

Uisce Éireann
Colvill House
24 – 26 Talbot Street,
Mountjoy
Dublin
D01 NP86

15th July 2024

Dear Sir/Madam,

RE: Uisce Éireann Consultation - Draft Water Services Strategic Plan (WSSP) 2050

The Irish Home Builders' Association (IHBA) and the Construction Industry Federation (CIF), enclose a joint submission in response to the core questions set out in the Draft Water Services Strategic Plan (WSSP) 2050.

We welcome the opportunity to respond to this consultation, and look forward to hearing from Uisce Éireann in due course.

Yours faithfully,



Rosie James

Executive - Housing, Planning & Development Services

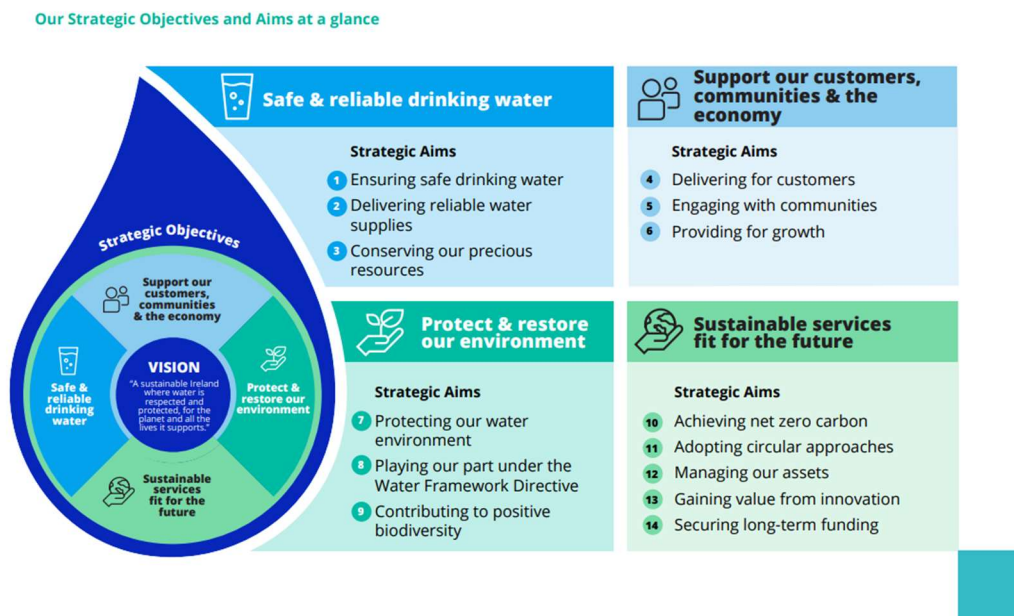
The Irish Home Builders' Association (IHBA), and the Construction Industry Federation (CIF) jointly welcome the opportunity to provide a response to Uisce Éireann's (UÉ) draft Water Services Strategic Plan (WSSP) 2050. The recently published housing demand by the ESRI and the first draft of the Revision of the National Planning Framework (NPF) which calls for increased annual housing targets indicate the scale of housing delivery that is required to meet the population's needs.

Critical infrastructure provision, including water and wastewater services, goes hand-in-hand with this to unlock housing delivery nationally; it is therefore essential that the WSSP reflects this. We also welcome UÉ's commitment to ongoing stakeholder engagement which will facilitate improved collaboration and planning to ensure all needs are met.

We have structured our submission in response to the questions set out by UÉ.

Question 1: In Section 4 we present our four strategic objectives. Do you have any comments on the strategic objectives and associated strategic aims and actions?

- Broadly speaking, the four strategic objectives are acceptable. We also consider the strategic aims within each objective (set out below) to be acceptable.



- We welcome aim 6 ("providing for growth") and aim 14 ("securing long-term funding"). We recommend including plan-led development as a strategic aim under the fourth objective, "Sustainable services fit for the future," to ensure sustainable infrastructure and unlock various developments (commercial, schools, hospitals, housing). This will create sustainable communities and facilitate regional growth across Ireland. This should also be mirrored by the CRU, to reflect the focus on plan-led development. It is vital that lands are serviced in advance to limit housing delivery time; currently this is not possible.

- For strategic aim 6, "providing for growth," it is crucial to consider population growth with accurate data and ambitious targets, reflecting the increases seen since the previous census in Ireland.
- Strategic Aim 2, "Delivering reliable water supplies," and Action 1.4, "Implement and review our NWRP," should include plan-led development and infrastructure delivery targets. The Water Supply project from the Shannon will help, but government support and prioritisation are essential to overcome delays. The Greater Dublin Drainage project also underscores the need for prioritising infrastructure investment to support population growth and housing needs.
- UÉ requires multi-annual budget certainty with ring-fenced funding for critical infrastructure, separate from other areas like leakage repairs and Local Authority/Village Schemes. Aim 14 should ensure this funding is secured directly for infrastructure delivery.
- Action 1.5 refers to developing "contingency plans to improve reliability of our water supplies" and this should address unknown events (e.g., conflicts, inward migration) that put pressure on water supplies and be ambitious enough to cater to "worst case" scenarios.

