



Clare County  
Development Plan  
**2023-2029**

## **Draft Clare CDP 2023-2029 - Public Consultation Portal**

**Submitted By: Anonymous user**

**Submitted Time: March 28, 2022 3:37 PM**

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### **Volume 1**

None of the above

### **Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps**

### **Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps**

## **Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps**

## **Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps**

### **Associated Documents**

None of the above

### **Environmental Reports**

None of the above

### **Your Submission**

The Irish Water Submission consists of three documents - a letter outlining our response to the Draft Plan (overall) as well as a details of Water Supply Capacity and Waste Water Treatment Capacity. Please see attachments for details.

### **Location Map**



Earthstar Geographics | Esri, FAO, NOAA

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## Upload Files

22\_IW\_FP\_07 Clare Draft Dev Plan.pdf, 0.39MB

Draft Clare DP IW WS Table.pdf, 0.11MB

Draft Clare DP IW WW Table.pdf, 0.11MB

Planning Department  
Clare County Council  
New Road  
Ennis

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28<sup>th</sup> March 2022

21\_IW\_FP\_07\_DCCDP

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## Re: Draft Clare Development Plan 2023 - 2029

A Chara,

Irish Water (IW) welcomes the opportunity to comment on the Draft Clare Development Plan (Draft Plan) 2023-2029. We note, and welcome, the inclusion of many objectives in the Draft Plan that will support the delivery of IW plans, programmes and policies. These policy objectives will also ensure the sustainable management of water and wastewater in line with national and regional objectives as stated in the National Planning Framework and the Regional Economic Spatial Strategy for the Southern Region.

IW have provided observations and comments on the Draft Plan below. We will continue to engage with the planning department as the development plan process progresses.

Our submission is set out as follows:

1. General
2. Proposed Core Strategy & Availability of Water Services
3. Comments and Suggestions on the Draft Plan text
4. Water Services summary tables (attached)

### 1. General

#### 1.1 Capital Investment Plan 2020-2024

The purpose of the Investment Plan is to set out Irish Water's budgetary plan from 2020-2024 in line with the Water Services Policy Statement 2018-2025 and our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). Our primary function is to provide clean drinking water to customers and to treat and return wastewater safely to the environment. In providing these services we play a central role in enabling economic growth, protecting both the environment and the health and safety of our customers and the public.

Irish Water's Draft Capital Investment Plan 2020-2024 has received final determination by Irish Water's regulator, the Commission of the Regulation of Utilities (CRU). An explanatory booklet which includes details of the planned investments in each county will be outlined is available [here](#).

#### 1.2 The National Water Resources Plan

Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment.

The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country.

A three-pillar approach will be used in the NWRP:

1. Lose Less- leakage reduction and network efficiency
2. Use Less- water conservation measures
3. Supply smarter – sustainable supplies.

Following public consultation, the NWRP Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway which involves the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. The public consultation stage for the Eastern and Midlands region, which includes East Clare, has recently concluded. Consultation for the remaining regional plans will be carried out in 2022.

### **1.3 Drinking Water Source Protection:**

Irish Water has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap. The 'source' component of DWSPs is a key component and a priority within Irish Water, as protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of the WFD.

Irish Water is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality are the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is currently involved in pilot drinking water source protection projects, which aim to trial catchment scale interventions to reduce the risk of pollution in water supplies.

### **1.4 River Basin Management Plan**

Irish Water supports the River Basin Management Plan (RBMP) Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive initial and further characterisation activities. Irish Water is a member of Water Policy Advisory Committee, National Technical Implementation Group, and Regional Operational Committees. Irish Water works collaboratively with the EPA Catchment Science and Management Unit (CSMU) to facilitate the identification of significant pressures and the setting of environmental objectives. In addition, Irish Water supports the Local Authority Waters Programme (LAWPRO) desktop studies and local catchment assessment work through ongoing data sharing. The objectives and priorities of the RBMP 2018 – 2021 have been incorporated into IW investment plans and work programmes as appropriate, and the objectives and priorities of the third cycle RBMP (2022-2027) will be a key driver for the next investment plan.

### **1.5 Sustainable Drainage and Green-Blue Infrastructure**

Irish Water welcomes the inclusion of objectives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the NPF under NPO 57. SuDS and Green-Blue Infrastructure are encouraged in new developments including the public realm and retrofitted in existing developed areas. These measures can provide a cost effective and sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers (thus increasing capacity for foul drainage from new developments) while providing multiple benefits e.g. improved air quality, amenity, noise reduction. Irish Water would be happy to discuss potential opportunities to collaborate on projects that would remove stormwater from combined sewers.

## **1.6 Planned road and public realm projects**

Planned public realm and road projects have the potential to impact on Irish Water assets and projects e.g. tree planting, building over of assets, new connections, programming network upgrades in advance of road project, provision of future-proofing ducts. In particular, these projects often provide the opportunity to implement nature-based SuDs solutions to remove stormwater from combined sewers.

Development in the vicinity of Irish Water assets should be in accordance with our Standard Details and Codes of Practice, and Diversion Agreements will be required where an Irish Water asset is diverted or altered.

There are a significant number of initiatives underway or planned which may impact water services in the road and/or public realm.

Early engagement in relation to road and public realm plans and projects is requested to ensure public water services are protected, enable Irish Water to plan works accordingly and ultimately minimise disruption to the public. Irish Water would appreciate the inclusion of text highlighting the above in the Draft Plan.

## **2. Proposed Core Strategy and Availability of Water Services**

### **2.1 Core Strategy**

The attached tables provide an overview of the ability of Irish Water to cater for the 2023-2029 population allocations in the settlements listed in the Core Strategy Table.

The core strategy table utilises Section 4.4.3 of the draft Development Plan Guidelines for Local Authorities in determining 'Zoning Land Required'. In many settlements, the zoned lands in the 'Zoning as per Map' column is further increased for reasons explained in the footnotes. It should be noted that if all of these lands were fully developed, strategic network reinforcements as well as treatment plant upgrades may be required in some settlements.

### **2.2 Zoning**

As part of IW's engagement with CCC, we previously provided feedback on land-use zonings for many of County Clare's settlements. In order to maximise the use of existing water services, phased sequential development in areas with existing water services infrastructure and spare capacity is encouraged.

