



National Federation of Group Water Schemes

Society Limited

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RE: National Federation of Group Water Schemes Submission on the Draft National Planning Framework – Ireland 2040 Our Plan

To whom it may Concern:

The National Federation of Group Water Schemes (NFGWS) welcomes publication of the Draft National Planning Framework – Ireland 2040 Our Plan. We do feel, however, that the following points should be taken into account before publishing the final Plan.

It is our view that all planning applications and decisions need to be properly water quality proofed to ensure that any new development does not have a negative impact on drinking water sources. The NFGWS has been working closely with all group water schemes, the Department of Housing, Planning and Local Government (DHPLG), the Geological Survey of Ireland and others, to progress preliminary drinking water source protection reports which include the identification and mapping of surface water source catchment areas and zones of contribution (ZOC) for ground water sourced GWSs. Most of this work is substantially complete and the remaining GWS catchments and ZOCs will be identified and mapped by the end of 2018. A copy of the report for each GWS is provided to the relevant Local Authority on completion.

The catchment/ZOC maps identify any vulnerable areas within each catchment where surface activities including new developments may have negative impact on the GWS source. When considering any development proposals in such areas, planning regulations should require the planning authority to automatically consult directly with the local GWS and its catchment/ZOC report, as the scheme is best placed to advise on potential impacts that might have a negatively effect on their source water quality.

Finally, the 'River Basin Management Plan' which will set out the DHPLG objectives to improve overall water quality in the country will be published shortly. However, we note that there is no reference to this plan at all in the Draft National Planning Framework – Ireland 2040 Our Plan. We would recommend that objectives of the final River Basin Management Plan should also be taken into account before publishing the final National Planning Framework.

Thank you for the opportunity to make this submission and we hope you can take on board the points raised above.

Yours sincerely

Barry Deane
NFGWS Chief Executive Officer