p>Employment-led growth will also be central to delivering sustainable and ambitious targets envisaged for the city. It is estimated that approximately 35,000 new jobs will be generated by the planned population growth. Lands have been zoned to accommodate future demand while targeting neighbourhoods where there are relatively high levels of unemployment, creating inclusive and sustainable communities.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Cork City Council	160	<p><i>Strategic Growth in Cork City</i></p> <p>This submission details strategic land banks within Cork City for the delivery of phased growth in the short, medium and long term. These strategic locations are directly linked to key NPF targeted growth and CMATS infrastructure planning including the new suburban rail network, strategic bus corridors, cross city greenways, the delivery of LRT, strategic park and ride infrastructure, critical multimodal distributors routes and active travel networks. Many of these locations are designated as mixed-use regeneration and expansion areas for delivery within the current plan period 2022-2028. To help enable this, much of this strategic transport infrastructure is currently being planned or delivered.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Cork City Council	161	<p><i>Strategic Growth in Cork City</i></p> <p>The map and table belows identify strategic locations in Cork City for the delivery of long term growth at scale. Each location has a designation under the current Cork City Development Plan 2022-2028. All locations are highly accessible to other strategic infrastructure, including existing or planned transport infrastructure. The locations comprise a mix of strategic brownfield, infill and greenfield lands in public and private ownership.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
Cork City Council	162	<p><i>Strategic Growth in Cork City</i></p> <p>Collectively these locations can facilitate the delivery of a range of mixed-used development, including an estimated 60,000 to 100,000 residential units on 1,500 ha of land at an average density of 80 units per hectare. Three of the locations are within the city centre or docklands, ten are within the city suburbs and three are located in the urban towns of Ballincollig and Blarney. The Long-term growth strategy looks at potential new residential capacity across the city on a short, medium and long-term basis (Note: All maps can be shared separately as GIS shapefiles).</p>	<p>The Strategy has been developed taking full account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>

Consultee	Comment number	Consultee Comment	Response
Cork City Council	163	<p><i>Supporting a Strategic Approach to Wastewater Treatment Planning and Investment</i></p> <p>Cork City Council looks forward to continuous engagement in supporting Uisce Éireann's strategic plan, and in particular the following objectives:</p> <ul style="list-style-type: none"><li>· Support the future development of the Cork Metropolitan Area by providing the necessary capacity in wastewater drainage, management and treatment systems.</li><li>· Enhance and protect the environment through effective wastewater management.</li><li>· Prioritise sustainable options for effective wastewater management that deliver multiple benefits.</li></ul> <p>In providing these services Uisce Éireann plays a central role in enabling the future population growth, economic growth, environmental management and climate change targeted for Cork City under the National Planning Framework 2040 and beyond. With this in mind, Cork City Council welcomes early opportunities for key stakeholder engagement that can affirm designated key strategic options for future infrastructure investment that provide the necessary capacity in wastewater drainage and management. Cork City Council looks forward to working with Uisce Éireann to deliver essential infrastructure in a timely manner that supports the population growth targets in a sustainable way in order to deliver much needed homes in the city.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>
		<p><i>Study area</i></p> <p>While the document is titled as a Cork Wastewater Strategy, the area of focus is largely on Cork Harbour and surrounding areas and would be better titled as <b>Metropolitan Cork Wastewater</b></p>	

Consultee	Comment number	Consultee Comment	Response
Cork County Council	164	<p><b>Strategy.</b> The study area includes some locations that are not included in our current County Development Plan 2022 (CDP) settlement network and does not include other settlements that are in the current CDP. For consistency and monitoring purposes, and to ensure plan-led infrastructure that follows the adopted land use planning strategy, it would be beneficial to have the settlements identified align with the settlements in the CDP rather than equating to the location of existing UÉ infrastructure. Settlements identified in the Issues Paper that have been discontinued from the settlement network include:</p> <ul style="list-style-type: none"> <li>· Berrings</li> <li>· Matehy</li> <li>· Coole East</li> <li>· Leamlara</li> <li>· Ballymore</li> </ul> <p>There are also a couple of location that have been identified separately and should be considered as part of the adjoining settlement:</p> <ul style="list-style-type: none"> <li>· Ballinacurra (should be considered as part of Midleton)</li> <li>· Myrtleville (should be considered with Crosshaven and Bays as per the CDP)</li> </ul> <p>The following settlements and Strategic Employment Location are identified in the CDP and located in the Metropolitan Cork SPA and should be identified in the study area:</p> <ul style="list-style-type: none"> <li>· Marino Point</li> <li>· Ballinhassing</li> <li>· Waterfall</li> <li>· Ballynora</li> </ul> <p>Grenagh and Watergrasshill are identified in the study area but are not located in the Metropolitan Cork Strategic Planning Area, but their inclusion is welcome. Dripsey is referred to as Upper Dripsey in the CDP.</p> <p>CCC, in welcoming this proposed Plan, would request that a similar exercise that addresses the wastewater needs of the remainder of the County be given priority.</p>	<p>Uisce Éireann acknowledges the comment regarding plan-led development. However, the Cork Wastewater Strategy is a standalone strategic study. While it is developed with due consideration of the Cork County Development Plan (CDP), we do not consider the CDP to be the primary determinant for the location of future wastewater infrastructure. Infrastructure planning within this strategy is based on technical assessments, environmental constraints, and long-term serviceability, rather than solely on land use zoning or development aspirations outlined in the CDP</p> <p>It was previously agreed to use the name Cork Wastewater Strategy, with an always attached subtitle of Metropolitan Area.</p>
