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[UÉ Ref: 24\_UE\_FP\_45\_Longford\_LAP]

By email to [lap@longfordcoco.ie](mailto:lap@longfordcoco.ie)

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## Re: Draft Longford Town Local Area Plan 2025-2031

Dear Sir / Madam,

Uisce Éireann (UÉ) welcomes the opportunity to comment on the Draft Longford Town Local Area Plan (LAP). We note, and welcome, the inclusion of objectives in Chapter 13 that will support the work of UÉ. These policy objectives will also ensure the sustainable management of water and wastewater in line with national and regional objectives as stated in the National Planning Framework and the Regional Spatial and Economic Strategy for the East and Midlands Region.

UÉ is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of UÉ to provide both drinking water and wastewater capacity to support national, regional and local economic and spatial planning policy (subject to the constraints of the UÉ Capital Investment Plan).

### Water Services Infrastructure

#### Water Supply and Network

UÉ publishes Water Supply Capacity Registers annually for each county. The latest capacity register for the county was published in June 2023. The register is currently being updated and will be revised before the Draft LAP process is completed. UÉ will issue Longford Planning Department a copy of the Water Supply Capacity Register as soon as it is completed.

#### [Longford | Water Supply Capacity Register | Uisce Éireann \(formerly Irish Water\)](#)

Longford Town is supplied by Lough Forbes Water Treatment Plant (WTP) that has limited headroom. There is an ongoing project which will increase supply at the WTP, this will provide additional supply for the immediate term. UÉ are also looking to progress a more significant upgrade to the WTP in the coming years, that will facilitate long term growth in Longford.

#### Wastewater Treatment Capacity

As noted above, the wastewater capacity registers are also being revised and will be available in the coming weeks. UÉ will issue Longford Planning Department a copy of the Wastewater Capacity Register as soon as it is completed.

**Stiúrthóirí / Directors:** Niall Gleeson (POF / CEO), Jerry Grant (Cathaoirleach / Chairperson), Gerard Britchfield, Liz Joyce, Michael Nolan, Patricia King, Eileen Maher, Cathy Mannion, Paul Reid, Michael Walsh.

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There is sufficient headroom at the Longford Town Wastewater Treatment Plant to serve the population uplift indicated in the County Development Plan and beyond.

## Longford| Wastewater Treatment Capacity Register | Uisce Éireann (formerly Irish Water)

### **Wastewater Collection**

There are many areas within the sewer network that experience significant capacity challenges; in particular, capacity exceedance will occur more frequently where rainwater from roof or paved surfaces is connected to the wastewater system, most notably in areas served by a single combined sewer network.

UÉ strongly encourages the removal (or significant reduction, if full removal is not feasible), of surface water inflows to the wastewater system (including the removal of other misconconnections). To support this objective, UÉ encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in both existing and new development areas.

There are known issues on the wastewater network including:

- Infiltration into the core network.
- Storm water overflow spills, most notably from Little Water Street Wastewater Pumping Station which is the terminal WWPS for the network.
- Some sections of the network are operating at, or close to capacity which will restrict future development as all flow is routed through the core town network.
- The receiving waterbody (Camlin River) is identified as being at risk of not meeting its environmental objectives under the Water Framework Directive

These sites are being closely monitored with operational improvements targeted to achieve improved performance.

UÉ have commenced work on a Drainage Area Plan (DAP) for the town. As well as investigating the above issues, the DAP will investigate the root cause of wastewater flooding incidents at locations including the following: Lisbrack Downs, Braedens Lane, Midara Gardens, Teffia Park, Battery Rd, Athlone Road and Lower Main Street.

The DAP will model the existing sewer network, future scenarios and develop solutions to resolve constraints. This will take a number of years to complete. As there is no upgrade project for Longford Town on UÉ's current Capital Investment Plan, the necessary wastewater infrastructure upgrades required to resolve certain constraints may not be completed within the lifespan of this Local Area Plan.

