

SUBMISSION TO THE DEPARTMENT FOR PUBLIC EXPENDITURE AND REFORM

Review to Renew: Review of National Development Plan

26th January 2021

Introduction to An Fóram Uisce

An Fóram Uisce |The Water Forum (hereafter, An Fóram) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. An Fóram is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 28 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

1. Submission Overview

1. An Fóram Uisce welcomes the opportunity to respond to the Review to Renew Public Consultation on the Review of the National Development Plan (hereafter: Review to Renew public consultation)
2. An Fóram Uisce recognises that Review to Renew is not considering the merit of individual projects or sectoral policy strategies.
3. An Fóram Uisce recognises the scope of work undertaken by the Department for Public Expenditure and Reform (hereafter, the DPER) to develop the Review to Renew public consultation document; as well as the challenges in delivering a public consultation during the current COVID pandemic.
4. An Fóram Uisce recognises that the DPER prefers submissions within the set format, answering the pre-prescribed questions in the public consultation document. However, given its statutory role, and the limitations of the response template, An Fóram Uisce provides its formal submission as set out below.
5. The items included in this submission are those to which members of An Fóram Uisce have identified as priority issues and which are within the remit of An Fóram Uisce. These do not preclude the importance of items contained within the Review to Renew public consultation document to which An Fóram Uisce has not responded.

2. Specific Submission Items

2.1 Public Consultation Document

The template used for the Review to Renew public consultation document is exceptionally restrictive. The seven questions provided in the document are leading, implying that if more capital investment in, for example, water services infrastructure is proposed for prioritisation, it must be specified which other sectors must suffer cutbacks as a consequence. This does not imply increased ambition for delivering the NDP; nor is the role of a public consultation process to identify avenues of expenditure for the exchequer to determine which sectors are 'winners and losers'.

In 2020, An Fóram Uisce released a briefing note on ‘Public Engagement in Managing Ireland’s Waters’¹, based on research commissioned by An Fóram Uisce². Key components regarding public engagement include addressing inequity and power imbalances; incorporating various forms of knowledge and expertise; and addressing issues of scale. These key components are equally applicable to non-water related forms of public engagement, and the Review to Renew public consultation process should address these key components to ensure equitable public engagement. Given the expertise and technical knowledge required to respond to this Review to Renew public consultation process; and the lack of detail provided in the consultation document (both of which create power imbalance among stakeholders), An Fóram Uisce urges DPER to ensure that any subsequent NDP public consultation phases address these issues.

2.2 Policy Integration

Fundamental changes are needed in infrastructure planning processes and integrating policy. Water fundamentally underpins each of the UN Sustainable Development Goals and water is critical to the national planning process in terms of delivering secure and good quality drinking water supplies and suitable urban and rural wastewater treatment infrastructure. All of which must adhere to EU legislation and must protect the quality of Ireland’s water resources.

Connecting spatial planning with relevant EU Directives and accompanying national legislation is challenging. The river catchment is an appropriate landscape unit for managing the integration of policy for land and landscape management. In 2020, An Fóram Uisce presented a Framework for Integrated Land and Landscape Management (FILLM)³ which builds on and reframes the concept of Integrated Catchment Management used in water management. A core component of the FILLM is that a spatial planning system is needed that considers all environmental components in a holistic and cohesive manner. Reduced compartmentalisation of planning is needed as cross-component planning can deliver cost-efficiency and environmental benefits.

An Fóram Uisce proposes that the FILLM is adopted across government departments as a framework for delivering integrated policy and management approaches to protect and improve the quality of Ireland’s water services and water resources.