Cork County Council	165	<p><i>Population of Metropolitan Cork</i></p> <p>The Core Strategy of the Cork County Development Plan 2022 (CDP) is directly informed by the National Planning Framework (NPF) and the regional Spatial and Economic Strategy (RSES) and puts significant emphasis on growth in the Cork Metropolitan area.</p> <p>In order for UÉ to better understand the needs to Metropolitan Cork, we would like to take this opportunity to reiterate the population targets for Metropolitan Cork which are fully articulated in the Core Strategy of the CDP and which are highlighted in the following paragraphs. It should be noted that the NPF is now under review and any increased population/housing growth needs to be factored into UÉ's future plans once these figures become available in Q3 2024.</p> <p>Cork County is tasked with planning for over a quarter of the Southern Region's growth (or 66,000 people) to 2031 and 104,000 to 2040. This equates to an overall requirement for the plan period (Q3 2022 to Q2 2028) of 22,611 units. County Metropolitan Cork Strategic Planning Area is required to provide 10,514 new net units of the 22,611 total to Q2 2028.</p> <p>CCC have prepared high-level population projections for the County to 2080 based on two scenarios; average growth rate based on NPF/RSES targets and a high growth scenario. (See 'Screenshots' tab)</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p>



Consultee	Comment number	Consultee Comment	Response
Cork County Council	166	<p><i>Jobs growth in metropolitan Cork</i></p> <p>In line with population growth, Cork County Council anticipate an associated growth in jobs in the county and consider that the UÉ strategy should account for an increased jobs growth which for strategic planning purposes is calculated at 0.6 per 1 person. Metropolitan Cork contains four of the County's Strategic Employment Locations – Carrigtwohill, Little Island, Ringaskiddy and Whitegate as well as the Strategic Employment Centre of Marino Point.</p> <p>These strategic employment areas act as regional drivers which may not experience significant planned population growth but importantly will account for significant jobs growth in the period to 2040, for example Cork Harbour Economy Area, which will play a major role in both population and jobs growth for the region and requires specific short, medium and long-term investment planning. Work undertaken by the Council has highlighted the potential for accelerated growth in jobs in areas such as offshore renewable energy development, the jobs/industries that the significant green energy supply can support, and this potential should be factored into long term targets.</p> <p>The necessary settlement specific key water services infrastructure identified in the CDP and required to deliver the growth targets to 2028 outlined above are included in Appendix A of this letter.</p>	<p>The Strategy has been developed taking account of all relevant statutory plans and policies, and is aligned with the strategic spatial frameworks that direct the future growth of the region. This has taken into account the latest projection for growth for the country and the region, including the update to the National Planning Framework and is flexible, allowing for future change in patterns of development experienced or proposed.</p> <p>Provision for growth in jobs in the CMA has been included in the Strategy as follows: Baseline commercial-institutional population is taken as 16% of the residential population as per Greater Dublin Strategic Drainage Study (GDSDS). This population component is assumed to increase at the same rate as for residential population.</p> <p>Licensed discharge data was used to determine the baseline Industrial population (equivalent). Industrial population is assumed to stay same for all project horizons without any future growth. It is considered that the headroom allowance will accommodate potential industrial growth. A key element of Uisce Éireann's strategy for meeting demand is the maintenance of an acceptable level of headroom (available capacity over current demand) in our systems to allow for growth potential and capacity risks. A headroom of 20% was applied for Cork City and Suburbs with a headroom of 15% applied everywhere else.</p>
Cork County Council	167	<p><i>Timelines</i></p> <p>The timeline for the review periods of this study should consider and where possible align with the review periods of the CDP, i.e. 2026 and 2036 for the 2028-2038 and 2028-2048 plans, respectively, Legislative context: the diagram is not up to date and should reflect more current and longer term plans. Cork County no longer have Local Area Plans or Town Development Plans.</p>	<p>Uisce Éireann acknowledge and welcome comments made by Cork City Council. The strategy will be subject to periodic review and updates to reflect changes in population growth, environmental conditions, regulatory requirements, and investment priorities. The timeline for review will be established in the Final Strategy Report.</p> <p>The diagram illustrating the hierarchy and interaction of plans and projects will be updated as advised.</p>
Cork County Council	168	<p><i>Holistic Settlement Planning</i></p> <p>The council requests that any strategy addresses the need to consider a “Whole of settlement approach” to infrastructure investment. De- coupling of wastewater and water supply investment decisions has the potential to undermine growth potential in settlements where one element of the water services infrastructure is addressed without commensurate investment in the other element. While this may be appropriate in a scenario to address environmental compliance, where the motivation for investment is to address growth, a more holistic view should be taken of settlements and this issue should be a consideration of any programme that is developed on foot of this strategic plan.</p>	<p>Uisce Éireann has already published a separate Water Supply Strategy under the Regional Water Resources Plan (RWRP) – South West Region. While both strategies are aligned in terms of long-term planning and sustainability objectives, they are developed independently to address the specific challenges and requirements of water supply and wastewater management respectively.</p>
Cork County Council	169	<p><i>Developer provided infrastructure</i></p> <p>Cork County Council has received notification from the Department of Housing, Local Government &amp; Heritage that, with effect from 1<sup>st</sup> January 2024, Uisce Éireann has responsibility for the remediation of developer provided water services infrastructure (DPI). The strategy should include for specific reference to DPI and set out a plan and timeframe for its remediation and taking in charge. Cork County Council will provide support and assistance to Uisce Éireann as required to expediate this process.</p>	<p>Private wastewater treatment systems do not form part of the public wastewater network and are therefore not considered within the scope of this strategy. Uisce Éireann have a programme in place for estates, including those with DPI, where the solution is their connection to public wastewater or water network and taking the DPI out of use.</p> <p>As part of the Cork Wastewater Strategy, loading figures for all existing homes within an existing catchment boundary—including those currently unconnected—have been considered. This ensures that the planned infrastructure has sufficient capacity to accommodate both current and future demand, supporting equitable access to wastewater services across the region.</p>

Consultee	Comment number	Consultee Comment	Response
