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## **RE: Public Consultation on National Marine Planning Framework Baseline Report**

Irish Water welcomes the opportunity to make a submission in response to the above public consultation.

Since 1<sup>st</sup> January 2014, Irish Water has assumed responsibility for public drinking water supply and wastewater services in the Republic of Ireland. Irish Water oversees the operation of c. 1,130 wastewater treatment plants (WWTPs) around the country, of which c. 200 discharge into coastal or transitional waters.

With Ireland's significant population growth predicted to be focused heavily in coastal urban hubs, it is likely that the volume of treated effluent discharging into coastal waters will continue to rise. As one of many stakeholders reliant on maritime resources, Irish Water is keen to engage with DHPLG in the process of establishing a National Marine Planning Framework (NMPF) that will ensure Ireland's precious marine resources are protected for generations to come.

### **Comments on Section 5.0 Aquaculture**

Irish Water notes the DHPLG's goal of reducing the aquaculture license application backlog by making 300 license determinations this year and a further 300 next year. Irish Water is currently consulted by DAFM prior to the granting of an aquaculture license, a critical step in ensuring that aquaculture plots are not established near existing or planned wastewater discharges, which could compromise the safety of the shellfish produced. If an Irish Water discharge lies within 10 kilometres of the proposed

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Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.

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aquaculture plot, Irish Water informs DAFM of the location of the discharge(s), level of treatment, and any other relevant information that may inform their decision on whether or not to grant the license. However to provide greater regularity to this process, Irish Water would suggest that the NMPF could emphasise to a greater extent the need for aquaculture plots to be located at a specified minimum setback distance from wastewater discharges, to be determined by DAFM.

## **Comments on Section 22.0 Waste Water Treatment and Disposal**

It should be noted in this section of the document that Irish Water is responsible only for *public municipal* wastewater collection, treatment, and discharge. A number of other types of wastewater discharges exist which have the potential to impact on the marine environment and users thereof. These include, but are not limited to:

- Section 4 discharges,
- IPPC licence discharges,
- Unauthorised discharges,
- Urban storm runoff, and
- Agricultural runoff and diffuse pollution.

In particular, combined sewer overflows (CSOs) are a potential source of marine pollution. Ireland's expansive network of aging CSOs must be assessed to ensure it remains fit for purpose. Irish Water is actively engaged in this work but significant time and investment are required to see the process through.

In light of the recent publication of the EPA's report 'Urban Waste Water Treatment in 2017'<sup>1</sup>, Irish Water would suggest that paragraph **22.6** be updated to better reflect the current picture. As of 2017 y/e, the number of untreated wastewater agglomerations had reduced from 50 to 38.

Similarly paragraph **22.7** can be updated to state the following: "Six formerly untreated agglomerations were connected to new treatment plants in 2017 – Youghal, Killybegs, Bundoran, Rush, Belmullet, and Ringaskiddy/Crosshaven/Carrigaline. The last of these has significantly reduced the amount of raw sewage entering Cork Lower Harbour. Irish Water has committed to providing treatment for 33 additional areas by the end of 2021."

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<sup>1</sup> <http://www.epa.ie/pubs/reports/water/wastewater/Final%20report%20for%20website.pdf>

Paragraph **22.14** and the table beneath it can be updated to reflect the fact that a new treatment plant with UV disinfection has been commissioned in Belmullet, leaving only Rathmullan and Killala still requiring UV disinfection for shellfish protection.

Irish Water would suggest a correction to paragraph **22.15** which states “Irish Water must finalise assessments of the impacts on shellfish of discharges from around 70 other urban areas.” A more accurate statement would be “For the 64 designated shellfish waters in Ireland, shellfish assessments were either not required or found no adverse impact from UWW at 33 locations. Irish Water must complete the remaining 31 assessments to determine if UWW is impacting on these areas.”

### **Comments on Appendix A Public Bodies with Marine Responsibilities**

Irish Water should be listed in the cell containing the Department of Housing, Planning and Local Government and its subsidiaries.

As regards the questions posed for public consultation, Irish Water wishes to contribute responses to three of those questions as follows:-

2. A marine plan should recognise the ecosystem service value currently provided by sustainable discharges of appropriately treated effluents from waste water treatment plants to marine waters at existing locations but needs to recognise that effective and efficient treatment of effluent can be impacted on through inappropriately located marine development. In particular designations that are intended to confer benefit to coastal communities such as Shellfish designations but that impose a significantly more stringent effluent standards requiring upgrades of waste water facilities need to be avoided.

Balance should be maintained between the use of marine resources and their impact on existing and future terrestrial development. It is thus suggested that the ecosystem service value to waste water services provision has not been appropriately addressed.

4. Irish Water would favour a policy based approach to guide the decisions of statutory consent authorities with respect to specific sectoral developments or activities. However, should a more prescriptive zoning approach be adopted appropriate zoning of areas adjacent to waste water outfalls and storm overflows is required to recognise the impracticality of removal of combined sewer overflows (CSOs), a feature of the combined collection networks taking foul and storm water in all urban areas and implemented over

the last 150 years in Ireland. Measures can be implemented to mitigate these impacts, but would take significant time and resources to deliver.

A more refined approach in a designation process that excludes relatively small areas around outfalls from such designations would allow broad objectives to be achieved.

5. Clear alignment between land based and marine based development objectives is needed. In particular the impacts on coastal communities need to be clearly identified and realistic assessments of the impacts developed. Through having this focus it will be possible to align the provision of services such as housing, complementary facilities and infrastructure in a cost effective manner.

If you wish to follow up, Irish Water would be happy to have a meeting with you to discuss this response.

Yours faithfully,



Gerry Galvin,

Chief Technical Officer

13<sup>th</sup> December 2018