

## Submission by Waterford City & County Council on the Irish Water Capital Investment Plan 2020 – 2024

Waterford City & County Council as Planning Authority welcomes the opportunity to make a submission on the IW Capital Investment Plan 2020-2024 and is broadly supportive of the policies and objectives contained therein.

The Planning Authority notes and welcomes the proposals to invest in WWTP within Waterford City and County along with the provision of Drainage Area Plans for strategic settlements. The Planning Authority also notes the themes of Quality, Conservation and in particular Future Proofing which have informed the Investment Plan.

The Plan recognises that water and wastewater services are of critical importance to our society and economy. However, it must be reiterated that a joint-up approach is required to addressing both water *and* wastewater deficiencies if we are to facilitate development in our towns and villages.

It is noted that the Small Town & Villages Growth Programme relates to villages with a population of more than 500. The Planning Authority considers this limit to be too restrictive excluding numerous settlements in County Waterford which are identified for growth in the County Development Plan Settlement Strategy. Failure to provide adequate water and waste water infrastructure in such smaller settlements to cater for sustainable growth will prevent the promotion of such settlements as alternative locations to one off housing in the countryside, contrary to NPO 15 and 18b of the National Planning Framework.

To this end, there needs to be a focus on providing real alternatives to servicing smaller rural settlements. It is noted that there is no mention in the Investment Plan of Integrated Constructed Wetlands (ICWs) for example, as a viable and cost-effective wastewater treatment solution for smaller settlements. The Planning Authority would welcome support for same in the Investment Plan, if deemed appropriate by Irish Water.

Notwithstanding, the Planning Authority notes and welcomes IW's commitment to work with stakeholders and to provide technical support to establish the most cost effective and robust solutions. The Planning Authority would welcome a strong statement within the document to this effect.



Date 10/08/19

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