



IRISH LANDSCAPE INSTITUTE
Institiúid Tírdhreacha na hÉireann

Submission on Reform of the Water Sector in Ireland

February 2012

Irish Landscape Institute



1.0. Introduction

The **Irish Landscape Institute (ILI)** would like to take the opportunity to respond to the invitation for submissions in response to the Reform of the Water Sector in Ireland, Position Paper, currently advertised for Public Consultation.

The Irish Landscape Institute (ILI) was formed in 1992 from an amalgamation of two older professional bodies. The Institute, as the professional body representing Landscape Architects in Ireland, has a Constitution and a Code of Professional Conduct. ILI is the recognised body in Ireland under the European Federation of Landscape Architects (EFLA) and affiliated to the International Federation of Landscape Architects (not yet). The Institute has a membership of 160, made up of full members, graduate members, student members, and well as honorary members and Fellows. The ILI aims to:

- Set standards of excellence in the fields of landscape planning, landscape architecture and landscape management.
- Encourage and facilitate the Continued Professional Development of its members.
- Increase public awareness of landscape professionals and their work.
- Support the interaction of landscape architecture with related disciplines such as engineering, architecture and planning.
- Support the development of landscape education at all levels in Ireland, including accreditation of a degree course at NUI on behalf of EFLA.

2.0. Proposed Reforms

In summary, we understand that it is proposed to establish the Water Services Authority to be known as Irish Water as a single point of contact for customers, and would be statutorily responsible for both investing in and operating water services infrastructure in its role as a provider of drinking water and waste water services to household, commercial and industrial customers in Ireland (not served by Group Water Schemes).

The Authority would have responsibility for:

- The abstraction, treatment and distribution of drinking water;
- Conserving water supplies through maintaining and upgrading the infrastructure;
- The collection and treatment of waste water and the management and operation of combined sewer overflows;
- Sludge disposal;
- Customer billing and relationship management, including requests for new connections;
- Strategic planning for the sector, water resource management and localised catchment management focused on source protection;
- The roll-out of the water metering programme;
- Sourcing private finance for investment in capital projects.



The ILI recognises the opportunity presented by such a co-ordinated and strategic approach to the provision of water services in terms of efficiencies and value for money provision and the raising of standards nationwide. The ILI Policy Working Group has prepared a submission for consideration by Government on how to approach the establishment of Irish Water in relation to the wider issues of water resources management.

3.0. Comments

3.1. New landscape assets and the opportunities resulting

We understand that it is proposed that the new Water Services Authority / Irish water (IW) will become owner or controller of all water supplies, treatment facilities and distribution facilities. It is assumed that this would include such large reservoir facilities as Blessington, Poulaphuca and Vartry in Co Wicklow and others nationwide. In this regard IW will, similar to Bord na Mona and Coillte, become responsible for significant estates and landholdings in Ireland often in scenic areas or containing interesting industrial architecture and heritage. Similar to these public agencies, and reflecting best practice internationally, a policy response in terms of landscape and environmental management, biodiversity, leisure, access and recreation and other uses/opportunities associated with these extensive lands and water bodies should be put in place and implemented. We refer the new agency to the evolving development of Green Infrastructure in Ireland and its applicability to the future IW scenario (Comhar, 2011). <http://www.comharsdc.ie/files/Comhar%20Green%20infrastructure%20report%20final.pdf>

Such an approach, at little additional cost if any, will ensure the maximum value is extracted from this new strategic resource; ownership of the water and the national resources will be seen to be vested still in the public / community (a particularly important aspect given the introduction of charges for the water itself); and potentially an additional source of revenue would be created for the IW when appropriate.

