



**Submission to the Department of Housing, Local Government and Heritage
on the**

Review of the Statement of Strategy 2021-2025

March 2023

Submission on the Preliminary Review of the DHLGH Statement of Strategy 2021-2025

The Forum acknowledges that the Department of Housing, Local Government and Heritage (DHLGH) is currently reviewing the current Statement of Strategy, with a view to updating the Strategy for the period 2023 to 2025.

The Forum welcomes the request to “identify any cross-cutting issues that you consider should be incorporated into our Statement of Strategy” and welcomes the opportunity to provide input in the review process.

Members of the Forum reviewed and discussed the current Statement of Strategy at the Plenary meeting on the 21st March 2023. Goal B ‘To provide a framework for the sustainable management of water resources from source to sea’ is of particular relevance to the Water Forum, along with a small number of other objectives/actions in the current Strategy.

The Forum has made the following recommendations to be included in the review of this Statement of Strategy.

Goal A – To provide a framework that ensures a sustainable housing system in Ireland with a supply of good quality housing to match needs.

While the Forum acknowledges that the current strategy considers energy efficiency for sustainable housing system (Actions 2.4 and 7.3), there is currently a gap around water efficiency. There is already significant pressure on our water supply in many parts of the country, e.g. Uisce Eireann’s (Irish Water) National Water Resources Plan indicates that 58% of water resource zones have a supply risk in normal conditions, while 66% are in deficit during drought conditions. Furthermore, population and economic growth and future climate change, will add additional pressure on our water resources. Water efficiency technologies such as rainwater harvesting, greywater re-use and water efficient devices (e.g., showers, taps, toilets), should be included in all new developments.

Recommendation 1: *Water efficiency for future housing developments should be included in Goal A (along with energy efficiency) to ensure a resilient supply of water in the future. Building Regulations should be updated to include water efficiency targets, to ensure that new developments incorporate water efficient technologies.*

Recommendation 2: *A sustainable housing system should also consider where nature-based solutions can be incorporated into planning*, such as sustainable urban drainage systems to mitigate the impacts on flooding and its associated impacts on water quality. Furthermore, nature-based solutions such as integrated constructed wetlands, should also be considered to reduce the pressures of existing wastewater infrastructure and potentially as a measure to address deficits in domestic wastewater treatment systems.

Goal B - To provide a framework for the sustainable management of water resources from source to sea.

Objective 1; To protect, enhance and restore water quality and water resource

Action 1.2 should be updated to finalise and implement the 3rd River Basin Management Plan, taking learnings from both learnings and failings of the 2nd cycle.

The DHLGH stated that this Statement of Strategy should “reflect relevant overarching budgetary and policy frameworks”, yet the current strategy lacks any commitment to adequately resourcing this Goal.

Recommendation 3: The Forum recommends that this Statement of Strategy should **commit to adequately resourcing the 3rd River Basin Management Plan** to ensure it meets the requirements of the EU Water Framework Directive. In particular, there should be a commitment **to establish and resource a full-time project management secretariat** for successful implementation of the 3rd cycle, in line with recommendations made by the Institution of Public Administration. This would ensure successful implementation and monitoring of the Plan and support the required engagement and cooperation between the different tiers of governance. It would also ensure there is continuous engagement within and between government departments to ensure policy coherence and alignment with national and EU policies.

According to the DHLGH, the Statement of Strategy should take account of “specific strategic and cross-Departmental issues”.

Recommendation 4: *There should therefore be a commitment in the Statement for policy coherence for climate, water and nature objectives.* The Forum recommends an urgent commitment to complete the interdepartmental group to **develop a comprehensive financing strategy to support the implementation of measures to deliver on the ambitious Water, Climate and Biodiversity objectives** (as proposed in the draft RBMP).

In 2020 the Water Forum adopted the Framework for Integrated Land and Landscape Management (FILLM)¹ as the overarching framework for not only catchment management, but also environmental management. The FILLM requires multidisciplinary and multi-organisational approaches, as well as environmental policy coherence, integration and implementation. This holistic approach should also be taken by government departments to maximise environmental outputs through better alignment and coordination of existing resources.

