



Nenagh Local Area Plan
Planning Department
Tipperary County Council
Civic Offices
Limerick Road
Nenagh
Co. Tipperary
E45 A099

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Online submission: <https://consultations.tipperarycoco.ie/>

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Draft Nenagh Local Area Plan 2024-2030

Dear Sir / Madam,

Uisce Éireann welcome the opportunity to comment on the Draft Nenagh Local Area Plan (LAP) 2024-2030. We have provided observations and comments below on the Draft LAP in relation to public water services and we will continue to engage with the planning department as the LAP process progresses. We will also provide updates to Uisce Éireann plans and projects as further updates become available.

General

Sustainable Drainage and Green-Blue Infrastructure

Uisce Éireann encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments including the public realm and retrofitted in existing developed areas, in line with NPO 57 of the National Planning Framework.

These measures can provide a cost effective and sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers (thus increasing capacity for foul drainage from new developments), while providing multiple benefits for example, improved air quality, amenity, and noise reduction. The removal of stormwater from combined sewers as part of roads, public realm, residential or other developments is strongly encouraged; this is particularly relevant to the achievement of compact growth objectives.

To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. To support sustainable use of the available hydraulic capacity in Combined Sewers, Uisce Éireann would be happy to discuss potential opportunities to collaborate on projects that would remove stormwater from combined sewers, and we welcome the inclusion of objectives in the LAP promoting the introduction of Nature-based Sustainable Drainage Systems in areas contributing to combined drainage systems. Uisce Éireann are happy to engage with any planning authority 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 road and public realm projects have the potential to impact on Uisce Éireann assets and projects e.g., tree planting, building over of assets, new connections, requirement to programme upgrade works in advance of road projects. Examples of projects that may impact Uisce Éireann assets are the Martyr's Road Masterplan, the future Nenagh Town Centre First Plan, and the Green and Blue Infrastructure Masterplan Roadmap for Tipperary Waterways.

Development in the vicinity of Uisce Éireann assets must be in accordance with our Standard Details and Codes of Practice. Diversion Agreements will be required where an Uisce Éireann asset needs to be diverted or altered.

Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.

General Proposed Core Strategy and Availability of Water Services

Zoning

A high-level review of the land-use zoning maps has been carried out. Available network information indicates network extensions may be required to service some zoned sites. Depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. Sections of the wastewater network are 150mm in diameter, and sections of the watermain network are 80mm or less within Nenagh; therefore, localised upgrades are likely to be required to facilitate future development.

To maximise the use of existing water services, we encourage phased sequential development in areas with existing water services infrastructure and spare capacity. Similarly, to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.

Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.

All new residential and commercial/industrial developments wishing to connect to an Uisce Éireann network are to be assessed on a case-by-case basis through Uisce Éireann's New Connections process, which will determine the exact requirements in relation to network and treatment capacity. New connections to Uisce Éireann networks are subject to our Connections Charging Policy. Further information on this process is available at: <https://www.water.ie/connections/developer-services/>.

Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure e.g., on some 'backland' sites and/or housing and industrial/commercial estates with private water services networks. This may apply to a number of residential sites in the northern (i.e., Residential Sites 5-8 and 38), western (i.e., Residential Sites 16-18, and 39), central (i.e., Residential Site 12), eastern (i.e., Residential Sites 11 and 25), and southern (i.e.,

Residential Sites 26, 36, and 40) areas of the town, which appear to require access to existing services on nearby roads via third party lands. Similarly, Employment Sites 1-6, 8, 9, and 11 may require access to existing services via third party lands. Uisce Éireann has no information on the ownership of the lands surrounding the zoned land parcels.

Where Uisce Éireann assets are within a proposed development site, these assets must be protected or diverted. Existing foul sewers run through Residential Sites 3, 4, 6, 10, 11, 14, 15, 18, 22, and 31), existing watermains run through Residential Sites 2, 3, and 36, and existing water trunk mains run through Residential Sites 18 and 40. Ballygraigue Wastewater Pumping Station is located at the eastern edge of Residential Site 31. Similarly, existing foul sewers run through Employment Sites 8 and 11. Richmond Wastewater Pumping Station is located at the south-western edge of Employment Site 2. Site layouts shall take account of the existing sewer, watermain and ancillary structure locations. If there is a possibility that Uisce Éireann assets will need to be altered or diverted because of a proposed development, a diversion agreement may be required. Further information on this process is available at: <https://www.water.ie/connections/developer-services/diversions/>

In settlements where the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g., dwellings, any future development of these lands should take account of the established use of the existing WWTP and the potential for extensions/intensification of use of the WWTP in the future.

Regarding zoning and development in lands with no public water services infrastructure, as outlined in Draft Water Services Guidelines for Planning Authorities (January 2018), Section 5.3: *“It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance”.*

We would be happy to engage further with Tipperary County Council in relation to the serviceability of sites as required.

Water Services Infrastructure and Constraints

The following sections provide information for water supply and wastewater in terms of capacity and constraints in existing networks, water supply and wastewater treatment in Nenagh town. The latest Census data (2022) has recently been published by the Central Statistics Office (CSO); however, the table overleaf uses population figures from Table 4 of the Draft LAP for alignment with this plan.

