Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
Transport Infrastructure Ireland (TII)	**1**	Transport Infrastructure Ireland (TII) Consultation	*Transport Infrastructure Ireland (TII) welcomes consultation on the Galway Wastewater Strategy. TII's statutory remit relates to the provision of a safe and efficient network of national roads and light rail infrastructure.* *It is noted that the project is at a very early stage, therefore, TII would welcome Uisce Eireann, actively engaging the Authority as the project develops especially where there are to be interactions with TII assets on the strategic national road network; both existing and planned.*	Uisce Éireann has and will continue to ensure TII remains informed of developments through the public consultation process, and we will continue to engage with TII in relation to any potential interactions with TII assets. While projects and plans emerging from the draft Galway Wastewater Strategy may interact with TII assets, specific assets and locations are not identified at the draft Galway Wastewater Strategy level. Instead, potential impacts will be assessed through further studies, such as site and route selection processes, following the publication of the final draft Galway Wastewater Strategy.
Transport Infrastructure Ireland (TII)	**2**	Potential Impacts on National Road Network, National Strategic Outcome 2 of NPF and NDP	*TII would be concerned with potential impacts on the existing national road network (and junctions with national roads) and schemes in the proximity of the Galway Wastewater Strategy projects. National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.* *TII is concerned about impacts on the national road network and junctions near the project.*	Uisce Éireann has and will continue to ensure TII remains informed of developments through the public consultation process, and we will continue to engage with TII in relation to any potential interactions with TII assets. While projects and plans emerging from the draft Galway Wastewater Strategy may interact with TII assets, specific assets and locations are not identified at the draft Galway Wastewater Strategy level. Instead, potential impacts will be assessed through further studies, such as site and route selection processes, following the publication of the final draft Galway Wastewater Strategy.
Transport Infrastructure Ireland (TII)	**3**	National Roads Collaboration and N6 Galway City Transport Project Scheme	*With respect to national road projects, TII in collaboration with Galway City and County Councils, progresses national road schemes and improvements in accordance with National Development Plan investment commitments. The N6 Galway City Transport Project scheme is identified as to be delivered under the National Development Plan and currently is with An Bord Pleanála.* *With respect to this, and other national road improvement schemes in development, Uisce Eireann should consult with the Councils Road Design Office and the local National Road Project Office to ensure the inclusion of up to date information, noting that the status of schemes can alter.* *TII works with local authorities to progress national road schemes in line with National Development Plan commitments.*	Uisce Éireann has engaged with Local Authorities and other stakeholders and will continue to collaborate with them as part of the draft Galway Wastewater Strategy. This includes and will continue to include interfaces with the proposed N6 Galway City Ring Road. This aligns with its consultation objectives, ensuring transparent communication throughout the public consultation process.
Transport Infrastructure Ireland (TII)	**4**	Public Transport Consultation	*In relation to future public transport projects, consultation should be undertaken with the National Transport Authority.* *TII recommends consultation with the National Transport Authority on future public transport projects.*	Uisce Éireann is committed to engaging with the public and all relevant stakeholders and will include the National Transport Authority as part of the consultation process during this and other future projects. Our consultation and engagement practices align with the public participation requirements of the Aarhus Convention, as well as the public consultation obligations under the SEA Directive and the Habitats Directive. We are dedicated to ensuring that our communications and public consultations are accessible, transparent, meaningful, and accountable, providing clear and proportionate information for all stakeholders, including those without a technical background.
Environmental Protection Agency (EPA)	**5**	Overall comments on Scoping Report	*The relevant objectives and policy commitments of the National Planning Framework (and impending first revision) and the Regional Spatial and Economic Strategy for the Northern and Western Region should be aligned with the Strategy and considered, as appropriate.* *You should also ensure that the Strategy aligns with national commitments on climate change mitigation and adaptation, as well as any relevant sectoral, regional and local adaptation plans.*	The objectives and policies of the NPF (and later revisions) and the RSES were considered and incorporated into Appendix 1 - Managing Growth and Section 8.1 in the draft Galway Wastewater Strategy report. Similarly, national climate commitments and other relevant plans were taken into account and were aligned with the draft Galway Wastewater Strategy. Refer to Appendix 2 - Our Approach to Modelling & Climate Change.
Environmental Protection Agency (EPA)	**6**	Integration of SEA and Strategy	*All recommendations from the SEA and Appropriate Assessment processes, including mitigation measures, should be reflected in the Strategy. We recommend that the Strategy includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to Strategy objectives/measures, proposed mitigation measures and monitoring programme.*	Noted. The key findings of the SEA have been incorporated into the draft Galway Wastewater Strategy reports, ensuring alignment with the strategy's outcomes and recommendations. Section 3.5 in the draft Galway Wastewater Strategy Report outlines how the SEA has influenced the strategy.

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Environmental Protection Agency (EPA)	**7**	Monitoring, Review, and Reporting	We note that the SEA environmental report will set out the proposed approach to mitigation and monitoring. In addition, the Strategy should include a commitment to implement the environmental monitoring programme and associated reporting. We suggest including a separate section on 'Monitoring, Review and Reporting' in the Strategy, setting out the provisions for monitoring and reporting on the the significant environmental effects of the implementation of the Strategy and periodic reviews. There may be merits in aligning the periodic reviews of the Strategy with existing cyclical reporting e.g. Ireland's Environment, National Planning Framework, Water Framework Directive, Marine Strategy Framework Directive, etc, where feasible. In between review periods for the Strategy, we recommend that Strategy-related implementation reports, including the results of environmental monitoring, are published annually, or biennially, as appropriate. We recommend aligning Strategy implementation monitoring and reporting with the environmental monitoring required under the SEA legislation. This will enable the environmental performance of the Strategy to be evaluated and would also provide for increased transparency during implementation. The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any environmental issues that may arise. The Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring. To avoid duplication in data collection, the same indicators should be used for the plan-related and SEA-related monitoring where possible. Suggests a dedicated section on monitoring and reporting in the Strategy, including annual or biennial implementation reports and alignment with existing environmental monitoring (e.g., WFD, Marine Strategy Framework Directive).	Noted. Please refer to the proposed mitigation and monitoring plan in Section 10 of the SEA Environmental Report.
Environmental Protection Agency (EPA)	**8**	Future Consultation and SEA Consultation under SEA Regulations	*Under the SEA Regulations, you should consult with: • Environmental Protection Agency;* *• Minister for Housing, Local Government and Heritage;* *• Minister for Environment, Climate and Communications;* *• Minister for Agriculture, Food and the Marine.* *If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.*	Noted and acknowledged. Uisce Éireann confirms that statutory consultees were contacted and were engaged during the consultation process for the Issues Paper and SEA Scoping reports, and during the consultation process for the draft Galway Wastewater Strategy, the Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Statement (NIS). Please refer to Section 4 in the draft Galway Wastewater Strategy.
Environmental Protection Agency (EPA)	**9**	Integration of SEA and Strategy	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of the GWS?* *We recommend that the SEA informs and is integrated significantly into the Strategy. The integration of the SEA process into the Strategy should reflect the overall objective of the SEA Directive "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes.* *It is key that the SEA acknowledges the complex and cross cutting nature of climate and biodiversity issues and includes targets and measures, where relevant and appropriate, that can tackle Ireland's climate crisis and our biodiversity emergency as part of an integrated approach to tackling environmental problems.* *We welcome the schematic included in the scoping report outlining the relationships between the Strategy, SEA and appropriate assessment processes. We recommend that this schematic be included in the Strategy and environmental report also to show how these relationships have contributed to the development of the Strategy.* *Fully integrating the findings and recommendations of the SEA into the Strategy will be key to strengtheningthe Strategy's overall positive commitments while ensuring that any potential significant adverse effects of implementing the Strategy are mitigated.* *The SEA Environmental Report and the Strategy should include a chapter outlining how the recommendations and mitigation measures from the SEA have been incorporated into the Strategy. We recommend that the SEA Environmental Report includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Strategy policies/measures.*	The Strategic Environmental Assessment (SEA) process and the development of the draft Galway Wastewater Strategy were conducted in an interactive and iterative manner, ensuring that environmental issues were considered during the development of the draft Galway Wastewater Strategy. This reciprocal process allowed environmental issues, opportunities, and constraints identified through the SEA to inform and shape the draft Galway Wastewater Strategy, enabling refinement and alignment with sustainability objectives. The recommendations, mitigation measures, and enhancement opportunities are summarised in Appendix 5 - Optioneering and Solution Development, particularly the Multi-Criteria Decision Analysis process. Refer to section 11.2 in the draft Galway Wastewater Strategy report which describes how the SEA and Appropriate Assessment requirements have been fully integrated into the development of the draft Galway Wastewater Strategy and have directly informed the options assessment methodology. Section 10 in the SEA Environmental Report includes the mitigation and monitoring plan for the Strategy. This demonstrates transparency and traceability in decision-making, highlighting the influence of the SEA on strategic direction and feasible option selection.
Environmental Protection Agency (EPA)	**10**	Governance and Implementation	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of the GWS?* *The Strategy should clearly set out the implementation arrangements and governance structures, including lines of responsibility for implementation and delivery as well as provisions for interim review and progress reporting. Implications of the Strategy in the context of existing Local Authority plans/programmes should also be clarified (e.g. will these be required to be reviewed and updated?).*	Noted with thanks. Please refer to Section 12 in the draft Galway Wastewater Strategy report for details about how the strategy will be implemented, and to Secton 13 for how the strategy will be monitored and evaluated.

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Environmental Protection Agency (EPA)	**11**	Wastewater considerations	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of the GWS?* *Our report on Water Quality in Ireland 2016 -2021 (EPA, 2022) (and more recently in the Water Quality in 2023 – Indicators Report (EPA, 2024)) highlight that one of the key causes of water pollution is from point sources including discharges from waste water treatment plants.* *The need to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and proposed developments is critical.* *While Uisce Éireann indicates that it will work with stakeholders to plan forward for capacity, it should specifically include a commitment that this planning is done within the constraints of the local receiving environment and in compliance with existing legislative requirements, including those under the WFD, to prevent deterioration of water body status.* *Uisce Eireann's "wastewater treatment capacity registers" give an indication of whether there is adequate wastewater treatment capacity in an area to cater for a proposed development with or without capital upgrades to infrastructure. We recommend that Uisce Éireann continue to promote that, when considering applications for planning permission, local authorities should perform additional assessments of the capacity of wastewater infrastructure to cater for the additional loads that will be generated by the proposed development under consideration. This could be highlighted as a recommendation in the Strategy.*	Alongside other relevant national and local dataset, the reports referenced in the submission have informed the development of the draft Galway Wastewater Strategy. The draft Galway Wastewater Strategy has been developed to ensure that wastewater services are planned and delivered in accordance with national and European legislative requirements, including the Water Framework Directive, with a strong focus on protecting receiving water bodies and preventing deterioration in water quality (see Section 3.3 and Appendix 4 – Impact on Water Quality). The draft Galway Wastewater Strategy also identifies the infrastructure required to support projected growth and development, ensuring that adequate and appropriate wastewater treatment capacity is provided in line with zoning and planning objectives (see Appendix 1 – Managing Growth and Appendix 3 – Status and Performance of the Sewerage System). In this context, the draft Galway Wastewater Strategy supports an evidence-based approach to wastewater capacity and infrastructure planning, informed by ongoing engagement with planning authorities and relevant stakeholders.
Environmental Protection Agency (EPA)	**12**	Wastewater considerations	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of the GWS?* *Other recommendations that could be made in the Strategy include:* *- a commitment to work with local authorities to ensure there is, or will be, sufficient wastewater treatment facilities in place and that any connection to a treatment plant will not cause or contribute to non-compliance with existing legislative requirements* *- Uisce Éireann should work with local authorities to remind them to always check the designation of the receiving water and its status on the EPA WFD Application. The application is publicly available data* *- Local authorities, supported by Uisce Éireann, should establish the assimilative capacity of the receiving water, determine whether an additional effluent load from a proposed development can be catered for without deteriorating the Water Framework Directive status of the river and prevent it from meeting its environmental objectives and ensure compliance with the obligations as set out in S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009 (as amended). In this regard, key enforcement information is available on the EPA's website – see LEAP Online | Environmental Protection Agency (epa.ie). Particular regard should be had to the Annual Environmental Reports (AER) for specific wastewater treatment plants, which provide an overview of compliance with EPA licence requirements. The "Operational Performance Summary" section in the AER contains information on the peak and the most recent hydraulic capacity of the plant. Any non-compliances recorded in the AERs should be factored into the decision-making process as should the hydraulic capacity of the plant.* *- Agglomerations with no treatment or poorly performing (or at capacity) treatment plants are highlighted in the Urban Waste Water Treatment in 2023 (EPA, 2024). A commitment to support the provision of appropriate measures to address these issues as a priority, in collaboration with Uisce Eireann should be considered where relevant. Measures to ensure that combined storm water overflows, sewers and trade effluent in the area covered by the Plan is also managed properly should also be included as appropriate.* *- You should also consult the 2021 Code of Practice for Domestic Waste Water Treatment Systems, (EPA, 2021) and the National Inspection Plan for Domestic Wastewater Treatment Systems 2022-2026 (EPA, 2021), as appropriate.* *- In Ireland's State of the Environment Report (EPA, 2024), we refer you to Chapter 8 (Water) and Chapter 14 (Environment-Health and Wellbeing) which provides information on wastewater that may also be of relevance to you in preparing the SEA and the Strategy.*	These recommendations were considered and were used to develop the draft Galway Wastewater Strategy. For water quality please refer to Appendix 4 - Impact on Water Quality. For projected growth and to provide infrastructure to maintain adequate and appropriate wastewater treatment capacity to service the agglomerations in the study area refer to Appendix 1 - Managing Growth. For technical information relating to the operational performance of the wastewater treatment plants refer to Appendix 3 - Status and Performance of Sewerage System. Also, please refer to the SEA Environmental report for information about Water, and Biodiversity, Flora and Fauna.
Environmental Protection Agency (EPA)	**13**	Maintenance and Monitoring	*Do you have any comments on the approach to the Strategic Environmental Assessment (SEA) of the GWS?* *The methodology proposed seems appropriate to the level at which the Strategy is being developed. While the SEA describes that the construction and operation stages of wastewater and associated infrastructure are covered, we also suggest that maintenance aspects are also considered. The need for ongoing maintenance and monitoring of associated infrastructure is required over the lifetime of the Strategy. Further details should be provided in the Environmental Report and Strategy.*	For existing infrastructure, the draft Galway Wastewater Strategy recommends enhancements to treatment capacity at Mutton Island (Galway City) and Athenry Wastewater Treatment Plants in the short term, while wastewater treatment at Moycullen and Claregalway Wastewater Treatment Plants will be maintained with future upgrades informed by population and economic growth projections. In addition to this, routine monitoring and maintenance will be carried out by Uisce Éireann Operational Team crews in accordance with approved Uisce Éireann Standard Operating Procedures. Refer to Section 10 in the SEA Environmental Report for details about the monitoring plan for the draft Galway Wastewater Strategy.
Environmental Protection Agency (EPA)	**14**	Data and Knowledge Gaps	*The key considerations for the environmental assessment of the GWS and the proposed scope of the assessment is summarised in Section 3.20. Do you have any comments on these?* *The SEA Environmentalal report should identify any significant data and knowledge gaps and include commitments to help address these on a priority basis during the implementation phase of the Strategy. This is with a view to strengthening the evidence base for future reviews and iterations of the Strategy.*	Section 10.3 in the SEA Environmental report addresses Adaptive Planning pathways that will identify decision points and sequence interventions to accommodate changes in knowledge, regulation, or societal needs, while maintaining strategic coherence. This recognises that the Strategy must continuously evolve with changing conditions so five-yearly reviews will enable regular updates to incorporate data and address knowledge gaps, ensuring the Galway Wastewater Strategy remains aligned with evolving policy, environmental targets, and investment priorities

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Environmental Protection Agency (EPA)	**15**	State of the Environment Report	*The key considerations for the environmental assessment of the GWS and the proposed scope of the assessment is summarised in Section 3.20. Do you have any comments on these?* *The EPA has recently published the latest iteration of our State of the Environment Report 2024. The relevant aspects of this report should be considered and integrated as appropriate, in implementing the plan or programme over its lifetime.*	The State of the Environment Report 2024 was considered during the development of the draft Galway Wastewater Strategy. Please refer to Section 4.6, 4.8.2.6, and Appendix A in the SEA Environmental report.
Environmental Protection Agency (EPA)	**16**	Plans, Policies and Programmes	*Are there any further plans, policies and programmes not identified in Section 4 or in Appendix B that should be considered?* *We welcome the inclusion of Figure 2.3.1 showing the hierarchy and interaction of relevant related plans and projects.*	Noted.
Environmental Protection Agency (EPA)	**17**	SEA Approach	*Do you have any comments on the SEA approach to considering plan alternatives at this stage?* *We acknowledge the approach to identifying and assessing alternatives as described in the scoping report. The EPA guidance document Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA) (EPA, 2015) should be referred to and considered in preparing the SEA environmental report.*	The EPA guidance document Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA) (EPA, 2015) has been referred to (EPA. 2015. Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA). Available from: Review of Effectiveness of SEA in Ireland. Accessed: July 2024) and was considered in Section 6.3 - Consideration of Alternatives in the SEA Environmental report.
Environmental Protection Agency (EPA)	**18**	Additional or Additional Plans or Programmes	*Are there any additional or specific plans or programmes that you feel should be considered within the cumulative impact assessment?* *The First revision of the National Planning Framework and associated SEA Statement is due for publication in the near future. This should be reviewed to ensure the Strategy aligns with the NPF in preparing and in implementing the Strategy.*	The Department of Housing, Planning and Local Government (DHPLG)'s 2018 document Project Ireland 2040 – National Planning Framework (First Revision) which is available at: National-Planning-Framework-First-Revision-April-2025-1.pdf was last accessed in January 2026 and has been taken into account in Section 2,3 and 8 in the SEA Environmental report, Appendix 1 - Managing Growth, and Section 2, 3 and 8 in the draft Galway Wastewater Strategy.
Environmental Protection Agency (EPA)	**19**	Communications	*How would you like Uisce Éireann to communicate with you as the development of the GWS progresses?* *All communication with EPA in relation to the SEA should be sent electronically to sea@epa.ie.*	Noted.
Environmental Protection Agency (EPA)	**20**	Additional Resources	*Chapter 3 sets out the current baseline environment conditions, future trends and relevant issues for the assessment. Do you have any comments on these?* *We note the information provided in Chapter 3. Additional resources can be found on the EPA website as follows:* *- Our website contains various SEA resources and guidance, including: SEA process guidance and checklists, Inventory of spatial datasets relevant to SEA, Topic specific SEA guidance (including Good practice note on Cumulative Effects Assessment (EPA, 2020), Guidance on SEA Statements and Monitoring (EPA, 2020), Developing and Assessing Alternatives in SEA (EPA, 2015)).* *These and other resources are available at: https://www.epa.ie/our- services/monitoring--assessment/assessment/strategic-environmental- assessment/sea-topic-and-sector-specific-guidance-/* *With regards wastewater information, the EPA publishes annual reports on wastewater, including the Urban Wastewater Treatment in 2023 report (EPA, 2024). Further EPA information on wastewater is available at: https://www.epa.ie/our-services/compliance--enforcement/waste-water/.* *UK Water Industry Research Guidance - Environmental Assessment for Water Resources Management Plans and Drought Plans. Report Ref No 21/wr/02/15 (See chapter 3 and Appendices 2-3)* *Our WFD Application provides a single point of access to water quality and catchment data from the national WFD monitoring programme. The application is publicly available data can be accessed via the Catchments.ie website.* *Our SEA WebGIS Tool has been updated recently and is now publicly available at https://gis.epa.ie/EPAMaps/SEA. It allows public authorities to produce an indicative report on key aspects of the environment in a specific geographic area It is intended to assist public authorities in SEA screening and scoping exercises.* *Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to a select a location, specify a search area and gather available information for each European Site within the area. It is available at: http://www.epa.ie/terminalfour/AppropAssess/index.jsp*	Noted with thanks. Relevant information from these resources were used in the development of the draft Galway Wastewater Strategy and its associated documents. Refer to Sections, 2, 3, 4, 8, 11, 12,13 of the SEA Environmental Report which were carried into the draft Galway Wastewater Strategy.
Environmental Protection Agency (EPA)	**21**	Recreational/ Tourism uses of Waterways	*Are there recreational or tourism uses of the waterways within the SEA study area or additional locations where fishing and water sports take place, that should be considered as part of the baseline?* *Please refer to Beaches.ie for the latest information on bathing waters and bathing water quality. Additionally the Bathing water quality in Ireland in 2023 report can be found on the EPA website.* *It would be useful to consult with Failte Ireland in relation to any experience plans in the area. Wastewater infrastructure should be resilient enough to accommodate seasonal pressures related to tourism and recreation activities. To achieve this, we recommend developing and maintaining strong communication and collaboration with key stakeholders to develop actions and mechanisms that provide for sustainable wastewater treatment.* *It would also be useful to consult with Inland Fisheries Ireland (IFI) in relation to fishery resources in the strategy area.*	Noted with thanks. The baseline review in the SEA Environmental report and Appendix 4 - Impact on Water Quality report have incorporated the latest available information on bathing water quality. We liaised with the IFI early in the development of the draft Galway Wastewater Strategy. We utilised information from Failte Ireland using a breakdown of accommodation types in the study area including hotels, B&B, self catering apartments, student accommodation used outside of term time, and caravan parks to estimate occasional occupancy into the future, and the Galway Tourism draft Galway Wastewater Strategy 2020-2025 was used during the development of tourism and recreation growth projections in Appendix 1 - Managing Growth.