Available network information indicates network reinforcements e.g. extensions, may be required to service some zoned sites. Depending on the extent of development realised, network upgrades may be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. In order 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. Stormwater separation from combined sewers and the implementation of Suds is strongly encouraged to remove surface water from combined sewers, thereby freeing up additional capacity for development. This is particularly relevant to achieving compact growth objectives in settlements.

In several settlements, the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g. residential dwellings. These include Quinn, Killimer, Kilfenora, Feakle, Crusheen, Ennistymon. Any future development of these lands should take account of the established use of the existing wastewater treatment plant and the potential for extensions / intensification of use of the WWTP in the future.

Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works.

All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's New Connections process which will determine the exact requirements in relation to network and treatment capacity. New connections to Irish

Water 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. servicing backland sites or connecting to IW network via private network in a housing estate.

Where Irish Water assets are within a proposed development site, these assets must be protected or diverted. If there is a possibility that Irish Water assets will need to be altered or diverted as a result 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/>.

Where relevant, additional site-specific comments are included in the attached table. Irish Water is available to assist Clare County Council with land-use zoning queries that may arise from a water services perspective and when future Local Area Plans are being prepared.

## **2.3 Wastewater Infrastructure**

### ***Wastewater Treatment Plants (WWTPs)***

The attached table provides an overview on the ability of Irish Water to cater for the planned population growth in the settlements listed in the Core Strategy Table. Details on available capacity at all Irish Water WWTPs in Clare is outlined in Irish Water's 2020 Wastewater Treatment Capacity Register which was issued to Clare County Council this month.

The Key Town of Ennis is served predominantly by Ennis North WWTP, which has approximately 7,000pe spare capacity. Projects to upgrade both Ennis North WWTP, and the smaller Clarecastle WWTP, are at an early stage. A project is also underway to pump wastewater from Clarecastle to Clareabbey agglomeration. In Shannon, a WWTP upgrade to improve performance and provide significant additional capacity was completed in 2021.

Athlunkard, Clonara and Parteen are served by Limerick city WWTP, which has headroom available and a project underway to provide additional capacity. At Ballycannan, a project is underway to connect the settlement to the Limerick City agglomeration.

WWTP upgrade projects to increase capacity for growth and/ or improve compliance are progressing at Killaloe, Ennistymon, Lahinch, Newmarket-on-Fergus and Kilfenora. Capital investment projects are also ongoing to provide WWTPs in the previously untreated agglomerations of Ballyvaughan, Liscannor, Kilkee and Kilrush. The site selection process is ongoing for several of these projects and will have regard to the draft Plan; the over-arching wastewater infrastructure policies support these projects in general. At Doonbeg, a project to provide additional capacity to cater for the projected population growth is being progressed via Irish Water's Small Towns and Villages Growth Programme. A project to provide WWTP capacity at Kilmihill is at an early stage. Initial scoping for a project at Kildysert WWTP will be carried out in 2022. It is anticipated that both Kilmihill and Kildysert WWTP projects will be completed within the lifetime of the Draft Plan. Minor WWTP upgrades and improvements are also continually carried out on a nationally prioritised basis through Irish Water's programmes.

### ***Wastewater Networks***

Irish Water and Clare County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, storm water overflow upgrades, etc. Irish Water and Clare County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. A capital project is also underway to pump the wastewater load from Clarecastle to Clareabbey WWTP.

A Network Development Plan (NDP) for Ennis was completed in 2019. This is a high-level study that will help inform how undeveloped zoned sites could be serviced. NDPs are also being prepared for settlements served by IW infrastructure in the Limerick metropolitan area.

Drainage Area Plans (DAPs) assess the wastewater network in detail to identify issues and needs. A DAP is underway and due to be completed in 2024 for the Limerick and Castletroy agglomerations and a DAP for Ennis is due to commence in 2022. Irish Water will engage with Clare County Council to ensure planned growth is taken account of in these studies. A DAP for Shannon was also completed in 2017 and capital maintenance works on the rising main network there are ongoing.

The attached water services summary table provides further detail on the wastewater networks in Clare.

## **2.4 Water Supply Infrastructure**

### ***Water Supply for Clare***

County Clare is supplied by 16 water resource zones (WRZs). Ennis is supplied by the Ennis WRZ. Within the Limerick-Shannon metropolitan area, Shannon and Sixmilebridge are supplied by the Shannon/ Sixmilebridge WRZ while Clonlara and Limerick city and environs are supplied by Limerick City WRZ. The attached table provides an overview on the ability of Irish Water's WRZs to cater for the planned population growth in the settlements listed in the Core Strategy Table.

An upgrade of the New Doolough Water Treatment Plant (WTP) is underway in the West Clare WRZ and an upgrade of the Castle Lake WTP in Shannon/ Sixmilebridge WRZ is planned. The NWRP preferred solution for the Ennistymon WRZ is to interconnect it to the West Clare WRZ to improve security of supply. WTP improvements are also continually progressed through our capital maintenance and national programmes.

The full options assessment stage of the NWRP has been carried out in consultation with the water services department of CCC. This has identified the preferred interim and long-term interventions required to ensure a sustainable water supply in Clare, and nationally. Public consultation on the Eastern and Midlands Regional Plan, which includes part of Co. Clare, commenced in December 2021. Consultation for the remaining Regional Plans will be undertaken in 2022.

### ***Water Networks***

Irish Water and Clare County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. Irish Water and Clare County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Mains rehabilitation works have been carried out in recent years as part of the Leakage Reduction Programme on distribution and trunk mains throughout the county, totalling approx. 18km in total. An additional 7km of mains rehabilitation works will be carried out in Clare in 2022.

## **2.5 Water Supply Project Eastern and Midlands Region (WSP)**

### ***WSP Overview***

The WSP has been developed to deliver a long-term, sustainable, resilient water supply source for the Eastern and Midlands Region, to meet forecast water supply need for the region until the year 2050 and beyond. It represents the first major nationally and regionally significant provision of 'new source' water supply infrastructure for the region for over 60 years, and it is anticipated that its implementation will contribute to meeting the domestic and commercial water supply needs of over 40% of Ireland's population in the medium to long term.

The Proposed Project will involve the abstraction and pumping of raw water from the Lower River Shannon at Parteen Basin; treatment of the water nearby at Birdhill, County Tipperary, and pumping of the treated water via buried pipeline to a Break Pressure Tank (BPT) located at a high point near Cloughjordan, County Tipperary. From this high point near Cloughjordan, the treated water will flow via buried pipeline through the Midlands to a termination point reservoir (TPR) at Peamount, in County Dublin (within the administrative area of South Dublin County

Council), where it will connect into the existing Greater Dublin Area Water Resource Zone (GDA WRZ) network.