Recommendation 5: *The Statement of Strategy should also outline the resourcing requirements for the implementing bodies of the River Basin Management Plan,* in particular Action 1.4 should be updated to assign resources to expand LAWPRO and Local Authority staff to ensure they can adequately implement the 3rd RBMP. There should be a reference to the new Water EIP which aims to provide funding to implement the necessary targeted measures in waterbodies At Risk of not meeting the objectives of the Water Framework Directive.

Recommendation 6: An additional action should be added to Goal B, Objective 1 **to engage with stakeholders of the National Water Forum during implementation of the 3rd River Basin Management Plan to provide sectoral input and advice,** in line with the Water Forum’s statutory advisory role to the Minister and the Water Policy Advisory Committee.

¹ [Framework for Integrated Land and Landscape Management - An Fóram Uisce \(thewaterforum.ie\)](https://thewaterforum.ie)

Finally, the current Statement of Strategy mentions some of the key implementing bodies to meet Objective 1 (Goal B), however there is a gap in acknowledgement in how the public can also protect, enhance and restore water quality. The Forum have recommended to the DHLGH that efforts on public participation should be improved for the 3rd cycle, and through a series of pilot approaches and evaluation, a national approach for public participation should be developed.

Recommendation 7: *Opportunities for public participation to protect, enhance and restore water quality should be considered in the Statement of Strategy.*

Objective 2: Structure water and waste water services around Ireland's needs, the centrality of customers, the prioritisation of public health and environmental protection

The Forum is supportive of Objective 2 in the current Statement of Strategy, however, recommend that the following gaps are addressed;

Despite the current fragility of our water resources, with increasing pressures expected with population growth, economic development and climate change, there are little efforts on 'reducing consumption', currently mentioned in Action 2.4 of this objective.

Recommendation 8: *The Forum recommends that there is a stand-alone action to address the need to improve water conservation in Ireland. Specifically, the Forum calls for a Government-led National Strategy for Water Conservation in Ireland, which should be reflected in the revised Statement of Strategy, to support sustainable management of our water resources.* In 2021, the Forum commissioned research on a Framework to Improving Domestic Water Conservation in Ireland, which included policy recommendations on the need for updating building regulations to specify total water use per building and maximum ratings for fittings and a mandatory government-led water labelling scheme. The research also highlighted the need for a National Water Conservation Team comprised of all agencies and partners responsible for water, to share best practice, skills and knowledge to provide a pathway for water conservation in Ireland. Water conservation can also support Ireland's efforts for achieving net zero carbon targets, Housing for All/Project Ireland 2040 development targets and in reducing wastewater flows.

Recommendation 9: The Forum recommends that there is a commitment in Goal B Objective 2 to ***review and update the Climate Change Sectoral Adaptation Plan: Water Quality and Water Services***, to include the latest projections of climate impacts on Ireland's water resources, including both water quality and quantity.

Drought management and supporting policies and legislation in the UK and elsewhere in Europe are considerably more advanced than in Ireland at present; for example, water companies in England and Wales are obliged to produce a drought management plan every five years (Hammond et al., 2021), while England have prepared a report, 'Preparing for a drier future; England's water infrastructure needs' which outlines how England will address water supply challenges and deliver the appropriate level of resilience for the long term.

Recommendation 10: *There should be a commitment in the Statement of Strategy for both DHLGH and Uisce Eireann to develop and publish drought management plans for every water resource zone in the country*, in line with requirements of the European Commission.

There is currently a significant gap in Objective 2, Goal B to address leakage from our existing water infrastructure. Every day we currently lose about 38% of our treated water through leaks before it even reaches our taps. Uisce Eireann are making some progress to reduce leakage rate, and state they are on track to achieve a national leakage rate of 25% by the end of 2030.