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Environmental Protection Agency (EPA)	**22**	Comments on Next Steps	*Any comments on the next steps or the outlined SEA Environmental Report structure?* *As previously stated, the SEA Environmental Report and the Strategy should include a chapter outlining how the recommendations and mitigation measures from the SEA have been incorporated into the Strategy.* *We recommend that the SEA Environmental Report includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Strategy policies/measures.* *Also as previously mentioned, we suggest including a separate section on 'Monitoring, Review and Reporting' in the Strategy, setting out the provisions for monitoring and reporting on the significant environmental effects of implementation of the Strategy and periodic reviews. The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on- going review to facilitate an early response to any significant environmental issues that may arise. Additionally, the EPA has published guidance notes that may be of assistance in preparing the SEA environmental report.* *Guidance on the SEA Process is included in the Development of Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland (EPA, 2003). You can access these SEA process guidance and topic and sector specific guidance documents along with other resources listed below at the link provided.*	The recommendations, mitigation measures, and enhancement opportunities identified through the SEA process were incorporated into the Strategy (Section 10 and 11.2) and in *Appendix 5 - Optioneering and Solution Development* t, particularly the Multi-Criteria Decision Analysis process. The SEA Environmental Report also includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Strategy policies/measures (Refer to Sections 8, 10 and 11).
Galway City Council	**23**	Alignment with Council Policies and Programmes	*Thank you for the opportunity to make a submission to the Galway Wastewater Strategy Issues Paper, the Strategic Environmental Assessment (SEA) Scoping Report, and the Appropriate Assessment Screening Report. Galway City Council supports the objectives of the Galway Wastewater Strategy, as outlined in Section 2.1 in chapter 2 of the SEA Scoping Report, many of which are aligned with City Council policies and programmes.*	Noted and Acknowledged
Galway City Council	**24**	NPF and Settlement Strategy	*The National Planning Framework (NPF) identifies Galway City as one of the four designated regional cities outside Dublin and accordingly has allocated the city ambitious population growth targets with at least half of the associated homes to be delivered in the existing built-up footprint. This focus of scale and settlement pattern distribution is further reflected in the objectives in the RSES for the Northern & Western Regional Assembly (NWRA) which reinforces the need for Galway's growth strategy to be compact, smart and sustainable.* *Galway City, together with the Metropolitan Area, is identified as having the characteristics and capacity to deliver the NSOs of the NPF which include sustainable city living, a strong economy, enhanced quality of life and reduced carbon footprint.* *Galway City Metropolitan area supports and complements a key principle set out in the national/regional planning frameworks which is the delivery of compact urban growth with a target to grow the city by 50% to 2040 and that at least 50% of all new homes would be delivered within the existing built-up area of the city.* *A key element of the settlement strategy for the city is to deliver growth in a compact form throughout the Metropolitan Area, with a focus on redevelopment of regeneration/brownfield sites and development of infill sites and underutilised land, including Ardaun to the east of the city.*	Noted. The strategy and associated projected loadings were informed by relevant development policies, zoning maps, land use plans, masterplans, and provisions outlined in the Galway City and County Council Development Plans. This distribution also reflects the National Planning Framework's (NPF) objectives for Compact, Smart, and Sustainable Growth and also incorporates insights from stakeholder consultations completed during development of the strategy including consultations with the LDA and local authorities. Future growth enablers from the NPF were also considered during the development of the strategy including: - Regeneration projects to extend and intensify the City Centre, focusing on areas such as the Station, Docks, Headford Road, and Sandy Road; - Infill and regeneration opportunities to enhance housing and employment in inner suburban areas; - Sustainable development of new greenfield sites for housing and supporting infrastructure, such as at Ardaun; - National water supply and wastewater projects to improve Galway's water supply and wastewater treatment capacity. Residential population densities were determined using Development Plan data, stakeholder input, and the 2024 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities from the Government of Ireland. Trade and other loadings were distributed based on policy documents, stakeholder input, and Uisce Éireann's modelling standards.
Galway City Council	**25**	Growth Enablers and Delivery of Infrastructure	*The recently published Draft 1st Revision of the NPF (July 2024) highlights that, at a metropolitan scale, there is a necessity to focus on the delivery of critical infrastructure required to meet the ambitious compact growth targets expressed in the NPF, including improved wastewater infrastructure, water supply, public transport and sustainable mobility. To this end, the revised NPF specifically identifies the following 'key future growth enablers for Galway':* *- Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Ardaun;* *- Delivery of the Galway East Main Drainage Scheme as part of the wider Greater Galway Area Drainage Study;* *- Ensuring that wastewater needs are met by new national projects to increase waste water treatment capacity for Galway City and the Metropolitan area.* *Galway City Council recognises that the delivery of infrastructure and utilities in a sustainable manner are critical tothe future development of the city and should form part of the Galway Wastewater Strategy. GCC supports investmentfor both new and enhanced infrastructure and utilities particularly from a wastewater perspective which is critical toensuring economic growth and investment, the delivery of employment opportunities, compact growth of our settlements and more sustainable communities.*	Noted. Refer to response to Comment 24 above. All strategic options considered, including the key future growth enablers, were carefully evaluated while developing the strategy and are described in the Strategy report and in Appendix 5 - Optioneering and Solution Development.
Galway City Council	**26**	Ardaun Wastewater and Merlin Park Storage	*It is acknowledged that the Ardaun Wastewater Network Extension (design stage) is well advanced, with a planning application lodged by Uisce Éireann, for infrastructural upgrade works to Merlin Park pumping station storage tank. This project requires continued priority to support land activation at Ardaun to meet the housing targets for the city.* *In recognition of the above, Galway City Council respectively request that the Uisce Éireann Galway Wastewater Strategy includes for the delivery of the above mentioned key future growth enablers for Galway.*	We confirm that the wastewater needs of Ardaun, along with other identified growth areas, have been accounted for in the growth projections in the draft Galway Wastewater Strategy. The phasing of such schemes shall be considered in line with strategy recommendations.

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Galway City Council	**27**	City-Wide Drainage Projects	*In addition, it is requested that the following city-wide projects listed below are also accounted for as part of the Uisce Éireann Galway Wastewater Strategy:* *- Progress implementation the outcomes of the Greater Galway Strategic Drainage Study to relieve pressure on Mutton Island Wastewater Treatment Plant (WWTP) and provide growth potential in the Greater Galway area with the implementation of the Galway Strategic Drainage Study.* *- Progress projects identified in Galway Area Drainage Plan and Greater Galway Strategic Drainage Study, including works to address foul and surface water cross connections causing pollution of receiving waters and threats to beach water quality (including storm overflows). Works on combined sewer overflows to reduce surface water pollution.*	The draft Galway Wastewater Strategy report provides recommendations for short term, medium term and long term infrastructure to meet the needs of the study area. This aligns with projected growth patterns, expected increases in flow and load within catchments, and environmental protection measures. The draft Galway Wastewater Strategy recognises the importance of shorter-term, tactical-level planning which is implemented through the Galway City Drainage Area Plan (DAP). The Galway City DAP operates at a more tactical, asset-level planning scale, and implementation of project will be informed by the strategic direction and preferred options identified within the Galway Wastewater Strategy. Refer to Section 5.2 in the draft Galway Wastewater Strategy for information about how the DAP aligns with the draft Galway Wastewater Strategy.
Galway City Council	**28**	Protection of Bathing Water	*The Mutton Island WWTP has led to major improvements in bathing water quality in Galway Bay. This is confirmed by the securing of EU Blue Flag status and the National Green Coast Award for Silverstrand and Salthill beaches. Protecting bathing water is crucial for public health and environmental sustainability. Clean water ensures safe swimming and reduces the risk of waterborne diseases, which can spread through contaminated water sources. It also preserves ecosystems, supporting aquatic life and biodiversity. The Galway City Development Plan 2023 – 2029 seeks to maintain and extend the Blue Flag Beaches status in regard to water quality, infrastructure and amenity provision for beaches in the city. In this context, the Galway Wastewater Strategy, should support investment in enhanced infrastructure and utilities for the protection of bathing water quality, to ensure safeguarding of both human and environmental health.*	Uisce Éireann acknowledges the positive improvements in bathing water quality in Galway Bay, including those associated with the Mutton Island WWTP. The protection of bathing waters is a shared objective across multiple agencies. Local authorities have primary responsibility for the monitoring and management of bathing waters, while Uisce Éireann's role is to provide, operate and maintain wastewater infrastructure in compliance with environmental legislation. Through ongoing investment in wastewater treatment and network performance, Uisce Éireann contributes to the protection of water quality and the wider environment. Bathing water quality is influenced by a range of factors beyond wastewater discharges, including surface water runoff, agricultural activities, misconnections and weather events. The Draft Galway Wastewater Strategy supports a long-term, sustainable approach to wastewater infrastructure development in the study area. This includes identifying investment needs to ensure compliance with statutory requirements, support environmental protection, and contribute to the continued improvement of water quality, including at designated bathing waters, in collaboration with relevant stakeholders.
Galway Chamber	**29**	Recognition of the GWS	*The Galway Chamber welcome the opportunity to make a submission on the draft Uisce Éireann's Galway Wastewater Strategy (GWS) supporting a number of key items and identifying areas for further and more specific focus. This submission emphasises the importance of a strategy that meets current demands while also anticipating future pressures. It advocates for an approach rooted in sustainability, innovation and compliance with national and EU environmental standards. Through this submission, the Galway Chamber aims to support Uisce Éireann in developing a robust, adaptive and community-centred wastewater strategy that contributes to a cleaner, greener and more resilient region.*	Noted and Acknowledged
Galway Chamber	**30**	Ués responsibility for Balanced Growth	*One of Uisce Éireann's core responsibilities is to support balanced regional growth, as outlined in Ireland's National Planning Framework (NPF), which aims to foster development outside Dublin by improving infrastructure and services in regional areas like Galway, Cork, and Limerick. However, despite its mandate to support balanced growth, a disproportionate amount of funding and resources has historically been directed towards Dublin. The capital city, with its higher population density and more immediate pressures on infrastructure, often receives the lion's share of funding for wastewater treatment and water supply projects. This centralisation of investment results in slower progress for cities like Galway, where growing populations and socio-economic development, place increasing pressure on existing infrastructure.* *While Uisce Éireann has committed to addressing these regional disparities, the historical focus on Dublin has led to persistent gaps in wastewater capacity and infrastructure development in growing regions like Galway. The challenge lies in balancing the urgent needs of the capital with the long-term development goals of other regions to achieve truly sustainable and equitable growth across Ireland.*	Uisce Éireann acknowledges the importance of balanced regional development, as set out in the National Planning Framework, and the critical role that wastewater infrastructure plays in supporting sustainable growth in regional cities such as Galway. As Ireland's national water services provider, Uisce Éireann plans and prioritises investment on a national basis, guided by environmental and public health obligations, population growth projections, and the need to address capacity constraints and compliance risks across the network. This includes responding to a legacy of underinvestment in water and wastewater infrastructure, which affects multiple regions. The Draft Galway Wastewater Strategy recognises the Galway Metropolitan Area as a key regional growth centre and identifies current and future capacity constraints within the wastewater system. It sets out a long-term, phased programme of investment to address these challenges and ensure that wastewater infrastructure can meet environmental obligations, support housing delivery, economic development and sustainable communities in the region. Uisce Éireann will continue to prioritise investment nationally based on objective need and regulatory requirements, while supporting the delivery of national and regional planning objectives. Through this approach, the Strategy contributes to enabling balanced regional growth over the long term.

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Galway Chamber	**31**	Inclusion of all zoned lands in the Study Area	*The current study area includes the Galway Metropolitan Area, Moycullen Barna, Athenry, and Oranmore.* *To support sustainable urban and rural development, we emphasise the importance that all zoned lands (including those unserviced) under the Galway City and Development Plan and the Galway County Development Plan should be included within the study area. This ensures that currently unserviced land therefore has the capacity to become serviced, and be developed appropriately in order to ensure socio-economic growth. The omission of key settlements presents significant restrictions on facilitating growth in these towns. These areas are noted within the Galway County Development Plan as part of the settlement plan strategy and are part of the strategic economic corridor. Their exclusion from the Galway Wastewater Strategy, therefore significantly limits their potential for economic growth. Without adequate wastewater management and facilities, enhanced development potential is drastically limited. Therefore, their omission from the study area breaches key objectives and strategies outlined within the Galway County Development, as the socio-economic projected for these areas is unattainable without adequate wastewater facilities.* *The Galway Chamber therefore strongly urges Uisce Éireann to include all zoned lands (including those unserviced) under the Galway City and Development Plan and the Galway County Development Plan, within the study area.*	The design load assessment for the Galway Wastewater Strategy aligns with key policy documents, including development plan population targets, NPF and RSES projections, and long-term growth forecasts based on CSO and Eurostat 2100 projections. To identify optimal growth areas within the strategy's short- to medium-term timeframe, consultations were held with Galway County Council, Galway City Council, and the Land Development Agency, among others. These discussions informed the development of a population growth forecast and distribution GIS, reviewed by Uisce Éireann to minimize uncertainty. Projected loadings have been spatially distributed across the Study Area for each time horizon, guided by development policies, zoning maps, land use plans, masterplans, and Galway City and County Council Development Plans. Input from stakeholders, including the LDA and local authorities, has also informed this distribution. While all zonings have been considered, the strategy also aligns with the NPF's objectives for compact growth and sustainable development of compact cities. Given the uncertainties in growth projections, the forecasts outlined in Appendix 1 - Managing Growth and in the Strategy will be periodically reviewed as part of the Galway Wastewater Strategy monitoring programme and updated as necessary (on a 5 year review cycle), especially if policy changes occur. All recommended infrastructure will be designed to accommodate potential fluctuations in growth. Additionally, infrastructure sites, such as WWTPs, will be selected through detailed studies and chosen for modular expansion or reduction, ensuring flexibility.
Galway Chamber	**32**	Interim guidelines for developers, planners and other professionals to detail where development may proceed.	*While the study and strategy progress, it is essential to provide clear interim guidelines for developers, planners and other built environment professions to understand when and where development may proceed in alignment with current infrastructure capacity. These interim guidelines will help clarify under what circumstances development proposals may be granted.*	Development proposals continue to be assessed through existing planning and connection processes based on available wastewater capacity and compliance requirements. Uisce Éireann supports early engagement to provide site-specific clarity.
Galway Chamber	**33**	Suggestions for measures to be adopted by UÉ	*Suggested measures include:* *• Criteria-Based Development Approval System,* *- Existing Capacity Thresholds: Establish specific wastewater capacity thresholds that determine where new developments may proceed without overburdening current systems. For instance, developments located in areas where existing infrastructure has documented, reliable capacity should be allowed to move forward under defined conditions.* *- Prioritisation of low-impact developments: Smaller-scale or lower-density projects that place minimal demand on wastewater systems should be considered for approval, as they are less likely to exceed current infrastructure capabilities. This approach allows for ongoing, manageable growth without compromising the system's stability or causing environmental issues.* *- Case-by-Case Assessment: For larger development, a case-by-case review could be applied, evaluating each proposals expected wastewater impact and whether any temporary or alternative solutions (such as private treatment plans) could support the project until permanent upgrades are in place.* *• Temporary Wastewater Solutions for Key Projects* *- Modular or Scalable Temporary Facilities: In areas where there is currently limited wastewater capacity, modular treatment facilities could be implemented on a temporary basis, with the potential to connect to the broader infrastructure network as soon as the necessary upgrades are completed.* *- Conditions on temporary solutions: Any temporary measures can be subject to strict conditions, ensuring that they are decommissioned or replaced with permanent solutions once the main infrastructure is ready. This will prevent temporary systems from becoming semi-permanent solutions, which may be less environmentally sustainable or cost effective in the long term.* *• Transparency and Consistency* *- Accessible Information on Current Capacity Status: Make regularly updated information available on which areas currently have sufficient wastewater capacity, areas under temporary restrictions, and the expected timeline for future capacity upgrades. Maps or digital dashboards could help stakeholders easily understand where they may proceed with development throughout the study period.* *- Ensure that the public and developers are aware of any temporary restrictions or guidelines related to the wastewater strategy, including what lands may be temporarily undevelopable during the strategy or what current or planned projects up to 2030 and beyond may be affected or delayed due to the study, to promote a fair and transparent development process.*	The Draft Galway Wastewater Strategy is a long-term, strategic planning document that identifies future wastewater infrastructure needs and investment priorities. Development proposals will continue to be assessed through established planning, regulatory and connection processes, with decisions based on available wastewater infrastructure capacity, environmental compliance requirements and connection feasibility. These processes operate on a site-specific basis, recognising that capacity and constraints vary across the network. Uisce Éireann supports early engagement and pre-application consultation to provide clarity on capacity and connection considerations, enabling informed decision-making by planning authorities and applicants.

