



Uisce Éireann
Colvill House
24-26 Talbot Street
Dublin

8th September 2023

Dear Sir/Madam,

RE: Draft Uisce Éireann Capital Investment Plan 2025 – 2029

The Irish Home Builders Association (IHBA), a constituent association of the Construction Industry Federation (CIF), welcomes the opportunity to make a submission to Uisce Éireann's draft Capital Investment Plan 2025 – 2029. A copy of the submission is enclosed, with this responding to the three themes referenced in the plan: quality, conservation, and future proofing.

The core points of our submission focus on water infrastructure projects being appropriately targeted and being plan-led rather than demand led. This should be underpinned by accurate and reliable data sources based on future population projections to ensure that water supply meets long term population needs; forward planning and investment in infrastructure is vital to meet the anticipated population growth of 1.2 million by 2050. Furthermore, the investment plan must consider housing supply a core pillar in its investment strategy.

We look forward to hearing from you in response to the IHBA's submission.

Yours faithfully,

Conor O'Connell
Director – Housing, Planning & Development Services



As outlined in the UÉ draft Capital Investment Plan 2025 – 2029, the IHBA's submission to this consultation focuses on the below four questions. Our submission should be read in conjunction with the draft plan.

1. Investment cases related to the Quality theme can be found in Section 5 in the attached. Do you have any comments or suggestions on these?
2. Investment cases related to the Conservation theme can be found in Section 6 in the attached. Do you have any comments or suggestions on these?
3. Investment cases related to the Future Proofing theme can be found in Section 7 in the attached. Do you have any comments or suggestions on these?
4. A Draft Investment Portfolio is provided in Section 8 in the attached. Do you have any comments or suggestions as to the make-up and balance of the funding allocation for each WSPS Theme and WSSP strategic objective?

1. Investment cases related to the Quality theme can be found in Section 5. Do you have any comments or suggestions on these?

- The IHBA supports UÉ's focus to deliver quality water supply as part of the Government's Water Services Policy Statement (WSPS), meeting UE's Water Services Strategic Plan (WSSP) objectives of a) ensuring a safe and reliable water supply and b) providing effective management of wastewater.
- From a housing delivery perspective, these objectives interlace with providing safe and quality housing, and the IHBA looks forward to working with UÉ to deliver these aims.
- To support the delivery of quality water and waste-water infrastructure provision, it is vital that adequate funding is provided. A targeted approach, as outlined in the draft plan, will help to deliver this in a strategic manner.
- Following on from the above points, the IHBA support the approach proposed by UÉ to focus on risk reduction, prioritising works to improve quality via a risk-based approach.
- Section 5.2 on page 38 of the draft plan states that management of wastewater will be a key priority for UÉ. As part of this, it states: "*This capacity must also be adequate to provide for population and economic growth*". It is vital that any focus on delivering water and wastewater infrastructure provision for the future uses accurate population demand growth estimates. This should include but not be limited to CSO data and the most recent Census population figures. If accurate figures are not used, any infrastructure system upgrades will be unable to meet future population demands. As referenced in our cover letter, adequate forward planning and investment in infrastructure to meet the anticipated population growth of 1.2million by 2050 is vital; plan led development with an appropriately implemented Capital Infrastructure Programme are the only solutions to support the delivery of this.



2. Investment Cases related to the Conservation theme can be found in Section 6. Do you have any comments or suggestions on these?

- The IHBA supports the focus on conservation and sustainability, as part of the WSPS and meeting the WSSP objectives of a) ensuring a safe and reliable water supply and b) protect and enhance the environment.
- Similarly, the IHBA supports the proposed three-pillar approach set out within the National Water Resource Plan (NWRP) as follows: “lose less, use less and supply smarter” (pg. 45).

3. Investment Cases related to the Future Proofing theme can be found in Section 7. Do you have any comments or suggestions on these?