Cork County Council	170	<p><i>Environmental issues</i></p> <p>Uisce Éireann in partnership with the Council have an extremely important role in the protection, maintenance and improvement of water quality and compliance with environmental standards. As the effects of climate change are exacerbated through extreme weather events (rainfall, drought etc.), UÉ and Local Authorities will require a robust response through both mitigation and adaptation measures. There is a continued departure in the approach of UÉ and CCC on the basis for assessment of capacity. Environmental considerations need to be reflected in the capacity register rather than a view solely of hydraulic volume. As a key input to a Strategy like this, there needs to be greater alignment between LAs and UÉ.</p>	<p>The capacity registers are reviewed annually using the latest data, and Uisce Éireann will maintain collaboration with relevant local authorities regarding these registers.</p>
Cork County Council	171	<p><i>Environmental issues</i></p> <p>Cork Harbour is a particularly sensitive water catchment containing two EU sites, namely Great Island Channel SAC and the Cork Harbour SPA. UÉ previously committed to a Cork Harbour Modelling Study the purpose of which was to provide a calibrated and validated strategic water quality model, which was to be the basis for the future assessment of impacts of UÉ activities on Cork Harbour. CCC would welcome clarification on progress of this modelling exercise in the context of the development of this Strategy. Given the scale of targeted population growth, combined with the increase in extreme weather events, the assimilative capacity of the Harbour will come under significant pressure.</p>	<p>The outputs of the Cork Harbour Marine Modelling Study was used in the Water Quality Modelling for the strategy.</p> <p>Water quality modelling has been implemented to guide the strategy in identifying appropriate discharge locations and treatment standards. This modelling ensures that discharges are environmentally sustainable and aligned with legislative requirements.</p>
Cork County Council	172	<p><i>Environmental issues</i></p> <p>Rainwater management and associated flood risk is a growing challenge for UÉ, OPW and LAs. With the imminent recast of the UWWTD and the introduction of a requirement for the preparation of Integrated Urban Wastewater Management Plans, the proposed strategy needs to address the legacy of combined systems in the Study Area and CCC request that the preparation of this strategy should consider the potential for a prioritised Integrated Wastewater Management Plan for Metropolitan Cork.</p> <p>See 'Screenshots' tab</p>	<p>In line with the recast Urban Wastewater Treatment Directive, an Integrated Urban Wastewater Management Plan must be developed for the Cork City agglomeration by the end of 2033, and for other 'risk agglomerations' between 10,000 and 100,000 population equivalent by the end of 2039. These plans aim to reduce pollution from combined sewer systems and separate urban runoff systems. Uisce Éireann is collaborating with the Department of Housing, Local Government and Heritage, local authorities, and other stakeholders to establish the methodologies for these plans. The Integrated Urban Wastewater Management Plans will be governed by an Implementing Act under the recast UWWTD, which will define the required methodologies and formats, with development led by the EU Commission starting in 2025 and concluding by January 2, 2028. These plans will also inform future updates to the wastewater strategy for the study area.</p> <p>The Integrated Urban Wastewater Management Plans that will be developed for Cork City and other agglomerations within this Study Area will inform future updates of the Strategy.</p>
Cork County Council	173	<p><i>Feedback on SEA Scoping Report</i></p> <p>Decoupling wastewater from water services is of concern when planning for 2080. Given the water cycle, these services are considered to be inextricably linked and have cumulative impacts that need to be considered. A plan that provides for wastewater and drinking water to 2080 would be welcomed. (links in with Section 1.1.2 comments)</p>	<p>Once the Cork Wastewater Strategy is finalised and published, Uisce Éireann will have comprehensive strategies in place for both water—through the Regional Water Resources Plan for the South West Region—and wastewater, specifically covering the Cork Metropolitan Area.</p>
Cork County Council	174	<p><i>Feedback on SEA Scoping Report</i></p> <p>Table 3.1 of the SEA Scoping Report lists wastewater sludge disposal as an activity related to the Cork Wastewater Strategy with potential environmental effects. However, there is no further detail of sludge management in the Cork Wastewater Strategy which may impact areas outside of the core study area/zone of influence. It is recommended that the Strategy should include details of waste/sludge management (including any satellite dewatering, sludge hubs etc) as part of a wastewater strategy for the Cork Metropolitan Area and this may affect the project boundary and scope. The SEA would also need to consider cumulative impacts in this context.</p>	<p>Sludge generated from wastewater treatment plants will be managed and disposed of in accordance with Uisce Éireann's National Wastewater Sludge Management Plan and the Water Services Strategic Plan 2050.</p> <p>A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.</p>

Consultee	Comment number	Consultee Comment	Response
Cork County Council	175	As per the National Biodiversity Plan and the River Basin Management Plan, a catchment-based approach should be taken for this plan.	<p>The strategy is informed by catchment-based modelling to assess the potential impacts of all discharges. Water quality modelling has been implemented to guide the strategy in identifying appropriate discharge locations and volumes to water bodies. This modelling ensures that discharges are environmentally sustainable and aligned with legislative requirements.</p> <p>In addition, we have reviewed climate change parameters to adapt the model to the longer-term planning horizons outlined in the strategy. This will help ensure that the strategy remains resilient and responsive to future hydrological and environmental conditions, supporting the long-term protection of water quality and ecosystem health.</p>
Cork County Council	176	The plan appears to focus on current UE infrastructure. The plan should also consider legacy infrastructure and include these in the plan, particularly developer-provided infrastructure that is in place.	<p>Private wastewater treatment systems do not form part of the public wastewater network and are therefore not considered within the scope of this strategy. Uisce Éireann have a programme in place for estates, including those with DPI, where the solution is their connection to public wastewater or water network and taking the DPI out of use.</p> <p>As part of the Cork Wastewater Strategy, loading figures for all existing homes within an existing catchment boundary—including those currently unconnected—have been considered. This ensures that the planned infrastructure has sufficient capacity to accommodate both current and future demand, supporting equitable access to wastewater services across the region.</p>
Cork County Council	177	Given the long timeframe of the plan, a review system should be set out to systematically review the plan at intervals considering changes in legislation, policy, design, technology, status/risk etc. It is suggested that the plan should follow the review cycle of Development Plans.	The strategy will also include timelines for systematic review in its Implementation and Monitoring section to ensure ongoing evaluation and updates.