In addition, Irish Water has identified that the Eastern and Midlands Water Supply Project (EMWSP) is the preferred scheme to identify a new source of water for the Eastern and Midlands region. The planning process for EMWSP cannot be initiated until the General Scheme of the Water Environment (Abstractions) Bill is written into Irish law. Delays in the legislative process will result in delays in the planning application process for the EMWSP. While An Fóram Uisce recognise the necessity of scrutiny

¹ An Fóram Uisce (2020). Briefing note on public engagement in managing Ireland’s waters. Available online: [Water-Forum_Briefing-Note_Public-Engagement.pdf \(thewaterforum.ie\)](https://thewaterforum.ie/Water-Forum_Briefing-Note_Public-Engagement.pdf)

² Bresnihan, P., and Hesse, A. (2019). Public engagement in water governance. Report to An Fóram Uisce. Available online: https://thewaterforum.ie/app/uploads/2020/03/Water-Forum_Public-Participation_Bresnihan-and-Hesse_2019.pdf

³ An Fóram Uisce (2020). A Framework for Integrated Land and Landscape Management (FILLM). Available online: [An-Fóram-Uisce_Framework-for-Integrated-Land-and-Landscape-Management.pdf \(thewaterforum.ie\)](https://thewaterforum.ie/An-Fóram-Uisce_Framework-for-Integrated-Land-and-Landscape-Management.pdf)

of the proposed Abstractions Bill and the due planning process, this highlights the integral need for policy integration for the delivery of water services infrastructure projects. Dublin's water supply is on a knife edge due to demographic pressures; limited sources of water; and climate change. Administrative barriers to progressing the relevant planning applications should be minimised as a matter of urgency to avoid further delays in the planning process for the EMWSP.

2.3 Investment in water services infrastructure

The table on page 8 of the Review to Renew public consultation document outlines the top eight capital expenditure spending areas from 2005-2019. Water services lies in sixth place out of eight for the proportion of total capital expenditure allocated. Expenditure on water services reduced from a high of €512 million in 2009 to €19 million in 2017. The establishment of Irish Water in 2014 resulted in a revision of capital expenditure structures towards water services. Between 2005-2013, capital expenditure on water services represented between 5.5% and 8.1% of the total capital expenditure. Between 2014-2017, that proportion reduced to between 0.8% and 0.4% before increasing to 8.8% and 9.3% for 2018 and 2019, respectively. Overall, for the period 2005-2019, water services represented 6% of the total capital expenditure. This compares to 20% for roads, 15% for housing, 10% for schools and PPP and 8% for public transport.

It is clear from multiple recent national-level reports and policy^{4,5,6,7,8,9} that significant increased investment in Ireland's water services infrastructure is urgently required to, as a minimum, meet EU Directives and legislation.

As part of its statutory role, An Fóram Uisce provides guidance to the Commission of Regulation of Utilities (CRU) regarding the function and performance of Irish Water. In its submission to the CRU on the Water Supply Project in 2019, An Fóram Uisce noted:

'many of our critical water services are in poor condition and require significant investment. Investment in water services infrastructure is provided for in the National Planning Framework which states that '*Investment in water services infrastructure is critical to the implementation of the National Development Plan. The current Water Services Strategic Plan by Irish Water will be updated in the light of the policies in the National Planning Framework addressing the requirements of future development, while also addressing environmental requirements such as obligations under EU Water Framework Directive mandated River Basin Management Plans*'.

⁴ EPA (2019). Water quality in Ireland 2013-2018. Environmental Protection Agency, Wexford. Available online: [Water Quality: Environmental Protection Agency, Ireland \(epa.ie\)](https://www.epa.ie/water-quality/)

⁵ EPA (2020). Ireland's environment – An integrated assessment 2020. Environmental Protection Agency, Wexford. Available online: [State of the Environment Report: Environmental Protection Agency, Ireland \(epa.ie\)](https://www.epa.ie/state-of-the-environment-report/)

⁶ EPA (2020). Urban wastewater treatment in 2019. Environmental Protection Agency, Wexford. Available online: [Urban Wastewater Treatment: Environmental Protection Agency, Ireland \(epa.ie\)](https://www.epa.ie/urban-wastewater-treatment/)

⁷ DHPLG (2019). Significant Water Management Issues in Ireland Public Consultation Document.