#### Water Supply Project in Context of NWRP

The NWRP comprises a Framework Plan (adopted 2021) and four Regional Plans (drafts under preparation / currently at statutory consultation stage). The pertinent Regional Plan for WSP is the Eastern and Midlands Regional Water Resources Plan, which includes east County Clare.

The WSP pre-dated the development of the NWRP, and the project had been subject to considerable non-statutory consultation prior to the development of the Plan. As such, it represents an “in-flight” project and remains the project identified to deliver a ‘new source’ water supply for the Eastern and Midlands area. Whilst various analysis done to date continues to indicate that WSP is the preferred approach for the Eastern and Midlands Region, this will require review and confirmation in light of the NWRP (Framework and Regional Plans and associated statutory consultations and SEAs). Following the publication (and statutory consultation) of the draft Regional Plan for The Eastern and Midlands Region the WSP will be reviewed, after which it is anticipated that WSP will be subject to further public consultation. Once Abstraction Legislation is enacted, planning permission will be sought from An Bord Pleanála for the Strategic Infrastructure Project. A separate licence application will be made to the EPA.

#### Proposed WSP Elements in Clare

Whilst not in the administrative area of Clare County Council, the abstraction point of the proposed project – the Raw Water Intake and Pumping Station – is located on the eastern side of Parteen Basin, in Co. Tipperary and will be visible from Co. Clare.

In order to provide the power required for the proposed Raw Water Intake & Pumping Station and the proposed Water Treatment Plant, uprating works to existing electrical infrastructure, located within the administrative area of Clare County Council, are proposed. These works include the uprating of the existing Ardnacrusha – Birdhill 38kV OHL (Over Head Lines) (Northern and Southern Lines). Consultation in respect of these proposed works is ongoing with ESB.

#### Supportive National and Regional Policy

The National Planning Framework recognises the importance of WSP in National Strategic Outcome No. 9 where it is explicitly identified that ‘...investment in water services infrastructure is critical to the implementation of the National Development Plan...’ and that:

*‘A new long-term water supply source for the Eastern and Midland Region, which includes the Dublin Water Supply Area (DWSA), is needed by the mid-2020s, to provide for projected growth up to 2050 and contribute to resilience and security of supply for the region. This requires infrastructure provision to be guided and prioritised in a manner that can benefit the greatest possible number of areas within the country;’*

The National Development Plan 2021-2030 also highlights the important role that the Water Supply Project has in catering to water demand in the Eastern and Midland region. The delivery of the project is categorised within Chapter 14 of the NDP as a ‘Strategic Investment Priority’, which is required to ‘meet future economic, housing, and population demands’.

The WSP is also referenced as a project that is required to meet the needs of our growing economy across the regions and in the interests of public health and quality of life in the Southern Region RSES (Section 8.1). We note that the RSES explicitly calls out the importance of “key enabling infrastructure” associated with the WSP (S.8.1). We would respectfully submit that all proposed project elements in Clare constitute key enabling infrastructure for WSP.

#### Water Services Policy Statement (2018-2025)

The Water Service Policy Statement prepared by the (then) Department of Housing, Planning and Local Government in line with the Water Services Acts, sets out parameters for strategic

planning and decision making in respect of water and wastewater services in Ireland over the period to 2025. The Statement provides a series of high-level policy objectives across the three thematic areas of Quality, Conservation, and Future Proofing which must be pursued when planning capital investment and framing current spending plans. It also sets out the context within which necessary funding and investment plans by Irish Water will be framed and agreed. The statement recognises that local authorities, within their broader remit of social and economic development and planning, are key players in aligning infrastructure planning for the delivery of water services with wider land use planning objectives in respect of housing, social infrastructure and industrial and commercial development.

#### Comments on Draft Clare County Development Plan in the context of the Water Supply Project (WSP)

We welcome the references within the Draft Clare CDP which are supportive of Irish Water's general objectives. These include *Objective CDP11.27* which commits to supporting the development of Drinking Water Protection Plans that accord with the Water Framework Directive, and *Objective CDP 11.30* which contains a commitment to support Irish Water in the implementation of Investment Plans, and in efforts to conserve water and maximise existing capacity in water supply services.

*Objective CDP 11.28* also expresses a commitment "to support investment and the sustainable development of strategic water supply projects of Irish Water and leakage reduction programmes and initiatives through the **National Water Resources Plan**". Given that the WSP has been identified as a strategic water supply project within regional and national policy documents, Objective CDP 11.28 is welcomed. We note however that, at present, there is no reference within the Draft CDP to the *Eastern and Midland Regional Water Resources Plan (EMRWP)*. A draft of the EMRWP was published on December 14<sup>th</sup> 2021 and is currently open to public consultation until 14<sup>th</sup> March 2022.

The Draft EMRWP contains a review of the water supply needs of the eastern and midland region and outlines a range of local and regional options which have been identified as having the potential to address system deficiencies and to secure adequate water provision for the region until 2044 and beyond. Amongst the options outlined in the Draft EMRWP is a preferred regional approach termed the 'New Shannon Source' which would facilitate the transfer of water from Parteen Basin to other areas within the region.

The 'New Shannon Source' option would enable the development of a sustainable and interconnected water supply system across the region. It would also, in combination with other measures such as an ambitious leakage reduction programme, contribute to addressing existing/forecast water supply deficits within two thirds of the region's water supply zones.

The Draft EMRWP therefore provides a detailed overview of the water supply needs of the Eastern & Midland region and outlines the measures which are considered to be required in order to secure a sustainable and secure water supply for the entire region up to 2044 and beyond. Given that this region includes eastern County Clare, we would welcome the inclusion of a reference to the *Eastern and Midland Regional Water Resources Plan* in the County Development Plan.

It is noted that specific reference to the WSP is made within *Section 11.3.4* of the Draft CDP where it is stated that "a carefully balanced approach needs to be achieved between meeting national priorities for water supply and addressing local concerns about the potential impacts of the proposed project".

In this regard and as noted in earlier sections of this submission, regional and national planning policy documents are fully supportive of the WSP. As part of the consent process, the project will be subject to detailed planning and environmental assessment in accordance with statutory provisions, including public participation in the Planning and Licensing processes.

