



SUBMISSION ON

Draft Water Services Guidelines

For Planning Authorities

February 2018



Introduction

An Fóram Uisce (the Water Forum) was launched in April 2017. With the forthcoming commencement of Part 5 of the Water Services Act, An Fóram will be the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 30 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

In representing the various stakeholders, An Fóram has commenced engaging with the agencies and departments who have responsibilities under the Draft River Basin Management Plan for Ireland (2018 – 2021) as well as the wider water community. This will result in improved understandings and enable the emergence of a common policy platform on particular catchment management issues and on the overall area of water services-drinking water and waste water treatment.

Overview of the Water Services Guidelines for Planning Authorities

An Fóram notes that the draft guidelines relate to operational processes between Irish Water and Planning Authorities rather than to a new or revised policy. However, throughout the draft there are references to the requirements of the National Planning Framework, the Water Framework Directive and the Draft River Basin Management Plan, all of which are of direct relevance to the work of An Fóram. Indeed, An Fóram has made submissions during the consultation processes for the National Planning Framework and the draft River Basin Management Plan. Furthermore, An Fóram has statutory responsibilities in relation to the work of Irish Water. Accordingly, An Fóram considers it appropriate to make this short submission in relation to issues of concern.

The main concern of An Fóram relates to the need to protect and restore all waters to good status, to protect drinking water supplies and to ensure that safe and potable drinking water is provided to the citizens of this Country. In this context, An Fóram is concerned that these draft guidelines exclude reference to a substantial number of households who are served by Group Water and Waste Water Schemes and also private and communal water services systems. It is understood that Irish Water's remit is confined to the schemes identified in its Water Services Strategic Plan and schemes outside of that plan will be most unlikely to receive any funding or attention from Irish Water during the course of the WSSP.

The concern of An Fóram relates to requirements outside of these areas in terms of arrangements for the provision of services in those towns/villages and the implications in relation to the security of drinking water supplies and contamination of water sources, groundwaters etc. arising therefrom.

Put very simply, in the absence of ability to connect to Irish Water services, will citizens be forced to install private solutions which in turn could pose a significant threat to their own wellbeing and the wellbeing of the environment in which they build their home or business? Furthermore, what arrangements are being put in place to secure water sources for existing group water/communal/private sources which will not be referenced in Irish Water's database and thus may not receive the attention of the Planning Authorities in the context of source protection? It would be of concern to An Fóram if the efficiencies in terms of managing Irish Waters facilities and assets were to have a negative impact on the environment and public health in those areas (of which there are many) which are outside of their remit and database of information. It is considered that the Department should consider addressing this issue, particularly in the context of the objectives contained in chapter 5 of the NPF in relation to planning for rural places.

Conclusion

An Fóram is conscious of the evolving underpinning assumptions concerning water services as it relates to Irish Water's remit. Formerly in Ireland, the entity which had the responsibility for water services i.e. local authority, also provided a comprehensive range of services and other inputs into its area, particularly as one of a number of economic development drivers, as a housing authority and as an agent for social development. It is reasonable to assume that its water services remit was approached within this wider range of functions. Clearly Irish Water is a single service entity whose primary concern has to be the equity, efficiency and economic value of its service.

An Fóram, however, draws attention to the fundamental nature of decision making around water services and to the wider domain of local economic, social and physical development and is concerned that this wider agenda can get lost in the singular focus of a sole service provider.

An Fóram appreciates that the draft Guidelines relate primarily to the operational relationship between Irish Water and Planning Authorities and do not, of themselves, create a new policy direction. However, there is a concern that the issues referred to above need to be addressed and An Fóram would welcome an opportunity to engage in relation to same and is available for that purpose.

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