



10th September 2019

RC3 Team - Water Division,
 Commission for Regulation of Utilities,
 The Exchange, Belgard Square North,
 Tallaght,
 Dublin 24.

Re: Irish Water Revenue Controls – RC3 (2020 – 2024)

Carlow County Council welcomes the opportunity to comment on the above document.

Water Services are critical to social and economic development. Indeed, it is critically important that the wider societal outcomes from Water Services policy are not lost sight of in the policy making process. In this regard, the input of Local Authorities in relation to the strategic planning for water and wastewater infrastructure should be paramount. Strategic Water Investment objectives should not be set to only meet objectives set in the National Planning Framework and regional Spatial Economic Strategies but should take equal cognisance of County and City Development Plans. Sufficient flexibility should be included to allow for changes in the country's economy, (for example, an upturn resulting in a faster than expected population increase.

The schedule in Appendix 4, of the Irish Water Investment Plan 2020 to 2024 submission to the CRU, listed a total of only five schemes to be considered for funding in County Carlow during the period. Carlow County Council is concerned that the methodology used to form the list does not reflect the earlier input from Carlow County Council to the stakeholder feedback process. A number of issues arise:

Issue 1. The schedule does not include the necessary upgrade required at the County's largest water treatment plant at Rathvilly and whereas assurances were given that the necessary and urgent upgrades would be facilitated through a 'generic programme' we have received no confirmation to date that this will in fact be the case. The upgrade of the plant is required to ensure a safe and reliable water supply not only in Carlow but in the adjoining counties

DIRECT LINES: CODE 059

Carlow MD Area Engineer	9136272	Information Technology	9136215	Fire Service & Building Control	9131144
Planning	9170346	Housing	9136296	County Museum	9131554
Human Resources	9170314	Waste & Environment	9136231	Rent Payments	9172497
Muinebheag MD Area Engineer	9172415	Rates	9172489	Recreation & Amenity	9170377
Local Enterprise Office	9129783	County Library	9129705	Arts	9136203
Register of Electors	9170313	Community	9136204	Motor Taxation	9170342
Roads / Transportation	9170379	Loan Payments	9172491		



of Wicklow, Kildare, Laois and Wexford. It will also ensure environmental compliance and will facilitate future growth and the future decommissioning of other unreliable and vulnerable supplies.

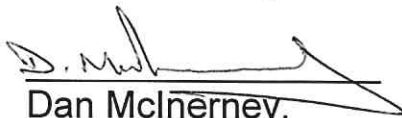
Issue 2. The schedule does not include for the provision of waste water treatment capacity at numerous agglomerations that are at and above capacity. We are at a loss to know why specific agglomerations were excluded from the list and yet we note that other counties have a more extensive list included. We would again have to question how this priority list was formed. Towns and villages in Co. Carlow such as Clonegal, Tinryland, Ardattin and Ballinabrannagh/Raheendoran were all submitted for consideration for inclusion and yet were excluded. That said we note priority given to investment in sewer network extensions in other counties and investment into waste water treatment plants with spare capacity and yet we don't have the capacity to treat the effluent to the necessary standard in existing agglomerations.

Issue 3. There is no provision for network extensions in water or waste to allow for future growth in our larger towns in County Carlow. Submissions made were not included in the schedule and yet major road investment schemes about to commence may now advance without the necessary funding to provide the water services infrastructure at construction stage.

Issue 4. There is no provision for the provision of strategic trunk water mains to replace aging AC mains and to interconnect vulnerable WSS with WSS that have headroom.

Issue 5. As referred to above the capital investment into Co Carlow will have to be adequate to accommodate the growth targets of the NPF, the RSES and CCCs CDP. Planning policy in respect of limitations on one off rural dwellings and limitations on the provision of developer provided infrastructure will necessitate capital investment, in public waste water treatment capacity, if our towns and villages and rural communities are to be sustained and are to meet the target growth rates set.

Yours sincerely



Dan McInerney,
Director of Services