



# Planning Statement

## Strategic Infrastructure Development

**Proposed Upgrades to Castletroy Waste Water Treatment Plant at Dromroe, Castletroy, Limerick.**

**Client:** Uisce Éireann (formerly known as Irish Water)

March 2023



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**Connecting places.**



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# Introduction

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This Planning Statement has been prepared by HW Planning in collaboration with J.B. Barrys & Partners, on behalf of Irish Water (IW) who are seeking planning permission from An Bord Pleanála (ABP) for the upgrade of the existing Castletroy Waste Water Treatment Plant (WwTP) at Dromroe, Castletroy, Limerick under the provisions of The Planning and Development (Strategic Infrastructure) Act 2006.

The Act provides that applications for permission/approval for specified private and public strategic infrastructure developments be made directly to An Bord Pleanála. The applicant entered into pre-application consultations with An Bord Pleanála, with meetings held on 28<sup>th</sup> June 2021 and 30<sup>th</sup> August 2022 (ref ABP 310201-21). The Board confirmed their opinion that the proposed development meets the definition of 'strategic infrastructure development' as defined in the legislation by means of formal notice dated 24<sup>th</sup> January 2023. The subject application is made pursuant to this determination.

This planning statement has been prepared in support of the project and sets out the background context for the proposals in question, a description of the planned works, summary of key guiding policy and objectives, as well as an overview of key planning assessment matters. This statement should be read in conjunction with the submitted Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and other submitted plans and particulars.

## 1.1 Site Location and Description

Castletroy is a Limerick suburb situated approximately 3km east of the City Centre. Castletroy WwTP is surrounded by the University of Limerick campus and the Lower River Shannon spans its northern boundary. The area is largely urban in nature and has experienced significant population



Figure 1 Castletroy WwTP and Discharge Point Locations

and employment growth over the last 20 years owing to the presence of the University of Limerick Campus, and the 156-hectare National Technology Park at Plassey.

The subject site, which comprises the current Castletroy WwTP, is approximately 3.16 hectares (7.82 acres) in area and located north of and accessed from the L1117 Plassey Park Road. As indicated in Figure 2, to the west of the site is the University of Limerick (UL) Rowing Club, to the south is the UL Western Carpark and attendant Nexus Innovation Centre, and to the east the ruins of the old Plassey Mills<sup>1</sup> are located and beyond the Dromroe Student Village.

The WwTP was constructed in the early 1990s. The existing foul sewer network serves the Castletroy, Monaleen, Ballysimon, Annacotty, Mountshannon, Lisnagry and Castleconnell areas.

