

Carrick-on-Suir Local Area Plan
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Uisce Éireann welcomes the opportunity to comment on the Draft Carrick-on-Suir Local Area Plan (LAP) 2025-2031. 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 on Uisce Éireann plans and projects as further updates become available.

1. General

1.1 Sustainable Drainage and Green-Blue Infrastructure

Uisce Éireann 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 National Policy Objective (NPO) 57, and under NPO 77, 79 and 80 (SuDS) and NPO 83 and 92 (green and blue infrastructure) of the Updated Draft Revised National Planning Framework (November 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.

Uisce Éireann is happy to engage with any planning authorities interested in progressing nature-based rainwater management initiatives in line with the Department of Housing, Local Government and Heritage's (DHLG) Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document (2022) and Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - A National Strategy (2024). Other guidance of relevance includes the Design Manual for Urban Roads and Streets' Advice Note 5: Road, and Street Drainage using Nature Based Solutions Design (2023) and the National Transport Authority's Greening and Nature-based SuDS for Active Travel Schemes (2023). Reference to these documents could be included in the Draft LAP.

1.2 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, and the requirement to programme upgrade works in advance of road projects. Examples of projects that may impact Uisce Éireann assets are the proposed masterplan for the landbank of 'New Residential' zoned land on the northern side of the Coolnamuck Road, projects for Carrick-on-Suir in the Green and Blue Infrastructure Masterplan Roadmap for Tipperary Waterways, the proposed Tipperary Greenway and Trail Strategy, and the Town Centre First Plan. 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.

2. Availability of Water Services

2.1 Zoning

A high-level review of the land use zoning map has been carried out. In order to maximise the use of existing water services, Uisce Eireann encourages 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.

Available network information indicates localised network extensions may be required to service some zoned sites e.g. New Residential and Strategic Reserve sites (as referenced in the Serviced Land Assessment), for example: Site 6 (approx. 70m (watermain) and 90m (sewer)), Site 7 (approx. 90m (sewer) via the public road), Site 8 (approx. 30m (watermain)), Site 9 (approx. 335m (sewer)), and Site 10 (approx. 30m (sewer)). It is also noted that potentially long extensions are required to the water network for New Residential site 13 (approx. 110m) and sewer network (approx. 300m).

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 or less in diameter e.g. in proximity to Employment site 4 and sections of the watermain network are 80mm or less e.g. in proximity to New Residential and Strategic Reserve sites 7, 9, 10, and 14, and Regeneration sites 3 and 5; therefore, localised upgrades are likely to be required to facilitate future development. In addition, to connect Residential Sites 5 and 6 to the wastewater network may require upsizing of the 150mm and 225mm diameter sewers on Ballyrichard Road.

Pipe size and materials are unknown across parts of the water and sewer network and there are known lengths of the water network that are older mains infrastructure, including cast-iron and asbestos pipework; these may require upgrades to facilitate development. GIS data for sewer networks is limited in several areas within the settlement; local knowledge may provide greater clarity in these instances.

There are several large landbanks in the town that would benefit from masterplanning so that sequential connections to water supply and wastewater infrastructure can be undertaken in the most efficient manner, this is particularly relevant for Residential Sites no. 1, 5, 7, 9, 10. In particular, servicing of Sites 7, 8 and 9 from a water services perspective would require detailed masterplanning and development on a phased basis, and would potentially require significant upgrades.

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 our 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 New Residential site 7 and other sites. 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 assets are located within Regeneration Sites 1 (sewer), Site 2 (watermain and sewers), and Site 4 (sewer), and Employment sites 2 and 4 (sewers), and the Employment site to the west of site 1 (Mill River Business Park) (sewer). Site layouts shall take account of the existing sewer and watermain 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/>.

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 [Uisce Éireann] to facilitate connections to existing infrastructure, where capacity exists, in order 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 [Uisce Éireann] will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance'*.

It should be noted that it appears that in the Service Land Assessment, Residential Site no. 2 and Employment Site no. 1 are the same site – the zoning type for this site should be clarified.

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

2.2 Wastewater Infrastructure

2.2.1 Wastewater Treatment Plant

Uisce Éireann publishes Wastewater Capacity Registers annually for each county. The latest capacity register for the county was published in June 2023 and is available on Uisce Éireann's website at www.water.ie/connections/developer-services/. The capacity register is currently being updated and will be issued to Tipperary County Council shortly. The Carrick-on-Suir Wastewater Treatment Plant currently has capacity to cater for the growth identified in the Draft LAP.

With regard to the capacity register, it should be noted that the remaining capacity available changes regularly and our registers are only an indication of available capacity. In all instances if someone is considering progressing a development, they should contact our Developer Services team who will provide a greater level of detail in relation to the availability of water.

2.2.2 Wastewater Networks

Currently it is envisaged that capacity is available in the wastewater networks in the town. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites, as outlined in Section 2.1 above; these can be customer driven/funded in accordance with the requirements of our Connections Charging Policy. Further information on this process is available at: <https://www.water.ie/connections/developer-services/>

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.

2.3 Water Supply Infrastructure

2.3.1 Water Supply

Uisce Éireann publishes Water Supply Capacity Registers annually for each county. The latest capacity register for the county was published in June 2023 and is available on Uisce Éireann's website at www.water.ie/connections/developer-services. The capacity register is currently being updated and will be issued to Tipperary County Council shortly.

Carrick-on-Suir is served by the Carrick-on-Suir Water Resource Zone (WRZ). Currently it is envisaged that there is potential spare capacity available in the Carrick-on-Suir WRZ. Some capacity constraints exist however, and connection applications will be assessed on an individual basis considering their specific load requirements.

