

National Water Resources Plan
Irish Water, P.O. Box 13216
Glenageary, Co. Dublin

24 August 2022

Re: Consultation Draft Regional Water Resources Plan – South West

To whom it may concern,

Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community.

As such, we are determined to ensure that our over 200-year-old Chamber continues to create a positive legacy. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals, five of which have been identified by the Chambers Ireland network.



Ireland 2040 & Cork

Cork Chamber would first like to take this moment to encourage continued commitment from Government and Irish Water to deliver on Ireland 2040, ensuring alignment of water infrastructure and capital investment and Cork's role within it. As set out in Ireland 2040, Cork's population is forecast to grow at least 50% by 2040. It is essential that these plans are infrastructure led. Enhanced investment into water infrastructure is key to meeting these targets.

Concurrently, Cork city has recently been designated to be carbon neutral by 2030 as part of the Horizon EU Framework. Our city region is inherently linked our waterways, harbour and ocean resources and it is essential that we enhance and protect our natural environment and reinforce our infrastructure, creating better places to live, work and play. The alignment of Irish Water's service

and infrastructure delivery with the SDGs is critical to supporting this pilot mission and future proofing our region for decades to come.

This Water Resource Plan for the Southwest Region presents a distinct opportunity to support Cork's role in Ireland 2040. It is critical that it caters to balanced regional development to secure our region's current and future competitiveness and our economic, social and environmental goals, in terms of housing, commercial and industrial development. To achieve this and obtain an accurate picture of the economic landscape in Cork and the southwest, a coordinated approach and engagement with Local Authorities, Transport Infrastructure Ireland (TII), the NTA, Bus Eireann, Iarnród Éireann, ESB, GNI, National Broadband, LDA, IDA and EI and the private sector is required.

With this in mind, we wish to offer a series of comments that we hope will act as a pause for thought as this immensely important task of planning and securing our water assets in the southwest region is undertaken.

Water Infrastructure's Economic Impact

Cork has the potential to be a national driver of economic and population growth. To facilitate this, it is essential that Foreign Direct Investment (FDI) and indigenous enterprise continue to be enabled, while ensuring that we can provide sufficient housing with quality drinking water.

Stakeholders and Cork Chamber members have been reporting that the provision of water infrastructure, both in terms of supply, and wastewater management, is a significant inhibiting factor in the rollout of new housing and strategic sites for commercial use. Delays in the construction of new housing developments of over 5 years have been reported by members as a result of a lack of provision of critical water infrastructure.

Delays in rollout of water infrastructure is also impacting investment and FDI, and impeding talent attraction efforts. New recruits to major employers in the region are facing serious difficulties finding suitable accommodation because of a lack of housing supply, the provision of which is dependent on water infrastructure being delivered as a key enabler. If this trend continues, our reputation internationally will be negatively impacted upon and reversing this will prove difficult and costly.

It is essential that strategic development sites, both brownfield and greenfield, for housing and commercial use are adequately serviced by water infrastructure to avoid a situation where we cannot deliver on our economic and social goals as outlined in our National Development Plan.

Housing Development

Cork Chamber has had significant engagement with and feedback from stakeholders highlighting water infrastructure, inter alia, as a key barrier to housing development in Cork. While there is plentiful land zoned and brownfield sites, along with land that has been granted planning permission, often the necessary water infrastructure is absent, thus inhibiting development.

We are concerned that the forecasted domestic and non-domestic demand contained within the plan for water resources for the Southwest region and Cork is underestimated. As highlighted above and within the plan itself, Cork's population is forecast to grow 50%-60% by 2040. However, under the modelling underlying this plan domestic demand for water in Cork, is only forecast to increase by 30%. This contrasts with Dublin, where within the same period the population of Dublin is expected to grow by 26% and domestic demand for water resources to increase by 25%. It is not clear why this anomaly exists in the forecasts between the two cities and regions.

As an added concern, this concentrated focus on Dublin is further mirrored on the Irish Water website:

“Supporting social and economic growth: The welcome return of economic growth brings a requirement for additional capacity to support housing development, together with offices, factories and commercial buildings supporting jobs. This growth is currently hampered by a limited system capacity for water and wastewater and is one of the constraints to be overcome if housing needs are to be met in the Greater Dublin Area.”¹

While we are cognisant that both leakage reduction and water efficiency programmes are contributing to offsetting some of this increased demand, concerns remain that this plan will continue years of unbalanced development and investment focused on Dublin. Considering the current housing crisis, lack of housing developments in Cork along with the projected population growth, we are in firm belief that the forecasted demand for water resources in Cork by 2040 is too conservative and will not support our region’s goals. We strongly urge that Irish Water re-evaluate the forecasted domestic demand to allow for balanced development and in support of our population goals.

Commercial and Industry Development

Similar concerns have been raised through stakeholder consultation and various forums regarding strategic development sites for commercial and industrial use. As it currently stands, Cork is a hub for FDI having being ranked number one for economic potential, and second in the overall ranking of fDi Intelligence European Cities and Regions of the Future 2022/2023². Close to 200 overseas companies employing over 43,000 call Cork home, due to a facilitative regulatory and legislative environment.

Within the Regional Resource Plan, Cork’s non-domestic demand is forecast to grow by only 10% by 2044, yet Dublin’s is forecast to increase 66% by 2044. If this significant difference in forecasted demand for the two regions is carried forward into the final plans, we will lose out on future investment from both multinationals and indigenous companies. Further, the regional balanced development that Project Ireland 2040 seeks to realise will not be achieved, and the historical development inconsistencies that have focused on Dublin will continue.

We strongly advise that the forecasted demand for non-domestic water use is re-evaluated and increased to match the significance of Cork and Southwest region’s current and future economic contribution to the country, so that we may continue to attract and accommodate both talent and investment.

Conclusions

Irish Water service and the delivery of vital infrastructure must be increased to match the current and future demands in Cork and the wider Southwest region to align with Ireland 2040. Current deficits are apparent and causing disruptions to economic and population growth. Cork’s economic potential must be recognised and proactively planned for by Irish Water to ensure that infrastructure is an enabling rather than an inhibiting factor.

Thank you for the opportunity to contribute to this consultation. We request that our recommendations are fully considered.

¹ <https://www.water.ie/about/about-irish-water/>

² <https://www.wecork.ie/cork-city-ranks-1st-for-economic-potential-in-financial-times-fdi-european-cities-regions-of-future-league/>

Yours sincerely,



Conor Healy
CEO