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14/01/2021

(Ref: 20\_IW\_FP-54)

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**Re: Draft Longford County Development Plan 2021-2027**

Dear Sirs,

Irish Water (IW) welcomes the opportunity to comment on the draft County Development Plan for Longford for the period 2021-2027. We have provided some high-level updates below and we will continue to engage with the planning department as the development plan process progresses. We will provide updates to Irish Water plans and projects as updates become available.

## National and Regional Policy

### EMRA Regional Spatial and Economic Strategy

Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the adopted East and Midlands Region Regional Spatial and Economic Strategy (RSES) and we are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard we would draw your attention to Section 10 of the RSES which provides general policy direction in relation to the sustainable management of water.

## Section 1.13 of Draft CDP - General updates on Irish Water National Plans

### Water Services Strategic Plan Review

Irish Water completed the 5 year review of the WSSP in October 2020. The review stated that the current WSSP is still valid and appropriate to provide strategic direction for the planning of water services by Irish Water for the next 5 years.

### Irish Water Investment Plan (Revenue Control Period 3) 2020 to 2024

Irish Water's Investment Plan is the budgetary plan for the five-year period from 2020 to 2024 inclusive, in line with our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). It sets out where we are continuing to invest and prioritise where we can deliver the most urgently needed improvements to drinking water quality, leakage, water availability, wastewater compliance, efficiencies and customer service. In providing these services we play a central role in enabling economic growth, protecting both the environment and the health and safety of our customers and the public.

The list of projects and programmes included in our Investment Plan is continuously being refined and is subject to budget, technical and environmental constraints, as well as statutory approvals. Further information on the current plan submitted can be found on the CRU Website [www.cru.ie](http://www.cru.ie)

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Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.

**Uimhir Chláraithe in Éirinn / Registered in Ireland No.:** 530363

## The National Water Resources Plan (NWRP)

The National Water Resources Plan (NWRP) is carrying out a review of all Water Resource Zones in the country, to determine projects to resolve deficits on a nationwide scale. The NWRP will be published in two distinct stages, the combination of which will form our overall National Water Resource Plan.

**Phase 1** is the National Water Resources Plan – Framework Plan, which will be subject to Strategic Environmental Assessment and Appropriate Assessment. Phase 1 includes: the methodologies for assessing need (including how the hazards identified in the DWSPs are incorporated into the strategic plan); the methodologies for developing strategic plans for each supply as part of the Regional Water Resources Plans and, a summary assessment of need across all water supplies. The Framework Plan will highlight the vulnerability of our water supplies particularly during severe weather conditions (storms and droughts), including our largest supply, the Greater Dublin Area.

**Phase 2** is made up of 4 Regional Water Resources Plans each of which will be subject to Strategic Environmental Assessment and Appropriate Assessment. The Regional Water Resources Plans will develop the strategic plan for each water supply, including short, medium- and long-term options to address risk across our supplies.

The Regional Water Resources Plan for the Eastern and Midlands Region will include the strategic Plan for the Louth, including an assessment of all potential options to resolve needs in the area, and how these have been assessed to develop a Preferred Approach, including short, medium and long term investment requirements and operational improvements.

Phase 2 follows after the adoption of the NWRP Framework Plan. Phase 1 and 2 combined will form the overall National Water Resource Plan

The models and intelligence relating to our existing water sources and asset base, that have been developed as part of our water resources planning process, have also been used to inform the operation of our supplies particularly during critical drought periods.

Public Consultation information can be found on the IW website at <https://www.water.ie/projects-plans/our-plans/nwrp/>

## Proposed Core Strategy and Availability of Water Services

### Wastewater Infrastructure

The County is served by 20 wastewater treatment plants. Available capacity at any plant varies daily. Where there are constraints, applications for developments would be on a first come, first served basis. If no project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site. This would be through the Connections and Developer Services section of Irish Water's website. <https://www.water.ie/connections/developer-services/>

The table on the next page gives a snapshot of capacity of some of the larger settlements, as discussed at our infrastructural assessment workshop, last year. *(Note these figures are estimates and are subject to change)*. There are constraints in the sewer networks in some settlements. Other areas, particularly if zoning changes are proposed, infrastructure will have to be assessed on a case by case basis. As above, developers should enquire through the above web link.

### Wastewater Networks

Throughout the County, general capital maintenance upgrades are on-going through Network programmes based on needs. This includes rehabilitation of sewers, upgrades to pumping

stations, assessment of storm water overflows and installation of telemetry in line with national programmes.