In the interim, developer led solutions will be required. UÉ can work with developers to determine the best solution for individual sites. This process is outlined on the Connections and Developer Services section of UÉ's website. <https://www.water.ie/connections/developer-services/>

Should further wastewater network constraints materialise without a dedicated project on UÉ's Capital Investment Plan to resolve them, private developers may carry out the work required to remove the constraint.

*We would like to highlight that the recast Urban Wastewater Treatment Directive (UWWTD) includes requirements for the preparation of Integrated Urban Wastewater Management Plans for selected agglomerations greater than 10,000 persons based on risk, by 2035. Longford Town falls into this category.*

An Integrated Urban Wastewater Management Plan will therefore commence for Longford Town as per the requirements of the recast (UWWTD). This includes obligations for the reduction of pollutant load from both wastewater and storm water systems (Storm Water Overflows and Urban Runoff respectively). UÉ will work collaboratively with the Local Authority on the preparation of the plan.

## **Sustainable Drainage**

### **Green-Blue Infrastructure and SuDS**

UÉ encourages Planning Authority objectives and initiatives supporting the implementation of Sustainable Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the National Planning Framework under NPO 57, and NPO 78 (SuDS) and NPO 82 and 90 (green and blue infrastructure) of the Draft First Revision to the National Planning Framework (July 2024). SuDS and green and blue infrastructure are encouraged both in new developments, including the public realm, and as retrofit schemes in existing developed areas. These measures can provide a cost effective and sustainable means of reducing pollution and flooding risk at source by limiting or removing surface water inflows to combined sewers while providing multiple additional benefits such as improved air quality, biodiversity, amenity and noise reduction. The removal of surface water from combined sewers, thus increasing available capacity for foul drainage for new developments, is particularly relevant to the achievement of compact growth objectives.

In addition, and to support sustainable use of the available hydraulic capacity in Combined Sewers, UÉ welcomes the proposal to promote SuDS and in particular promotion of Nature based SuDS (NbSuDS); however, we would recommend the introduction of further objectives in the LAP to promote the introduction of NbSuDS in areas contributing to combined drainage systems (if applicable) where streetscape enhancement programmes or resurfacing programmes are planned.

UÉ is happy to engage with any planning authorities interested in progressing nature-based rainwater management initiatives in line with the recently issued Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.

## **Planned Road and Public Realm Projects**

Planned public realm, active travel and road projects have the potential to impact on UÉ assets and projects e.g., tree planting, building over of assets, new connections, programming network upgrades in advance of road project, provision of future-proofing ducts.

Development in the vicinity of UÉ assets must be in accordance with our Standard Details and Codes of Practice. Diversion Agreements will be required where a UÉ asset needs to be diverted or altered. Where planned development may impact on UÉ assets, early engagement is requested to ensure public water services are protected and access is maintained, and to enable UÉ to plan works accordingly and ultimately minimise disruption to the public.