Question 2: In Section 2, we have identified the biggest challenges we think will influence how we deliver our water services in 2050. Do you have any views on these challenges?

- Climate change poses a major challenge to water services. Long-term planning should focus on utilising water storage systems to meet current and future population needs.
- Page 18 discusses aging infrastructure; it is crucial to include the need for financial support for improvements and new infrastructure, with an ambitious growth approach.
- A challenge that is missing relates to resourcing, from a staff and funding perspective. This should be included along with suitable actions identified to overcome this (i.e. ring-fenced funding, planned hiring drives etc). UÉ must adopt a commercially viable model to attract and retain skilled operators and implement advanced technologies so that the industry can develop, innovate, attract talent and implement leading technologies.
- Section 2 references "Economic Conditions" as a challenge, including global factors (wars, pandemics etc). Given the impact that these factors can have, and have had, UÉ must consider ambitious changes and adequate supports are in place.
- Action 2.1 on pg. 37 outlines understanding customer needs and expectations. This is an important aspect of any customer facing business, but this action needs to include objectives that will deliver long term for future populations' needs, increased population figures, increased housing targets and actionable items that UÉ will undertake to meet these requirements. This is = pertinent given the recent publication of the first draft of the Revision of the National Planning Framework which recommended an increased housing delivery target of at least 50,000 units per annum.

- A further challenge which should be included is delivering new infrastructure in the face of legislative uncertainty. This relates to the forthcoming Planning & Development Bill and ongoing challenges to planning applications for the delivery of critical infrastructure projects. Such projects are often delayed and should be given emergency powers to be delivered given their role in supporting development. Furthermore, the Minister must make greater use of their emergency powers during the planning process to ensure that adequate critical water and wastewater infrastructure is being delivered.
- Furthermore, Action 2.6 (pg. 40) comes under the heading “supporting planning policy”. The action is to “engage and collaborate with key stakeholders to support national, regional and local planning policy”. The IHBA welcomes the reference within the draft plan to support the revised NPF and to “invest in infrastructure that facilitates well-planned social and economic growth”. We also support the reference to providing “enough headroom”, however, this section requires further focus. Stakeholders should be identified, with targeted meetings and plans put in place to aid this increased headroom, Similarly, the plan in its current form focuses on “prioritising growth areas that have available infrastructure and environmental capacities”, but, in tandem with this, we need to see infrastructure planned to unlock future development which is undertaken in a targeted manner.
- Whilst Action 2.7 commits to engagement with housing and industry stakeholders, as well as referencing plan-led development (pg. 42), targeted outcomes should be included here (i.e., regular engagement with meaningful outcomes following meetings with the industry), UÉ should be reviewing this every six months and engaging with housebuilders and planners to identify key future projects that can be prioritised from an investment perspective to unlock all development types.
- The above could be completed by preparing a document/plan that identifies future development areas that need to be serviced and therefore unlocked for development. Similarly, UÉ should be sharing capacity data that is accurate so that this can feed into greater data gathering to support info on available serviced zoned lands.
- In relation to data, a future challenge relates to the accessibility of serviced land availability data. Compiling accurate and robust data on this will enable targeted infrastructure provision, as well as providing a useful reference tool which the whole industry (planners, local authorities, homebuilders etc) can utilise.

Question 3: In Section 8 we outline our approaches to meeting long term challenges.

Do you have any comments on these?

- The document refers to “Adaptive Planning” to plan for the future so that UÉ can respond to changing trends and needs (pg. 66). This relates to population increases resultant from climate migration, however, there is no reference of the population increases that Ireland is currently facing excluding from climate migration. As mentioned earlier, this needs to be paramount to UÉ’s approach with plan led development. Similarly, the recently published

ESRI report considers population growth a key driver of housing demand, and in Ireland, this is underpinned by net migration. The ESRI have acknowledged the challenge of predicting this, given the volatility associated with causal factors in migration. Given this, UÉ must plan ambitiously for infrastructure provision.

- Again, further commitment to resourcing and a plan to continue resourcing is needed. There is some reference to investing in staff, but consideration should be given to funding contractors and committing to increased resourcing to undertake major infrastructure projects (capacity).

Question 4: Do you have any comments on the Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Statement (NIS) which accompany the draft Water Services Strategic Plan 2050?

- In the SEA, the IHBA welcomes the references made to forthcoming policies and legislative changes, including the Planning & Development Bill, the National Development Plan and the National Planning Framework – Project Ireland 2040. We particularly support the reference to population and economic growth and the level of housing developed to meet future population demands. As outlined in the recent ESRI report on Structural Housing Demand, Ireland has seen exponential population growth like nowhere else in Europe. It is therefore vital that services provide for this growth, and support housing delivery (as emphasised throughout this submission).
- We welcome the inclusion on “Population, Economy and Tourism & Recreation” within the SEA, and agree with the challenges referenced here. However, further reference should be made to how these challenges will be addressed and overcome.