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Galway Chamber	**34**	Short Term Solutions	*The Galway Wastewater Strategy, while critical to addressing long-term growth and environmental sustainability, raises significant concerns if it is primarily focused on medium to long-term solutions without sufficient provisions for the short term. Galway's population and economic growth, coupled with its unique environmental setting along the west coast, demands a wastewater management strategy that not only prepares for future demand, but also addresses immediate infrastructure challenges. This raises the pressing question: what will happen in the short term to meet Galway's current wastewater needs. If the Galway Wastewater Strategy is focused on medium-to long term improvements, there is a risk that existing issues may be left unaddressed for years. Current wastewater infrastructure in parts of Galway City and County are already under significant strain, with frequent capacity issues in urban and growing suburban areas. In particular, housing and commercial developments are likely to face delays if short- term wastewater solutions are not integrated into the strategy. Galway has seen strong housing demand driven by its growing population and economy, yet many areas zoned for residential development will experience restrictions and delays due to insufficient wastewater capacity. If the strategy does not incorporate short-term solutions, this could lead to a bottleneck in development potentially exacerbating the housing shortage and affecting affordability. Furthermore, developers and investors will find it challenging to plan and deliver projects effectively if interim guidelines for wastewater are unclear or restrictive.* *A critical gap in a medium to long-term strategy could also impact smaller rural communities that rely on Galway's wastewater infrastructure. These areas are vital to Galway's regional economy and identity, yet they are often among the last to benefit from major infrastructure upgrades. Without short-term solutions, more rural communities will face limitations in development potential, creating disparities in service availability, socio-economic development, and affecting the balanced growth needed across Galway City and County.* *To address these concerns, the Galway Wastewater Strategy should also include robust, well-defined short-term measures that can successfully alleviate current pressure on the wastewater infrastructure in order to facilitate continued sustainable development across the city and county.*	Uisce Éireann acknowledges the need to address both short-term and long-term wastewater infrastructure needs in Galway. The draft Galway Wastewater Strategy adopts a phased approach, with investment identified across short-, medium- and long-term horizons, including short-term resilience works to the Mutton Island WWTP and network performance improvements. This is detailed in Section 12 of the draft Galway Wastewater Strategy. The draft Galway Wastewater Strategy also recognises that parts of the existing system are already under pressure and includes measures to manage current constraints while longer-term solutions are delivered (see Sections 2.3 and 9). Through this approach, the draft Galway Wastewater Strategy is designed to manage existing challenges while supporting sustainable growth and development across Galway City and County.
Galway Chamber	**35**	Guidelines for developers	*Clear and transparent guidelines for developers and communities during this transitional period is essential. Short-term plans and policies could offer interim solutions for certain types of development, while larger, longer term infrastructure projects are implemented. This would enable Galway to manage growth responsibly and sustainably without forcing indefinite delays on much-needed housing and business expansion.* *Ultimately, without a balance between short-term actions and long-term goals, the Galway Wastewater Strategy risks failing to meet the immediate needs of local communities, potentially undermining the very growth and environmental sustainability that it seeks to support. Therefore, a comprehensive approach that addresses current issues alongside future needs is critical to protecting Galway's communities, natural resources and economic growth.*	The draft Galway Wastewater Strategy has been developed having regard to relevant statutory plans and growth projections, and sets out a phased approach to infrastructure delivery, including short-, medium- and long-term measures to meet the needs of the study area. The draft Galway Wastewater Strategy is not intended to introduce interim planning or connection policies. Development proposals will continue to be assessed through established planning, regulatory and connection processes, based on available wastewater capacity, environmental compliance requirements and site-specific conditions. Uisce Éireann supports early engagement to provide clarity on connection feasibility. Through this approach, the draft Galway Wastewater Strategy seeks to manage existing pressures while supporting sustainable growth across Galway City and County.
Galway Chamber	**36**	Supporing Growth	*The National Water Resources Plan (NWRP) published in 2021 notes that a key concept in water resource planning is the balance between supply and demand. The figure included in the submission demonstrates the demand for water increasing over time, which is typical of a growing population and economy. Our forecasts and assessments of demand require assumptions, including data accuracy and the reliability of our future projections. The available water supply, WAFU is anticipated to reduce over the 25-year period due to climate change impacts. There is also a risk that in some locations that our WAFU will need to reduce over time, in order to meet the requirements of the then current River Basin Management Plan or abstraction licensing, where the current level of abstraction is considered to be causing environmental damage. This shows that interventions would be required to reduce demand or increase supply to address the deficit shown in this example. The onus is therefore on Uisce Éireann as a semi-state body, to ensure that Galway can continue to grow sustainably in the context of socio-economic development, by addressing wastewater capacity constraints, and prioritising short, medium and long-term projects that will support this regional growth.*	Uisce Éireann acknowledges the importance of supporting balanced regional development, in line with national planning policy, and addressing both current and future wastewater infrastructure needs in Galway. The draft Galway Wastewater Strategy aligns with this approach, identifying the investment required to address existing capacity constraints and future demand, while recognising the influence of climate change, regulatory requirements and environmental protection on infrastructure provision. The draft Galway Wastewater Strategy adopts a phased approach to infrastructure delivery, including short-, medium- and long-term interventions to respond to projected growth, increasing loads and compliance obligations (see Section 12 of the draft Galway Wastewater Strategy).
Galway Chamber	**37**	Miscellaneous Queries	*The Galway Chamber therefore requests that Uisce Éireann provide clarity on their short-term plans and strategies to alleviate the current lack of infrastructure:* *- What is the overall timeline to complete the study?* *- What is the short-term plan to alleviate the current lack of infrastructure?* *- Uisce Éireann to confirm whether changes in national and European legislation will have any impact on short term delivery of projects required over the next 5 years.* *- Uisce Éireann to confirm the 5- and 10-year capex plan for Galway City and County irrespective of the ongoing study.*	The draft Galway Wastewater Strategy is currently progressing through public consultation, with the final Strategy scheduled for publication in 2026 (refer to Section 4 – Public Consultation in the draft Galway Wastewater Strategy report). The draft Galway Wastewater Strategy adopts a phased approach, with short-term measures including enhancements to treatment capacity at Mutton Island and Athenry, alongside network improvements. In parallel, short-term network interventions identified through the Drainage Area Plan (DAP) will continue to progress. The draft Galway Wastewater Strategy, including Appendix 3 – Status and Performance of the Sewerage System, indicates that sufficient wastewater treatment capacity is available to meet short-term planning needs, while identifying targeted upgrades to support future growth (see Sections 6 and 9 in the draft Galway Wastewater Strategy report). The draft Galway Wastewater Strategy takes account of current and emerging legislation, including the recast Urban Wastewater Treatment Directive. While not yet transposed into national legislation, its requirements have been considered, noting that some elements are subject to future Implementing Acts (see Section 3.3). Detailed capital investment plans are developed and approved through Uisce Éireann's national investment planning and regulatory processes and are not determined by the draft Galway Wastewater Strategy.

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Galway Chamber	**38**	Sustainable Socio-Ecomonic Development	*The Table provided in the submission demonstrates the projected population growth for Galway City and suburbs. This shows the population growth from 80,615 in 2019 to 123,662 in 2044. However, the Census 2022 has already shown significant growth in the area, with the population of Galway City and Suburbs increasing to 85,910. The county's population increased by 7.8% (13,933 people), while the city grew by 7.3% (5,746 people). Galway City, including its suburbs, now has a population of approximately 85,910, reflecting a 7.4% growth overall since the last Census. County Galway is experiencing growth at a faster rate compared to the city (Census, 2022). This clearly highlights the rapid population growth experienced by Galway City and County in recent years.* *In line with population growth, the number of housing units in Galway has been increasing. The 2022 Census recorded a 5% rise in housing stock across both Galway City and County. This surge includes both new builds and renovations to accommodate the rising population. Significant residential developments have been seen in suburban and rural areas, such as in Oranmore, Claregalway, and Moycullen. These areas have experienced dramatic population growth of over 30% as people look to live in more affordable housing outside of the city centre, yet within commuting distance. Developing more housing in Galway faces significant challenges, primarily due to constraints in the region's wastewater treatment capacity. As the city and county experience rapid population growth, driven by both residential demand and a flourishing industrial sector, wastewater treatment systems are struggling to keep pace. Galway's population has risen steadily, with projections indicating continued growth, but the existing infrastructure, built for a smaller population, cannot easily accommodate the additional load. This constraint is most evident in the city's urban expansion, where new housing developments require reliable wastewater services to meet health and environmental standards.*	Uisce Éireann acknowledges the significant population and housing growth in Galway in recent years. The draft Galway Wastewater Strategy incorporates updated growth projections aligned with national and regional planning frameworks (see Section 8 in the draft Galway Wastewater Strategy report). The draft Galway Wastewater Strategy recognises existing capacity pressures and identifies the infrastructure required, including targeted upgrades and long-term expansion, to support housing delivery and sustainable growth across Galway City, suburbs and key settlement areas (see Sections 2.3, 9 and 14 draft Galway Wastewater Strategy).
Galway Chamber	**39**	Importance of Short Term Measures	*The local wastewater treatment plants are already operating close to capacity, and while Galway County Council has planned upgrades, these improvements have not always kept up with the speed of development. Moreover, expanding wastewater facilities requires significant investment and time, which can delay new housing projects. In areas where infrastructure is already stretched, such as Parkmore East, the strain from industrial growth, only compounds the issue. As a result, despite the region's desire to meet growing housing needs, the limitations in wastewater infrastructure represent a critical bottleneck for sustainable urban development in Galway. This highlights the urgency for action, in order for Uisce Éireann to address Galway's short-term needs, as well as medium-long term requirements. Without short- term action and effective intervention, Galway risks a stagnation of social and economic growth, which would have significantly negative impacts on the city, county and wider region.*	The draft Galway Wastewater Strategy adopts a phased approach to addressing these challenges, including short-term measures such as targeted upgrades to existing treatment facilities and network improvements, alongside longer-term strategic infrastructure (see Section 12 – Implementation of the Strategy in the draft Galway Wastewater Strategy report). Uisce Éireann also continues to actively manage system performance through ongoing operations, maintenance and investment programmes, while progressing the preferred strategic options identified in the draft Galway Wastewater Strategy. Through this combined approach, the draft Galway Wastewater Strategy seeks to address both immediate constraints and longer-term capacity requirements to support sustainable growth across Galway City and County.
Galway Chamber	**40**	Enterprises in the GWS study area	*The Western Development Commission notes that the number of active enterprises in Galway is impressive, with 19,967 businesses in operation. Notably, 92.9% of these are micro-enterprises (those with 10 or fewer employees), indicating a vibrant small-business sector that likely contributes significantly to local employment. Moreover, Galway's economy has seen positive shifts in labour catchments. The labour catchment in Galway City itself was 70,170 in 2016, marking significant growth from earlier years.*	Noted. Future industrial (i.e. commercial and the IDA) loadings have been projected in Appendix 1 - Managing Growth and are included in Section 8.1 in the draft Galway Wastewater Strategy.
Galway Chamber	**41**	Supporting Industry	*It should also be noted that Parkmore East in Galway is a key business and industrial hub that hosts a variety of global and multinational companies, primarily in the sectors of MedTech, ICT, and manufacturing. Some of the most notable companies based in the area include Medtronic, Boston Scientific, Integer Holdings, Zimmer Biomet, and Stryker. These companies are key players in the region's economy, providing thousands of jobs and supporting the area's position as a global hub for medical device manufacturing. However, their substantial operations place significant pressure on local infrastructure, especially wastewater facilities. MedTech companies, particularly those in manufacturing, require large amounts of water for various processes, including sterilization, cooling, and manufacturing of medical devices. This high-water usage generates significant volumes of wastewater that need to be treated before being discharged. The city has been working on upgrading its facilities, but the expansion of these companies often outpaces the upgrades to wastewater treatment capacity.* *Further to this, the planned Dexcom development in Athenry, is likely to exacerbate pressures on the wastewater infrastructure. Dexcom is expected to bring a substantial number of new employees and industrial operations to the area. Given that Athenry is part of the wider Galway metropolitan region, the strain on wastewater facilities could have a cascading effect. Treatment plants that serve both urban and suburban areas could experience bottlenecks, impacting wastewater treatment across the entire region.*	Provisions for future industrial loadings to municipal WWTPs have been incorporated into the strategy. Refer to Appendix 1 - Managing Growth and Section 8.1.2 in the draft Galway Wastewater Strategy. Uisce Éireann has worked independently with the IDA on a separate initiative, ensuring that the three strategic industrial sites in Parkmore, Oranmore, and Athenry were considered and incorporated into the loading assessment and optioneering aspects of the draft Galway Wastewater Strategy.

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Galway Chamber	**42**	Balanced Regional Growth	*Uisce Éireann, is a semi-state body and its role extends beyond operational duties to include strategic planning, infrastructure development, and supporting national goals for balanced regional growth. However, despite its role in promoting balanced regional growth, Uisce Éireann faces challenges in equally distributing resources across the country.* *A significant portion of the funding and infrastructural projects tends to be concentrated in Dublin. Dublin's rapid growth and high population density necessitate substantial investments in water and wastewater infrastructure, but this often leads to a disproportionate focus on the eastern region of the country. In contrast, regions like Galway, which are experiencing considerable economic and residential expansion, do not seem to receive the same level of investment. Galway's wastewater treatment capacity is already under strain due to both residential growth and industrial demands, but the necessary upgrades are often delayed or insufficiently funded when compared to the large-scale projects in Dublin. This regional imbalance in funding and project prioritization poses a significant challenge to fostering sustainable, balanced growth across all parts of Ireland.* *Uisce Éireann's commitment to balancing regional development must be matched by concrete investments and a more equitable distribution of resources.*	Uisce Éireann acknowledges the importance of balanced regional development, as set out in the National Planning Framework, and the critical role that wastewater infrastructure plays in supporting sustainable growth in regional cities such as Galway. As Ireland's national water services provider, Uisce Éireann plans and prioritises investment on a national basis, guided by environmental and public health obligations, population growth projections, and the need to address capacity constraints and compliance risks across the network. This includes responding to a legacy of underinvestment in water and wastewater infrastructure, which affects multiple regions. The Draft Galway Wastewater Strategy recognises the Galway Metropolitan Area as a key regional growth centre and identifies current and future capacity constraints within the wastewater system. It sets out a long-term, phased programme of investment to address these challenges and ensure that wastewater infrastructure can meet environmental obligations, support housing delivery, economic development and sustainable communities in the region. Uisce Éireann will continue to prioritise investment nationally based on objective need and regulatory requirements, while supporting the delivery of national and regional planning objectives. Through this approach, the Strategy contributes to enabling balanced regional growth over the long term.
Galway Chamber	**43**	Supporting Industry	*Galway is keen to continue its economic growth, positioning itself as a welcoming hub for new industry across both the city and county. The city's strategic initiatives aim to enhance its status as a global leader in sectors such as MedTech and IT, leveraging its talented workforce and robust infrastructure. However, this growth faces significant challenges, particularly related to the capacity of its wastewater treatment facilities. As the population and industrial base expand, the existing infrastructure struggles to keep pace, limiting sustainable development. Upgrading these facilities in the short term is crucial for supporting further economic expansion while ensuring environmental sustainability, as the demands from new industries and population growth place increasing pressure on the region's already strained wastewater treatment systems.*	The Draft Galway Wastewater Strategy recognises the Galway Metropolitan Area as a key regional growth centre and identifies current and future capacity constraints within the wastewater system. It sets out a long-term, phased programme of investment to address these challenges and ensure that wastewater infrastructure can meet environmental obligations, support housing delivery, economic development and sustainable communities in the region. Uisce Éireann will continue to prioritise investment nationally based on objective need and regulatory requirements, while supporting the delivery of national and regional planning objectives. Through this approach, the Strategy contributes to enabling balanced regional growth over the long term.
Galway Chamber	**44**	Research Basis and Methodological Strategy	*A critical component of the Galway Wastewater Strategy is accurately forecasting population and economic growth to ensure that the wastewater infrastructure can meet future demands. Effective projections require robust, reliable data and sound methodologies, Understanding the sources and strategies used is critical for stakeholder buy-in to the study. This therefore raises key questions about the sources and models use to identify these projections, as well as the approach taken to factor in Galway's unique growth patterns, and how developments will be prioritised.* *It is important to examine which data sources are used to project Galway's population growth over the short, medium and long terms. Census data and demographic trends will be apparent in Census / CSO data, however this many need to be supplemented with local insights specific to Galway in order to ensure the most accurate projections. Questions arise whether the Galway Wastewater Strategy accounts for various population growth drivers, such as increased urbanisation, migration trends, and the rise in remote working, which has allowed people to settle in more diverse areas across areas. The presence of universities and industry hubs also significantly affects population dynamics. It would therefore be useful to gain clarity from Uisce Eireann on what sources and strategies will be used to best predict population growth in the context of the wastewater strategy.* *Economic growth projections also play a critical role in determining wastewater demand. Certain activities such as tourism, manufacturing and healthcare services place varying demands on wastewater infrastructure, often above and beyond the typical residential requirements. It is crucial to question what sources will inform the growth forecasts within the wastewater strategy. Moreover, industries with specific wastewater requirements (such as pharmaceuticals or specific industrial processes) should be given special consideration. If the strategy relies on general economic growth rates without recognising the particular composition of Galway's economy, it risks underestimating the infrastructure needed for the industrial sectors. Additionally, the emergence of sectors such as technology or the growth of the service economy could alter wastewater needs significantly. Understanding whether the strategy anticipates these shifts and draws from sector -specific data sources is key to assessing its comprehensiveness.*	The Appendix 1 - Managing Growth details the assessment and findings of the population projections and Strategy report provides a summary. In general, the design load assessment for the Galway Wastewater Strategy aligns with key policy documents, including development plan population targets, NPF and RSES projections, and long-term growth forecasts based on CSO and Eurostat 2100 projections. To identify optimal growth areas within the strategy's short medium term timeframe, meetings were held with Galway County Council, Galway City Council, the Land Development Agency amongst others. Based on these insights, a population growth forecast was developed, and this is provided for each agglomeration in Appendix 1 - Managing Growth. Given the inherent uncertainties in growth projections, these forecasts will be periodically reviewed (on a 5 year cycle) as part of the Galway Wastewater Strategy monitoring programme and updated as needed, i.e., changes in policy documents may necessitate a change in the projected loadings.
Galway Chamber	**45**	Growth Projections	*Transparency in the methodology and opportunities for stakeholder input are essential. Galway's residents, businesses and local authorities could provide key insights that enhance the accuracy and relevance of projections. Public consultations and collaboration with economic development agencies could help ground the projections in the true context of Galway City and County, improving confidence in the study and the strategy's outcomes.* *Stemming from this, The Galway Chamber requests that Uisce Éireann address the following questions:* *- How will Uisce Éireann determine the population projections for each location? Can they identify these numbers now?* *- What effect will the projected 40% increase in population growth up to 2040 affect current capacity of WWT?* *- How will Uisce Éireann predict economic growth patterns for commercial developments within these areas?* *- How will projects be prioritised in terms of delivery by Uisce Éireann?*	The Appendix 1 - Managing Growth details the assessment, outlines the methodology used for the projections, identifies Domestic, Commercial, Institutional, and Industrial base year agglomeration and settlement loadings, confirms the headroom allowances, and presents the population projections. The draft Galway Wastewater Strategy report provides a summary. Future project prioritization will emerge from subsequent studies following the draft Galway Wastewater Strategy.

Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
Galway Chamber	**46**	Case Study: Mutton Island Wastewater Treatment Plant	*The Mutton Island Wastewater Treatment Plant, located just off the coast of Galway City, is central to the region's wastewater management, serving much of Galway City and its growing population.* *As Galway City has grown, Mutton Island's capacity has increasingly fallen short of demand. The plant now serves a population far beyond its intended capacity. The expansion project aimed to address this by enhancing Mutton Island's treatment capabilities and expanding its capacity.* *However, the expansion of Mutton Island has faced significant delays over the years due to a range of issues, including funding constraints, planning challenges and logistical difficulties. Initially the expansion was intended to be completed much earlier, but delays have pushed back critical upgrades. Such delays mean that the plant has continued to operate at maximum capacity, unable to reliably manage increased wastewater volumes from new developments, commercial areas, and a growing population. Delays at Mutton Island serve as a cautionary example for the Galway Wastewater Strategy's broader plans. If similar delays or issues affect other planned projects, the entire wastewater infrastructure could struggle to keep pace with the growth and development of Galway City and County, leading to socio-economic vulnerability and associated challenges.* *The strain on Mutton Island's capacity has already placed restrictions on new developments in Galway, with potential impacts on the local economy. Development delays due to insufficient wastewater capacity could slow the city's economic momentum and worsen housing pressures by limiting new residential construction. With the Galway Wastewater Strategy set to guide infrastructure planning over the coming years, Mutton Island's expansion delays highlight the risks of relying on long-term plans without sufficient short-term provisions.* *The challenges faced by the Mutton Island project underscore several important lessons for the Galway Wastewater Strategy. Firstly, the importance of robust interim solutions is clear; relying solely on long-term expansion plans can leave existing infrastructure strained and exposed to risk, while Galway's immediate needs remain unmet. Secondly, maintaining transparency with local communities and stakeholders will help build public trust. Engaging with the public about project timelines, funding sources, and contingency plans will help manage expectations and mitigate the risk of over-promising and under-delivering.* *In conclusion, the expansion delays at Mutton Island highlight potential risks in the Galway Wastewater Strategy, including project delays, funding challenges and capacity issues. Without careful planning, monitoring and a focus on both immediate and future needs, Galway's wastewater infrastructure may struggle to support sustainable growth, protect the environment, and meet public health standards.* *Stemming from this, we emphasise to Uisce Éireann the importance of addressing short term issues in the context of Mutton Island delays. We also wish to highlight the absolute importance of implementing lessons learned to ensure that future Uisce Éireann projects are successfully delivered without delays in order to address the wastewater capacity constraints of Galway*	The Draft Galway Wastewater Strategy recognises existing capacity constraints and identifies both short-term upgrades and longer-term strategic solutions to address these (see Sections 2.3 and 9 in the Draft Galway Wastewater Strategy report). The Draft Galway Wastewater Strategy adopts a phased and adaptive approach to delivery, supported by monitoring, risk assessment and periodic review to respond to growth, regulatory requirements and delivery risks (see Section 12 – Implementation of the Strategy in the Draft Galway Wastewater Strategy). Short-term measures, including enhancements to existing treatment capacity and network improvements, are identified to support system performance while longer-term infrastructure is progressed, ensuring a coordinated and sustainable approach to wastewater delivery across Galway.
Galway County Council	**47**	Recognition of the GWS as a key growth enabler	*The Metropolitan Area Strategic Plan, and as set out in Chapter 1 of the Galway County Development Plan, and under NPO 9 of the NPF, recognises the pivotal importance of infrastructure to be prioritised within the Metropolitan Area as a means to retain and build on the attractiveness of the area as a place in which to live and work. A key Growth Enabler for Galway as identified in the NPF relates to the delivery of the Greater Galway Area Drainage Study.* *The Draft First Revision to the NPF identifies the delivery of the Galway East Main Drainage Scheme as part of the wider Greater Galway Area Drainage Study as a key Growth Enabler for Galway. Galway County Council fully endorses the delivery of this critical additional wastewater treatment infrastructure.*	Noted and Acknowledged
Galway County Council	**48**	Alignment of the GWS with the goals of the NDP, MASP and CDP.	*Currently the settlements of Bearna and Oranmore are served by the existing Mutton Island Wastewater Treatment Plant. Garraun and Briarhill are also expected to be served by Mutton Island, which also serves Galway City. The ability of the Mutton Island Treatment Plant to accommodate all of the allocated growth within the catchment area is uncertain. The importance of the Metropolitan Area cannot be overstated given the continued emphasis being placed on linking critical mass with Transport Orientated Development. In this regard, Garraun and Oranmore have a combined population allocation of 2,798 for the County Development Plan period 2022 – 2028. In addition, the Garraun Urban Framework Plan identifies lands for up to 3,000 residential units in the medium to long term. Funding has also been allocated under URDF Call 2 for railway improvement works to at Oranmore Train Station to increase train frequency and it also includes for associated local centre/open space design as well as a density typology study. This is transport orientated development, which seeks to deliver residential development closely integrated with public transport. In the case of Briarhill, the core strategy population allocation is 977. However the UFP identifies further lands which could accommodate significant future housing in the longer term. The former Galway Airport site is also located within the MASP area. It is identified in the NPF as a Growth Enabler for strategic employment development. Works are currently underway to prepare a masterplan for these lands. It is anticipated that a significant number of jobs would be located at this strategic site in the medium to longer term.* *Overall, it is vital that the Galway Wastewater Strategy aligns the infrastructure planning with the development goals as set out in the NDP, the MASP for Galway and the County Development Plan. Additional wastewater treatment capacity is crucial to the success of the MASP area in the delivery of housing and employment growth.*	The draft Galway Wastewater Strategy and subsequent plans/designs for wastewater infrastructure aligns with the growth and development targets set out in the NDP, MASP, and County Development Plan. A wide range of options for expanding and providing new/ upgraded wastewater infrastructure has been evaluated as part of the draft Galway Wastewater Strategy and are detailed in Appendix 5 - Optioneering and Solution Development. The draft Galway Wastewater Strategy incorporates key development sites, ensuring that wastewater infrastructure planning aligns with future growth needs.

Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
Galway County Council	**49**	Claregalway WW Infrastructure	*Baile Chláir located to the north east of Galway City within the MASP area has a population allocation of 975 as set out in the adopted Core Strategy. Continued investment and upgrade of the town's wastewater treatment system is critical to realizing its potential as a metropolitan settlement in the delivery of housing and jobs.*	Noted. An assessment of the WWTP in Claregalway is provided in Appendix 3 - Status and Performance of Sewerage System, and a summary is provided in the Strategy. Projected growth in the Claregalway area indicates that the WWTP has sufficient capacity to accept and treat the projected additional load up to the planning horizon of 2055. Water quality modelling demonstrates that treatment and discharge to the existing location will remain feasible through 2080 using presently available technologies. Analysis has indicated that the plant would benefit from having more load received at the works, to allow the biological processes to operate more efficiently.
Galway County Council	**50**	Athenry wastewater treatment capacity	Athenry is identified in the RSES as An area of Strategic Potential (ASP). The Athenry Local Area Plan (LAP) was adopted by the Athenry Oranmore Municipal District on 5th January 2024 and came into effect on 20th February 2024. The population allocation for Athenry under this new LAP is 1,350 with a density of 25 Dwellings Per Hectare. The town has been designated as an ASP in the RSES due to the town's easy access to the mainline railway and motorway network, providing easy access to Galway. In addition, the town has existing access to broadband infrastructure thus ensuring that Athenry is an attractive place for industry to invest. It is noted through the preparation of the Local Area Plan that in recent years Uisce Éireann has completed a €5 million upgrade to the Athenry Wastewater Treatment Plant to increase capacity and improve water quality in the Clarin River in partnership with Galway County Council. The work has resulted in a plant that will provide improved wastewater discharge standards, ensuring compliance with the requirements of the Urban Wastewater Treatment Directive and thereby protecting the Clarin River. In addition, there is potential wastewater capacity available to cater for the projected growth targets , however applications will be assessed on an individual basis considering their specific load requirements. Galway County Council notes that there may be a reduction in available capacity at Athenry owed to connection enquiries and applications. This inevitable reduction in available wastewater treatment capacity will need to be addressed as a high priority given the status of Athenry as an ASP, in addition to the potential capacity issues the eastern metropolitan area. Potential reduction in wastewater treatment capacity due to connection applications and limited available capacity.	The draft Galway Wastewater Strategy recognises Athenry's designation as an Area of Strategic Potential and the need for adequate wastewater infrastructure to support both residential and industrial/commercial growth. Industrial and commercial opportunities in Athenry have been considered, and the IDA has been consulted with relevant findings incorporated into the Strategy (refer to Section 8.1 in the draft Galway Wastewater Strategy). In its current configuration, Athenry WWTP has a capability up to 9,500PE as specified in the Annual Environmental Report. If housing development accelerates over the next 15 years at the rate specified in the RSES, the facility's capacity may be exceeded by 2030. The scale of growth poses a risk to the plant's ability to meet its discharge licence requirement. The draft Strategy recommends enhancements to treatment capacity at Athenry WWTP in the short term to meet projected growth demands (Refer to Section 14.1 in the draft Galway Wastewater Strategy). Work on the plant is planned within the 2040 investment cycle. The Strategy recommends a new Regional Galway East WWTP be commissioned, and there will be a gradual transfer of loads from Athenry to reduce loading pressures on the existing plant, protect the environment, and manage long term regulatory risk. Athenry WWTP will become a pumping station to transfer load to the new Regional Galway East WWTP.
Galway County Council	**51**	Maigh Cuilinn wastewater treatment capacity	*Maigh Cuilinn is designated as a Small Growth Town in the Galway County Development Plan. Continued investment in the wastewater treatment capacity will enable further sustainable population growth.*	Noted. The draft Galway Wastewater Strategy prioritises the assessment of sustainable wastewater treatment options to support both growth and environmental protection in Moycullen. Details are provided in Appendix 3 - Status and Performance of Sewerage System.
Galway County Council	**52**	Wastewater issues in peripheral areas (e.g., Furbo, Clarinbridge)	*The strategy must account for future peripheral wastewater contributions from areas such as Furbo, Clarinbridge, Kilcolgan, Lackagh, Ballinderreen and Craughwell, which currently rely on septic tanks and on-site treatment systems. These agglomerations pose risks to sensitive environments, including the Inner Galway Bay SPA and Galway Bay Complex SAC. It is not evident from the information provided if these agglomerations are to be considered. Craughwell and Clarinbridge villages have been allocated funding under Measure A8 of the Multi-Annual Rural Water Programme 2024-2026 (MARWP 2024-2026). The Council presented options to pump sewage to Oranmore to discharge to the public network at Merlin park with treatment at Mutton Island WWTP. UÉ are investigating this option further in addition to considering the provision of a single WWTP to serve both villages. These projects are constrained by the presence of the Rahasane Turlough downstream of Craughwell and the South Galway Bay SAC into which both the Dunkellin and Clarin Rivers ultimately discharge. These projects are at -5 Workshop Stage in UÉ internal process.*	The draft Galway Wastewater draft Galway Wastewater Strategy assesses the potential impacts of several settlements, including Furbogh, Clarinbridge, Kilcolgan, and Craughwell, (none of which are currently served by Uisce Éireann assets), in anticipation of future loadings. Refer to Appendix 1 - Managing Growth and Section 8.1 in the draft Galway Wastewater draft Galway Wastewater Strategy. While Lackagh and Ballinderreen were not included in the draft Galway Wastewater draft Galway Wastewater Strategy, this will be periodically reviewed as part of the draft Galway Wastewater Strategy periodic reviews (i.e., every 5 years). Future revisions of the draft Galway Wastewater Strategy may consider these areas if they meet the draft Galway Wastewater Strategy's objectives, to achieve long term regulatory compliance, protect the receiving environment, and provide a resilient wastewater service for those areas to 2080.
Galway County Council	**53**	Building on Previous Studies including the East Galway main drainage scheme	*Previous strategies have highlighted the urgent need for a new East Galway main drainage as part of the wider Greater Galway Area Drainage study which is also included as a priority project in the National Development Plan. This facility is essential for supporting economic development within this study area including the Galway Strategic Economic Corridor.This facility is critical for:* *- Providing additional wastewater treatment capacity to accommodate the region's growing population and employment base* *- Facilitating the development of strategic employment lands and housing areas.* *- Enhancing environmental protection by alleviating pressure on existing overburdened infrastructure.* *We strongly recommend that the new strategy explicitly incorporates and reinforces the need for this scheme and prioritises its delivery.*	Noted. All strategic options, including the East Galway main drainage recommendations, and the Galway Drainage Area Plan (DAP) have been carefully evaluated during the draft Galway Wastewater Strategy development and have been referenced throughout the reports. Refer to Section 3.1.1, 5.2, 7.1, 9.2, and 12.1 in the draft Galway Wastewater Strategy and further details are in in Appendix 2 - Our Approach To Modelling and Climate Change (network modelling based on the DAP model), and Appendix 3 - Status and Performance of Wastewater System (SWO).
Galway County Council	**54**	Delivery of Wastewater Infrastructure a key enabler for growth and development	It should be noted that the Census 2022 recorded a resident population in excess of 193,000 in County Galway. The review of the NPF is ongoing with the review of the RSES to follow thereafter. It is widely expected that the population allocation for County Galway will increase, which will place additional wastewater infrastructure capacity pressure on the key Metropolitan settlements along with Athenry and Maigh Cuilinn. Therefore it is critical that the delivery of additional sustainable wastewater treatment infrastructure is forthcoming in order for County Galway to deliver in its role as one of the key drivers of economic growth in the north west region.	The Appendix 1 - Managing Growth report details the assessment and findings of the population projections. The design load assessment for the Strategy aligns with key policy documents, including development plan population targets, NPF and RSES projections, and long-term growth forecasts based on CSO and Eurostat 2100 projections. To identify optimal growth areas within the strategy's short medium term timeframe, meetings were held with Galway County Council, Galway City Council, the Land Development Agency amongst others. Based on these insights, a population growth forecast was developed and reviewed by Uisce Éireann to minimise uncertainty. Given the inherent uncertainties in growth projections, these forecasts will be periodically reviewed as part of the Galway Wastewater Strategy monitoring programme and updated as needed. For instance, changes in policy documents may necessitate a change in the projected loadings.

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Galway County Council	**55**	Compliance with WFD and UWWTD	*It is also of critical importance that the strategy safeguards our environmental standards, and prioritises compliance with the Water Framework Directive (WFD) and Urban Wastewater Treatment Directives (UWWTD) to protect Galway's water bodies and biodiversity.*	Ensuring the protection of Galway's water bodies and biodiversity is a key priority in our draft Galway Wastewater Strategy. Uisce Éireann are committed to upholding the highest environmental standards, with a strong focus on complying with the Water Framework Directive (WFD) and the Urban Wastewater Treatment Directive (UWWTD), which will be fully integrated into our strategic approach.
Department of the Environment, Climate and Communications (DECC)	**56**	Quaternary treatment of discharges	*"Will there be quaternary treatment of the discharges?"*	Our approach to wastewater treatment is guided by compliance with relevant regulations, including the Revised Urban Wastewater Treatment Directive (RUWWTD) requirements. The directive emphasizes a risk-based approach to treatment, ensuring that additional treatment measures, such as quaternary treatment by 2045, are implemented where necessary to protect water quality and public health. Quaternary treatment future requirements and potential future requirements have been considered and accounted for in the draft Galway Wastewater Strategy. Refer to Section 3.3.1 in the draft Galway Wastewater draft Galway Wastewater Strategy report, and to Appendix 3 - Status and Performance of the Wastewater System for more details. Quaternary treatment will be required at large WWTPs in the study area (>150,000 PE), including the proposed new Regional WWTP. Requirements to provide quaternary treatment at other WWTPs in the study area, particularly those > 10,000 PE, will be guided by site specific risk assessments, taking into account factors such as receiving water sensitivity, emerging contaminants, and regulatory requirements. Uisce Éireann will continue to evaluate the need for advanced treatment processes as part of ongoing Galway Wastewater Strategy reviews, ensuring alignment with legislative and environmental priorities.
Department of the Environment, Climate and Communications (DECC)	**57**	Compliance with groundwater discharge standards	*Even if the discharges to surface waters are deemed compliant with respect to surface water standards, will they comply with requirements for discharge to groundwater? (Either to existing Codes of Practice, or with scientifically-defensible limits).* *There is a concern, in karst environments in particular, that water of a quality that would be acceptable for surface water discharges will present a risk to groundwater and groundwater-dependent receptors downstream, e.g. springs used for drinking water supplies. This is due to minimal attenuation and biodegradation of pathogens in the subsurface.*	Groundwater was assessed for each feasible option in Section 8 of the SEA Environmental report. The karst nature of bedrock is discussed in Section 5.8.1 and 5.15 of the SEA Environmental Report. We note that detailed groundwater modelling may be carried out if deemed necessary as part of future projects arising from the Strategy. The Strategy aligns with current and future (e.g., rUWWTD) requirements to treat effluent water to a quality that is and will be acceptable to the groundwater-dependent receptors. All proposed new primary discharges are directed to waterbodies where groundwater disturbance is not considered a concern (e.g. Corrib Estuary, and Galway Bay). Existing discharges at Moycullen and Claregalway remain unaffected and the draft Galway Wastewater Strategy recommends to remove the Athenry WWTP discharge to the karst watercourse in the River Clarin.
Department of the Environment, Climate and Communications (DECC)	**58**	Groundwater and hydrogeological impacts in Environmental Assessment	*The Environmental Assessment report outlines the potential for LSEs (Likely Significant Effects) at 21 European sites (8 SACs and 13 SPAs) many of which are listed as being potentially caused by habitat degradation (water quality, hydrological, hydrogeological, air quality, invasive species), disturbance and mortality but there is no discussion of groundwater and hydrogeology. For example, page 85 summaries the main challenges as being "Water pollution affecting fresh, estuarine and coastal waters from treated and untreated (stormwater or septic tank) discharges" but doesn't seem to consider groundwater as a receptor (or as a pathway except shallow surface flow from septic tanks).*	Both the SEA Environmental Report and the NIS consider groundwater as a receptor. Refer to Section 5.2 in the SEA Environmental Report and Section 4.6 in the NIS.
Department of the Environment, Climate and Communications (DECC)	**59**	WFD compliance and Athenry WWTP discharge	*The wastewater from the Athenry WWTP flows into the Clarinbridge River. This river is classified as being 'at risk' of not meeting objectives of WFD. It is also classified as being of moderate to poor status (2022), with it changing to poor status just downstream (< 1 km) of the WWTP. Urban wastewater is listed as being the top pressure giving rise to this poor status. This stretch of river is actually within the Brockagh Lisduff Group water scheme Zone of contribution and, therefore, any change here would affect the water quality at the drinking water supply.*	The River Clarin is not considered a long-term viable discharge waterbody for Athenry. Wastewater from the agglomeration is recommended to be treated at the proposed Regional East Galway WWTP and proposed to be discharged via a new outfall in Galway Bay. Further details are provided in Appendix 5 - Optioneering and Solution Development and in Section 10 of the draft Galway Wastewater Strategy.
Department of the Environment, Climate and Communications (DECC)	**60**	Groundwater flow and karst pathways downstream of Athenry WWTP	A few metres downstream of the WWTP the Clarinbridge River runs straight into a large swallow hole, described as a 'Major sink' (Drew and Daly 1993). In extended dry periods all the flow in the river can sink at this point or further downstream such as at Polnacirca. There are number of other large swallow holes located further downstream in the Clarinbridge River. One such is found in the now drained Polnacirca turlough and one in Willmount Turlough. Water sinking at these swallow holes including the large one beside Athenry WWTP resurges again at major springs such as Clarinbridge, Kilcornan, Kilcolgan West and East. These flow out into Galway Bay Complex SAC and have been traced to the springs with low flow velocities of 1.2 km / day and high flow velocities of up to 12 km per day. These flow pathways should be considered. Due to the karstic nature of the bedrock and fast groundwater velocities there is considered to be no attenuation of potential pollutants in the aquifer. Fast groundwater velocities and swallow holes downstream of the Athenry WWTP pose risks to major springs and Galway Bay Complex SAC.	Noted with thanks. Both the SEA Environmental Report and the NIS consider groundwater as a receptor. Refer to Secton 5.2, 5.8, and 5.15 in the SEA Environmental Report and Section 4.6 in the NIS.

Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
Department of the Environment, Climate and	**61**	Clare River and Claregalway WWTP discharge	*Although no mapped swallow holes are located in the River Clare downstream of the Claregalway WWTP, the drainage network here is wholly artificial and is essentially a canal connected a series of pre-existing lakes, turloughs and springs. Strip groundwater recharge is very prevalent in the Clare River with many stretches losing water to the underlying aquifer with up to 30% losses in summer flow (Drew and Daly, 1993).*	Thank you for bringing this information to our attention, and it has been included in Section 5.8.1.1 of the SEA Environmental report.
Department of the Environment, Climate and	**62**	Moycullen WWTP impacts on groundwater	*There are a large number of sinking streams upgradient (~600 m) of the Moycullen WWTP and the Ballycuirke River and lake are at moderate status due to urban wastewater.*	Thank you for bringing this information to our attention, and it has been included in Section 5.8.1.1 of the SEA Environmental report.
Department of the Environment, Climate and Communications (DECC)	**63**	Drinking water supplies and group water schemes	*There are a number of groundwater fed drinking supplies and group water schemes in the study area that have not been mentioned, including the Brockagh Lisduff GWS mentioned above which potentially receives water from the Athenry WWTP discharge.*	The groundwater fed drinking water supplies for in the Study Area are illustrated in Figure 4-6, and the Brockagh Lavally River and Tributaries Group water scheme are included in Section 5.8.1.1 of the Environmental Report. The River Clarin is not considered a long-term viable discharge waterbody for Athenry. Wastewater from the agglomeration is recommended to be treated at the proposed Regional East Galway WWTP and proposed to be discharged via a new outfall in Galway Bay. Further details are provided in Section 10 of the draft Galway Wastewater Strategy.
Department of the Environment, Climate and Communications (DECC)	**64**	Geological heritage sites	*There is no mention of other Geological heritage sites such as GC011 Terryland River (sink/ Rising) in Galway City. This is described as a River with unusual flow regime flowing from or into River Corrib, with associated karst features, such as Cooper's Cave.*	Please note that the Terryland River (sink / Rising) was included in the SEA Scoping Report. It was listed as one of the Geological Sites within the study area for the Strategy in section 4.8.1 and 4.15.1 of the SEA Environmental report and it is noted that the Terryland River (Terryland_010) is unusual in that its flow is diurnal reverse flow, draining either from two estavelles to the River Corrib when they act as springs, or from the River Corrib to the estavelles when they act as sink. The estavelles are in a karst depression. It is understood that the estavelles are connected to Galway Bay or Lough Atalia via an underground conduit system, although the precise discharge locations remain unidentified
Department of the Environment, Climate and	**65**	Broken link to Environmental Sensitivity Mapping	*The link to Environmental Sensitivity Mapping provided in the document is no longer functional .*	Noted. During the development of the SEA Environmental Report, the integrated statutory environmental datasets were accessed through EPA Maps were assessed [gis.epa.ie/EPAMaps/], and relevant information has been included in Section 4.
Department of Housing, Local Government, & Heritage	**66**	Archaeology	*The information provided to date is not sufficiently detailed to allow for assessment of the archaeological implications of this strategy. The Department notes the inclusion of a summary of Cultural Heritage in the Draft SEA Scoping Report (Section 3.14) that includes 'Key Considerations' and challenges and opportunities pertaining to archaeological heritage within the GWS area.* *It is noted that a summary of the 'Cultural Heritage Baseline Condition' set out in Section 3.14.2 of the Draft SEA Scoping Report is high-level and does not provide a comprehensive overview of the archaeological heritage of the GWS area or set out any detail on the constraints and opportunities that may be involved in the design and implementation of schemes deriving from the GWS.* *In this regard, the Department advises that a Project Archaeologist be engaged as a member of the design team to input and provide specialist advice on specific opportunities and constraints relating to archaeological heritage. Any and all future individual wastewater schemes deriving from the GWS should be subject to, and informed by, comprehensive Archaeological Impact Assessment (AIA) at preliminary design stage.*	The Strategic Environmental Assessment (SEA) provides a high-level framework to identify and consider key cultural heritage issues at an early stage in the development of the wastewater draft Galway Wastewater Strategy. At this strategic stage, the assessment draws on available information through a desk-based review to inform overall draft Galway Wastewater Strategy development and ensure that environmental considerations are integrated from the outset. As the recommendations of the draft Galway Wastewater Strategy progress to statutory planning and design stages, more detailed, project-specific assessments will be undertaken. This will include Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), supported by specialist input, including archaeological expertise, to fully evaluate potential impacts and inform design and mitigation measures
Department of Housing, Local Government, & Heritage	**67**	Archaeology	*By way of general archaeological advice, and as referenced in Section 3.14.2 of the Draft SEA Scoping Report, the proposed strategy area contains over 700 Recorded Monuments. Each are subject to statutory protection in the Record of Monuments and Places (RMP), established under Section 12 of the National Monuments (Amendment) Act 1994. Any future wastewater schemes deriving from the GWS that may have archaeological implications, due to location, size or nature, must be subject to Archaeological Assessment (see Section 12.6.11 of the Galway County Development Plan 2022-2028).* *Section 3.14.2 of the SEA Scoping Report lacks comprehensive archaeological context.*	The archaeological context for Galway City and County has been further developed in the SEA Environmental Report. Section 4.14 provides a comprehensive overview of the cultural heritage receiving environment, drawing on a range of relevant national and local sources, including the SEA for the Galway City Development Plan 2023–2029, the Galway City Heritage Plan 2025–2030, the National Monuments Service datasets, and the Galway County Development Plan (including Architectural Conservation Areas). This information has been incorporated to ensure that key archaeological sensitivities, constraints and opportunities are appropriately considered in the development of the draft Galway Wastewater Strategy.
Department of Housing, Local Government, & Heritage	**68**	Archaeology	*The Department further advises that the following are incorporated (as appropriate) as part of the AIA processes to ensure a comprehensive assessment of proposed development:* *- A desk-study and field inspection regime* *- Targeted non-intrusive advance geophysical survey or prospection (such as Ground Penetrating Radar Surveys)* *- Targeted advance archaeological test excavation* *- Any and all intrusive advance investigations (such as, but not limited to, ground investigations required for soils/geology/hydrogeology) carried out as part of a design process should be subject to a programme of archaeological monitoring by a suitably qualified Archaeologist, under licence from this Department* *The results of such investigations should inform the AIA processes and scheme designs.* *The Department is available to provide further advice and clarification as and if required in relation to the preparation of suitably comprehensive assessments as outlined above, with particular regard to the scope and locations for any advance non-intrusive prospection or advance archaeological test excavation that might be appropriate to inform the assessment of this proposed strategy and resultant schemes.*	The Strategic Environmental Assessment (SEA) provides a high-level framework to identify and consider key cultural heritage issues at an early stage in the development of the draft Galway Wastewater draft Galway Wastewater Strategy. At this strategic stage, the assessment draws on available information through a desk-based review to inform overall draft Galway Wastewater Strategy development and ensure that environmental considerations are integrated from the outset. As the recommendations of the draft Galway Wastewater Strategy progress to statutory planning and design stages, more detailed, project-specific assessments will be undertaken. This will include Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), supported by specialist input, including archaeological expertise, to fully evaluate potential impacts and inform design and mitigation measures

Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
Department of Housing, Local Government, & Heritage	**69**	Nature Conservation	*The Department agrees with the opinion stated in the Appropriate Assessment Screening Report that likely significant effects of the draft Strategy cannot be ruled out and therefore that an Appropriate Assessment is required. It is advised however, that the Appropriate Assessment itself does not necessarily limit itself to consider the impacts only on the Qualifying Interests that have been "screened in" according to Appendix C of this report. Whilst the analyses presented in the Natura Impact Statement to be prepared may focus in on specific Conservation Objectives as part of the process, it is important that the initial stages of the assessment address all the Qualifying Interests and Conservation Objectives and that clear reasons are given as to why impacts on only certain Conservation Objectives have been considered.*	The Appropriate Assessment of the draft Galway Wastewater Strategy, is presented in the Natura Impact Statement (NIS). This report considers impacts to all Qualifying Interests of relevant designated sites. The source pathway receptor model was used to assess potential impacts of the draft Galway Wastewater Strategy. Conservation Objectives of all Qualifying Interests of relevant designated sites were considered when assessing for adverse impacts on the designated sites and justification has been provided for any conservation objective that were not considered relevant.
Department of Housing, Local Government, & Heritage	**70**	Nature Conservation	*Uisce Éireann is advised to be cognisant of Objective 3C1 of the National Biodiversity Action Plan "All Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure". The target of no net loss should be articulated within the Strategy.*	The draft Galway Wastewater Strategy and SEA Environmental report reference the target of biodiversity net gain. The draft Galway Wastewater Strategy and all future plans and projects arising from it align with Uisce Éireann's Biodiversity Action Plan (BAP), which is designed to protect and enhance biodiversity across its sites nationwide. The draft Galway Wastewater Strategy takes into account Ireland's Fourth National Biodiversity Action Plan (2023-2030), Actions for Nature, launched in January 2024, which aims to protect and restore biodiversity across the country
Department of Housing, Local Government, & Heritage	**71**	General Compliance	Any intrusive investigations should align with Section 12.6.11 of the Galway County Development Plan 2022–2028.	Noted. The draft Galway Wastewater Strategy does not specify any intrusive investigations; however, the Galway County Development Plan 2022–2028 requirements will be adhered to as part of future construction projects outlined in the draft Galway Wastewater Strategy's recommendations.
Department of Housing, Local Government, & Heritage	**72**	General Compliance	*How would you like Uisce Éireann to communicate with you as the plan progresses?* *You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:* *The Manager* *Development Applications Unit (DAU)* *Government Offices* *Newtown Road* *Wexford* *Y35 AP90*	Noted.
Department of Housing, Local Government, & Heritage	**73**	General Compliance	Ensure alignment with national legislation, including the National Monuments (Amendment) Act 1994 and Planning and Development Act, 2000, as amended.	The draft Galway Wastewater Strategy's primary objectives include identifying sustainable options to address wastewater needs aligned with European and National legislation, supporting economic and population growth, enhancing environmental protection, and improving infrastructure resilience to climate change. Refer to Section 2.1.2 and 2.4 in the draft Galway Wastewater Strategy report.
Department of Agriculture, Food and the Marine	**74**	Suggestions for Galway Wastewater Strategy	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Galway Wastewater Strategy?* *"In line with the Bioeconomy Action Plan 2023-2025 the opportunity arises to examine wastewater biorefinery (WWBR) bridging biorefinery (BR) and wastewater (WW) treatment. A WWBR generates products, of sufficient value to make the process economically viable and enhance resource productivity, while simultaneously remediating wastewater to an acceptable quality. It is centred on the conversion of the organic carbon, nitrogen, phosphorous and associated trace nutrients in the wastewater stream to value added products, while concomitantly providing clean or 'fit for use' water as a product."*	While sustainable wastewater technologies and energy recovery are central to the draft Galway Wastewater Strategy's objectives, the selection of specific wastewater treatment technologies and infrastructure will be determined during the development of more detailed plans and projects.
Department of Agriculture, Food and the Marine	**75**	Suggestions for Galway Wastewater Strategy	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Galway Wastewater Strategy?* *A WWBR would contribute to valuing wastewater treatment as an integrated component of a wider system rather than a unit process for 'end-of-pipe treatment', as is generally the state of current operation, a significant paradigm shift which has the potential to increase plant profitability and reduce environmentally deleterious effluents. It provides a link between the users of waterand those responsible for its management, leading to the recovery of resources in closed loop cycles and thus contributing to progressing towards the concept of a circular economy and bioeconomy, where valuable nutrients and components are recovered and reused.*	While sustainable wastewater technologies and energy recovery are central to the draft Galway Wastewater Strategy's objectives, the selection of specific wastewater treatment technologies and infrastructure will be determined during the development of more detailed plans and projects.

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Department of Agriculture, Food and the Marine	**76**	Suggestions for Galway Wastewater Strategy	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Galway Wastewater Strategy?* *Uisce Eireann are developing activities in relation to national bioresources and there are international examples that could be examined: The wastewater treatment plant of the future launched in Billund, Denmark (stateofgreen.com)*	The reference example in Denmark integrates wastewater, domestic waste, and trade waste treatment. It involves the hydrolysis of waste streams and reuse of generated gas as an energy. From a wastewater treatment perspective, this approach can include advanced digestion plants for larger plants. UE has a planned programme of works, including the Sludge Hubs and Biogas Optimisation Programme (BOP), aimed at identifying potential new sludge hubs and enhancing existing sludge hubs in line with sustainability goals, climate change commitments, and net-zero emissions targets. This is not specifically addressed in the draft Galway Wastewater Strategy but this will be considered as part of the National Bioresources strategy which is due for publication in summer 2026.
Department of Agriculture, Food and the Marine	**77**	Relevant Plans and Policies	*Uisce Éireann has reviewed plans, policies, and programmes relevant to the Galway Wastewater Strategy in chapter 4 of the SEA Scoping Report. Are there any others that should be considered?* *"Please ensure the Bioeconomy Action Plan 2023-2025 gov.ie Bioeconomy Policy (www.gov.ie) is considered."*	Section 4.12.6 in the SEA Environmental Report references the Bioeconomy Action Plan 2023-2025. For the purpose of the SEA Environmental Report, Material Assets are considered to be the natural and built assets (non-cultural assets) and resources that support society's ability to live and work, and that have intrinsic and economic value. Waste management is an aspect of resource management and an important part of the circular economy and this is included as a Material asset that has been considered in the SEA Environmental report.
S.O.S. (Save Our Shoreline) Bearna	**78**	Bearna Sewerage and Pumping Station Issues	*It is recognised that the sewerage system in Barna is in an appalling state. It is well documented by the community and particularly by the locals in the Rinn na Mara area with correspondence and numerous complaints issued to both Uisce Eireann and the Galway County Council. Tankering of sewerage waste has been taking place regularly over a number of years from the failing Bearna Pumping Station ("Pumping Station"). It is clearly no longer able to service the unreasonable demands put on it by huge increases in development of the village without any corresponding investment in critical wastewater infrastructure. Correspondence obtained from Uisce Eireann have shown near 'catastrophic' instances where the Pumping System had become completely overloaded.*	Historically, the Bearna Pumping Station (BPS) experienced operational pressures during periods of high rainfall, with the practical response to excess flows being the occasional tankering of these flows to other locations. Targeted upgrade works have since been undertaken, including pump upgrades and interventions to address groundwater infiltration into the network, involving relining sections of sewer where groundwater was entering the sewerage system. These measures have materially improved BPS's operational performance and service capacity. These improvements have alleviated previous capacity constraints. Currently, and in light of the operational upgrades outlined above, tankering flow away from BPS is not required and the capacity of the BPS is not restricted. Development proposals are assessed through established planning and connection processes. A Confirmation of Feasibility confirms whether a proposed development can technically connect to the public wastewater network at the time of assessment, based on available information and subject to standard conditions; it does not constitute planning approval. . At the time of issuing Confirmation of Feasibility assessments, Uisce Éireann considered that sufficient collection and conveyance capacity existed within the network, based on available data, and based on the upgrade works that had been completed at the BPS The Draft Galway Wastewater Strategy is informed by a comprehensive assessment of the wastewater system, including networks, pumping stations and treatment infrastructure across the study area, as set out in Appendix 3 – Status and Performance of the Wastewater System. This assessment includes analysis of network performance, flooding and environmental risk, infiltration, cross-connections and operational constraints, and provides the evidence base for identifying and prioritising interventions. Operational matters relating to the day-to-day performance and maintenance of individual assets are managed through ongoing operational programmes and asset management processes, which operate alongside the Strategy. Where issues are identified, further detailed investigations, surveys and targeted interventions are progressed as part of these processes.
S.O.S. (Save Our Shoreline) Bearna	**79**	Planning and Development Issues	*"In a recent planning application for a development in Freeport refused by Galway County Council but under appeal to an Bord Pleanala (Planning Reference: 2460147), the environmental section of Galway County Council issued a letter to the planning department confirming there are significant concerns relating to the Pumping Station in Barna.It was summarised in the Planners Report (10 April 2024) relating to that application as follows:-* *Environment Section Correspondence:* *It was stated in this correspondence that the engineer in Uisce Eireann (UE) who covers that area of the county was consulted, and who previously did same role for Galway County Council. Tankering of wastewater from the sewerage pumping station referenced in many of the submissions still takes place in periods of high rainfall. It is stated that this highlights inadequacies with the system and these issues should be rectified by UE before any further developments are allowed to connect into the wastewater network in Barna. There are water quality issues with Truskey stream (adjoining the development site) and the coastal waters at Barna Pier to which Truskey discharges to. It was also stated in relation to Truskey, that clarification should be sought from applicant that there will be no discharge of surface waters from the development either directly or indirectly to this stream. It is not clear from submission if there is any overflow from the attenuation tanks included with the proposal and will all surface water be managed within the confines of the development. These comments are noted.*	The Draft Galway Wastewater Strategy is informed by a comprehensive assessment of the wastewater system, including networks, pumping stations and treatment infrastructure across the study area, as set out in Appendix 3 – Status and Performance of the Wastewater System. This assessment includes analysis of network performance, flooding and environmental risk, infiltration, cross-connections and operational constraints, and provides the evidence base for identifying and prioritising interventions.