Cork County Council	178	The issues paper should provide more Cork-specific detail and set out key specific issues for Cork.	The Cork Wastewater Strategy will set out key specific issues for the Cork Metropoliation Area and how these will be adressed over the next 50 years.
Cork County Council	179	Would welcome emission limit values (ELV) issue consideration in determining UE available capacity. Could do with including a specific statement recognising that additional ELV may be required to reach the WFD objectives over and above UWWTD compliance.	The environmental assessement and WQM includes consideration of the WFD objectives along with the Recast UWWTD standards. Water quality modelling has been implemented to guide the strategy in identifying appropriate discharge locations and volumes to water bodies. This modelling ensures that discharges are environmentally sustainable and aligned with legislative requirements.
Cork County Council	180	Take a catchment-based approach which would extend well beyond the boundaries of the Metropolitan area.	<p>The strategy is informed by catchment-based modelling to assess the potential impacts of all discharges. Water quality modelling has been implemented to guide the strategy in identifying appropriate discharge locations and volumes to water bodies. This modelling ensures that discharges are environmentally sustainable and aligned with legislative requirements.</p> <p>In addition, we have reviewed climate change parameters to adapt the model to the longer-term planning horizons outlined in the strategy. This will help ensure that the strategy remains resilient and responsive to future hydrological and environmental conditions, supporting the long-term protection of water quality and ecosystem health.</p>
Cork County Council	181	Scoped out noise and vibration impacts — flood warning systems? operational noise? There are sensitive receptors in Cork Metropolitan area.	It is important to note that the level of detail at this stage will remain strategic. Detailed site level assessments will typically be undertaken at later project-specific stages, once individual schemes are identified and progressed through planning and design.

Consultee	Comment number	Consultee Comment	Response
Cork County Council	182	Section 3.4 outlines the study area which includes a zone of influence for WFD waterbodies and European Sites. This zone does not appear to extend far enough to include the groundwater source protection area in Cloyne.	Environmental assessments, including Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), apply the source-pathway-receptor model, extending beyond the core study area to consider relevant European sites, such as the groundwater source protection area in Cloyne. No additional sites are deemed relevant for AA in this context.
Cork County Council	183	The impacts of sludge and by-products should be included in the assessment of effects and would also need to consider cumulative impacts in this context.	Sludge generated from wastewater treatment plants will be managed and disposed of in accordance with Uisce Éireann's National Wastewater Sludge Management Plan and the Water Services Strategic Plan 2050.  A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.
Cork County Council	184	Appendix B relevant legislation plans and programmes missing from the list are: <ul style="list-style-type: none"><li>Energy Efficiency Directive (2012/27/EU)</li><li>Seveso III Directive (2012/18/EU)</li><li>Integrated Pollution Prevention Control Directive (2008/1/EC)</li><li>Sewage Sludge Directive (86/278/EEC)</li><li>Waste Management (use of sewage sludge in agriculture) Regulations 1998 (S.I. No.148 of 1998) as amended by the S.I. 267 of 2001</li><li>Waste Management (Registration of Sewage Sludge Facility) Regulations 2010, (S.I. No. 32 of 2010)</li></ul>	We have added to 'Appendix A Relevant Legislation, Plans and Programmes': <ol style="list-style-type: none"><li>1. Energy Efficiency Directive (EU/2023/1791) - revised updated directive</li><li>2. Seveso III Directive (2012/18/EU)</li><li>3. Industrial Emissions Directive (2010/75/EU)</li><li>4. Sewage Sludge Directive (86/278/EEC)</li><li>5. Transcribed Irish legislation - Waste Management (use of sewage sludge in agriculture) Regulations 1998 (S.I. No.148 of 1998) as amended by the S.I. 267 of 2001</li><li>6. Waste Management (Registration of Sewage Sludge Facility) Regulations 2010, (S.I. No. 32 of 2010)</li></ol>
Cork County Council	185	<i>Q - Section 2.1 in Chapter 2 of the SEA Scoping Report outlines the objectives of the Cork Wastewater Strategy. Do you have any comments on these objectives?</i> <ul style="list-style-type: none"><li>The requirements for wastewater treatment and drainage infrastructure should be considered in the wider policy context (e.g. National Biodiversity Plan, River Basin Management Plan etc), not just considering current Development Plans, the National Planning Framework (NPF) and the Southern Regional Spatial and Economic Strategy (RSES) 2020.</li><li>Identification of alternatives would have to be consistent with the broader legislative framework, not just Uisce Éireann's plans and strategies.</li></ul>	Uisce Éireann's Cork Wastewater Strategy aligns with regional and national plans, using catchment-based modelling to assess discharge impacts. The strategy reflects Water Framework Directive (WFD) objectives and includes timelines for systematic review. Site-level impacts will be addressed through standard processes as projects progress. Importantly, wastewater and drainage infrastructure requirements are considered within the broader policy and legislative context—including the National Biodiversity Plan and River Basin Management Plan.