ILI suggests that further consideration be given to the large estate and land holdings arising from the amalgamation of water resources and constituent lands by one central authority, their management, planning and potential. *The ILI and its members can assist Irish Water in optimising the multiple benefits of their estate as amenity, recreation and tourism resources, whilst protecting the water quality and the ecological balance of the water systems. It would be important that such a broader amenity and green infrastructure agenda is part of the the new agencies remit, from the start, that it is not focused exclusively on the infrastructural aspects of its brief, and can build good community relations with its neighbours.*

3.2 Water Industry and its potential

The reforms envisage the amalgamation of water resources under one national authority in Ireland. This is primarily due to need to ensure an adequate and high quality water supply for our own citizens and commercial users, and to provide a strategic resource for water intensive industries which might be attracted to this country, particularly in the light of future global



shortages and escalating costs of water. Without water security, Ireland's competitiveness is limited.

Consideration should be given to the long term provision/ creation of larger scale strategic water resources and reservoirs to service such needs and potentially to provide a saleable commodity internationally. The proposed new reservoir for Dublin on a cut-over peatland in the midlands sets a suitable precedent for creating such a strategic resource, and there are tens if not hundreds of square kilometres of such cutover peatlands in central Ireland looking for new uses as the peat extraction comes to an end. Many of the peatlands are former lakes with the capacity to refill naturally from ground water and have been pumped for decades to keep dry.

As well as creating such a strategic resource of a naturally occurring but heretofore undervalued aspect of our wet climate (much like our wind resources), such uses would create new landscapes in central Ireland with the potential to create amenity, leisure and other commercial opportunities in areas suffering significant economic decline.

3.3 Intelligent management of economic resources

As stated in the Position Paper, sustainable management of water resource security will be essential. There are likely potential conflicts between water-consuming regions and water source regions. Land use policies of upper and lower catchments will have to address and meet targets under the Water Framework Directive Programme of Measures for each River Basin District. Landscape Architects provide services relevant to site selection, environmental impact assessment and landscape management plans and programmes for such strategic water resources.

There will be a necessity to protect water resources and a requirement under the existing Water Framework Directive, the Regional Planning Guidelines and the Planning Act and Amendments (2010-2011) to integrate land use planning with water quality management. It should be recognised that there is considerable savings and value in protecting the quality of the water where it originates, then extensive treatment later on collection. Internationally across the European Union and elsewhere, Landscape Architects are employed by water authorities in regard to watershed management, source protection plans, catchment management planning and groundwater protection strategies, including land use planning and regional master plans. As there are currently no Landscape Architects employed at national and regional government level, and very few employed at the level of local government, the ILI seeks specific details as to how this is to be implemented by Irish Water.

There may be a need to consider community gain for water-production regions. The income from proposed water charges will need to not only address infrastructure provision in terms of the distribution system of urban areas, but also the green infrastructure and management planning for watersheds. Measures to incentivise good land management practices already exist, but this needs to be expanded and implemented more coherently across the multitude of government agencies and programmes to target cost-effective measures which enhance watershed protection and deliver WFD targets.



3.4 Public consultation and stakeholder involvement

The current report has been prepared with no public consultation and with invited stakeholders comprising mainly state and semi-state bodies. Water and water resource management is an issue for many diverse groups. ILI suggests that the current phase of public consultation be used to elicit a more diverse and representative stakeholder engagement process to achieve success. ILI is available to join any future stakeholder groupings which may emerge from this process to work toward development and implementation of better water resource management.

3.5 Shared services

In assessment of the scope of shared services, there should be consideration of support required by ecological and landscape services to Irish Water to ensure the compliance with legislation cited. There is a current deficit at local government level in some regions of expertise required to meet the demands of the Water Framework Directive, SEA Directive and Birds and Habitats Directive. This is particularly required with requirements to meet good ecological status and status of Protected Areas.

3.6 Transitioning

The phasing proposed should be coordinated with the reporting timeframes of the WFD for the respective RBD's in so far as possible.