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S.O.S. (Save Our Shoreline) Bearna	**80**	Infrastructure Feasibility Reviews	*"It is noted with astonishment that Uisce Eireann issued a standard letter, a 'Confirmation of Feasibility' dated 19th December 2023 in respect of that planning application. It is clear there is no proper investigation being undertaken in respect of the actual feasibility of such development in an area that is already overloaded and causing significant pollution to the nearby water ways and coastal area."* *Despite the issues clearly identified in Barna, the Applicant Appellant of the above-mentioned appeal maintained that Uisce Eireann conducted a thorough check on the existing wastewater infrastructure to evaluate any potential adverse impacts the proposed development might have on the network. The evaluation apparently also assessed whether any upgrades were necessary to facilitate the proposed connection, and apparently, they then confirmed that the development could be accommodated within the current wastewater network without requiring any infrastructure upgrades. This is clearly untrue and grossly misleading.* *We note the Appellant is in fact relying on a generic standard Uisce Eireann letter "a Confirmation of Feasibility ". By Uisce Eireann's own admissions there have been near "catastrophic" instances where the Barna pumping station has become completely overloaded. Even in the appellants submission there are contradictions with Uisce Eireann confirming there are water pipes erroneously connected to the foul sewer lines and that ongoing improvements are underway.*	Development connections are assessed through established planning and connection processes. A Confirmation of Feasibility confirms whether a development can technically connect to the public wastewater network at the time of assessment, based on available information and subject to standard conditions, and does not constitute planning approval.
S.O.S. (Save Our Shoreline) Bearna	**81**	Overflow at Barna PS	*In the aforementioned planning refusal appeal to an Bord Pleanala, the report from Tobin Engineers states that "there is no overflow mechanism at the Barna pumping station". This is not true as this cannot even be ascertained by Uisce Eireann. There is evidence to suggest that an overflow pipe connects to the Truskey East Stream which is the reason for the extremely high readings of hazardous waste and a serious risk to health that have been recorded at the mouth of the stream with the harbour at Barna and have led to swim ban notices being issued by the County Council.* *Tobin Engineers went on to state that the efforts by Uisce Eireann "resulted in sufficient capacity at the Barna pumping station eliminating the need for tanker effluent removal in the past 12 months."* *There was no factual basis for these assertions, indeed during the 12 month period referred to in that report, the local residents gathered photographic evidence which clearly contradicts this statement and exposes it for the lie it is. We detail such time dated photographs at Appendix A of this observation. Note tankering continues in the Pumping Station. The photos contained in Appendix A are only sample photos and do not establish the full extent of the problems/malfunctioning of the holding tanks and evidence of lack of capacity at the Pumping Station and the entire wastewater infrastructure in Barna as there is no transparency in relation to the ongoing issues or the pollution of the river and coastal waters in Barna.*	The Bearna Pumping Station is designed as part of a wider network conveying flows to Galway City Network and does not operate as a direct discharge point to receiving waters. System performance and asset condition are managed through ongoing monitoring and maintenance programmes. Historically, the Bearna Pumping Station (BPS) experienced operational pressures during periods of high rainfall, with the practical response to excess flows being the occasional tankering of these flows to other locations. Targeted upgrade works have since been undertaken, including pump upgrades and interventions to address groundwater infiltration into the network, involving relining sections of sewer where groundwater was entering the sewerage system. These measures have materially improved BPS's operational performance and service capacity. These improvements have alleviated previous capacity constraints. Currently, and in light of the operational upgrades outlined above, tankering flow away from BPS is not required and the capacity of the BPS is not restricted.
S.O.S. (Save Our Shoreline) Bearna	**82**	Capacity Issues, Structural Defects and Overdevelopment	*Galway County Council and Uisce Eireann are aware from the planning file for the Pumping Station (Part 8 Development LA3206) that the maximum capacity was for 2,000PE whereas that capacity has now been well surpassed with many more connections to come from the existing approved large scale Maolán and Burkeway developments, a newly commenced development next to Thornberry and further separate ongoing development right in the centre of the village, comprising hundreds of new houses and ancillary commercial facilities. In August 2023 it was publicly reported that investigations confirmed that "numerous structural defects are associated with these sewers" in Barna. As far back as 2020 TD Noel Grealish confirmed it was clear the current system in Barna was "not fit for purpose" and called on Galway County Council and Irish Water to urgently address the issue. Since that date hundreds of houses have been built in Barna and the issues have worsened and are a direct threat to human health in the area.* *As stated above, pursuant to the planning file Part 8 Development LA3206 the local authority are aware that the maximum capacity for the pumping station was for 2,000PE whereas that capacity has now been well surpassed, without even taking into account the connections needed for the approved and partially constructed developments in the village.*	It should be clarified that the Bearna scheme comprises a wastewater pumping station and associated network, with flows conveyed to Galway City Network. It should be noted that pumping station performance is not defined solely by population equivalent (PE). Instead, performance is assessed based on hydraulic loading, inflow rates, storage capacity and operational controls within the network. Development connections are assessed through established planning and connection processes. A Confirmation of Feasibility confirms whether a development can technically connect to the public wastewater network at the time of assessment, based on available information and subject to standard conditions, and does not constitute planning approval.
S.O.S. (Save Our Shoreline) Bearna	**83**	Part 8 Planning Issues	*In the Part 8 Planning Report of September 2006 relating to LA 3206, it was stated that "In order for Galway County Council to comply with its agreement with Galway City Council to limit flows to 2,000 PE from Barna village and environs, it is necessary to restrict the proposed phase 1 catchment. The proposed Phase 1 catchment comprises of the village core and is generally bounded to the north and west by the proposed local distributor route."* *An extract of the Minutes of Monthly Meeting Galway Co Co on 18/12/2006 makes for chilling reading considering the level of development in Barna since the sewerage pumping station was constructed. TO CONSIDER REPORT UNDER PART 8 OF THE PLANNING & DEVELOPMENT REGULATIONS 2001 - BEARNA SEWERAGE SCHEME PHASE 1* *On the proposal of Comh O'Tuairisg, seconded by Cllr. S Walsh, the Bearna Sewerage Scheme phase 1 was approved.* *Cllr Kyne enquired about the PE to be served and what allocation was remaining. Mr Cullen stated that the scheme would be connected to the City network and the effluent treated at Mutton Island. There was an agreement whereby the City would treat up to a maximum PE for Bearna and a small proportion of this allocation will still be available after the proposed works have been completed. (emphasis added)*	

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S.O.S. (Save Our Shoreline) Bearna	**84**	Pollution of Coastal Waters/ Habitats and Public Health Issues	*The County Council and Uisce Eireann are well aware of the pollution taking place in the area which is in turn polluting the sea water in Galway Bay (a Special Area of Conservation) and the nearby popular bathing areas leading to the Council themselves issuing Bathing Water Prohibition Notices.* *It is further noted it is the policy objective of the Planning Authority to enhance the provision of swimming facilities throughout the County and ensure the quality of bathing waters is maintained and to contribute towards the achievement of the requirements of the EU Bathing Water Directive and to transposing Bathing Water Quality Regulations (SI No. 79 of 2008) and EU Mandatory Values, as a minimum and EU Guide Values, where possible. The current pollution from the failing Pumping Station and the largescale defects in the wastewater pipes and infrastructure has caused numerous instances of pollution into the coastal waters in Bearna which are used by the community for swimming and other leisure pursuits. Local habitats are being affected and public health is being put at risk with known complaints of illness having being made to the Council.* *As late as this month (November 2024) there was foul smelling sewage emissions evident in the village which were subject to complaints and necessitated emergency works being carried out by sewer and pipeline repair companies. Onsite workers confirmed the pipes on the pier road and in the surrounding area were in terrible condition, with numerous leaks and needed full replacement as opposed to a piecemeal relining of parts of the pipes as seems to be sporadically occurring and does not address the significant problems with the basic wastewater and stormwater infrastructure in the village, where overdevelopment has been facilitated by UE and Galway County Council.*	It should be clarified that the Bearna scheme comprises a wastewater pumping station and associated network, with flows conveyed to Galway City Network. There is no overflow to the environment from Bearna Pumping Station. Historically, the Bearna Pumping Station (BPS) experienced operational pressures during periods of high rainfall, with the practical response to excess flows being the occasional tankering of these flows to other locations. Targeted upgrade works have since been undertaken, including pump upgrades and interventions to address groundwater infiltration into the network, involving relining sections of sewer where groundwater was entering the sewerage system. These measures have materially improved BPS's operational performance and service capacity. These improvements have alleviated previous capacity constraints and tankering is no longer required under normal operating conditions.
S.O.S. (Save Our Shoreline) Bearna	**85**	Wastewater Strategy Recommendations	*The most immediate attention should be given to develop a Strategy of refraining from providing ill- defined "Letters of Confirmation of Feasibility" to developers in the Barna area until such time as full and thorough investigations are carried out in relation to the wastewater infrastructure including the Pumping Station, the sewerage network and the rainwater/storm infrastructure and all piping.* *No such letters should be issued until same has been carried out and there has been proper and adequate upgrading of the infrastructure not only deal with future connections but to deal adequately with existing connections. The draft Galway Wastewater Strategy when assessing existing sewerage system conditions should also clearly assess the conditions of the Pumping Station and all of the wastewater infrastructure in Barna and elsewhere and not just consider the conditions of sewage treatment plants.*	Development connections are assessed through established planning and connection processes. A Confirmation of Feasibility confirms whether a development can technically connect to the public wastewater network at the time of assessment, based on available information and subject to standard conditions, and does not constitute planning approval.
S.O.S. (Save Our Shoreline) Bearna	**86**	Wastewater Strategy Assessment	*Full complete and competent investigations should be carried out to map precisely the wastewaterinfrastructure in the area to include all sewerage pipes, rainwater/storm drains and storm wateroverflows.* *A detailed map should be issued advising where storm water drains/pipes and sewerage piper are connected. Combined sewers should be avoided in the future. The use of storm overflows should be greatly curtailed given the levels of harm caused by storm overflow discharges into rivers and seas. It is clear from the existing pollution that storm overflows are operating when there has notbeen significant rainfall due to the overburdened and failing nature of the existing infrastructure. Thisis acknowledged by the EPA. This will be worsened by the increasing risks of unpredictable weatherpatterns from climate change.*	The Galway Drainage Area Plan has significantly improved the mapping and modelling of the wastewater infrastructure in the Galway City Agglomeration. The DAP incorporated existing plans, and the results of targeted surveys into a hydraulic model that represents the connectivity and operation of the wastewater infrastructure including pumping stations and stormwater overflows. The Draft Strategy considers Combined sewer separation, Removal of Storm Water Misconnections, Tidal Ingress Reduction and Groundwater/ Tidal Infiltration Reduction as viable interventions to address risks on the wastewater networks. All new connections (including extensions) to the UE wastewater network are separate foul systems with foul only flows permitted to connect.
An Taisce	**87**	Uisce Éireann's Responsibility	*Section 1. Introduction of the Issue Paper opens with the following sentence: "Uisce Éireann's responsibility is to ensure that all of its customers (households and businesses) receive a safe and reliable water supply and have their wastewater collected, appropriately treated and returned safely to the environment." It is An Taisce's view that Uisce Éireann has failed, since its establishment in January 2014, and is continuing to fail to ensure that households and businesses in the Galway Agglomeration "have their wastewater collected, appropriately treated and returned safely to the environment." An Taisce is concerned that the EPA has shown remarkable forbearance since Uisce Éireann became the licensee in January 2014.*	Since its establishment in 2014, Uisce Éireann has been addressing the legacy of significant historical under investment in Ireland's water services through a sustained national capital investment programme. Between 2020 and 2024, approximately €5.4 billion has been invested in water and wastewater infrastructure across the country, with a substantial proportion directed towards wastewater collection and treatment systems. This investment programme has delivered measurable improvements at a national level, including the elimination of raw sewage discharges in many locations, the construction and upgrade of wastewater treatment plants, and increased compliance with the Urban Wastewater Treatment Directive. At the same time, Uisce Eireann has highlighted that achieving full compliance across all systems will require sustained multi billion euro investment over a prolonged period, reflecting the scale and complexity of the existing infrastructure challenges in delivering upgrades in a complex regulatory environment. The Draft Galway Wastewater Strategy has been developed in this national context. It is informed by a detailed assessment of existing network and treatment performance, including operational constraints and environmental risks, and identifies the interventions required to address both current deficiencies and future growth (see Appendix 3 – Status and Performance of the Wastewater System). Through ongoing investment, operational improvements and strategic planning, Uisce Éireann is committed to progressively improving wastewater infrastructure performance and environmental compliance, both nationally and within the Galway Area.

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An Taisce	**88**	Misleading Growth Figures	*In Section 2. Galway Wastewater Strategy there is the following in the second paragraph: "The economic success of the Galway Metropolitan Area (GMA) and surrounding areas under the National Spatial Strategy and National Planning Framework has led to very significant growth in these areas. As a result of this growth the wastewater infrastructure is challenged to keep pace with the increased demand for new service land for housing, commercial development, and industry. The National Spatial Strategy was for the period 2002 to 2022. It was replaced by the National Planning Framework published in 2018."* *The population of Galway City grew by 6,582 in the four years between Census 2002 and Census 2006, a Compound Annual Growth rate of 2.41%. This was almost the same percentage growth rate between 1991 and 2002. During the 16 years between 2006 and 2022, the population grew by 12,000, with Compound Annual Growth Rates of 0.85%, 0.82%, and 1.18% respectively. One has to go back to the period between 1956 and 1961 to find a lower growth rate. The population of the city grew by 18,728 in the 16 years between 1986 and 2002, more than the 18,582 in the 16 years following 2002.* *It is misleading to imply that there has been very significant growth within Galway City since 2002 relative to what had gone before. Had the growth rates achieved between 1991 and 2006 continued, the population of Galway City would be much greater now. There may has been significant growth in the surrounding settlements since 2002 but not in Galway city and suburbs.*	Uisce Éireann notes the observations on historic population growth rates. The Strategy considers the Galway Metropolitan Area (GMA) as a whole, including Galway City and surrounding settlements such as Oranmore, Bearna and Claregalway, which have experienced different growth patterns over time. Population projections used in the Strategy are aligned with national and regional planning policy (NPF, RSES and development plans) and are intended to inform future infrastructure planning rather than characterise historical growth trends. Further detail is provided in Appendix 1 – Managing Growth.
An Taisce	**89**	Uisce Éireann's 'excuse'	*It is noted from correspondence between Malcolm Noonan, TD, Minister of State, and Catherine Connolly, TD in the recent past that Uisce Éireann has attempted to use the fallacy of exceptional population growth in Galway city and suburbs as an excuse for the inadequacy of wastewater collection network in the Galway Agglomeration.*	The draft Galway Wastewater Strategy recognises that pressures arise from a combination of legacy infrastructure, evolving complex regulatory requirements and spatial growth patterns across the wider metropolitan area. Population projections are used to support forward planning in line with national policy, ensuring a consistent and evidence based approach. Further detail is provided in Appendix 1 – Managing Growth
An Taisce	**90**	Investment Failures	*The Mutton Island WWTP was commissioned in 2003, the year after the launch of the National Spatial Strategy, following a period of significant population growth in both actual numbers and in percentage terms.* *Upgrading works on the Mutton Island WWTP to increase its organic and hydraulic capacity were commissioned in Q1 of 2016. However, no significant investment has been made in the wastewater collection network in the Galway Agglomeration over the last 20+ years."*	Recent and ongoing investment in the wastewater collection network in Galway includes the recently completed Galway City Drainage Area Plan (DAP), Inflow & Infiltration Reduction Programme, Removal of tidal inflow and provision of a storage tank at Merlin Park No. 1 WWPS. The Galway City DAP operates at a tactical, asset-level planning scale. UE are currently progressing with Feasibility Study Reports to implement the DAP recommendations while taking account of the strategic direction and preferred options identified within the draft Galway Wastewater Strategy. A programme of implementation works will follow the completion of the Feasibility Study Reports. The draft Galway Wastewater Strategy sets out phased delivery of short term and long term interventions across both network and treatment infrastructure to improve performance and support sustainable growth. This phasing approach will ensure alignment with the plans being developed under the Feasibility Study Reports and subsequent Works programme.
An Taisce	**91**	Future Population Growth	*If the NPF population target of 120,000 by 2040 is to be achieved the rate of growth of the population of the city from 2022 to 2040 will have to be 1.9% per annum, double what was achieved between 2006 and 2022.*	Population projections used in the Strategy are aligned with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) and development plans. These projections are used to ensure that wastewater infrastructure planning supports policy led growth scenarios. Further detail is provided in Appendix 1 – Managing Growth.
An Taisce	**92**	WWDL Improvement Works	*The improvement works specified in the WWDL issued in 2010, which should have been completed by May 2014, are still not complete more than 10 years later. These works must be completed as soon as possible and certainly before 2030.*	Improvement works are prioritised nationally based on environmental risk, regulatory requirements and available funding. UE's Environmental Regulation team submit updates to the EPA as part of the annual national Specified Improvements report. The draft Galway Wastewater Strategy supports identification and prioritisation of required interventions; however, delivery timelines are subject to statutory planning, design development and funding approval processes.
An Taisce	**93**	SWOs and Licencing	*"There are only 13 of a total of 26 Stormwater Overflows in the Galway Agglomeration licensed. Uisce Éireann must make the EPA aware of this as soon as possible and have the licence amended to include them or remove them."*	Storm Water Overflows (SWOs) are regulated through the EPA Wastewater Discharge Authorisation process. UE shall examine the current licence in relation to the existing stormwater overflows and, in accordance with relevant EPA guidance documentation and applicable legislation, identify the appropriate mechanism for a inclusion in the license.
An Taisce	**94**	Drainage Area Plan	*The necessary works identified in the Drainage Area Plan Stage 3 Report, June 2024, should be completed by 2030. The preparation of the Drainage Area Plan, which commenced in 2016 and was forecast at that time to take 3 years to complete, has been used as an excuse for delaying the improvement works to the SWOs in the AERs submitted to the EPA since 2016. The DAP Stage 4 Report is expected to be completed in 2025, 9 years after its commencement.*	The recently completed Galway City DAP operates at a tactical, asset-level planning scale. UE are currently progressing with Feasibility Study Reports to implement the DAP recommendations while taking account of the strategic direction and preferred options identified within the draft Galway Wastewater Strategy. A programme of implementation works will follow the completion of the Feasibility Study Reports. Delivery timelines are determined based on risk, regulatory requirements, funding and statutory processes.

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An Taisce	**95**	Siphon Condition	*The Drainage Area Plan Stage 3 Report makes no reference to either the condition or adequacy of the two existing siphons under the estuary of the River Corrib. The McBreen Environmental survey report found that the larger of the two siphons 'is at risk of collapse at any time.' The necessary remedial action must be taken as early as possible in 2025. It was recognised in 2007 that a third larger siphon, 750 mm in diameter, would be required. Adequate capacity to carry all wastewater flows from east of the River Corrib to the Mutton Island WWTP should be made available by 2030.*	Uisce Éireann recognises that the Corrib siphons are critical elements of the Galway wastewater network, conveying flows from the eastern catchment to Mutton Island Wastewater Treatment Plant. Detailed inspection and survey works have been carried out on the siphons. These assessments confirm that the assets are operational and continue to perform their function within the network. While localised defects have been identified, these are not indicative of overall structural failure and are being addressed through planned maintenance and capital works programmes. The Galway Drainage Area Plan (DAP) and draft Galway Wastewater Strategy consider the long-term performance and role of this infrastructure, including future system configuration. This includes assessment of options to reduce reliance on existing conveyance constraints through provision of additional treatment capacity and wider network improvements. Any further interventions required will be progressed through detailed design and project development, prioritised based on risk, system performance and future capacity requirements.
An Taisce	**96**	Sludge Tankering	*It was revealed in correspondence between Malcom Noonan, TD, Minister of State and Catherine Connolly, TD, that Uisce Éireann has been taking sludge from water and wastewater treatment plants to the west of Galway city by sludge tanker and introducing it into the Bearna Pumping Station. This is unacceptable practice, particularly in a residential area, and is not in accordance with the National Wastewater Sludge Management Plan. This practice must cease.*	Waste contractors were discharging sludge from other Uisce Éireann sites into Bearna Pumping Station in 2025, this operation has now been restricted.
An Taisce	**97**	Athenry, Baile an Chláir and Maigh Cuilinn	*The Water Framework Directive requires that all waters are restored to at least good ecological status by 2027 at the latest. It is noted the Annual Environmental Reports 2023 submitted to the EPA, that the final discharge of treated wastewater from the wastewater treatments plants in Athenry WWTP, Baile an Chláir and Moycullen are to receiving waters the WFD ecological status of which are "moderate". Whatever works are necessary to ensure that the WWTPs in Maigh Cuilinn, Baile an Chláir and Athenry to ensure that they comply with the provisions in their WWDLs should be completed by 2030. It is noted, in particular, that the average daily hydraulic loading on the Moycullen WWTP already exceeds its as constructed capacity by 5% and the annual maximum hydraulic loading exceeds it as constructed capacity by 76%.*	The Draft Galway Wastewater Draft Strategy is informed by a comprehensive assessment of wastewater system performance and its interaction with the receiving environment. This includes detailed analysis of water quality, treatment performance and environmental risk, as set out in Appendix 3 – Status and Performance of the Wastewater System and Appendix 4 – Impact on Water Quality. These assessments consider wastewater discharges to receiving waters under both current and future scenarios, including projected growth and climate change. The analysis evaluates compliance with WFD Environmental Quality Standards and the capacity of receiving waters to assimilate treated discharges, ensuring that future options do not result in deterioration in ecological status and support overall water quality objectives.
An Taisce	**98**	rUWWTD Requirements	*The European Council gave the final green light for a revised EU directive on urban wastewater on 05 November 2024. This new directive will have to be transposed into Irish Law by mid-2027. By 2039, the removal of nitrogen and phosphorus (tertiary treatment) will be mandatory for urban wastewater treatment plants treating urban wastewater with a load of 150,000 population equivalents and above.* *According to AER 2023, the organic loading on Mutton Island WWTP was 105,693 pe. It would be much higher if it was not for the frequent spilling of wastewater through multiple SWOs which are not compliant with the DoEHLG criteria. The threshold of an organic loading of 150,000 p.e. on the Mutton Island WWTP will most likely be achieved by 2039. For those wastewater treatment plants, additional treatment, know as quaternary treatment, to remove micro-pollutants will be necessary by 2045.* *The new directive also introduces an energy neutrality target, meaning that by 2045 urban wastewater treatment plants treating a load of 10,000 population equivalents and above will have to use energy from renewable sources generated by the respective plants.*	The recast Urban Wastewater Treatment Directive introduces enhanced treatment requirements, including tertiary and quaternary treatment subject to thresholds and risk assessment. These requirements have been considered in the Draft Strategy, including implications for Mutton Island WWTP and all other wastewater treatment plants in the draft Galway Wastewater Strategy study area. Implementation will be guided by national transposition and detailed project level design.
An Taisce	**99**	Impacts on Climate Change	*An increase if 1.5 C in global temperature was reached in 2024, much earlier than originally forecasted. The climate actions taken globally have not been sufficient to stop global warming. Scientist have warned of more frequent and more intense weather events associated with global warming and we have certainly seen plenty of evidence of that in Europe and around the world in recent years. An exacerbation in the frequency and intensity of weather events between now and 2055 is expected. Scientists are also warning of significant rise in global sea level associated with the melting of the Greenland and Antarctic ice sheets. Rising sea levels have been recorded around the Irish coast from the warming of the Atlantic Ocean. Significant rise in sea levels seems inevitable at this stage.* *Given the location of Mutton Island WWTP, it is vulnerable to sea level rise and the increase in intensity and frequency of storms. It may suffer overtopping in storm conditions. Increased sea levels will exacerbate the existing problem of tidal infiltration into the collection network.* *Increased rainfall intensity is going to add more stormwater to the combined sewers.* *All of the above will add to the hydraulic loading on Mutton Island WWTP and, particularly if very much seawater gets into the network, will impair its biological treatment capacity.*	Climate change impacts, including sea level rise, storm intensity and rainfall changes, have been incorporated into Strategy modelling and risk assessment. The draft Galway Wastewater Strategy aligns with national climate and environmental policy and identifies measures to improve system resilience. The long term role of Mutton Island WWTP has been considered in this context.

Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
An Taisce	**100**	Increase In Population up to 2055	*If the growth rate of 1.9% to achieve the National Planning Framework target population of 120,000 by 2040 is maintained from 2040 to 2055, the population of Galway City and suburbs alone will be of the order of 160,000, almost double its population in 2022. The populations of Athenry, Baile an Chláir and Maigh Cuilinn have grown at an even faster rate between 2011 and 2022. A total population within the Galway Wastewater Strategy Study Area of the order of 200,000 is likely by 2055.* *The process of identifying a site for wastewater treatment plant of such a size and an appropriate outfall location with adequate assimilative capacity will take considerable time. Obtaining statutory approval for it will also take considerable time as will the design an construction of it in due course. It is imperative that this process is commenced in the early 2030s.*	The draft Galway Wastewater Strategy adopts a policy-led approach to population forecasting, with projections aligned to the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES), and Galway City and County Development Plans, as set out in Appendix 1 – Managing Growth. These projections provide a consistent and evidence-based basis for assessing future wastewater infrastructure requirements. The draft Galway Wastewater Strategy identifies the potential need for additional wastewater treatment capacity over the long term and presents strategic options to support projected growth. These options, including the potential for new treatment infrastructure and associated networks, will be progressed through subsequent project development stages, including detailed design, site selection and statutory planning processes. This phased and adaptive approach ensures that infrastructure provision can respond to changes in population growth, policy direction and environmental requirements over time, consistent with the Strategy's long-term planning horizons to 2055 and 2080.
An Taisce	**101**	The 2080 Horizon	*It is likely that significant effects of Climate Change will be clear long before this horizon is reached. If the growth rate of 1.9% necessary to achieve the NPF target of 120, by 2040 is maintained until 2080, the population of Galway City and suburbs will be of the order of 256,000. If the other settlements in the Galway Wastwater Strategy Study area are included, the combined population is likely to be in excess of 300,000.*	The 2080 planning horizon enables assessment of long term risks, including growth and climate change. The draft Galway Wastewater Strategy provides a flexible framework for phased and adaptive infrastructure planning, with future updates informed by emerging data and policy.
An Taisce	**102**	Briefing document which sets out the historic concerns we wish to see addressed	The wastewater arising from developments in Galway City, Bearna and Oranmore, collectively referred to as the Galway Agglomeration, is collected in wastewater collection systems in each area and conveyed to the wastewater treatment plant on Mutton Island for treatment. The collection system in Galway City is combined in the centre and partially combined in areas surrounding the centre, with some of the newer developments on the periphery having separate sewage and stormwater systems. The system in Oranmore is like that in the city while the entire system in Bearna is a combined system. In the combined/partially separate sewer collection systems, both wastewater and stormwater flow through the same pipes. In dry weather, all wastewater flows to the wastewater treatment plant where it is treated before being discharged to Galway Bay. During wet weather, stormwater also enters the system. Stormwater overflows (SWOs) are designed to act as relief valves on a combined sewer system when the sewer system is at risk of being overwhelmed, such as during very heavy rainfall over many hours. At these times large volumes of stormwater, collected from roofs of buildings and paved surfaces enter the sewer system. Stormwater overflows in Galway City and Oranmore discharge polluting matter into the River Corrib, the Terryland River, Lough Atalia, Rusheen Bay, Galway Bay and Oranmore Bay during periods when there is rainfall. These overflows frequently occur during rainfall events which do not meet the criteria for "Unusual Weather Conditions" as defined in the licence. They discharge polluting matter that is not sufficiently diluted. This is contrary to the conditions of the licence and is, accordingly, an offence.	Uisce Éireann confirms that the briefing note attached to the An Taisce submission has been reviewed and its contents carefully considered in developing the draft Galway Wastewater Strategy. We remain committed to engaging proactively with all stakeholders as part of the ongoing Galway Wastewater Strategy and project delivery processes. Ongoing assessment, investment, and collaboration with regulators will continue to support improved network performance and environmental outcomes.
Cllr Michael Connolly	**103**	Galway Main Drainage Scheme	*IW should progress Galway Main Drainage Scheme to allow ARDAUN TO DEVELOP WITHOUT FURTHER DELAY.*	The draft Galway Wastewater Strategy has taken into account the Ardaun Development Potential and the recommendations of the East Galway Main Drainage Scheme, ensuring a comprehensive assessment of strategic options. The Ardaun development has been integrated into the population projections for the draft Galway Wastewater Strategy, while the East Galway Main Drainage recommendations have informed and supported the evaluation of options.
Cllr Michael Connolly	**104**	Wastewater Treatment Plant Upgrades	*IW should Upgrade their own Treatment Plants to make them compliant, ie like Mountbellew and Ballygar without and further delay.*	Noted. Maximizing the efficiency of existing assets is a key priority for the draft Galway Wastewater Strategy within the study area. While agglomerations like Ballygar (WWDL: D0371-01) and Mountbellew (WWDL: D0219-01) fall outside this scope, Uisce Éireann may independently assess the upgrading of these plants and any associated requirements as part of separate studies.
Cllr Michael Connolly	**105**	Wastewater Treatment Plants in Rural Areas	There is a very urgent need to Provide Waste Water Treatment Plants in many of our towns and villages throughout county Galway.One of the Ways to do this is for IW to engage LOCAL COMMUNITIES AND With local Group water schemes that exist in many locations throughout the country. Places like Castleblayney, Caltra, Menlough, Laurencetown, Clontuskert, Creggs, Glinsk, Kilconly, and many more. The local committees in those areas are Best placed to help identify Sites and with Grant aid build plants to IW specks and Standards. Those plants can be taken in charge by IW. This I believe could represent Best value for money. THOSE GWS GROUP WATER SHEMES HAVE THE EXPERTISE TO ENGAGE WITH THE COMMUNITY.	Noted. Uisce Éireann will review these recommendations separately from the draft Galway Wastewater Strategy, because their locations are outside the study area.

Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
Cuan Beo	**106**	Galway Wastewater Strategy Progression	*Do you have any suggestions that you would like Uisce Éireann to consider in the preparation of its Galway Wastewater Strategy?:* *"We welcome the preparation of this strategy. Cuan Beo believes there needs to be a strong emphasis on efforts to enhance and protect the environment and consideration of the pressures on receiving waters. In particular the challenges faced by the 'Designated Shellfish Waters' and 'Bathing Waters' in the whole of Galway Bay which come within the zone of influence of the Galway Wastewater Strategy.Shellfish contamination and frequent Beach closures due to contamination by E.Coli and Norovirus poses a substantial public health risk, as well as threatening the livelihoods of the fishers, aquaculture operators and food business operators that make a living from the shellfish produced within the bay. Any associated food poisoning incidents would have a negative impact on the growing food tourism sector in Galway which celebrates the oyster as a must have food when visiting the region. Norovirus in particular is very challenging for the oyster industry as there is no effective treatment if contaminated. As Norovirus is a contaminant from human waste only, this virus must be dealt with effectively at all wastewater treatment plants before being discharged to the environment."*	Uisce Éireann acknowledge the concerns raised regarding the protection of designated shellfish waters and bathing waters within the Galway Bay region, as well as the potential impact of contamination on public health, livelihoods, and the local food tourism industry. Uisce Éireann is dedicated to ensuring that wastewater treatment processes effectively mitigate the risks posed by contaminants. During the development of the draft Galway Wastewater Strategy we evaluated measures to enhance treatment capabilities, incorporating water quality modelling where relevant, to prevent harmful discharges into receiving waters.
Cuan Beo	**107**	Galway Wastewater Strategy Study Area	*The Galway Wastewater Strategy study area comprises the Galway Metropolitan Area, Athenry, and Moycullen. Do you have any comments on this?* *"It is important to note that the Shellfish waters and bathing waters on the South of Galway Bay are frequently impacted by discharges from Mutton Island as well as the majority of the coastal foul and stormwater systems and combined sewerage systems being considered under the Galway Wastewater Strategy study, so their inclusion is welcome.We also welcome the inclusion of assessing scenarios to transfer wastewater from towns outside the study area to within the study area (such as Clarinbridge and Craughwell) which have a negative impact on these waters also.*	Noted and acknowledged
Cuan Beo	**108**	SEA Objectives	*Section 2.1 in Chapter 2 of the SEA Scoping Report outlines the objectives of the Galway Wastewater Strategy. Do you have any comments on these objectives?* *"While we note and welcome the objective 'to develop a sustainable wastewater drainage strategy for the GWS study area consistent with the EU Water Framework Directive and Urban Wastewater Treatment Regulations,' but we would welcome a more ambitious objective to 'Increase the protection of citizens and natural ecosystems in line with the Biodiversity Strategy and the Zero Pollution ambition embedded in the European Green Deal. In recognition of the importance of the shellfish industry to the region we would welcome the inclusion of an objective "to protect the designated shellfish waters which are in the zone of influence from Micropollutants and microbiological contamination. We are glad to see stormwater separation prioritized in the GWS, this is essential in minimising public health and shellfish impacts during storm events"*	The European Green Deal has been considered in the draft Galway Wastewater Strategy especially for Biodiversity in relation to the EU Biodiversity draft Galway Wastewater Strategy for 2030, the new national waste policy and the EU Circular Economy Package for Waste Management, and the EU's Green Deal's Zero Pollution Action Plan for air quality.
Cuan Beo	**109**	Baseline Environmental Conditions	*Chapter 3 of the SEA Scoping Report sets out the current baseline environment conditions and future trends. The environmental issues are summarised in table 3.20.1. Do you have any comments on these?* *"The challenges outlined in 3.8.4 are indeed correct and solving these challenges is key to success. However, the absence of any recognition that the existing regime is contaminating b There is limited information on the quality of bathing waters except for a misleading high-level overview of 2023 without mention to the number of beach closures due to contamination during each year. Likewise, there is no assessment of shellfish waters' bacteriological quality. (https://www.sfpa.ie/What-We-Do/Molluscan-Shellfish/Classified-Areas).*	Uisce Éireann acknowledge concerns regarding the assessment of bathing water and shellfish water quality, as well as the need for greater recognition of contamination challenges. Please refer to section 4.11 in the SEA Environmental report. The shellfish areas within the SEA Coastal Study Area are Clarinbridge / Kinvara Bay, The Bay at Aughinish, and Ballyvaughan/ Poulnaclough Bay. Downstream of the Clarinbridge_030 river waterbody—into which the Athenry WwTP discharges—the Clarinbridge_050 river waterbody flows into the Dunbulcaun Bay transitional waterbody. Dunbulcaun Bay forms part of the Clarinbridge / Kinvara Bay shellfish area.
Cuan Beo	**110**	Plans, Policies and Programmes	*Uisce Éireann has reviewed plans, policies, and programmes relevant to the Galway Wastewater Strategy in chapter 4 of the SEA Scoping Report. Are there any others that should be considered?* *"We are glad to see review and reference to all relevant plans, policies, and programmes."*	Noted with thanks.
Cuan Beo	**111**	SEA Environmental Objectives	*Chapter 5 of the SEA Scoping Report sets out the environmental objectives that will be used to assess the Wastewater Strategy and its potential effects on the environment. Table 5.2.1 summarises these objectives. Have you any comments on these?* *"In respect to shellfish areas, objectives should be indicated to limit E. coli and Norovirus levels to respective safe levels before being discharged into the environment, ensuring WWTPs are equipped with appropriate infrastructure to achieve such treatment. Regarding material assets, the provision of grease traps for restaurants etc. is not included. The buildup of grease and oils in WWTP facilities limits their effectiveness (e.g. Kinvara). We believe this could be included in the GWS; grease traps should be introduced as standard.*	Uisce Éireann notes that issues that have the potential to impact on human health are assessed in the SEA Environmental report in the draft Galway Wastewater Strategy, and key challenges and opportunities in relation to human health are also included.
Cuan Beo	**112**	Communications	How would you like Uisce Éireann to communicate with you as the plan progresses? By email (mofficer@cuanbeo.com and cuanbeo@gmail.com). And as planned through public consultation. Thank you.	Noted

Consultee	Comment No.	Consultee Subject/ Theme	Consultee Comment	Uisce Éireann Response
Inland Fisheries Ireland	**113**	Galway Wastewater Strategy	*Thank you for the opportunity to contribute to the public consultation on the draft Galway Wastewater Strategy. It is noted that the multi-year Galway Wastewater Strategy will assess all wastewater treatment and network infrastructure in the Galway Metropolitan Area, Athenry, and Moycullen to determine what upgrades will be required to meet the future needs of the population, accounting for economic growth, environmental changes, and climate change. The following comments reflect the views of IFI Galway in respect of above and should be read in conjunction with IFIs observations on Uisce Éireann's Draft Water Services Strategic Plan 2050 (WSSP 2050) made in July 2024.*	Noted.
Inland Fisheries Ireland	**114**	Inland Fisheries Ireland (IFI) Role	*Inland Fisheries Ireland (IFI) is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation, of the inland fisheries resource and recreational sea angling. IFI is mandated to ensure that the fisheries of the State are protected. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish populations. Ireland has more than 70,000 km of rivers and streams and 144,000 ha of lakes, all of which fall under IFI's fisheries management jurisdiction. Many of these watercourses discharge directly to the sea and support species which utilise the marine environment for parts of their life cycle (e.g. salmon, sea trout, eel, lamprey species).*	Noted.
Inland Fisheries Ireland	**115**	Fish Habitat Protection	*Fish need unpolluted water and abundant food in a healthy habitat that provides spawning areas, shelter and freedom of movement. The bed and soil of any surface water and the associated aquatic and riparian vegetation combine to provide the critical elements on which fish depend. A natural river channel is characterised by morphological features which are vital for the life cycle of fish: gravel shoals or reed beds for spawning, pools and riffles where fish rest and feed, and turbulent reaches which enhance oxygenation. A healthy and sustainable fishery characterises and reflects a broader healthy ecology and a biodiverse and sustainable environment. Under section 7(3) of the IFI Act (Inland Fisheries Act 2010) it is stated that IFI shall in the performance of its functions have regard to (g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems), (h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995)* *The Irish implementing legislation (S.I. No. 94 of 1997) for the Habitats Directive (Council Directive No. 92/43/EEC 1992, on the Conservation of Natural Habitats and of Wild Fauna and Flora) identifies the Minister for Environment, Climate and Communications as having a role in carrying out monitoring of the status of relevant fish species. The present IFI Habitats Directive programme addresses elements of this obligation by assessing the conservation status of diadromous species including salmon, shad, smelt, and lamprey. The IFI programme complements it by including those fish species listed as vulnerable in the current Red Data Book and not covered by the Habitats Directive (e.g. Arctic char and smelt). IFI also has responsibility for pollan and the recreational angling aspect of marine fish species. Furthermore, the European Eel species is endangered at present, and additional protection measures have been introduced in that regard - it is incumbent on Ireland to ensure that the eel and its range and habitat are properly protected. Please also note that there are many surface waters, which are not formally designated, but which support populations of Annex II fish species designated under the Habitats Directive. However other fish species (those not listed in the above Directive) must be considered also.*	Acknowledged. Uisce Éireann is committed to fulfilling our obligations under the Habitats Directive and Water Framework Directive including the protection of the environment, protection of habitats and enhancing bio-diversity where practical. The SEA Scoping Report set out the proposed framework of Strategic Environmental Objectives (SEOs) and guided the development of the SEA Environmental report, outlined the key external influences relevant to the draft Galway Wastewater Strategy, described the draft SEA assessment approach, and identified interrelationships between environmental topics and other plans, policies, and projects. In the SEA Environmental report in the draft Galway Wastewater Strategy, Section 4.8 discusses the water environment and Section 4.11 discusses the biodiversity, flora and fauna in the study area.
Inland Fisheries Ireland	**116**	IFI and Angling	*Under section 7(2) of the Inland Fisheries Ireland Act, Inland Fisheries Ireland is the statutory authority responsible for the promotion, marketing, development and improvement of inland fisheries and recreational fishing in both fresh and saltwater. IFI has a mandate to market and promote Irish recreational angling in both the domestic and foreign tourism markets and this brief acknowledges the importance of angling as a significant contributor to the Irish economy. IFI is also the responsible agency in respect of the licensing and management of commercial and recreational fishing for salmon, with protection responsibilities at sea out to 12 miles from baselines. Recreational angling contributes more than €800 million to the Irish economy in a normal year, directly supporting over 11,000 existing Irish jobs. Many of these jobs are in rural parts of the Irish countryside and in peripheral regions along our coastline (IFI, 2015). Within the sector, participation rates totalled 446,000 people who were involved in recreational angling in Ireland in 2015, with over 170,000 of these visiting from outside of the State.*	Noted.