		<i>Q - Chapter 3 of the SEA Scoping Report sets out the current baseline environment conditions and future trends. The environmental issues are summarised in table 3.16. Do you have any comments on these?</i> <i>Water</i> <ul style="list-style-type: none"><li>Groundwater source protection areas should be included in the baseline. This should inform the zone of influence.</li><li>Map of WFD risk for all waterbodies should be shown — only ecological status is shown on map.</li></ul>	



Consultee	Comment number	Consultee Comment	Response
Cork County Council	186	<p>Risk is only listed in a column on a table. Waterbodies at risk, with urban wastewater identified as a significant pressure, should be highlighted.</p> <ul style="list-style-type: none"> <li>There are several high-status objective rivers in the metropolitan area — these should be included in the baseline and shown on a map as the protection and restoration of these high-status water bodies is a priority under Ireland's River Basin Management Plan (RBMP).</li> <li>Drinking water rivers located in the metropolitan area should be identified in the baseline.</li> <li>Identify WWTP discharging to sensitive waters that are not meeting the higher Emission Limit Values (ELVs) limits set by the Environmental Protection Agency (EPA) through their licensing system.</li> <li>Flood risk should be shown within the context of the location of UE assets as several WWTP and WWPS are located in Flood Zone A or B.</li> <li>Flood risk hydrometric modeling — does it include local flood info/ best available information? Seems to be just CFRAMs. The baseline also says that "No areas of medium or high probability of groundwater flooding have been identified".</li> <li>There are a number of Arterial Drainage Schemes and Drainage Districts in the Metropolitan area which should be included in the baseline.</li> <li>Section 3.8.3 under 'Urban Wastewater' should include Cloyne in the EPAs priority urban areas list.</li> <li>The Marine environment baseline is very generic and no detail for Cork is provided really.</li> <li>Climate change impacts on the water environment is limited to consideration of Cork City only. Significant weather events in wider Metropolitan cork should be included e.g. severe flooding in Storm Babet.</li> <li>Will a UE WW capacity register be published as a current baseline for the metro area settlements?</li> </ul>	<p>Uisce Éireann acknowledge and welcome comments made by Cork City Council on the baseline environment conditions and future trends as set out in the SEA Scoping Report. We will review and consider where relevant when updating the baseline through the SEA process.</p>
Cork County Council	187	<p><i>Section 3.8.4 key challenges</i></p> <ul style="list-style-type: none"> <li>Should include use of NBS rather than (SUDS) in new development.</li> <li>Another key challenge is assisting with restoring waterbodies "to at least good ecological status" as per action 2D2 of the National Biodiversity Plan. There are a lot of moderate and poor status rivers in the metropolitan area.</li> <li>A key challenge is with such a long-range plan, providing sufficient direction yet flexibility/ be able to be updated in response to new technologies, legislation, data etc.</li> <li>Flooding is a key challenge, inferred via climate change but probably needs to be listed.</li> <li>Assimilative capacity is a key challenge especially during extreme weather events.</li> <li>More specific stats on population figures, houses and jobs in the Cork Metropolitan Area is required.</li> </ul>	<p>Uisce Éireann acknowledge and welcome comments made by Cork City Council. These comments have been considered in the development of the draft Strategy.</p>
Cork County Council	188	<p><i>Biodiversity</i></p> <ul style="list-style-type: none"> <li>Key challenge is assisting with delivering a net gain for biodiversity.</li> <li>There are a number of heritage trees located in the metro area that should be included in the baseline.</li> </ul>	<p>Uisce Éireann is committed to delivering biodiversity net gain, as outlined in the Water Services Strategic Plan 2050.</p>
Cork County Council	189	<p><i>Q - Uisce Éireann has reviewed plans, policies and programmes relevant to the Cork Wastewater Strategy in Chapter 4 of the SEA Scoping Report. Are there any others that should be considered?</i></p> <p>Figure 2 in the issues paper which sets out the legislative context should be revised to include the broad suite of relevant policies listed in chapter 4 of the SEA scoping report.</p>	<p>Uisce Éireann acknowledge and welcome comments made by Cork City Council. Any additional relevant legislation will be included in the draft strategy and the SEA environmental report.</p>

Consultee	Comment number	Consultee Comment	Response
Cork County Council	190	<p>Q - Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</p> <p>Water environment</p> <ul style="list-style-type: none"> <li>SEO for water could include a more specific objective that UE will make significant efforts to assist with restoring waterbodies "to at least good ecological status" as per action 2D2 of the National Biodiversity.</li> <li>The flood risk SEO should also seek to avoid flooding others/ exacerbating flooding elsewhere as a result of the provision of UE services.</li> <li>In addition, a number of wastewater treatment plants or pumping stations are located in the floodplains (e.g. Carrigtwohill, Midleton, Cloyne, Rostellan) in Cork and should be considered for relocation/retrofit/resilience etc. (also relevant to climate topic and human health topic).</li> <li>UE should commit to taking a catchment wide approach to its service planning and implement nonstructural flood risk management measures as per 2D5 of the National Biodiversity Action Plan.</li> </ul>	<p>Uisce Éireann acknowledges its responsibilities under the Water Framework Directive and remains fully committed to the protection of the environment and the enhancement of biodiversity, where practicable. These commitments are embedded within the Strategic Environmental Assessment objectives and will be comprehensively addressed during the options appraisal and SEA process.</p> <p>Areas prone to the risk of flooding have been identified and assessed in the Strategy in the context of siting new wastewater infrastructure and protecting existing infrastructure.</p> <p>The strategy is informed by catchment-based modelling to assess the potential impacts of all discharges. Water quality modelling has been implemented to guide the strategy in identifying appropriate discharge locations and volumes to water bodies. This modelling ensures that discharges are environmentally sustainable and aligned with legislative requirements.</p>
Cork County Council	191	<p>Q - Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</p> <p>Population, Economy, Tourism and Recreation and Human Health</p> <ul style="list-style-type: none"> <li>SEOs for population and human health should include specific objective to protect bathing waters. Reference to "preventing restrictions to recreation and amenity facilities" may not be clear enough. The objective should seek to assist with protecting and improving bathing water quality where poor quality exists.</li> <li>Suggest inclusion of an objective to prioritise the EPAs Priority Areas List given Cork has Midleton, Cloyne and Whitegate/Aghada in cork metro area.</li> <li>Include the EPAs radon map in the human health baseline. Radon should be a consideration when assessing the impacts of earthworks, pipelines etc.</li> </ul>	<p>We have considered the protection of designated bathing waters as part of the optioneering process, including outfall selection and network interventions to address pressures from wastewater infrastructure. This has been included as a Strategic Environmental Assessment (SEA) objective.</p>