Settlement:	Existing population (CSO 2016):	Draft LAP 2024-2030 population target to 2030:	Draft LAP 2024-2030 population increase to 2030:
Nenagh	8,968	11,359	2,391

Water Supply Infrastructure

Water Supply Capacity

The latest water supply capacity register, published in June 2023, indicates there is sufficient capacity to cater for the projected growth within the lifetime of the LAP.

Following public consultation, the National Water Resources Plan (NWRP) Framework Plan was adopted in Spring 2021. This was followed by the development of four regional water resources plans to identify plan-level approaches to address the identified need in a sustainable manner. The [Eastern and Midlands Regional Water Resources Plan](#), which includes Nenagh was adopted in Autumn 2022 following public consultation.

Water Network Known Constraints

Uisce Éireann and Tipperary County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities, and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Uisce Éireann is carrying out a full network review and hydraulic modelling to determine if there are any major network constraints and to identify any strategic network upgrades required to provide sufficient capacity in the town out to 2030 and beyond.

Currently it is envisaged that capacity is available to cater for the population targets identified to 2030. Local network upgrades may need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of the Connections Charging Policy.

Wastewater Collection and Treatment

Wastewater Treatment Capacity

A project is currently underway by Uisce Éireann to provide additional capacity at Nenagh Wastewater Treatment Plant (WWTP), with an application for planning permission due to be submitted in the first half of 2024. Project delivery timeframes for the project will be available when the investment planning process, which is currently underway for the next Capital Investment Plan (2025-2029), has concluded. Project timelines are subject to planning approvals and statutory consents being obtained. The upgraded plant will have sufficient capacity to cater for the projected growth to 2030 and beyond. In the interim, while the planned upgrade project is progressing, the existing WWTP has available capacity for 927 Population Equivalent (PE).

Wastewater Network Known Constraints

Uisce Éireann and Tipperary County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc., and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. A Drainage Area Plan, incorporating a Wastewater Infrastructure Plan, has been completed for Nenagh agglomeration, identifying upgrade needs to cater for growth and alleviate hydraulic and environmental constraints.

Currently it is envisaged that capacity is available to cater for the population targets identified to 2030. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of the Connections Charging Policy.

Other General Comments

Section/Chapter Number	Comment
<p>Chapter 8: Infrastructure, Energy and Utilities</p> <p>Section 8.2 (Water and Wastewater)</p>	<p>Suggested amendment to the first paragraph of Section 8.2.2 (Nenagh Public Wastewater System) to reflect the current available capacity at Nenagh Wastewater Treatment Plant and the status of the treatment plant upgrade.</p> <p><i>‘Uisce Éireann is responsible for the collection, treatment and disposal of public wastewater. A planned upgrade of the Nenagh Wastewater Treatment Plan is currently underway by Uisce Éireann to increase the capacity of the plant. An application for planning permission for the upgrade works is due to be submitted in the first half of 2024. Project delivery timeframes for the project will be available when the investment planning process, which is currently underway for the next Capital Investment Plan (2025-2029), has concluded. Project timelines are subject to planning approvals and statutory consents being obtained. The upgraded plant will have sufficient capacity to cater for the projected growth to 2030 and beyond. In the interim, while the planned upgrade project is progressing, the existing WWTP has available capacity for 927 Population Equivalent (PE).’</i></p> <p>The latest capacity registers are available here:</p> <ul style="list-style-type: none"> • Water supply – https://www.water.ie/connections/developer-services/capacity-registers/water-supply-capacity-register/tipperary/ • Wastewater treatment – https://www.water.ie/connections/developer-services/capacity-registers/wastewater-treatment-capacity-register/#comp000062367c9500000006521276 <p>Our registers are only an indication of available capacity; available capacity changes regularly based on loads received from existing customers.</p> <p>In all instances if someone is considering progressing a development, they should contact our Connections and Developer Services Team who will provide a greater level of detail in relation to the availability of water and remaining capacity available at WWTPs.</p>

Section/Chapter Number	Comment
<p>Appendix 1: Serviced Land Assessment Section 2.3 (Methodology)</p>	<p>Suggested amendment to last paragraph of Section 2.3 (Methodology) to reflect the current available capacity at Nenagh Wastewater Treatment Plant and the status of the treatment plant upgrade.</p> <p><i>‘A planned upgrade of the Nenagh Wastewater Treatment Plan is currently underway by Uisce Éireann to increase the capacity of the plant. An application for planning permission for the upgrade works is due to be submitted in the first half of 2024. Project delivery timeframes for the project will be available when the investment planning process, which is currently underway for the next Capital Investment Plan (2025-2029), has concluded. Project timelines are subject to planning approvals and statutory consents being obtained. The upgraded plant will have sufficient capacity to cater for the projected growth to 2030 and beyond. In the interim, while the planned upgrade project is progressing, the existing WWTP has available capacity for 927 Population Equivalent (PE). For the purpose of the SLA assessment, where waste water capacity.....’</i></p>

Uisce Éireann Capital Investment Plan

Uisce Éireann’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) and the regulatory framework which is set out in legislation. 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 can be found on our [website](#). Preparation for the next Investment Plan period, 2025 to 2029, is currently underway.

Yours Sincerely,


Victoria Quigley
Regional Forward Planning Specialist
Asset Strategy