As noted above, the remaining capacity available changes regularly and our registers are only an indication of available capacity. In all instances if someone is considering progressing a development, they should contact our Developer Services team who will provide a greater level of detail in relation to the availability of water.

2.3.2 Water Networks

Uisce Éireann is currently carrying out a network review and hydraulic modelling project to determine if there are any major network constraints and to identify any strategic network upgrades which may be required. In addition, significant rehab works were completed in the town in 2022.

Currently it is envisaged that capacity is available in the main networks supplying the town. Local network upgrades would need to be delivered to provide capacity to individual sites, these can be customer driven/funded in accordance with our Connections Charging Policy.

Uisce Éireann is continually progressing leakage reduction activities, mains rehabilitation activities and lead replacement activities. These are prioritised based on leakage rates, water quality issues and ongoing disruption to Customer's supplies. We will continue to monitor the performance of the network to ensure that the most urgent works are prioritised as required.

3. Other Comments and Suggestions on the Draft Local Area Plan Text

Topic	Comment
	(Suggested additional text in red and deletions in strikethrough)
Chapter 5. Sustainable Communities	<p>Uisce Éireann welcomes the intention to prepare a comprehensive masterplan for the lands at Coolnamuck Road.</p> <p>As per the comment in section 2.1 above, there are other large landbanks that would also benefit from masterplanning so that sequential connections to water supply and wastewater infrastructure can be undertaken in the most efficient manner e.g. New Residential and Strategic Reserve site 7, and New Residential site 8.</p>

<p>Chapter 8. Infrastructure, Energy and Utilities</p> <p>Section 8.2.1: Carrick-on-Suir Public Water Supply</p>	<p>This section outlines the current situation with the Carrick-on-Suir WRZ; however, as noted in Section 8.2.2 (Carrick-on-Suir Public Wastewater System) Uisce Éireann publishes capacity registers annually for each county, with the latest capacity registers being published in June 2023. Uisce Éireann recommends that the section be updated to include similar information in regard to the Water Supply Capacity Register, suggested text as follows:</p> <p><i>Uisce Éireann publishes Water Supply Capacity Registers annually for each county. The latest capacity register for the county was published in June 2023 and indicates that the Carrick-on-Suir Water Resource Zone (WRZ) has potential spare capacity available. Some capacity constraints exist however, and connection applications will be assessed on an individual basis considering their specific load requirements.</i></p>
<p>Section 8.2.2: Carrick-on-Suir Public Wastewater System</p>	<p>...Uisce Éireann publishes Water Supply Wastewater Capacity Registers annually for each county. The latest capacity register for the county was published in June 2023 and indicates that the Carrick-on-Suir Wastewater Treatment Plant (WWTP)....</p>
<p>Section 8.3: Sustainable Surface Water Management</p>	<p>In regard to the statement <i>'The Council and Uisce Éireann are responsible for the on-going maintenance and monitoring of sustainable drainage systems and will seek to maintain drainage having consideration to Water Sensitive Urban Design and application of a nature-based Sustainable Urban Drainage Systems (SUDS) approach'</i>....</p> <p>Uisce Éireann can clarify that: It is the policy of Uisce Éireann to maximise the capacity of existing collection systems for foul water which means that the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. In addition, 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 is happy to engage with any planning authority interested in progressing nature-based rainwater management initiatives. We note however that the responsibility for the stormwater network (stormwater/surface water sewers) lies with the local authority.</p> <p>Also, in regard to the DHLG guidance referred to in this section, please note that other relevant guidance is mentioned above in section 1.1.</p>
<p>Section 8.6: Policy and Objectives</p>	<p>It is the policy of the Council to:</p> <p><u>Policy 8.2</u></p>

	<p>Support the sustainable and efficient use of existing capacity in water service; permit new connections to the Carrick-on-Suir public water and waste water supply; and safeguard the integrity of the water supply and waste water network. Where local network upgrades are required, to ensure that capacity is provided to individual sites in accordance with the Uisce Éireann Connections Charging Policy and Uisce Éireann's Connections and Developer Service process.</p> <p><i>Uisce Éireann notes that new connection applications to the public water and wastewater infrastructure should be submitted directly to Uisce Eireann – details are provided on our website and in Section 1.1 above.</i></p> <p><u>Policy 8.3</u></p> <p>Uisce Éireann welcomes this policy no. 8.3 and notes that it requires SUDS to be in accordance with DHLG guidance; however, as noted above there are other guidance documents that are also of relevance (see section 1.1 above for further details).</p>
<p>Chapter 9. Land use Zoning Framework</p> <p>Zoning Matrix</p>	<p>Uisce Éireann's activities in the provision of public water and wastewater services include access to, operation, maintenance and upgrading of existing assets, and where necessary, the provision of new infrastructure in multiple Land Use zoning types, as well as lands outside of zoned areas. Assets could include, for example, pipes, pumping stations, outfalls, treatment plants.</p> <p>In order to provide and operate the public water services necessary to achieve the objectives of this LAP, we note the need to include water services infrastructure in the zoning matrices as 'permitted in principle' or 'open for consideration' across all Land Uses.</p>
<p>Environmental Reports and Serviced Land Assessment</p>	<p>The contents of this submission should be taken account of in the Environmental Reports and Serviced Land Assessment.</p>

We look forward to continuing our engagement with Tipperary County Council as the LAP process progresses.

Yours Sincerely,

J Goold

Asset Strategy
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