Cork County Council	192	<p>Q - Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</p> <p>Biodiversity Flora and Fauna</p> <p>Cork County Development Plan 2022-2028 has objectives to seek to achieve net gain rather than no net loss Objectives BE 15-5: Biodiversity on Council owned and managed land and property and BE 15-6 (f): Biodiversity and New Development.</p>	<p>Uisce Éireann is committed to delivering biodiversity net gain, as outlined in the Water Services Strategic Plan 2050.</p>
Cork County Council	193	<p>Q - Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</p> <p>Material Assets</p> <ul style="list-style-type: none"> <li>It is not clear what the objective is around sludge "Minimise resource use and waste generation from new or upgraded wastewater infrastructure and the management of sludge and residuals from treatment processes"</li> <li>Should have an objective to ensure that sludge from drinking water treatment and/or wastewater treatment is appropriately managed, optimising potential for circular economy gains as per the CDP.</li> <li>Cork Harbour is the economic driver for the region - Cork harbour is a major material asset for the region.</li> </ul>	<p>Sludge generated from wastewater treatment plants will be managed and disposed of in accordance with Uisce Éireann's National Wastewater Sludge Management Plan and the Water Services Strategic Plan 2050.</p> <p>A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.</p>

Consultee	Comment number	Consultee Comment	Response
Cork County Council	194	<p>Q - Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</p> <p>Geology and soils</p> <ul style="list-style-type: none"> <li>· SEOs should include an objective about sludge and management of this whole process i.e. transporting sludge and spreading sludge on land. Objective to treat sludge on-site (reed beds, energy capture etc) to be considered.</li> </ul>	<p>Sludge generated from wastewater treatment plants will be managed and disposed of in accordance with Uisce Éireann's National Wastewater Sludge Management Plan and the Water Services Strategic Plan 2050.</p> <p>A draft National Bioresources Strategy is currently being prepared and will be published for consultation in due course. This strategy will play a key role in shaping the future management of wastewater sludge and related bioresources. We have ensured that the Cork Wastewater Strategy is fully aligned with this overarching national framework, supporting a coordinated, sustainable, and compliant approach to sludge treatment and reuse.</p>
Cork County Council	195	<p>Q - Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.1 summarises these objectives. Have you any comments on these?</p> <p>Air Quality</p> <ul style="list-style-type: none"> <li>· Consider the inclusion of an objective to monitor air quality and provide additional air quality monitoring infrastructure and actions where need exists.</li> <li>· Also, assessment of effects should include a conclusions and recommendations section to inform what mitigation is required to address certain effects.</li> </ul>	<p>An objective to monitor air quality on a project by project basis will be included in the Strategy</p>
Cork County Council	196	<p><i>Feedback on Appropriate Assessment Issues Paper</i></p> <p>This is a high-level document which outlines the proposed approach to the development of a Wastewater Strategy for the Cork Metropolitan Area. The Council welcomes the fact that all possible options for the management of wastewater, including the relocation of one or more outfalls, are to be considered. The need to consider the relocation of outfalls from areas within the Cork Harbour SPA and the Great Island Channel SAC was first raised by the NPWS during the preparation of the 2014 County Development Plan, when a commitment was given by CCC to work with stakeholders (IW, NPWS and EPA) towards the development and implementation of a waste-water management strategy for the Cork Harbour Area.</p>	<p>Uisce Éireann acknowledge and welcome comments made by Cork County Council in relation to evaluation of options for the management of wastewater and note the comments made in relation to relocation of outfalls.</p>
Cork County Council	197	<p><i>Feedback on Appropriate Assessment Issues Paper</i></p> <p>CCC notes the proposed approach to the identification of possible options to be included in the Wastewater Strategy. CCC recommend that the Multi Criteria Analysis would take account of natural capital value of the ecosystems of Cork Harbour and the coastal and marine zone more widely to ensure that the strategy is fully in compliance with Ireland's obligations in relation to the Habitats and Birds Directives, the Water Framework Directive and the Nature Restoration Regulation.</p>	<p>The Appropriate Assessment (AA) screening takes into account the conservation objectives of each European site, including, where applicable, the restoration of Qualifying Interests to favourable conservation condition. Ecological value and ecosystem services are integrated into the Strategic Environmental Assessment objectives, which will, in turn, inform the Multi-Criteria Analysis and options appraisal process.</p>
Cork County Council	198	<p><i>Appropriate Assessment Screening Report</i></p> <p>Having regard to the high level of development proposed for the Cork Metropolitan Area, CCC concurs that the proposed Wastewater Strategy will likely require Appropriate Assessment. We consider that the primary focus of any such assessment should be on the two EU sites within Cork Harbour, namely the Great Island Channel SAC and the Cork Harbour SPA, particularly given the proximity of existing major discharge locations for treated effluent in the harbour area to these sites (Rathcoursey, Slatty's Pool and Carrigrennan). We concur that there may be other sites within the coastal region which could be impacted by the strategy, depending on the potential solutions to wastewater management which the strategy will ultimately put forward.</p>	<p>Uisce Éireann acknowledge and welcome comments made by Cork City Council</p>

Consultee	Comment number	Consultee Comment	Response
Cork County Council	199	<p><i>Appropriate Assessment Screening Report</i></p> <p>CCC is of the view that the approach to identifying the EU sites which may be impacted by the plan, as set out to date is not very clear. IJÉ may want to consider providing additional reasoning for inclusion of certain sites within the zone of influence of the plan, as well as further clarification as to the identified likely effects that the strategy could have on these sites and their associated habitats and species. More detailed analysis and assessment of the type of impacts which could arise and the likely significance of any such impacts for relevant European sites is expected as the details of the proposed strategy emerge.</p>	<p>The Appropriate Assessment (AA) screening takes into account the conservation objectives of each European site, including, where applicable, the restoration of Qualifying Interests to favourable conservation condition. Ecological value and ecosystem services are integrated into the Strategic Environmental Assessment objectives, which will, in turn, inform the Multi-Criteria Analysis and options appraisal process.</p> <p>The identification of European sites within the Zone of Influence and the description of potential impacts, as outlined in Section 4, follow the South West Regional Water Resources Plan format, as agreed with Uisce Éireann. No further detailed analysis is proposed at the strategic level. Any projects arising from this strategy will be subject to their own project-level environmental assessments, as appropriate.</p>
