



Submission to Irish Water on the National Water Resources Plan

March 2021

Dublin Chamber is the representative body for businesses in the Greater Dublin Area, with a cross-sectoral membership spanning the spectrum from small start-ups to major multinationals. The Chamber is committed to improving the city region's business environment and quality of life in tandem, and strongly supports a vision of Dublin with sustainability and liveability at its core. We are strong advocates for the economic, social, and environmental benefits of urban density that are outlined in the National Planning Framework (NPF), National Development Plan (NDP), and Regional Spatial & Economic Plans (RSES) and have repeatedly emphasised the goals and visions of these interconnected documents in our policy papers and submissions to both local and national government.

Dublin Chamber welcomes the opportunity to respond to the National Water Resources Plan. The consultation comes at a critical time for the country, its residents, and its businesses. The plan must take into consideration the range of internal and external pressures facing Dublin, population pressures, aging and inadequate infrastructure, climate change challenges and the constant need to stay competitive on the global stage. It must also reflect the goals outlined under the NDP and NPF. As plans and policies shift focus to beyond Covid-19 it is critical that the Dublin economy is in the best possible position to reopen and recover. Strengthening water infrastructure and security of supply are key priorities in this context.

1. Alignment with the National Planning Framework

In recent years there have been moves, through the likes of the NPF and NDP to consolidate national planning and infrastructure policies. Within that context Dublin Chamber welcomes the development of the National Water Resources Plan and its commitment to directly align with existing government policy. The breakdown into four regional plans is also welcome as it aligns directly with the RSES and will enable accurate monitoring of how plans are progressing in each region.

1.1 Supporting our Urban Future

Increasing levels of urbanisation are a worldwide trend, with over half of the global population now living in urban areas.¹ Ireland is no different, and the current and future

¹ United Nations, 'Urbanization', <https://www.un.org/development/desa/pd/themes/urbanization>

demographic pressures facing the Dublin and Mid-East region must inform the new framework and prioritisation of projects in the NWRP.

The NPF outlines that 50% of future growth will be focused in the five city regions of Dublin, Cork, Galway, Limerick, and Waterford. Each city supports the counties that surround it. In Dublin's case, in addition to the 718,000 people working and living here, the city provides direct employment to a further 140,000 people living in the commuter belt. This is equivalent to just under a third of all employment in the surrounding 8 counties of the Mid-East and Midlands. The housing, transport, and social needs of this metropolitan workforce demands substantial investment to ensure that Dublin remains competitive and continues to drive growth in the overall economy.

1.2 Population Growth

The projected population growth outlined in the report is supported by the NPF and RSES, forecasting that there will be 26% population growth in Dublin City and Suburbs to 2044, beyond the current scope of the NPF. This significant population growth puts considerable demand on already overstretched infrastructure, particularly in regard to water. The NPF also notes that a secure and sustainable water supply will be a key future growth enabler for Dublin city and for the Greater Dublin Area. Notably, there is a recurring tendency to underestimate growth, especially in the Dublin Region. A situation cannot be allowed to develop where water security and supply issues force a cap on this growth.

Dublin Chamber welcomes the front loading of the growth to 1.3% between 2020 and 2030 for the Water Resource Zone that covers the Greater Dublin Area. This reflects the critical rate of growth in the area and its role as a core economic driver for the country. In supporting our urban future the NWRP must be cognisant of which areas should be prioritised for infrastructure, and invest in these appropriately. This strategic approach will provide the most benefit both economically and sustainably.

2. Security of Supply

Ireland's ability to remain competitive depends on its meeting the essential requirement of world-class infrastructure, including an appropriate water system. One of the most pressing elements in the pursuit of this goal is the delivery of a new water supply for Dublin and the Eastern and Midland Region. The Eastern & Midland Region is a critical economic area for the State, and reliable water supply for the Region is a vital national priority. A new supply is also a prerequisite for future growth, due to both economic and population pressures.

2.1 Eastern and Midlands Region Water Supply Project

In a recent submission on the review of the National Development Plan, Dublin Chamber stressed the importance of and urgent need to progress the Eastern and Midlands Region Water Supply Project, to provide water security for the region, to sustain current services, and enable future development. This project, which has been in development since the mid-1990s, exemplifies the impact of delayed investment in infrastructure that is intrinsic to the problems being experienced currently by Irish Water. The Chamber endorses the findings of previous Irish Water studies outlining why a new water source is needed and supports Irish

Water's preferred scheme at the Parteen Basin in Co. Tipperary.² This emerged as the preferred option following months of extensive study and research during which the Chamber contributed through public consultations.