⁸ DHPLG (2018). River Basin Management Plan 2018-2021. Available online: www.housing.gov.ie

⁹ DHPLG (2017). Water Services Policy Statement 2018-2025. Available online: [gov.ie - Water Services Policy Statement 2018-2025 \(www.gov.ie\)](https://gov.ie/Water-Services-Policy-Statement-2018-2025)

In addition to this, there are challenges presented by the growth in water demand. The projected demographic and infrastructural growth of the Dublin Region, as provided for in the National Planning Framework (NPF), presents a real and immediate challenge in terms of water supply. The NPF provides for same stating that '*A new long-term water supply source for the Eastern and Midland Region, which includes the Dublin Water Supply Area (DWSA), is needed by the mid-2020s, to provide for projected growth up to 2050 and contribute to resilience and security of supply for the region. This requires infrastructure provision to be guided and prioritised in a manner that can benefit the greatest possible number of areas within the country'*

In addition, there are emerging uncertainties in relation to year-round supply where, in recent years, issues of flooding, summer drought and severe weather events present additional burdens on an aged infrastructure.

It is the considered view of An Fóram that the challenge in relation to meeting the water demand in the Greater Dublin Area is pressing and must be addressed as a matter of urgency.

It is essential that sufficient support and funding through the multi-annual rural water programme continues to be provided into the future to address the water quality issues still being experienced on many private supplies, as highlighted by the EPA annually. During 2021, a working group established by the Minister to identify rural water investment needs will conduct its review. The findings of this process must be supported to ensure that long term sustainable structures and governance arrangements for the sector are implemented.

An Fóram Uisce considers investment in the nation's water infrastructure to deliver a safe and secure drinking water supply nationally an urgent priority.

Untreated wastewater is released into the environment at 35 towns and villages nationally. Wastewater treatment does not meet EU standards for 19 large towns and cities. Wastewater is the main significant threat to inland and coastal waters for 48 areas at risk of pollution. Wastewater collection systems must be upgraded to meet EU standards for 7 large urban areas. This is all unacceptable and reflects decades of underinvestment in Ireland's water services infrastructure.

An Fóram Uisce recognises that Irish Water is making progress to address these issues. But the progress is not happening quickly enough. There is an urgent need to streamline planning and legal processes to enable Irish Water to improve timeframes for delivering fundamental water infrastructure and upgrades that are needed to sustain the economy and protect our natural environment.

These issues must be prioritised for additional resources. Ireland's deteriorating water quality must be restored and protected through actions delivered through the river basin management planning process. However, the provision of funding of such actions to improve water quality should not result in a reduction of funding allocated to Irish Water to deliver urgent water services infrastructure improvement.

2.3.1 Multi-annual funding

If a greater proportion of the total capital expenditure is committed to improving water services infrastructure, it is essential that multi-year infrastructure project delivery is supported by a multi-annual funding model. Such a model has been critical in delivering successful and timely infrastructure upgrades within the Rural Water Sector and An Fóram Uisce urges the multi-annual funding model to be applied nationally.

2.3.2 Nutrient Recovery

An Fóram Uisce would welcome further consideration of the circular economy within the NDP. With a particular focus on investment in water services infrastructure, An Fóram Uisce would like to see greater investment in facilities to improve nutrient recovery process from municipal wastewater treatment plants. This would assist in protecting and restoring Ireland's aquatic environments which are deteriorating in quality primarily because of excessive nutrients entering waters from wastewater treatment and agriculture. As a first step, consideration should be given to prioritising nutrient recovery within catchments which have been identified as being at risk of failing to meet EU Water Framework Directive targets due to pressures associated with Wastewater Treatment Plants (WWTPs). In addition, investments should also focus on removing pharmaceuticals from wastewaters reducing ecological and public health risks.

Investigations should be undertaken into the safe application on to land of nutrients recovered from wastewater. Application should only be made on to suitable and appropriate land/soil types which minimises or negates potential risks to human health, animal health and environmental health (particularly water quality).

3. Conclusion

The delivery of a safe and secure drinking water supply and management of wastewater in line with EU Directives and legislation is critical for public and environmental health in the Republic of Ireland. Underinvestment in water and wastewater services over many years has resulted in increased risk to public health and a deteriorating aquatic environment. **Urgent investment in water and wastewater services must be a priority for national development.**

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Please address any correspondence as follows:

Donal Purcell,
Senior Executive Officer, An Fóram Uisce,
Civic Offices,
Limerick Road,
Nenagh,
County Tipperary
Email: donal@nationalwaterforum.ie