In addition to the above objectives and references to water supply, two additional objectives are considered to be noteworthy in the context of WSP.

The first of these is *Objective CDP2.22* which relates to Ardnacrusha Hydroelectric Power Station and states that *“It is an objective of Clare County Council to support the utilisation of all of the existing infrastructure at Ardnacrusha Hydroelectric Power Station, to increase its power input to the National Energy Grid”*.

In this regard, it should be noted that the proposed WSP will require the abstraction of water from Parteen Basin. Water levels in Parteen Basin vary from season to season and from year to year depending on climatic conditions and are managed by ESB within a normal water level operation band. Overall, on an average annual basis, it is expected that approximately 2% of the annual average flow at Parteen Basin will be redirected from Ardnacrusha Power Generating Station to WSP. Duration of generation will be reduced pro-rata, whilst ensuring the normal water level operation band is maintained. Abstraction from Parteen Basin associated with WSP will thus result in a relatively minor pro-rata reduction in the generation capacity of Ardnacrusha.

This minor pro-rata reduction will not have a significant impact on the output production of Ardnacrusha and is considered appropriate given the importance placed on the WSP to delivering sustainable water supply in national and regional planning policy, as outlined in earlier sections of this submission.

The second objective which may be considered to be of relevance to the WSP is Part E of Objective CDP6.8 which states that it is an objective *“to support and promote the future reopening of the Errina Canal as a piece of functioning waterway infrastructure...”*.

As noted previously the proposed WSP will not result in an increase in abstraction levels from Parteen Basin but rather consists of a minor redirection of existing flow from the Ardnacrusha power station. Detailed environmental analyses have been and continue to be undertaken by Irish Water to assess flows, levels and water quality arising from the proposed abstraction. Furthermore, it is noted that there is a required downstream minimum statutory compensation flow to the Old River Shannon (which serves the Errina Canal), which the WSP will not affect. As such, it is not anticipated that WSP would have the potential to have any impact upon any future reopening of the Errina Canal.

## **2.7 Proposed SDZ**

It is understood from the core strategy footnotes that the population allocation for the proposed SDZ is largely expected to be realised beyond the lifetime of the Draft Plan. The proposed SDZ has the potential to require significant network reinforcements as well as treatment plant upgrades. Depending on the extent of development, network reinforcements required may include network extensions, upgrades of existing strategic networks, new/ upgraded pumping stations, provision of additional storage at Newcastle reservoir. The exact extent and timing of works required to cater for this development will depend on the size of the load (including student and non-domestic loads) and the timing and phasing schedule of the proposed development. Further to this, IW supports CCC's decision to adopt a plan-led approach for this innovative development. Continued engagement, in particular through the two-year planning period following SDZ designation, is requested. The inclusion of a brief overview of infrastructure needs (water, transport, etc) in Section 6.9.1 would be beneficial.

Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works. Developers may be required to contribute to the costs of required upgrades, in accordance with the requirements of the Commission for Regulation of Utilities approved, Irish Water Connection Charges policy.

### 3. Additional Comments and Suggestions on the Draft Plan text

Section	Comment
<p>DPO CDP Ennis 4.1 DPO CDP Shannon CDP 4.4 DPO CDP Service Towns CDP 4.5 DPO CDP Small Towns CDP 4.6</p>	<p>Suggested additions in <b>red</b> and deletions in <del>strikethrough</del></p> <p>With regard to the objective: <i>To monitor the cumulative effect of grants of planning permission on available wastewater capacity where connection to a public wastewater treatment plant is included as part of a development proposal,</i></p> <p>Developers shall be required to connect to the public network, where available. As outlined in the Draft Water Services Guidelines for Planning Authorities (Jan 2018), there is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks.</p> <p>Suggested amendment: <i>To work with the relevant bodies and to seek investment for the timely and sustainable delivery of holistic infrastructure <b>to meet the objectives of this Plan</b> <del>enhance the levels of amenity and design quality and to regenerate and rejuvenate the ..... throughout the County.</del></i></p>
<p>S 6.28 Data Centres</p>	<p>Developers requiring connections are to engage with IW via our New Connections process. Water conservation and the use of water-efficient technologies will be required.</p>
<p>Chapter 8 Rural Development and Natural Resources Chapter 9 Tourism Chapter 12 Shannon Estuary Chapter 13 Marine, Coastal and Island Management</p>	<p>Development associated with extractive industries, renewable energy, low carbon economy developments, forestry, peat extraction, aquaculture, tourism etc must have due regard for, and not adversely impact, existing or planned water sources or other Irish Water infrastructure. Irish Water will engage via the planning process for such developments in its role as statutory consultee. Developers requiring connections are to engage with IW via our New Connections process.</p> <p>Irish Water would welcome the opportunity to provide input on the proposed plans such as the Integrated Environmental Management Plan for the Shannon Estuary, Integrated Coastal Zone Management Plan, etc. Marine and freshwater development should not significantly adversely affect existing, authorised, proposed or reasonably foreseeable Irish Water activity.</p>
<p>11.2.9.3 Access onto National Roads Exceptional circumstances CDP11.13 Direct Access onto National Roads</p>	<p>There are a number of water and wastewater projects planned in County Clare over the coming years which may require the creation of additional access points or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. These projects are necessary to meet strategic growth and environmental objectives in local, regional and national planning policy. Provision should be made for these projects in the County Development Plan as per section 2.6 Exceptional Circumstances of the Spatial Planning and National Roads Guidelines. Irish Water would be happy to engage further with TII and</p>