Until this project is complete the balance between water supply and demand in the Greater Dublin Area remains on a knife-edge. The over-reliance on abstraction from the River Liffey and lack of alternative water resources threatens Dublin's economic growth and in some areas is proving to be a significant infrastructure blockage to the badly needed development of new housing construction projects. The Government must prioritise the completion of new abstraction legislation, a commitment in the Programme for Government, in order to ensure that this project can commence.

2.2 Building Resilience

Dublin Chamber welcomes the focus in the consultation paper on Weather Event Planning Scenarios. Access to a good quality uninterrupted water supply is not only essential for public health, but for economic health. Irish Water must ensure that it can provide a continuous supply of water to customers in all weather conditions. In recent years Ireland has been experiencing more extreme weather events and coupled with other pressures in the system has struggled at times with the demand on supply. As global temperatures continue to rise, Ireland may experience more frequent extreme weather events, on either end of the scale, i.e. drought and storms. The Chamber welcomes the commitment to developing a resilient water supply system to limit the impact of extreme weather events in the future.

2.3 Investing in sustainable infrastructure

The legacy of inadequate investment in raw water treatment, water supply, and wastewater treatment is a significant challenge for Irish Water. In an international context, Ireland has failed to meet EU standards through repeated failure to deal with wastewater issues, particularly in our urban centres.³ Poor water quality is not just a serious issue for marine life and public health; it also threatens our international reputation as a smart, sustainable and resilient city through the risk of EU fines.

Current levels of investment in infrastructure will not be enough to counter the decades of sustained under-investment and if the new regional plans as outlined under the NWRP framework are to be a success there is a need to significantly boost investment and capital spend. A Government commitment to investment on a multi-year basis is required to ensure that the NWRP has the funding to be achieved and that Irish Water has the certainty it needs to plan and execute long-term projects.

4. Business Needs

Certainty and resilience of water supply is essential for existing businesses to plan their future. Companies that are considering development or expansion depend on the knowledge

² <https://www.water.ie/projects-plans/national-projects/water-supply-project/>

³ 'EU could fine Ireland over waste water failures', *The Times*, 12 March 2021, <https://www.thetimes.co.uk/article/eu-could-fine-ireland-over-waste-water-failures-nbdmlqhnx>

that their water supply is assured for the years to come. This is particularly true for companies whose business activity involves high levels of water use, such as those in the pharmaceutical and ICT sectors. In this way, a reliable water supply directly sustains jobs and investment. Indecon research from 2015 suggests that the daily cost of water disruption is likely to be upwards of €78 million.⁴ Additionally, the reputational damage caused by such shortages cannot be underestimated.

The level of service and reliability of supply is a critical issue for both communities and businesses. Irish Water's commitment to achieving an initial target of 1 in 50-year Level of Service (LoS) for the entire network is to be welcomed. However the comparison to the UK where there is a 1 in 100-year LoS target highlights the low base of our infrastructure and the considerable investment that is needed in the coming years to improve our competitiveness.

Conclusion

Dublin Chamber welcomes the commitment to the development of the National Water Resources Plan and its alignment with the NPF, NDP, and RSES. The Chamber has been a strong supporter of the need to invest in infrastructure, particularly water infrastructure, in recent years and has actively supported the Eastern & Midland Water Supply Project. Both businesses and communities in Dublin need security of supply going forward and the NWRP commitment to both sustainability and reliance is evident.

In response to the consultation document Dublin Chamber:

- Urges prioritisation of the Eastern & Midland Water Supply Project and calls for joint action to accelerate delivery.
- Welcomes the significant moves towards addressing the historic underinvestment in this area and bringing the infrastructure up to international standards.
- Notes that the strategic importance of the Greater Dublin Area to the national economy means that a secure and sustainable water supply is critical to national economic wellbeing.
- Notes that the NPF has identified meeting the water supply needs of Dublin and its environs as a key future growth enabler.
- Calls for increased and appropriate funding to deliver the ambitions set out in the NWRP.

⁴ http://www.watersupplyproject.ie/wp-content/uploads/2015/03/Vol-3_WSP-Economic-Needs-Report.pdf