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Inland Fisheries Ireland	**117**	Water Framework Directive (WFD)	*The EU Water Framework Directive (2000/60/EC) is recognised as a critical regulatory legislative provision. The WFD entered into force in December 2000 and requires the protection of the ecological status of surface and ground waters – this encompasses (among other elements) water quality and requires the conservation of habitats for ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that surface water systems be protected on a catchment basis - a shared objective between all relevant public authorities. Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Article 28(2) of the said regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status. Ireland is currently in the 3rd cycle of the Water framework Directive (2022-2027). IFI is also responsible for delivering the fish component of the national WFD monitoring programme. Over 300 waterbodies, encompassing rivers, lakes and transitional waters are designated for survey on a three year rolling basis for surveillance monitoring. IFI also carries out an element of investigative and operational monitoring, have developed fish classification tools, calibrated these in a cross Europe exercise and report on fish ecological status for each waterbody annually, along with providing additional advice on fisheries related matters. IFI have recently redesigned the national fish in rivers monitoring programme. The programme now follows a catchment-based approach designed around the existing surveillance monitoring network to meet stakeholders' requirements.* *The Wastewater Strategy should include reference to the protection and conservation of fish stocks and fisheries habitat within Lough Corrib, River Corrib, Clarin River, Ballyquirke Canal and Ballyquirke Lake. It should also be noted that fish are an indicator species for the Water Framework Directive and any diminution in fish stock status will impact on the WFD status of a watercourse. WFD compliance is critical, and fish population health reflects ecological status.*	The SEA objective for the water environment requires the prevention of deterioration of WFD status of waterbodies with regard to both quality and quantity of discharges of wastewater from treatment plants. The SEA objective on biodiversity requires protection and enhancement of terrestrial, aquatic and soil biodiversity and habitat connectivity, and to Achieve BAP commitments to No Net Loss of habitats related to provision of wastewater services. These two objectives together have included protection and conservation of fish stocks and fisheries habitat. The draft Galway Wastewater Strategy recommends a WWTP be designed to ensure no deterioration in waterbody status and contribute towards achieving 'Good' waterbody status. Uisce Éireann will monitor WWTP performance annually against environmental licence conditions to track any deterioration in performance. Uisce Éireann will ensure no deterioration of water quality occurs as part of the River Basin Management Plan monitoring. Section 10 in the SEA Environmental report details the mitigation and monitoring plan for the draft Galway Wastewater Strategy.
Inland Fisheries Ireland	**118**	Lough Corrib and River Corrib	*The agglomerations of the Galway Metropolitan Area and Moycullen form part of the Lough Corrib and subsequently the River Corrib and Corrib Estuary catchment.* *The River Corrib is part of the IFI managed Galway Fishery, with the main part of the fishery located just downstream of the weir in Galway City. Thousands of salmon annually make their way upstream through this stretch of river providing fishing opportunities for tourist and local anglers. Salmon start running in March. Grilse start moving upstream in late May, and peak season is from then until mid July.* *The River Corrib_020 is currently classified as of "good" ecological status and "not at risk" under the Water Framework Directive. It is imperative that these statuses are maintained, and the water quality does not deteriorate. Unfortunately, the Corrib Estuary has only been classified as of "moderate" status and is failing to achieve good chemical water status due to PBDE – unspecified isomers.* *IFI have engaged with Galway County Council/ Uisce Éireann over the past number of years regarding investigations into the release of partially treated wastewater into the mouth of the River Corrib at Spanish Arch and also at Claddagh Quay. A recently completed programme of civil works within Galway City appears to have resolved the SWO issues at the Claddagh Quay.*	Uisce Éireann is dedicated to fulfilling its obligations under the WFD, including safeguarding Lough Corrib and the River Corrib's ecological statuses and addressing related concerns. The draft Galway Wastewater Strategy has considered these issues in the SEA Environmental report and Appendix 4 - Impact on Water Quality.
Inland Fisheries Ireland	**119**	Clarin River and Athenry	*The Clarin River rises north of Attymon (known as the Clonkeen River) and flows for approximately 23 kilometres before entering Dunbulcaun Bay at Clarinbridge. The river itself supports populations of brown trout, salmon and eels, whilst an important oyster production zone is present within Dunbulcaun Bay. High water quality is crucial to the survival of these aquatic species and the protection of the oyster farming business.* *The section of the Clarin River which flows through Athenry has been classified as of only moderate ecological status before becoming classified as "at risk" where it flows past the Athenry wastewater treatment plant (Refer to Fig 2. Clarin River; Clarinbridge_030). The River Clarin therefore requires mitigation and restoration to achieve a good status objective.*	Uisce Éireann is dedicated to fulfilling its obligations under the WFD, including safeguarding Lough Corrib and the River Corrib's ecological statuses and addressing related concerns. The draft Galway Wastewater Strategy has considered these issues in the SEA Environmental report and Appendix 4 - Impact on Water Quality.

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Inland Fisheries Ireland	**120**	Moycullen and Ballyquirke Lake	*Ballyquirke Canal which flows through Moycullen has been classified as of only moderate ecological status and "at risk" where it flows past the Moycullen wastewater treatment plant. The canal flows into Ballyquirke Lake just downstream of the Moycullen wastewater treatment plant before flowing out into Lough Corrib. Ballyquirke Lough has also been classified as of only moderate ecological status and "at risk".* *EPA monitoring of the watercourse upstream of Ballyquirke Lough has recorded exceedances in ammonia on a number of occasions in 2017, 2018 and 2019 along with occasional exceedances in BOD and high total nitrogen also. The main pressures identified as impacting this catchment are domestic wastewater treatment systems (DWWTS), Urban wastewater and hydro morphology.* *In 2022, Ballyquirke Lake was also surveyed as part of IFI's ongoing coarse fish programme and the WFD operational monitoring programme. The lake was subsequently assigned a bad fish ecological status and a moderate macrophyte status. Both Ballyquirke Canal and Lake therefore urgently require mitigation and restoration to achieve a good status objective.*	Uisce Éireann is dedicated to fulfilling its obligations under the WFD, including safeguarding Lough Corrib and the River Corrib's ecological statuses and addressing related concerns. The draft Galway Wastewater Strategy has considered these issues in the SEA Environmental report and Appendix 4 - Impact on Water Quality.
Inland Fisheries Ireland	**121**	Urban Wastewater and Investment	*Investment is needed to upgrade all wastewater treatment plants (WwTPs) to tertiary treatment and meet the requirements of the Urban Wastewater Directive. Investment must keep pace with increasing urbanisation, population growth, emerging pollutants and the impact of rising global temperatures. It should include a long-term goal to separate combined storm and sewage systems. Focus on end-of-pipe compliance at WWTPs should not distract from discharges at storm water overflows (SWOs). Consistent monitoring of SWO discharges, their frequency or their contribution to pollution of surface waters is an important next step at some locations. Uisce Éireann should introduce a programme of works to install Event Duration Monitors (EDMs) on all SWOs. A mechanism to take in charge of wastewater treatment systems installed by private developers which have since closed business (communal discharges) must also be put in place.*	Uisce Éireann will fully comply with the requirements of the rUWWTD and other relevant legislation, including provisions for tertiary treatment and quaternary treatment at larger WWTP sites, SWO compliance, SWO monitoring, and other obligations.
Inland Fisheries Ireland	**122**	Hazardous Chemicals	*The prevalence of plastic pollution, the presence of persistent chemicals and the spread of antimicrobial resistant pathogens in rivers are all issues of grave concern. Current water and effluent quality monitoring is focused on organic pollutants. A variety of other substances – metals, pesticides, herbicides, pharmaceuticals, endocrine disruptors, industrial chemicals, and plastics – also contribute to poor water quality, yet many of these are not monitored routinely.* *Chemical monitoring of water should account for persistent, bio-accumulative and toxic substances. The current monitoring gap is a barrier to the regulation of synthetic chemicals polluting the water environment. Microplastics overwhelmingly originate from the laundering of synthetic textiles and road-tyre abrasion. A single domestic wash has the potential to release as many as 700,000 plastic fibres into domestic wastewater.* *The wastewater strategy must also address the threat that emerging pollutants such as 'forever chemicals' pose to biodiversity and water quality in rivers. The precautionary principle should be applied when assessing potential chemical contamination. Wastewater treatment removes some chemicals, but current treatment methods have not been designed to deal with the vast array of chemicals in use in modern life.*	Uisce Éireann has considered this where relevant at the Strategic level. The recommended plans and projects arising from the draft Galway Wastewater Strategy may address these aspects in greater detail for specific locations, in alignment with national and international wastewater treatment legislation. UE are considering these issues as part of requirements outlined in the recast UWWTD and will form part of project specific plans.
Pobal Bhearna Group	**123**	Investment in Wastewater Infrastructure and Independent Audit Recommendation	*It is widely recognised that investment in integrated WasteWater Infrastructure has lagged that which is required to support the population expansion and urban development, both nationally and in the 'Galway Metropolitan Area', in recent decades.* *In our opinion, the first issue that needs to be addressed in the Draft Galway WasteWater Strategy is the provision of a quantitative and transparent capacity audit of existing WasteWater treatment systems in County Galway – both WasteWater Treatment Plant (WWTP) Capacity and the associated sewerage network capacity. In the ideal world, this audit would be independently validated by 'external experts'.*	Uisce Éireann acknowledges the observation regarding historic investment in wastewater infrastructure and the need for continued investment to support population growth and development. The Draft Galway Wastewater Strategy is informed by a comprehensive assessment of the wastewater system across the study area, including treatment capacity, network performance and environmental risk. This assessment is set out in Appendix 3 – Status and Performance of the Wastewater System, and provides the evidence base for identifying and prioritising interventions. The Strategy represents a strategic (Stage 1) assessment and forms part of the broader infrastructure planning process. Subsequent project phases will involve more detailed technical assessment and are subject to governance, regulatory oversight and assurance processes.

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Pobal Bhearna Group	**124**	Bearna Population Growth and Existing UÉ Capacity Register	*The existing qualitative 'Wastewater Treatment Capacity Register' as per the Uisce Eireann website is wholly inadequate and lacks transparency. https://www.water.ie/connections/developer-services/capacityregisters/wastewater-treatment-capacity-register/galway.* *The existing capacity register (a) assesses WWTP capacity only and not the capacity of the associated sewer network, (b) uses a qualitative Green/Amber/Red classification to provide "an indication of available treatment capacity" and (c) uses 2016 Census population statistics (as of June 2023 – for planning/investment decisions?) - 7 years out of date – instead of the more recently available 2022 Census numbers.* *A Footnote to the capacity register states that "the indication of available treatment capacity has been determined based upon a standardised national review of the available information"? – Do factors other than 'PE capacity' impact decision making with respect to the Green/Amber/Red classification?* *For example, the WWTP Capacity Register shows that the Bearna Settlement had a population of 1,998. Analysis of planning awards made in the Bearna Settlement area, since the 2016 Census, indicates that a minimum of 253 residential units (catering for a population equivalent of 708) have already been granted approval and/or are in various stages of construction and/or are occupied. This equates to a potential 35.4% increase in the population of Bearna Settlement since 2016 – without any corresponding adjustment to the sewerage infrastructure. The 2022 Census analysis confirms that Barna ED (+3,810) had the highest population growth at Electoral Division level in Connacht between 2016-2022.*	The wastewater capacity register is a national tool designed to provide a high-level indication of available treatment capacity at wastewater treatment plants. The wastewater capacity register is updated annually based on the most up to date information available. Data from the 2022 census has been used in the capacity register since it was made available to Uisce Eireann in 2025. The Draft Galway Wastewater Strategy provides a more comprehensive and up-to-date assessment of system performance, incorporating current data, network modelling and policy-aligned population projections (Appendix 1 – Managing Growth and Appendix 3 – Status and Performance of the Wastewater System). This assessment includes analysis of performance, flooding and environmental risk, infiltration, cross-connections and operational constraints, and provides the evidence base for identifying and prioritising interventions. This approach enables a more robust understanding of both treatment and network constraints and needs and informs the identification of infrastructure upgrades required to support future growth and regulatory compliance. The Draft Galway Wastewater Strategy therefore adopts a multi-factor, evidence-based approach to assessing system capacity and performance, as outlined in Appendix 3. This provides a more comprehensive basis for identifying risks and prioritising interventions than a single-metric assessment.
Pobal Bhearna Group	**125**	Quantitative Capacity Registers	*Many County Councils (including, Offaly, Laois, Wicklow, Kildare etc.) provide a quantitative WWTP capacity register – in numbers - allowing for simple transparent equation – Design Capacity of System in PE minus (Existing Usage PEs + Planning Permissions Granted PEs) = Residual WWTP capacity in PE. This approach avoids any confusion, builds public trust and should help Uisce Eireann to lobby the political and administrative system for appropriate new investment where needed. We strongly recommend that Galway's WasteWater Treatment Strategy moves away from qualitative assessments and adopts a transparent, quantitative, approach to sewerage infrastructure audits.*	
Pobal Bhearna Group	**126**	Bearna WWTP Capacity Concerns	*There is anecdotal and other evidence (Galway County Council meeting minutes; internal emails obtained under FOI, etc.) which indicates that the Bearna WWTP has been operating at or above its design capacity of 2000 PE since handover to Irish Water/UE in 2014. Analysis of planning awards in Bearna, since the 2016 Census (see above), indicates that the de facto allocated operating PE of the system is already above 2,700 PE – significantly above its design capacity – prior to considering any Bearna Settlement planning applications under consideration since mid-2023.*	It should be clarified that the Bearna scheme comprises a wastewater pumping station and associated network, with flows conveyed to Galway City Network. It should be noted that pumping station performance is not defined by population equivalent (PE). Instead, performance and capability is assessed based on hydraulic loading, inflow rates, storage capacity and operational controls within the network. As outlined previously, targeted upgrade works have been undertaken at the Bearna Pumping Station and within the network, which have improved system performance and reduced operational pressures. The Draft Galway Wastewater Strategy assesses system performance using current data and modelling, considering both existing conditions and projected future growth. This assessment identifies areas where further interventions are required and informs investment planning.
Pobal Bhearna Group	**127**	Bearna Sewerage Scheme not fit for purose and Financial and Environmental Costs	*Significant upgrade of the Bearna Sewerage Scheme (WWTP + Network) is required prior to further large-scale developments in Bearna Village. There is a complete lack of transparency with respect to the operational capacity of the scheme with Published Infrastructure Assessment Reports for Bearna continuing to obfuscate on the actual current capacity of the waste water system for Bearna citing only 'Limited Capacity'. (See link https://consult.galway.ie/en/submission/glw-c20-218).* *There is strong evidence that the current Bearna WWTP is no longer fit for purpose with extensive sewage trucking operations required on a regular basis (along the R336) to prevent overflow of the holding tanks at Rinn na Mara, with potential for significant environmental damage along the foreshore around Bearna Pier. Tankering of sewerage waste by road from Bearna to Cappagh Road, Knocknacarra has become a regular feature of the Bearna Sewerage Export system since 2019 – in particular, during periods of high rainfall and periods of pump failure. These trucking operations have continued throughout 2024 – strongly suggesting a struggling sewerage export system in the Bearna area.* *The Galway WasteWater Strategy should document and publish the annual costs of tankering sewerage in County Galway (and particularly from the Bearna WWTP) over the last 5 years – to help build the case for more appropriate sewerage infrastructure investment in the area. Significant financial resources are being allocated to these operations, which should be quantified and presented as part of the Strategy document.*	It should be clarified that the Bearna scheme comprises a wastewater pumping station and associated network, with flows conveyed to the Galway City Network. Historically, the BPS experienced capacity pressures during rainfall events, with the practical response to excess flows being the occasional tankering of these flows to other locations. Targeted upgrade works, including pump upgrades and network improvements to address infiltration, have improved system performance and service capacity. Based on available information, capacity issues have since been alleviated. Currently, and in light of the operational upgrades outlined above, tankering flow away from BPS is not required and the capacity of the BPS is not restricted. The Draft Galway Wastewater Strategy assesses system performance using current data and modelling, considering both existing conditions and projected future growth. This assessment identifies areas where further interventions are required and informs investment planning
Pobal Bhearna Group	**128**	Trucking Sewerage	*Trucking sewerage by road (in any part of the County/Country) is not a sustainable solution to the sewerage infrastructure deficit. Using large diesel-powered tankers to transport sewerage by road carries a significant emissions profile (both Methane & CO2 emissions) – which will undermine attempts to achieve local/regional/national emissions targets – and may incur penalties going forwards. The Galway WasteWater Strategy should assess, document and publish the emissions impact of these road trucking operations – which are likely to entail significant 'latent costs'.*	

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Pobal Bhearna Group	**129**	Feasibility Letters	*In spite of the established underperformance of the Bearna WWTP, Uisce Eireann has continued to issue a standard 'Confirmation of Feasibility' letter to applicants for a number of large-scale developments within the Bearna Settlement area. The pro-froma letter states that wastewater connection of the proposed developments is "feasible without infrastructure upgrade by Irish Water". In our opinion this claim is not credible in the absence of transparency and clear statements by Uisce Eireann or the local planning authority with respect to the current capacity and operational status of the existing Bearna Sewerage Scheme. These pro-forma letters appear to be based upon the superficial assessment provided by Uisce Eireann's own WasteWater Treatment Capacity Register (Table 1) – which is wholly inadequate, out of date and lacking quantitative PE data.*	It should be clarified that the Bearna scheme comprises a wastewater pumping station and associated network, with flows conveyed to the Galway City Network. There is no overflow to the environment at Bearna pumping station. Uisce Éireann assesses development connections through established planning and connection processes. A Confirmation of Feasibility confirms whether a proposed development can technically connect to the wastewater network at the time of assessment, based on available information and subject to standard conditions. It does not constitute planning approval.. The Galway Wastewater Draft Strategy provides a comprehensive, up-to-date assessment of network and treatment performance and capacity and identifies future infrastructure requirements to meet growth and regulatory targets.
Pobal Bhearna Group	**130**	Environmental Monitoring	*The Draft Galway WasteWater Strategy needs to incorporate monitoring programs to identify and remedy environmental pollution caused by local WWTPs. Without measurement we can't identify the environmental impact of these WWTPs over time. For example, there is a fundamental issue with water quality and sewage in Bearna Settlement area – potentially caused by sewerage from septic tanks or temporary treatment systems, within the catchment area of the local Trusky streams. However, there has been insufficient investigation to eliminate outflows from the malfunctioning Bearna Sewerage Scheme pumping station and storage tanks at Rinn na Mara – as potentially the largest single contributor to Trusky stream and seashore pollution in the Bearna area. Intermittent 'bathing season' water quality monitoring has been taking place since Summer 2021 around Bearna Pier and adjacent to the main public bathing areas in Bearna. At the Bearna Pier inlet stream, immediately west of the bathing area, E.coli levels ranged from 13,760 to 198,636 cfu/100 ml and Enterococci levels ranged from 800 to 20,000 cfu/100 ml between late May to early September 2021 – representing very significant pollution. Sporadic high levels of E.coli and Enteroccocci have been recorded since then – but there is no water quality monitoring taking place for the 8 months of the year – outside the bathing season.*	Water quality is influenced by a range of factors beyond wastewater discharges, including surface water runoff, agricultural activities, misconnections and weather events. Monitoring of wastewater systems and environmental performance is undertaken in accordance with regulatory requirements, including EPA licensing, Annual Environmental Reporting and bathing water monitoring programmes. It should be clarified that the Bearna scheme comprises a wastewater pumping station and associated network, with flows conveyed to the Galway City Network. There is no overflow to the environment at Bearna pumping station. In addition, the accompanying Strategic Environmental Assessment (SEA) sets out an implementation and monitoring framework which includes ongoing monitoring of environmental indicators, including water quality, to track the environmental performance of the Strategy over time and ensure alignment with WFD objectives and River Basin Management Plan targets.