	CCC to ensure the necessary provisions are made in the development plan.
11.3 Water Resources	Has the Groundwater Protection Scheme been incorporated into the River Basin Management Plan for Ireland?
In relation to alternatives to public water services to service developments e.g. DPO CDP 4.7 Large Villages (e) DPO CDP 4.8 Small Villages DPO CDP 4.9 Clusters Chapter 9 Tourism S11.4.3 Wastewater Management DPO CDP 11.32 (h) Developer provided infrastructure (i) WWTPs for Small business/ community facilities in unserved areas DPO CDP 11.4 Rural Wastewater Treatment Programmes S4.2.5 Single houses in the Countryside S5.2.7 Sites for Independent Development 11.21 (d) Doolin Pier Masterplan Volume 3, Village Growth Areas and other proposed development in unserved settlements	As outlined in Draft Water Services Guidelines for Planning Authorities (Jan 2018), Section 5.3: 'It is the policy of Irish Water 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 will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.' The opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.
DPO CDP 11.29 Water Services (b) DPO CDP 11.30 Water Supply (a) DPO CDP 11.31 Ennis and Environs Water Supply (c) DPO CDP 11.32 WW Treatment and Disposal (a) DPO V3(a)17 (d), DPO V3(a)18 (a)	Early engagement in the preparation of masterplans and planning of development areas is welcomed. All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's New Connections process which will determine the exact requirements in relation to network and treatment capacity. New connections to Irish Water networks are subject to our Connections Charging Policy. Further information on this process is available at: <a href="https://www.water.ie/connections/developer-services/">https://www.water.ie/connections/developer-services/</a> .  Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works. Where water or wastewater treatment infrastructure upgrades are required to facilitate commercial or industrial connections, developers may be required to contribute to the costs of the upgrades in accordance with the requirements of the Commission for Regulation of Utilities approved, Irish Water Connection Charges policy.  The attached water services summary table provides an overview of Irish Water's ability to cater for the projected population growth in Clare's towns and villages over the lifetime of the draft Plan.

	<p>The current IW Capital Investment Plan covers the period 2020-2024 and was approved following extensive CRU led stakeholder consultation process during 2018-2019. Our next investment period will cover the period 2025-2029 and will include stakeholder consultation as part of the preparation process.</p>
DPO CDP 11.26 Water Framework Directive and River Basin Management	<p>e) Suggested amendment... <i>To protect groundwater <b>and surface water</b> resources....set out in the National River Basin Management Plan 2022-2027, <b>and any subsequent management plans</b></i></p>
Water quality impacts	<p>To align with the recent Weser ruling in relation to the Water Framework Directive, we suggest the following amendments are made to CDP11.26 and 11.3 (and any other applicable objectives):</p>
DPO CDP 11.26 Water Framework Directive and River Basin Management (g)	<p>Suggested amendment to CDP11.26 (g) third bullet point: <i>To consider proposals for development which infringe on a river boundary, or an associated habitat, including their connection by groundwater, only where it can be clearly demonstrated that:..... There will be <b>no deterioration of water body status</b> <del>impact on the ecological, aquatic or fishing potential of the waters or associated waters</del></i></p>
DPO CDP 11.33 Strategic Wastewater Treatment Projects (c)	<p>Suggested amendment: <i>To ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water <del>quality</del>-<b>body status</b> or give rise to adverse impacts on the integrity of the Natura 2000 network.</i></p>
Development in the riparian margin e.g. CDP11.26(g), CDP15.16	<p>Irish Water welcome objectives protecting the riparian margin such as CDP11.26(g) and CDP15.16; these will play an important role in protecting biodiversity and water quality. Notwithstanding this, the Draft Plan should allow for access to and maintenance of existing Irish Water infrastructure e.g. outfalls, pipelines, within these corridors. Similarly, provision of new assets may be required within riparian buffers in limited instances e.g. new outfalls, expansion of riverside WWTP sites, subject to proper planning and sustainable development.</p>
S11.3 DPO CDP 11.27 Water Resources	<p>Suggested amendment: <i>a) To support <b>protection and improvement of the quality of drinking water sources</b> <del>the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive;</del></i></p>
DPO CDP 11.31 Ennis and Environs Water Supply (Also DPO V3(a)17)	<p>The preferred solution as set out in the RWRP is to increase the groundwater abstraction at Drumcliff Springs, upgrade Drumcliffe WTP, and further leakage reduction.</p> <p>It is envisaged there is adequate capacity available to cater for the core strategy population allocation.</p> <p>In relation to (b), Irish Water have no plans to investigate the use of Pouladower Spring as a potential water supply source for Ennis at present.</p> <p>Suggested amendment:</p>

	<i>(d) ....notwithstanding development that may be required to maintain, upgrade or augment the existing water supply source and infrastructure, subject to proper planning and sustainable development.</i>
S11.4.3 Wastewater Management	Suggested amendment: <i>At present there are significant service and compliance issues in many existing wastewater systems in County Clare. A number of treatment plant and network projects are being progressed under Irish Water's 2020-2024 to address these issues.</i>
DPO CDP 11.32 WW Treatment and Disposal (b) (c)	In relation to (b); both seasonal loadings and climate change are taken into consideration in the design and construction of projects progressed under Irish Water Investment Plans.  Suggested amendments: (c) <i>To advocate for the on-going provision, <del>conservation</del> maintenance and upgrade of wastewater treatment infrastructure in the County;</i> (g) <i>To permit the development of single dwelling houses in unserviced areas only where it is demonstrated to the satisfaction of the Planning Authority...</i>
S11.4.3.1 Environmental assessment criteria	Suggested additions to list: <i>Nature-based solutions such as constructed wetlands (CWs) and integrated constructed wetlands (ICWs) will not be considered for;</i> <ul style="list-style-type: none"> <li>• <i>Sites that pose an unacceptable risk to drinking water sources.</i></li> <li>• <i>Sites that conflict with the protection guidelines set out in the Clare Groundwater Protection Scheme.</i></li> </ul>
DPO CDP 11.34 Rural Wastewater Treatment Programme (b)	Suggested amendment: <i>b) To support the servicing of rural villages (serviced sites) in settlements with adequate public wastewater treatment capacity available, to provide an alternative to one-off housing in the countryside.</i>
S11.4.4 Storm Water Management	Suggested amendment: <del><i>In serviced towns and villages with combined sewers the management of storm water</i></del> <i>The management of combined sewers falls within the remit of Irish Water.</i>
19.5 Land Use Matrix Appendix 2 Indicative Land Use Zoning Matrix	'Utilities' is referenced as a zoning on pg 431 but this does not form part of the zoning table on pg 462.
Appendix 1 Development Management Guidelines	Suggested amendment: WW Treatment Systems <i>Where connection to the public wastewater network is not available, the Planning Authority, in assessing...</i>  IW suggest the inclusion of the following text: <i>Applicants proposing to connect to public water services infrastructure shall engage with Irish Water prior to seeking planning permission. New connections shall be subject to a connection agreement with Irish Water.</i>
Volume 3a	Although details are provided on the Ennis 2040 strategy, the strategy document does not appear to be included in the Draft Plan. From the detail provided in Volume 3a, it is likely that significant network