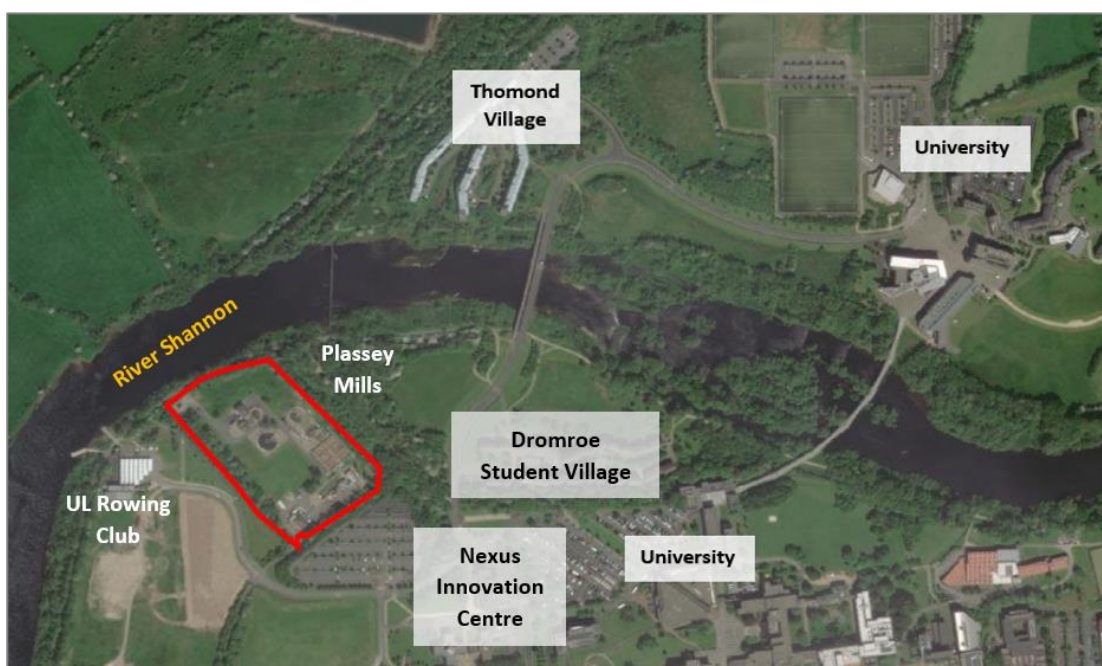


Figure 2 Subject Site Context

## 1.2 Application Details

### 1.2.1 Strategic Infrastructure Development (SID)

Planning applications for strategic infrastructure development are made directly to An Bord Pleanála and not to the Local Authority. The Planning and Development (Strategic Infrastructure) Act 2006 categorises development which is of strategic economic or social importance (i.e., 'Strategic Infrastructure Development') under its Seventh Schedule, which includes wastewater treatment plants with a capacity greater than 10,000 PE under the heading 'Environmental Infrastructure'. The existing plant exceeds the 10,000PE threshold and the proposed upgrade works will cater for the 10-year growth projections from 45,000 PE to 77,500 PE, which includes a future IDA load of 5,500 PE. As outlined, An Bord Pleanála has determined that the proposed development meets the definition of strategic infrastructure development and that the application should be made directly to them in accordance with associated legislative provisions.

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<sup>1</sup> NIAH listed, reg 21900504.



### 1.2.2 Other Consents

In addition to planning permission, the following consents and considerations are also required for construction and operation of the proposed development.

#### *The Waste Water Discharge (Authorisation) (WWDA) Regulations 2007 (as amended)*

The project will be constructed in the area licensed (WWDA) for the Castletroy Agglomeration. The agglomeration was issued a wastewater discharge licence by the EPA in April 2009 (EPA ref D0019-01). Irish Water are in process of submitting a license review for the Castletroy agglomeration to account for the upgrade project at the plant. The proposed project will be included in the license review.

### 1.2.3 Environmental Impact Assessment Report (EIAR)

The subject application is accompanied by an EIAR. Prior to lodgment of this application, the Department of Housing, Planning and Local Government has been notified of this and of the locations at which the EIAR can be viewed along with the application plans and particulars. An acknowledgement of this submission to the Department is enclosed with this application to An Bord Pleanála.

### 1.2.4 Stakeholder Engagement

#### *Prescribed Bodies*

A copy of this application, including the plans and particulars and EIAR, has been issued to the following 'relevant' prescribed bodies, prior to its submission to An Bord Pleanála.

Prescribed Bodies	
1. Minister for Housing, Local Government and Heritage	9. Inland Fisheries Ireland
2. Minister for Environment, Climate and Communications	10. Transport Infrastructure Ireland
3. Limerick City and County Council	11. The Heritage Council
4. Clare County Council	12. An Taisce
5. South-western Regional Assembly	13. An Chomhairle Ealaíon
6. Commission for Regulation of Utilities, Water and Energy	14. Failte Ireland
7. Health Service Executive	15. Health & Safety Authority
8. Environmental Protection Agency	16. Geological Survey Ireland

In addition to making hard copies of the application plans and particulars and the EIAR available for public inspection at the offices of An Bord Pleanála and Limerick City and County Council, the application, drawings, NIS and EIAR are also available to view and download at the following website address:

[www.water.ie/castletroywwtp-docs](http://www.water.ie/castletroywwtp-docs)

### 1.3 Other Engagement

As part of the preparation of this EIAR, Irish Water undertook consultation with the public, elected representatives, statutory bodies, and interested bodies / groups in respect of the proposed development. A variety of communications methods were used throughout and prior to the consultation period to promote and invite stakeholders to participate in the non-statutory consultation for the Castletroy WwTP Upgrade Project.

Public participation is an asset in the development of any infrastructure project and the aim was to promote and encourage participation in the consultation process and welcome submissions on the project.

The following consultation strategies were used:

- Webinars for elected representatives and the public;
- Social media and poster campaigns;
- Information web page; and
- Contact email address for submissions.

There was one round of non-statutory consultation, for a period of 6 weeks, which started on June 13, 2022. There was an online information event, where design details and environmental elements of the project were presented. Relevant information such as environmental reports and project information were also made available on the project website. Stakeholders and interested parties had an opportunity on the information event to raise queries, and the project team could be contacted for the duration of the 6 weeks.