		<p><i>Archaeology</i></p> <p>The National Monuments Acts 1930 to 2014</p> <p>The specific national legislative code for protection of monuments, historic wrecks and archaeological objects is the National Monuments Acts 1930 to 2014. In summary, this provides legal protection for all archaeological objects, wrecks 100 or more years old and for a range of categories of monuments and places. Archaeological objects (which in broad terms includes all moveable objects of archaeological importance) are comprehensively protected under the National Monuments Acts.</p> <p>In terms of protection of monuments and related sites, the most widely applicable protective mechanism is the Record of Monuments and Places (RMP), established under section 12 of the National Monuments (Amendment) Act 1994. There are over 130,000 entries in the RMP, which takes the form of lists and maps for each county in the State. Copies of these lists and maps, as prepared in the 1990s, were circulated to all planning authorities and are now available in PDF format at <a href="http://www.archaeology.ie">www.archaeology.ie</a>. The RMP includes the archaeological monuments which had been identified at the time it was issued. Of course, many more archaeological monuments have been identified since and, while these have not as yet been included in the RMP, an online database of known archaeological monuments, the Sites and Monuments Record (SMR)—including current RMP entries and ones which will be included in a revised RMP—is available as the Historic Environment Viewer.</p>	



Consultee	Comment number	Consultee Comment	Response
National Parks & Wildlife Service	200	<p>The RIMP requires notice to be given to the Minister for Housing, Local Government and Heritage of proposed work at or in relation to monuments and places included in it (generally referred to as “recorded monuments”). Similar protection is provided by the Register of Historic Monuments (established under section 5 of the National Monuments (Amendment) Act (1987) to historic monuments and archaeological areas included in it.</p> <p>The strongest legal protection under the National Monuments Acts in respect of monuments is afforded to National Monuments of which the Minister for Housing, Local Government and Heritage or a local authority is owner or guardian or in respect of which a Preservation Order under the National Monuments Acts is in force. The consent of the Minister is required for interference with such national monuments or ground disturbance around or in proximity to them. A national monument is any monument the preservation of which is a matter of national importance by reason of the archaeological, architectural, historical, traditional or artistic interest attaching to it.</p> <p>Under the National Monuments Acts the Minister and local authorities must maintain national monuments of which they are owners or guardians (the OPW has day to day responsibility in relation to national monuments owned by or in guardianship of the Minister for Housing, Local Government and Heritage) and, subject to such restrictions as are reasonably necessary, seek to provide public access to such national monuments.</p> <p>All wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under section 3 of the National Monuments (Amendment) Act 1987. Wrecks of any date and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection.</p>	<p>Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.</p>

Consultee	Comment number	Consultee Comment	Response
National Parks & Wildlife Service	201	<p><i>Archeology</i></p> <p>Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023</p> <p>The recently signed Historic and Archaeological Heritage and Miscellaneous Provisions Act (2023) will replace the National Monuments Acts (1930–2014). The Bill will provide for the protection of historic and archaeological heritage. A new ‘Register of Monuments’ will be established, replacing several overlapping designation and registration systems currently in operation. Newly discovered archaeological sites will be afforded immediate legal protection, mirroring the existing system for archaeological objects and historic wrecks that are automatically protected without a need for formal designation or registration. This will be reinforced by a statutory reporting scheme for finds of monuments. Subject to certain exceptions, archaeological objects with no known owner will automatically become the property of the State. A new civil enforcement procedure can be used as an alternative to, or to supplement, criminal proceedings.</p> <p>The bill makes explicit provision for the protection of World Heritage sites, including, for the first time, a definition in Irish law for “World Heritage Property”. The new legislation enables the State to ratify or accede to certain international conventions, notably the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property and the 1995 UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects. The Act gives further effect to the 1992 Council of Europe European Convention on the Protection of the Archaeological Heritage (the “Valletta Convention”).</p> <p>The Act introduces a new integrated licensing system whereby one licence can authorise a range of activities and, for the first time, a statutory appeals process will be established to review licensing decisions.</p> <p>Note while this new legislation has been signed into law, most of the provisions of the Act have not yet been commenced. However, it is expected that substantive implementation will occur within the lifetime of this Updated National Energy &amp; Climate Plan 2021-2030.</p>	<p>Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.</p>
National Parks & Wildlife Service	202	<p><i>International Conventions</i></p> <p>Ireland is a party to the 1972 UNESCO World Heritage Convention. Although not as yet a party to the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, Ireland supported its adoption and has through the recent Historic and Archaeological Heritage and Miscellaneous Provisions Act (2023) directly facilitated its ratification. As already noted above the new Act will enable the State to ratify or accede to certain other international conventions as well, notably the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property and the 1995 UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects.</p>	<p>Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.</p>

Consultee	Comment number	Consultee Comment	Response
National Parks & Wildlife Service	203	<p><i>National policy on protection of the archaeological heritage</i></p> <p>The Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) was published so as to promote a high level of compliance with the aims and requirements of the Valletta Convention. It sets out national policy on the protection of the archaeological heritage in the course of development. While not specifically directed at the planning system, as operating under the Planning and Development Acts, it speaks to all development control codes.</p> <p>Core elements of the policies set out in the Framework and Principles document include emphasis on the non-renewable nature of the archaeological heritage and the need to always consider its preservation in-situ as the first option, and also the need to carry out appropriate levels and forms of archaeological assessment in advance of development.</p> <p>The Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage is one of nine sectoral plans published in 2019 under the National Adaptation Framework. It outlines five adaptation goals for built and archaeological heritage in Ireland and maps them onto an action plan of specific actions to be implemented.</p> <p>This Department concurs with the SEA Environmental Report's Section 3.14.4 Key Considerations for CWS and the SEA.</p> <p>The Department would draw attention to the following data sources about the archaeological and cultural heritage environment relevant to the Strategy and its associated environmental</p>	Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.