	<p>reinforcements, and potentially treatment plant upgrades, would be required if all of the proposed transformational and opportunity sites were fully developed. Early and continued engagement will be essential to ensure the necessary infrastructure is planned in a phased and efficient manner. New connections will be subject to Irish Water's Connections Charging Policy. IW encourage the master-planning / plan-led approaches proposed for a number of these sites.</p>
<p>Volume 3c S 2, Killaloe</p>	<p>IW have no plans to interconnect the Killaloe and Newport WRZs at present. The preferred solution identified in the RWRP is to upgrade Killaloe WTP.</p> <p>Suggested amendment: <i>Wastewater from Killaloe is treated in Ballina and the existing wastewater treatment plant is currently operating at hydraulic capacity and cannot accommodate any further significant development.....</i></p>
<p>Volume 3d S2, Kilkee</p>	<p>Suggested amendment: <i>There is currently limited wastewater treatment in Kilkee, however, a new wastewater treatment plant, pumping station and rising main are planned for the town. <b>The WWTP is due to be completed within the lifetime of the Plan.</b> <del>Work is due to commence in late 2023 with completion in early 2025 which will cater for the population target for the town.</del></i></p>
<p>S3, Ballyvaughan</p>	<p>Suggested amendment: <i>A new wastewater treatment plant, pumping station including pipework extensions are planned and it is expected that the project will be completed in <del>2023</del> <b>2024</b>.</i></p>
<p>S3, Doonbeg, Inagh</p>	<p>Text in relation to sites R1 and R2 refer to compliance with the EPA Code of Practice for Wastewater Treatment. Irish Water are required to comply with the relevant authorisation issued by the EPA. As both Doonbeg and Inagh are served by public WWTPs, it may be more appropriate to refer to the relevant discharge authorisation.</p>
<p>S3, Liscannor</p>	<p><i>There is a public wastewater network in Liscannor <b>and a project is underway to construct a WWTP, which a planned upgrade to this will provide sufficient capacity to meet the needs of the target population over the plan period. The proposed upgrade is due to be completed in</b> <del>2022</del> <b>2023</b>.</i></p>
<p>S3, Kilmihill and Kildysert</p>	<p>A project to provide WWTP capacity at Kilmihill is at an early stage. Initial scoping for a project at Kildysert WWTP will be carried out in 2022. It is anticipated that both Kilmihill and Kildysert WWTP projects will be completed within the lifetime of the Draft Plan. As noted above, the Draft Water Services Guidelines for Planning Authorities (Jan 2018), Section 5 generally advises against alternatives to public water services infrastructure.</p>

Environmental Reports	The contents of this submission should be taken account of in the Environmental Reports.
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Yours Sincerely,



Elaine Heneghan  
**Regional Forward Planning Specialist**  
**Asset Strategy**

**Irish Water Water Services Summary Table - Water Supply**  
**For Draft Clare County Development Plan Public Consultation 2023-2029**  
**March 2022**  
**Subject to change**



Settlement	2016 Population	Core Strategy 2023-2029 Population Allocation	Irish Water WRZ	Irish Water WRZ Comment
Corofin	751	63	Corofin WRZ	It is envisaged there is adequate capacity available to cater for the core strategy population allocation.
Ennis	25,276	2,705	Ennis WRZ	It is envisaged there is adequate capacity available to cater for the core strategy population allocation. Ennis WRZ is included in ongoing RWRP public consultation. RWRP preferred solution is to upgrade Drumcliffe WTP, increase abstraction and further leakage reduction. Monitoring is required to fully understand the yield availability, and if sustainability issues arise, a connection to Limerick City (Clareville WTP) could potentially be required in the longer term to supplement supply.
Clarecastle (Ennis figure)			Ennis WRZ	As above.
Crusheen	534	46	Ennis WRZ	As above.
Shannon	9,899	1,060	Shannon/ Sixmilebridge WRZ	It is envisaged there is adequate capacity available to cater for the core strategy population allocation. Included in ongoing RWRP public consultation. A project to upgrade Castle Lake WTP is planned and will be completed within the lifetime of the Draft Plan, subject to the necessary approvals. The text with regard to the Shannon/ Sixmilebridge RWS in Volume 3 should be updated as per the above.
Sixmilebridge	2,669	357	Shannon/ Sixmilebridge WRZ	As above.
Bunratty	375	79	Shannon/ Sixmilebridge WRZ	As above.
Cratloe	926		Shannon/ Sixmilebridge WRZ	As above.
Newmarket-on-Fergus	1,968	209	Shannon/ Sixmilebridge	As above.
Tulla	759	81	Shannon/ Sixmilebridge WRZ	As above.
Kilkishen	592	50	Shannon/ Sixmilebridge WRZ	As above.
Quin	984	85	Shannon/ Sixmilebridge WRZ	As above. Small diameter mains (75mm) in village centre; upgrades may be required.
Ennistymon/ Lahinch	1,567	223	Ennistymon WRZ	Limited capacity at present however, leakage reduction and rationalisation to the West Clare WRZ planned. It is envisaged that, with these proposed measures, there will be adequate capacity to cater for the core strategy population allocation over the lifetime of the Draft Plan. Extension required for Ennistymon.
Lisdoonvarna	800	85	Ennistymon WRZ	As above.
Ballyvaughan	327	29	Ennistymon WRZ	As above.
Liscannor	182	17	Ennistymon WRZ	As above.
Kilfenora	290	25	Ennistymon WRZ	As above.
Feakle	250	21	Feakle WRZ	It is envisaged there is adequate capacity available to cater for the core strategy population allocation.
Killaloe	1,393	148	Killaloe WRZ	It is envisaged there is adequate capacity available to cater for the core strategy population allocation.
SDZ		3,500	Limerick City WRZ	It is envisaged there is adequate capacity available to cater for the projected population growth however, a WTP upgrade may be required in the medium term. It is understood from the core strategy footnotes that this population allocation is largely expected to be realised beyond the lifetime of the Draft Plan. At a minimum, the works required to facilitate the proposed SDZ will include an extension of the trunk water network. Depending on the demand requirements, increased storage at Newcastle reservoir, significant network upgrades and/or a WTP upgrade may also be required.
Clonlara	684	142	Limerick City WRZ	As above.
Parteen	834	50	Limerick City WRZ	As above.
Ballycannon North(Meelick)	917	50	Limerick City WRZ	As above.
Ardnacrusa	1,351	Part of unserved rural area	Limerick City WRZ	As above.
Athlunkard	3,486	215	Limerick City WRZ	As above.
Mountshannon	170	15	Mounthshannon WRZ	Leakage reduction and/or augmenting borehole supply may be required. It is envisaged that with the proposed works there will be adequate capacity available to cater for the projected growth.
Whitegate	207	17	Mounthshannon WRZ	As above.
Inagh	247	21	Not served by IW	N/A
O'Briensbridge	325	N/A	O'Briensbridge WRZ	N/A