Recommendation 11: *There should be a commitment in this Statement of Strategy to adequately resource Uisce Eireann to adequately implement the National Leakage Programme.*

New drinking water regulations of the Recast Drinking Water Directive have come into effect in Ireland this year, which require water service providers to develop risk assessment and risk management of the catchment areas for water abstraction. This risk-based approach should better align the Recast Drinking Water Directive with the requirements of the Water Framework Directive.

Recommendation 12: *The revised Statement of Strategy should reflect the requirements of the Recast Drinking Water Directive and the additional resources that may be required by water providers to deliver on this Directive.*

Recommendation 13: In relation to management of wastewater services, there should be a commitment in the Statement of Strategy to add urgency to ***complete upgrades of wastewater treatment plants to ensure compliance with the EU Urban Wastewater Treatment Directive, along with completion of assessments of all waterbodies at risk from urban wastewater.*** Efforts for a circular economy and resource recovery should be increased at urban wastewater treatment facilities.

Recommendation 14: Finally, there should be greater ambition for Action 2.1 (Objective 2, Goal B) on domestic wastewater systems, with a commitment to develop and implement a risk-based approach for inspections of domestic waste water systems across the country.

Objective 4: Reform of the Rural Water Sector

The Water Forum has an advisory role on rural water and plan to engage with the Rural Water Section of the DHLGH following the publication of the latest research by Tobin, Research and Information on the Rural Water Sector.

Recommendations 15: The Statement of Strategy *should reflect the role of the Water Forum in rural water, where the Forum should have ongoing engagement with the Rural Water Working Group to provide stakeholder input to both governance and operation of the rural water sector* (in line with Forum's statutory role in Rural Water).

The research report on the Rural Water Sector, highlighted the need to review and update the Rural Water Strategic Plans which were developed in the 2000s. These plans provided an opportunity to ensure a reasonably uniform, consistent and strategic approach to rural water services planning in rural areas.

Recommendation 16: The Forum recommends that the Statement of Strategy ***includes an action to update the Rural Water Strategic Plans for every county,*** (led by Local Authorities) which should provide an assessment of the primary needs of consumers, identify existing infrastructure and its condition and offer effective solutions such as consolidation or expansion of group water schemes.

Recommendation 17: The Statement of Strategy should ***define the role of local authorities in the delivery and administration of rural water and commit to additional resources and training where required*** to ensure effective governance of the rural water sector.

Recommendation 18: The Statement of Strategy should commit to *finalising and publishing the Multi-Annual Rural Water Programme*, which should be clear, concise and usable by all stakeholders of rural water.

Recommendation 19: Finally, in the context of the Reform of the Rural Water Sector, the RWWG need to consider the vital role that the group water sector can play in implementing the RBMP in terms of getting people to make sustainable changes to protect water quality and achieving multiple environmental benefits.

Objective 6. Ensure that Ireland has a clean, healthy, diverse and sustainably used maritime area while implementing relevant parts of UN Sustainable Development Goal (SDG) number 14.

Recommendation 20: The Forum is supportive of the actions in Objective 6 but *calls for more alignment between the Marine Strategy Framework Directive and the Water Framework Directive*. There is an overlap of 1 nautical mile between these two directives, and more efforts should be made to better coordinate and align the efforts required to meet both of directives. The European Commission are very strong on coherence between EU legislation implementation, especially where there is a thematic overlap. While the MSFD covers a wider range of elements/pressures relative to the WFD, there is overlap in some areas, such as eutrophication and hazardous substances.

Goal D: To ensure that planning and building in our regions, communities and maritime area contributes to deliver sustainable and balanced development

Objective 1 Delivery and review of the National Planning Framework (NPF) to achieve a more sustainable pattern and form of spatial development that is aligned with public investment to support more balanced regional development.

Recommendation 21: In the context of monitoring and reviewing of national planning policy (Action 1.1) and planning for sustainable development (Action 1.6), the requirements of the Water Framework Directive must be strictly adhered to ensure future planning does not negatively impact on Ireland's water resources.