National Parks & Wildlife Service	204	<p><i>NMS website</i></p> <p>The NMS's website (<a href="http://www.archaeology.ie">www.archaeology.ie</a>) is a key source of data, information and publications, including GIS datasets, including amongst other things:</p> <ul style="list-style-type: none"> <li>· Historic Environment Viewer (HEV) – SMR dataset and NIAH dataset (both datasets can be downloaded or accessed by third party GIS software)</li> <li>· Wreck Viewer - records of over 18,000 known and potential wreck sites in Irish waters</li> <li>· RMP – digitised maps and gazetteers for each County</li> <li>· List of National Monuments in Ownership or Guardianship of the Minister</li> <li>· List of Preservation Orders currently in force</li> </ul>	Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.
National Parks & Wildlife Service	205	<p><i>World Heritage in Ireland</i></p> <p>The World Heritage in Ireland website (<a href="http://www.worldheritageireland.ie">www.worldheritageireland.ie</a>) provides general information about UNESCO and World Heritage as well as specific information on the World Heritage in Ireland. It provides a current list and supporting documentation and reports for all currently inscribed World Heritage sites within Ireland as well as the most recent list of Tentative sites (i.e. sites proposed for future inscription).</p>	Uisce Éireann acknowledge and welcome comments made by NPWS. There are no UNESCO sites, Biosphere Reserves, Geoparks nor World Heritage Property sites within the study area. This has been noted in the strategy.
National Parks & Wildlife Service	206	<p><i>Excavations Bulletin</i></p> <p>The database of Irish excavation reports (<a href="https://excavations.ie/">https://excavations.ie/</a>) contains summaries of archaeological excavations carried out on the island of Ireland since 1969.</p>	Uisce Éireann acknowledge and welcome comments made by NPWS. The excavations.ie data source has been referenced in the Cultural Heritage section of the SEA and informed the environmental baseline in the report where applicable.
National Parks & Wildlife Service	207	<p><i>Built Heritage</i></p> <p>It is noted that Appendix B Relevant Legislation, Plans and Programmes does not include 'Architectural Heritage Protection: Guidelines for Planning Authorities', issued under Section 28 and 52 of the Planning and Development Act 2000 (as amended).</p>	Uisce Éireann acknowledge and welcome comments made by NPWS. Architectural Heritage Protection: Guidelines for Planning Authorities (published 2011) added to 'Appendix A Relevant Legislation, Plans and Programmes'.

Consultee	Comment number	Consultee Comment	Response
	208	<p><i>Built Heritage</i></p> <p><i>In relation to comment number 207:</i></p> <p>These guidelines are a practical guide for planning authorities and for all others who must comply with Part IV of the Planning and Development Act 2000 (as amended) on the protection of the architectural heritage. It is strongly advised that the Ministerial guidelines are consulted and referenced as part of any project involving architectural heritage afforded statutory protection under the Planning and Development Act. The guidelines are available here for consultation.</p>	<p>Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.</p>
National Parks & Wildlife Service	209	<p><i>Built Heritage</i></p> <p>This Department wishes to draw attention to the definition of a protected structure under the Planning and Development Act 2000 (as amended) which includes - the structure, its interior and the land lying within its curtilage and other structures within that curtilage (including their interiors) and all fixtures and features which form part of the interior or exterior of all these structures. The particulars of ‘curtilage’ and ‘attendant grounds’ are outlined and discussed in Chapter 13 of ‘Architectural Heritage Protection – Guidelines for Planning Authorities’ cited in Point 1. The issue of curtilage/attendant grounds has the potential to be of particular relevance to this project when considering cumulative direct and/or indirect impacts as well as during the multi-criteria analysis stage.</p>	<p>Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.</p>
National Parks & Wildlife Service	210	<p><i>Built Heritage</i></p> <p>In the case of Landscape, Townscape and Seascape, these may be subject to heritage designations in the form of Architectural Conservation Areas or within the curtilage of a protected structure/s. Such designations are relevant and would need to be taken into consideration in the assessment of environmental impacts as part of the overall project.</p> <p>This dept. notes that architectural heritage will have relevance to varying degrees in other adjacent legislative provisions and policy areas including, Tourism Plans and Strategies, Climate Action Plan 2024, Town Centre First Policy, and the National Development Plan. It is noted that this is not currently reflected in Appendix B Relevant Legislation, Plans and Programmes of the SEA Scoping Report.</p>	<p>Uisce Éireann acknowledge and welcome comments made by NPWS and will consider where relevant at strategy level.</p>
National Parks & Wildlife Service	211	<p><i>Built Heritage</i></p> <p>Both Cork City and County Councils have Architectural Conservation Officers, who are responsible for the statutory functions relating to architectural heritage. Early consultation with these officers is recommended.</p>	<p>Uisce Éireann acknowledge and welcome comments made by NPWS. Stakeholder engagement is a core component of the strategy development process. Uisce Éireann is committed to engaging with communities, local authorities, regulators, and other key stakeholders to ensure that the strategy reflects local needs, environmental priorities, and regulatory requirements. Feedback gathered through public consultation and targeted engagement will inform and support the delivery of sustainable and inclusive outcomes. Any projects arising from this strategy will be subject to their own project-level environmental assessments, as appropriate.</p>