Settlement	2016 Population	Core Strategy 2023-2029 Population Allocation	Irish Water WRZ	Irish Water WRZ Comment
Scarriff/ Tuamgraney	805	113	Scarriff WRZ	It is envisaged there is adequate capacity to cater for the core strategy population allocation.
Kilrush/Cappa	2,489	355	West Clare WRZ	WTP upgrade recently commenced. It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the core strategy population allocation.
Kilkee	1,155	123	West Clare WRZ	As above.
Miltown Malbay	769	83	West Clare WRZ	As above.
Doonbeg	342	29	West Clare WRZ	As above.
Mullagh	146	12	West Clare WRZ	As above.
Quilty	211	17	West Clare WRZ	As above.
Killimer	146	12	West Clare WRZ	As above.

**Legend**

WTP: Water Treatment Plant  
 PWS: Public Water Supply  
 PS: Pumping Station  
 RWRP: Regional Water Resources Plan  
 NWRP: National Water Resources Plan  
 WRZ: Water Resource Zone

The above table is based on available information at date of issue and is subject to change. It is to be in read in conjunction with Irish Water's response letter.

Settlement	2016 as a % of County	2016 Population	Core Strategy 2023-2029 Population Allocation	Irish Water Wastewater Comment
Ennis	21.3	25,276	2,705	<p>It is envisaged there is adequate capacity available to cater for the core strategy population allocation in Ennis.</p> <p>Ennis is primarily served by the Clonroadmore WWTP which has a capacity of 31,500pe and is capable of meeting WWDL ELVs.</p> <p>Ennis also has a second WWTP, serving the Clareabbey area, which is currently not compliant with WWDL ELVs but is capable of achieving at least UWW standards. Connection applications will be assessed on a case by case basis. Refer to WWCR for further information.</p> <p>Projects to upgrade Clareabbey and Clonroadmore WWTPs are at feasibility stage. Developers planning significant developments are encouraged to engage with IW as soon as possible to ensure any additional treatment capacity necessary is included in the upgrade projects. New connections are subject to IW's Connections Charging Policy. In addition, inlet works and a storm tank are to be installed in Clareabbey WWTP in 2022/2023, which will improve treatment performance and increase capacity at the plant to 10,900pe and facilitate the connection of Clarecastle agglomeration to Clareabbey.</p> <p>DAP will assess network in detail to identify issues and future needs, including constraints at Tulla Road and Francis St pumping stations. ENT3 and Com7 not serviced, motorway crossing required.</p>
Shannon	8.3	9,899	1,060	<p>WWTP upgrade recently completed. It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability).</p>
SDZ			3,500	<p>We envisage that the proposed wastewater discharge would be treated at Bunlicky WWTP however, confirmation of the connection point location, plus the timing and extent of the upgrades or extensions required, will depend on the size of the load (including student and non-domestic loads) and the timing and phasing schedule of the proposed development.</p> <p>At a minimum, the works required to facilitate the proposed SDZ will include an extension of the trunk wastewater network. Depending on the load requirements, new pumping station(s), upgrades of the existing strategic network and/ or a WWTP upgrade may also be required.</p> <p>It is envisaged that with the planned upgrade of Bunlicky WWTP, there will be adequate capacity available to cater for the proposed core strategy allocation. It is understood from the core strategy footnotes that this population allocation is largely expected to be realised beyond the lifetime of the Draft Plan.</p>
Sixmilebridge	2.2	2,669	357	<p>It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability). Some network constraints however it is envisaged the solutions could be developer-led.</p>
Athlunkard	2.9	3,486	215	<p>Served by Bunlicky WWTP. It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability). Project to provide additional capacity underway. Extension required for COM1, COM2, R2.</p>
Bunratty	0.3	375	79	<p>Served by Shannon WWTP. WWTP upgrade recently completed. It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability).</p>
Clonlara	0.6	684	142	<p>Served by Bunlicky WWTP. It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability). Project to provide additional capacity underway. Ent1 unserved, railway crossing required.</p>
Parteen	0.7	834	50	<p>Served by Bunlicky WWTP. It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability). Project to provide additional capacity underway.</p>
Ballycannon North(Meelick)	0.8	917	50	<p>A project to connect the settlement to the Limerick City agglomeration (Bunlicky WWTP) is at detailed design stage. It is envisaged that with the proposed works, sufficient spare treatment capacity will be available to cater for the projected growth however network upgrades and/or extensions may required to cater for the projected growth; it is envisaged this could be developer-led.</p>
Ardnacrusa	1.1	1,351	Part of unserved rural area	<p>Unserviced. Included in DHLGH-led pilot study identifying potential solutions and costings for unsewered settlements with failing Developer Provided Infrastructure (DPI).</p>
Cratloe	0.8	926		<p>Not served by an IW WWTP.</p>
O'Briensbridge	0.3	325		<p>Not served by an IW WWTP.</p>

**Irish Water Water Services Summary Table - Wastewater Treatment**  
**For Draft Clare County Development Plan 2023-2029 Consultation**  
**March 2022**  
**Subject to change**