- The IHBA supports the focus on future proofing water and wastewater infrastructure as part of the WSPS and the WSSP objectives of a) ensuring a safe and reliable water supply, b) provide effective management of wastewater, c) investing in the future and d) support social and economic growth. Again, these objectives must tie in with a long-term approach to infrastructure provision which we see as critical to long term housing supply and delivery.
- On pg. 53, the proposed plan references “Scale of Need”, summarising abstraction and supplying water to the population whilst managing with an uneven scale of rainfall across the country. The document states: “*Rainfall is unevenly distributed across the country, with more falling in the west than the east. The areas with the lowest rainfall have the greatest population density, meaning resources in our most popular areas can become stressed. The country’s population is expected to increase by 21% or 1.2 million people over the next 25 years*” which will have a huge impact on the requirement for water. As referenced in the above points, it is paramount that UÉ reference long-term and reliable population projection figures and implement a targeted strategy to deliver infrastructure provision. This should be carried out in line with a plan-led, focused approach to providing infrastructure for housing supply, to ensure that the needs of the future population can be met. The IHBA has concerns regarding the significant and ongoing issues with the accuracy of certain population predictions and as part of the ‘future proofing’ UÉ strategy, reliable population predictions (i.e., ESRI) should be used to ensure targeted and plan-led infrastructure provision can be implemented.
- Page 54 references the environmental, sustainability and planning challenges in delivering the Future Proofing theme. The plan must go further to highlight a focus on delivering long-term, strategic infrastructure delivery and ensuring a consistent approach to policy delivery. Inconsistent approaches will have a detrimental impact on infrastructure supply, and consequently, a negative impact on housing delivery.
- Section 7.2.1 focuses on treatment capacity for growth, and pg. 55 sets out the population increases anticipated over the next 25 years. Our submission already highlights the need for accurate and informed population predictions to be used to underpin this delivery plan, but the



plan must also allow for an ongoing, or regular (e.g., 2 years) review of population projections in tandem with this plan. This will ensure the data predictions used in reference to population changes is current and accurate; the plan can then reflect these changes to ensure infrastructure delivery needed to future proof the UÉ network and meet population needs occurs.

- A suitable headroom for wastewater capacity and the “Scale of Need” (pg. 56) is required. There is no reference to headroom here when reviewing the Wastewater Capacity Register that has been published.
- The IHBA supports the targeted approach to wastewater set out on pg. 56 under “Wastewater – Activity for RC4”. This focuses on providing services under both the “Small Towns and Villages Growth Programme” and the “Large Towns and Cities Growth Plan”. The latter programme is due to be established in RC4, and it is vital that this is prioritised urgently in line with the growth rates shared by Local Authorities and the National Planning Framework requirements. Establishing this early in the investment plan will again enable a targeted and well-planned approach to water and wastewater infrastructure delivery, which is a key part of housing supply. Establishing these locations and priorities should be completed with relevant stakeholder engagement and include the IHBA.
- Section 7.2.2 on page 57 focuses on “Network Capacity for Growth Investment Case”. The IHBA considers this a core focus area for the RC4 plan, and welcome the acknowledgement that low investment in the water networks combined with high population increases has *“increased the risk of strategic networks constraining future growth and development”*. This section continues to set out identifying increased network capacity improvement works and how these link to the local authority development plan. However, the plan does not outline how exactly this will be carried out. The IHBA recommends that future growth and development opportunities are identified in a targeted manner on a location basis, with relevant stakeholders being part of this review process. This will enable a targeted infrastructure planning approach to be taken and unlock housing delivery.
- As part of the above, UÉ should consider how their strategic and long-term future planning theme can connect with the Housing for All plan to aid housing delivery.
- Overall, Section 7 is missing a focus on unlocking housing delivery. This must be referenced given that it ties into future proofing through meeting future population needs and planning in the long term for water and wastewater connection needs.

4. Do you have any comments or suggestions as to the make up and balance of the funding allocation for each WSPS Theme and WSSP strategic objective (section 8)?

- The IHBA appreciates the need to adequately balance long-term investment allocation to the three WSPS themes. Our core concern is the delivery of housing supply at a time when the housing market is struggling to meet the growing population’s demands.



- The allocations to each theme set out in Table 8.1.1 should be reviewed, with increased focus on the “Invest in our Future” WSSP strategic investment objective. We welcome the percentage allocation under the “Support Social and Economic Growth” objective, provided this covers housing delivery.
- Housing delivery themes need to be incorporated into the future funding allocation, and overall strategy, in this plan.

Conclusion

The IHBA welcomes the publication of the draft Capital Investment Plan 2025 – 2029, as well as the opportunity to provide a submission to this consultation. Infrastructure and housing provision are interconnected, and it is essential that a plan led approach with continued reference to the anticipated population increase is taken as part of UÉ’s future investment strategy.