## General Comments

Section Ref	Comment
Section 9 Regeneration & Placemaking	Strategic Site 6 - This area is not currently serviced with a sewer network and there is no current UÉ project to support this. Network extensions will therefore be developer driven.
13.3 Water Supply and Wastewater Services	<p>Suggest that the 2<sup>nd</sup> sentence is reworded to avoid confusion.</p> <p><i>“UÉ will invest in infrastructure that facilitates well-planned social and economic growth that is based on principles of environmental sustainability. Public health and environmental compliance are prioritised. Capital investment is subject to the budgetary constraints of UÉ’s Capital Investment Plan and therefore prioritised appropriately.”</i></p>
13.3.1 Water Supply	<p>2<sup>nd</sup> Paragraph, 2<sup>nd</sup> last sentence, there is repetition of the following sentence</p> <p><i>“The provision of piped water services, drinking water and wastewater, are now in the domain of Uisce Éireann with the support of the Local Authority under a service level agreement”</i></p>
	3 <sup>rd</sup> Paragraph – this should be moved to section 13.3.2 Wastewater Services.
	<p>UÉ would welcome the inclusion of an objective on efficient design in new developments and retrofitting programmes.</p> <p>(Water efficient developments with a reduced net water usage / aim to achieve water neutrality eg through rain water harvesting systems).</p> <p>Reason: It can provide multiple benefits including taking pressure off water resources and infrastructure, reducing carbon emissions and improving climate resilience.</p>
13.3.2 Wastewater Services	<p>1<sup>st</sup> Paragraph, 1<sup>st</sup> Sentence. Suggest this is reworded to avoid confusion.</p> <p><i>“Where applicable, UÉ will design new infrastructure with foresight, ensuring that it not only meets the current needs but also provides enough headroom to support future growth.”</i></p>
	<p>1<sup>st</sup> Paragraph, 2<sup>nd</sup> &amp; 3<sup>rd</sup> Sentences</p> <p>Suggest these lines are deleted and the remainder of the paragraph re-worded as there is sufficient capacity at the</p>

	<p>WWTP to support domestic growth over the period of the LAP in line with the population targets in the CDP.</p> <p>New commercial/industrial developments wishing to connect to an UÉ network are to be assessed through Connections and Developer Service process which will determine the exact requirements in relation to network and treatment capacity. Connections to UÉ networks are subject to our Connections Charging Policy. Further information on this process is available at:</p> <p><a href="https://www.water.ie/connections/developer-services/">https://www.water.ie/connections/developer-services/</a></p>
13.3.3 Objectives Table	<p>WS 03 - Delete the last sentence as does not make sense.</p> <p><i>“Wastewater will be disregarded completely”</i></p>
	<p>WS 04 - Delete the 2<sup>nd</sup> sentence</p> <p><i>“In this regard, the sewerage treatment plant in the town should be sized, as part of Uisce Éireann investment, to cater for potential large-scale industrial development in particular and in addition to anticipated population projections.”</i></p> <p>Reason: This is not current UÉ policy</p>
	<p>WS 09</p> <p>Suggest that this LA objective is now not required and source protection, as described in WS 10 &amp; 11 suffices.</p> <p><i>“Ensure that public water supply shall comply with EU standards and shall be upgraded where necessary to comply with same and to ensure that the public drinking water supply of the Town complies with relevant EU drinking water standards and to extend supply, where necessary and where resources permit, to meet demand”</i></p> <p>Reason: It is an UÉ responsibility</p>
	<p>WS 13 Delete “move to surface water drainage”</p> <p>This objective should remain in this section as refers to foul sewers and not surface water sewers.</p>
	<p>WS 14 Demand Management</p> <p>We welcome the inclusion of this objective, and it could also include the aim for new developments to strive towards water neutrality.</p>
	<p>WS 16 – Wording could be more specific.</p> <p><i>“Require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment...”</i></p>

	Does this relate to private developments providing their own water supply and wastewater treatment or UÉ projects? UÉ complies with AA requirements as set out in the EU Habitats Directive.
	UÉ would welcome the inclusion of an objective to promote the introduction of Nature Based SuDS in areas contributing to combined sewers. In particular, where streetscape enhancement programmes or resurfacing programmes are planned.
13.4. Surface Water & 13.4.1 Objectives	<p>3<sup>rd</sup> Paragraph</p> <p><i>“Uisce Éireann will endeavour to resolve the separation of foul and surface water within its budget constraints.”</i></p> <p>SW 02 - Surface Water management is not within the remit of UÉ. Where it is a case of separating combined systems into separate foul and SW systems, UÉ will work collaboratively with the LA to address these issues.</p>

If you require any further information or assistance in respect of this submission or in respect of the availability of capacity in our infrastructure to support the plan making process, please do not hesitate to contact us.

Yours faithfully,

*Niamh McDonald*

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