Settlement	2016 as a % of County	2016 Population	Core Strategy 2023-2029 Population Allocation	Irish Water Wastewater Comment
Ennistymon/ Lahinch	1.3	1,567	223	At present, there is potential spare capacity at both WWTPs. WWTPs currently not compliant with WWDL ELVs but are capable of achieving at least UWW standards. Projects progressing to provide additional capacity and improve performance at both WWTPs. The projects are currently at the feasibility stage and options are being investigated. It is anticipated that it will be at least 2025, but within the lifetime of the Draft Plan, before the projects are completed. It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the core strategy population allocation. Prior to completion of the project, there is potential to accommodate a limited amount of new development. Connection applications will be assessed on an individual basis considering their specific load requirements. Ennistymon: Significant extent of 150mm dia. sewers; upgrades likely to be required. Extensions required for Ent1, Ind1, R3. SR5 bounds WWTP, CCC may wish to consider restricting development to minimise potential operational impacts for existing WWTP. SW separation in both agglomerations strongly encouraged to free up capacity for development, preferably using Nb-suds.
Kilrush/Cappa	2.1	2,489	355	Project to provide a new WWTP at construction stage and expected to be completed in 2023 (subject to change). It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the core strategy population allocation. Network extensions may be required to service zoned Ind1, Ent1, Ent2.
Scarriff/ Tuamgraney	0.7	805	113	It is envisaged there is adequate capacity available to cater for the projected population growth (to WWDL ELV capability).
Kilkee	1.0	1,155	123	No spare capacity at present (untreated agglomeration). Project to provide a new WWTP at detailed design stage and expected to be completed after 2024 but within the lifetime of the Draft Plan, subject to the necessary planning approvals. It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the core strategy population allocation. Network extensions of approx. 100-200m required to service R1, R2, R3, R7.
Killaloe	1.2	1,393	148	No spare capacity at present. Project to provide additional capacity underway and expected to be completed in 2024 (subject to change). It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the projected growth. Network extensions required to service TOU1, TOU2, TOU6.
Lisdoonvarna	0.7	800	85	It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability).
Miltown Malbay	0.6	769	83	Potential spare capacity, connection applications will be assessed on a case by case basis. WWTP currently not compliant with WWDL ELVs but is capable of achieving at least UWW standards. Refer to WWCR for further information. It is our intention that a feasibility study will be undertaken in the 2020-2024 investment period, and delivery will be considered for inclusion in the next investment period (2025-2029). Network extensions may be required to service SR1, C1 and Ent1.
Newmarket-on-Fergus	1.7	1,968	209	Potential spare capacity to cater for population targets. WWTP has capacity available however, the plant is currently not compliant with WWDL ELVs but is capable of achieving at least UWW standards. Connection applications will be assessed on a case by case basis. Refer to WWCR for further information. WWTP upgrade project to improve compliance underway and expected to be completed in 2025.
Tulla	0.6	759	81	Potential spare capacity to cater for population targets. WWTP has capacity available however, the plant is currently not compliant with WWDL ELVs but is capable of achieving at least UWW standards. Connection applications will be assessed on an individual basis considering their specific load requirements. Refer to WWCR for further information. Extension required to service Ent1.
Ballyvaughan	0.3	327	29	No spare capacity at present (untreated agglomeration). Project to provide a new WWTP at detailed design stage and will be completed within the lifetime of the Plan, subject to the necessary approvals. It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the projected growth.
Clarecastle (Ennis figure)				Untreated agglomeration. A capital project is underway to pump the wastewater load from Clarecastle to Clareabbey WWTP, due to commence construction in 2022.
Corofin	0.6	751	63	It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability).
Crusheen	0.4	534	46	It is envisaged there is adequate capacity available to cater for the projected growth (to WWDL ELV capability). Site R2 bounds the WWTP, future development should take account account of the established use of the existing WWTP and potential operational impacts arising.

Settlement	2016 as a % of County	2016 Population	Core Strategy 2023-2029 Population Allocation	Irish Water Wastewater Comment
Doonbeg	0.3	342	29	Potential spare capacity to cater for population targets. WWTP has capacity available however, the plant is currently not compliant with WWDL ELVs but is capable of achieving at least UWW standards. Connection applications will be assessed on an individual basis considering their specific load requirements. Refer to WWCR for further information. Project underway via STVGP to improve compliance and provide additional capacity. It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the projected growth within the lifetime of the Draft Plan.
Feakle	0.2	250	21	It is envisaged there is adequate capacity available to cater for the core strategy population allocation. Com1, Com2 unserved. SR1 and R3 in close proximity to WWTP, future development should take account account of the established use of the existing WWTP and potential operational impacts arising.
Inagh	0.2	247	21	It is envisaged there is adequate capacity available to cater for the core strategy population allocation (to WWDL ELV capability).
Kilkishen	0.5	592	50	Limited spare capacity available (ca50pe). An upgrade to increase capacity will be required if full growth allocation realised.
Mountshannon	0.1	170	15	It is envisaged there is adequate capacity available to cater for the the core strategy population allocation. Some upgrade works would be required to cater for the proposed Inis Cealtra visitor centre. Approx. 150m network extensionr equired for Ent1.
Mullagh	0.1	146	12	It is envisaged there is adequate capacity available to cater for the the core strategy population allocation.
Quilty	0.2	211	17	It is envisaged there is adequate capacity available to cater for the the core strategy population allocation (to WWDL ELV capability).
Quin	0.8	984	85	WWTP upgrade recently completed. It is envisaged there is adequate capacity available to cater for the the core strategy population allocation (to WWDL ELV capability). R1 in close proximity to WWTP, future development should take account account of the established use of the existing WWTP and potential operational impacts arising.
Whitegate	0.2	207	17	It is envisaged there is adequate capacity available to cater for the the core strategy population allocation. SR2 is not serviced.
Liscannor	0.2	182	17	Untreated agglomeration. Project to provide a new WWTP at construction stage and expected to be completed in 2023, (subject to change). It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the the core strategy population allocation.
Kilfenora	0.2	290	25	Project to upgrade the WWTP at construction stage and expected to be completed in 2023 (subject to change). It is envisaged that with the proposed works, sufficient spare capacity will be available to cater for the the core strategy population allocation. Some network extensions required, in particular for SR sites. SR4 adjacent to WWTP, future development should take account account of the established use of the existing WWTP and potential operational impacts arising.
Killimer	0.1	146	12	It is envisaged there is adequate capacity available to cater for the the core strategy population allocation. R2 in close proximity to WWTP, future development should take account account of the established use of the existing WWTP and potential operational impacts arising. Killimer WWTP serves only the housing estate adjacent to R2. Developer-led extensions would be required to service other zoned sites, including approximately 300m extension to service R1.

**Legend**

DAP: Drainage Area Plan  
 ELV: Emission Limit Values  
 NDP: Network Development Plan  
 PS: Pumping Station  
 p.e.: Population Equivalent  
 WWTP: Wastewater Treatment Plant  
 WWDL: Wastewater Discharge License  
 WWCR: 2019 Wastewater Treatment Capacity Register  
 UWWTD: Urban Wastewater Treatment Directive

**The above table is based on available information at date of issue and is subject to change. It is to be in read in conjunction with Irish Water's response letter.**