3.7 Efficiency

ILI members have direct experience of the inefficiencies as cited in the Report of the management of land and water systems which straddle administrative boundaries of local authorities. The proposed reorganisation of Irish Water into territories based on catchment units under the RBD's is sensible and such an approach is long overdue. However, in many instances, the interface between land and water will be variable and is interdependent. Further exploration is necessary. For example, much of the land in river valleys of urban and suburban areas is managed as parkland for public access and amenity and providing valuable habitats for designated species. The multifunctional remit of a local authority can address this, with challenges at times. The introduction of Irish Water, in addition to the roles of the existing OPW, EPA and adjoining local authorities across waterbodies, as a manager could cause further overlap of responsibilities and lack of a coherent approach or accountability.

Another issue, cited in the report, is the desirability of stronger regional controls and linking the RBD's with the Regional Planning Authorities, whose boundaries do not coincide. While the Regional Planning Guidelines (RPG's) give statutory policies in relation to the WFD, how the decision-making process by a planning authority is affected is less than clear. Even the ability of the lead local authority of a given RBD to action other local authorities is limited, and can be more of a 'cheerleading' role or merely acting as the reporter, rather than true leadership. Who leads on planning, on water quality, and who acts and implements will have to be addressed. The regulatory role of the EPA will bring about considerable change for the public and their elected representatives in terms of who to seek out for information, accountability and direction.



While the Phase 1 Report raises questions about stormwater management, it does not provide any answers. There needs to be more comprehensive measure for funding of this issue nationally, particularly to address combined sewer overflows on an urgent basis. The report's recommendation that Irish Water be confined to network-related public provision leaves an artificial divide that will ultimately weaken its efficiency. It is disappointing that the septic tank inspections regime is passed over yet again to local authorities which have no resources to cope. The impacts on the landscape of diffuse pollution sources are serious. In many other countries, landscape architects are registered as a profession and can provide septic tank design services which can then be certified as part of a planning consent process as part of a landscape plan for a development. Private sector services could be certified to inspect, with the requirement to produce a certificate by the septic tank owner to a government agency. This would reduce government administration and inspection burdens and stimulate jobs in the private sector.

There is great potential efficiency in the proposed agency for coordination of fieldwork, inspections and monitoring and database management. ILI welcomes such an approach as it will provide better communication of information and hopefully support our engineering colleagues who have been calling for some time for such investment to improve delivery of services, avoid duplication of efforts, analyse trends more rapidly and meet WFD requirements where status is still unknown.

3.8 Wider resource management and climate change

Policy on water resource management and the proposed establishment of Irish Water must be linked to the emerging National Landscape Strategy, as the continuum of land and water exists so strongly in an Irish context. The ILI, as a member of the NLS Steering Committee, recommends that this Report, which does not refer to the landscape at all (except the 'funding landscape') addresses how it will ensure compatibility with landscape policy and also the emerging national Sustainability Strategy. There is no point in strategic silos. The extent of wetland loss in Ireland, and its continuing consequences for climate change and water resources management, has been documented. While the Position Paper refers to the issue of climate change, again, the only reference to any climate in the Phase 1 Report is that of an economic nature. Climate and landscape are strongly inter-linked, and neither can be overlooked in water resource planning. As stated in the report, water shortages and supply cut-offs dominating the national news are not the images which Ireland can afford to project.

3.9 The Irish Landscape Institute and Irish Water

The ILI, as a member of the Urban Forum, is an allied discipline to Engineering. Some of the members of the ILI currently are working in the practical measures to implement the WFD. This year, the ILI has provided CPD training in Sustainable Urban Drainage Systems (SUDS) to its own members and members of allied professional bodies (Engineers Ireland, IPI, RIAI) in recognition of the design standards specified in Governmental flood protection guidelines. Professional institutes have a key role to play in the measures regarding skills training and collaboration.



IRISH LANDSCAPE INSTITUTE
Institiúid Tírdhreacha na hÉireann

The ILI is available to engage with Irish Water regarding the involvement of landscape professionals in the management and development of water resources.

On behalf of the Irish Landscape Institute,

Yours sincerely

Maryann Harris, MILI
President,
Irish Landscape Institute

Declan O Leary, MILI
Vice President
Convenor Landscape Policy Working Group