Introduction

The South West Regional Authority welcomes the opportunity to comment on the recently published position paper on the Reform of the Water Sector in Ireland and we look forward to our comments being taken on board.

Ireland’s Competitiveness and Infrastructure

Determining the drivers of growth and competitiveness is a current priority of the Organisation for Economic Co-operation and Development (OECD). In 2009 the OECD published a document, entitled, ‘Economic Policy Reforms: Going for Growth 2009’, highlighting areas that countries should focus on to improve economic growth. This report recommended Ireland to improve its infrastructure as it did not compare favourably with other similar OECD countries such as Austria and Belgium.

In 2011 the National Competitiveness Council published its annual benchmarking report, Ireland’s Competitiveness Scorecard 2011. The report provides a comprehensive assessment of Ireland’s competitiveness performance, using 127 statistical indicators which provide insights into Ireland’s ability to compete on world markets. As a result of this assessment the National Competitiveness Council has seven areas of concern, one of which is infrastructure.
Therefore the provision of a high quality, reliable water supply and appropriate wastewater treatment is imperative to sustain a healthy population and also to promote economic development and it is necessary to invest in infrastructure in order to provide Ireland’s businesses with every possible competitive advantage. We submit that Regional Planning Guidelines (RPGs) policies will assist future decision making regarding prioritisation of wastewater treatment and water supply and will assist in achieving more cost effective infrastructure investments.

**South West Regional Planning Guidelines (RPGs)**

It is an objective of the South West Regional Planning Guidelines (RPGs) to support the provision of adequate sustainable water supplies and sustainable waste water collection and treatment and views it as a prerequisite for its settlement strategy. Objective RTS-07 specifically refers:

“It is an objective to ensure that the provision of sustainable water services in the region is focussed on the delivery of quality supplies in sufficient, sustainable volumes to the Gateway and Hubs as a priority. The required waste water treatment facilities must also be provided in a sustainable manner. Specific city and county priorities, including dealing with current supply, treatment and distribution deficits, will need to be identified and prioritised by the local authorities and provided in advance of significant development taking place.”

The RPGs recognise the importance of ensuring that measures are put in place to ensure that adequate wastewater facilities are available for the anticipated population growth in the region. They further recognise the importance of ensuring a sustainable supply of clean safe drinking water for the population of the region, while endeavouring to improve water quality within water bodies throughout the South West.

**Proposed Reform of the Water Sector in Ireland**

This phase one report on the reform of the water sector in Ireland recognises that Irish Water will require a regional and local focus. The potential which exists within the Regional Authorities to generate a more effective coordinated approach to public services at regional level, through prioritisation of investment and resource allocation, the use of shared services, and the utilisation of regional synergies in several important areas has been recognised and acknowledged by the Local Government Efficiency Review Group¹.

¹ Report of the Local Government Efficiency Review Group, 2010
The Regional Authorities are ideally placed to provide a forum through which Irish Water can provide democratic accountability in the discharge of their duties. Furthermore the Regional Authorities have a proven track record in implementing policies and projects of national importance and they already have a recognised role in the co-ordination of public services. Operating at a regional level means that the Regional Authorities are ideally placed to take a less fragmented and much more holistic approach to public service co-ordination.

Effective strategic planning on a national and regional basis will be of particular importance for the water metering programme and for regional water resource planning. As the strategic planning body for the South West region, the South West Regional Authority considers that at a minimum it should have a consultative role in this regard.

We also support the promotion of water demand management and water conservation measures so as to reduce the need to abstract water and to conserve treated water. In addition we submit that it is of the utmost importance that money collected by Irish Water is ring fenced to develop the water and wastewater services nationally.

We note the report states that one of the benefits of the suggested approach which Irish Water will take as a public utility company is that it will support the implementation of the Water Framework Directive and best international practice in river basin management. Is it intended that Irish Water becomes the body responsible for funding the implementation of the Water Framework Directive and how is it hoped that this can be achieved? We welcome greater clarity with regard to this matter.

In order to ensure that the future provision of infrastructure is aligned with strategic planning policy, we submit that regional authorities should co-ordinate the preparation of the “Assessment of Needs” for the Water Services Investment Programme (WSIP). Such a proposal would provide the benefit of promoting the infrastructural objectives of the RPG and thus a more focused prioritisation of infrastructure, and overall will assist in achieving more cost effective infrastructure investments. We believe that the regional authority could act as an invaluable bridge between the national and local level in this regard and that the potential of the Regional Authority in this regard should be utilised.
Conclusion

It is now clear that there is a defined planning hierarchy from the National Spatial Strategy (NSS) through the RPG's right down to the local authority development plans and local area plans. While this planning hierarchy will not in itself provide economic development it does provide the framework and guidance within which development can take place. However key to the realisation of the objectives and policies set within the planning hierarchy is appropriate investment in sustainable infrastructure. The South West Regional Planning Guidelines has identified priority areas which require investment in advance of significant future development within the South West and we look forward to working with Irish Water in relation to strategic planning and priority investment matters in the future. We also look forward to further consultation opportunities and in particular to Phase II of the report.