	Agglomeration	Census population (2016)	Population Proposed Uplift	Comment on Wastewater Services
Key Town	Longford	10,008	1,938	<p><b>Waste Water Treatment</b> - This level of growth could be accommodated</p> <p><b>Sewer Network:</b> A Drainage Area Plan for the catchment is due to commence in 2021. This will concentrate on flooding and performance issues of Storm Water Overflows and Pump Stations within the catchment. Surveys expected where necessary, to commence in 2022.</p>
Self Sustaining Growth Towns	Edgeworthstown	2,072	484	There is very limited headroom at the Wastewater Treatment Plant, however due to other constraints, connections may be on a first come / first served basis and may be refused. Project planned and completion Post 2024. (CPO 5.84 of the Draft Plan refers)
	Ballymahon	1,877	484	There is currently no headroom in the Ballymahon WW treatment plant. Project planned and completion Post 2024. Developers should contact IW for interim arrangements / solutions (if possible). (CPO 5.84 of the Draft Plan refers).
Self Sustaining Towns	Granard	816	291	This level of growth could be accommodated
	Lanesborough	1,454	291	This level of growth could be accommodated
Towns & Villages	Aughnaccliffe	177	38	This level of growth could be accommodated
	Ballinalee	347	78	This level of growth could be accommodated
	Drumlish	931	201	Approximately 150 persons could be accommodated
	Keenagh	581	126	This level of growth could be accommodated
	Legan	215	35	This level of growth could be accommodated
	Newtownforbes	778	152	This level of growth could be accommodated
Remainder / Rural			809	There is no capacity at present in Abbeylara or Cullyfad/Woodlands Park. No project on the current IW Investment Plan. Most other settlements in this category have headroom.

## Water Infrastructure

The National Water Resources Plan (NWRP) is carrying out a review of all WRZs in the country to determine projects to resolve deficits on a nationwide scale. For WRZs where we have deficits leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers. Developers of non-domestic developments should review their proposals to see if they can maximise efficiency in their water requirements.

Longford has five water resource zones (WRZs) and the supply across the county is managed using the interconnectivity between the zones.

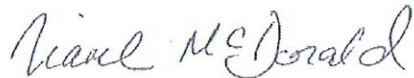
WRZ	Settlements	Comment on Availability of Supply
Longford Central	<ul style="list-style-type: none"> <li>▪ Longford Town</li> <li>▪ Edgeworthstown</li> <li>▪ Lanesborough</li> <li>▪ Ballinalee</li> <li>▪ Drumlish</li> <li>▪ Newtownforbes</li> </ul>	Supplied by Lough Forbes WTP – Limited headroom available but not likely to constrain domestic development in the near future. Can be constrained for winter critical periods (freeze thaw events) and dry year critical periods (drought events). Options are being considered to resolve this issue under the NWRP
Ballymahon	<ul style="list-style-type: none"> <li>▪ Ballymahon</li> <li>▪ Edgeworthstown</li> <li>▪ Keenagh</li> <li>▪ Legan</li> </ul>	Supplied by Abbeyshrule WTP – Limited headroom available at present but unlikely to constrain domestic development in the near future.
Granard	<ul style="list-style-type: none"> <li>▪ Granard</li> </ul>	Supplied by Lough Kinale WTP - Limited headroom available at present but unlikely to constrain domestic development in the near future. Constrained for winter critical periods (freeze thaw events) and dry year critical periods (drought events).
Lanesborough & Newtowncashel	<ul style="list-style-type: none"> <li>▪ Lanesborough</li> </ul>	Supplied by Lanesborough ESB TP, Lisrevagh WTP & Newtowncashel WTP. Limited headroom available at present, but unlikely to constrain domestic development in the near future.
Gowna	<ul style="list-style-type: none"> <li>▪ Aughnaclyffe</li> <li>▪ Drumlish</li> </ul>	Supplied by Smear WTP - Limited headroom available at present but unlikely to constrain domestic development in the near future. Constrained for winter critical periods (freeze thaw events) and dry year critical periods (drought events).

## General Comments

Some general comments are outlined below: -

Section Number	Correction
Section 1.13.2.1 Water Services Strategic Plan (under review in 2020).	Delete the words "under review in 2020" Reason: the review was completed.
Section 1.13.2.3 Irish Water Capital Investment Plan 2020-2024 (awaiting CRU determination).	Delete the words "Awaiting CRU Determination" Reason: the CRU completed its determination in 2020.

Yours Sincerely,



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Niamh McDonald

**Asset Strategy & Sustainability (Spatial Planning Unit)**  
**East & Midlands - Regional Forward Planning Specialist**