The issues raised and submissions received during the public consultation period were summarised in the Consultation Report. All issues raised were considered by the project team in developing and finalising its planning application and EIAR.

# Project Context

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## 2.1 Planning History

The Castletroy WwTP and drainage infrastructure were constructed in 1992, with various improvements made subsequently. Irish Water's 2017-2021 Investment Plan included 52 Wastewater 'Above Ground' (i.e., treatment) projects. In November 2017, J B Barry and Partners Limited (JBB) and T J O'Connor Limited (TJOC) in association with RHDHV were appointed by Irish Water (IW) as Consultants for this project which was included amongst these.

A requirement for upgrade works has been identified to cater for future population growth and industrial development in the area. Following on from three Workshops in 2018 and 2019, Irish Water investigated 6 options for maximising the use of the existing infrastructure. These included upgrading Castletroy WwTP to accommodate different growth horizons, with alternative options also examined which involved the partial or complete pumping away to Bunlicky WwTP, the latter case would result in the decommissioning of the Castletroy WwTP. The preferred option of upgrading Castletroy to cater for 10 years growth (with provision to cater for an option of 25 years growth) was identified.

## 2.2 Existing Conditions

The existing Castletroy WwTP operates as a Secondary Extended Aeration Activated Sludge Plant and consists of the following main elements:

- Inlet Works incorporating wet well and 3 Duty/Assist/Standby pumps and stormwater dry well with Duty/Standby pumps.
- Emergency Gravity Overflow to Outfall in the River Shannon.
- Hydro Rake Step Screens complete with screenings removal, washing and compaction.
- Jeta Grit Trap complete with blower, grit conveyor and classifier.
- Inlet Flow Measurement.
- Salsnes Screening Unit.
- Twin stream Secondary Extended aeration with FBDA.
- Three Secondary Clarifiers (two at 20m diameter and one with 25m diameter.)
- Final Effluent inspection chamber.
- Outfall to the River Shannon (combined storm and treated effluent outfall).
- Two Picket Fence Thickeners.
- Sludge Dewatering consisting of 1 no. Belt Press and 1 no. Centrifuge.

- Administration/Control Building & Sludge Building.



Figure 3 Existing WwTP

## 2.3 Need for Upgrades

Deficiencies associated with the existing plant and infrastructure were identified. It was noted that the existing plant is aging, with several items of equipment key to the treatment process in need of refurbishment or replacement. The plant is operating at the limitations of its design capacity and does not include storm storage. The EPA Annual Environmental Reports (AERs) show that the plant has been non-compliant with Licence Conditions in recent years. The WwTP needs to be upgraded to reflect modern requirements and better cater for existing committed and future loads.

In addition to the above, the key drivers for the expansion of the Castletroy WwTP are as follows:

- The committed industrial loading required (existing IPC Licenses) to be accepted at Castletroy WwTP (Wastewater Discharge License Reg. No. D0019-01) is 35,987 PE. The main industrial contributor to the Castletroy agglomeration is Johnson & Johnson Vision Care (Ireland), under EPA License IE P0818-03.
- There is a requirement to meet Irish Water's forecasted growth for domestic, commercial and institutional uses @ 3.28 % growth over 10 years (2018 – 2028) and 0.63% growth for 15 years (2028 – 2045).
- There is a requirement to provide for 20% headroom on domestic, non-domestic and institutional loading, an additional c.7,000 PE.
- The need to cater for a future IDA allocation of 5,500 PE, if required.

# Proposed Development

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## 3.1 Development Description

The proposed WwTP upgrade is required to support future planned population growth and industrial development in the area, in line with population projections for Limerick as set out in the National Planning Framework Implementation Roadmap and the Regional Spatial and Economic Strategy for the Southern Region. It will ensure the WwTP continues to comply with Urban Wastewater Treatment Directive and Wastewater Discharge License requirements, while providing appropriate future treatment capacity and stormwater storage.

The initial upgrade works will cater for the 10-year growth projections from 45,000 PE to 77,500 PE including a future IDA load of 5,500 PE. There will also be provision made in the infrastructural development of the plant (tank sizing and pipework) for the 25-year growth projections of 81,100PE. Although the infrastructure will be in place, a planning review will be required before any uplift above 77,500PE can be instated.

The upgrade design includes provision for 20% headroom allowance, in line with Irish Water guidelines for large urban settlements. It also includes installation of a new stormwater storage tank that will significantly reduce the annual rate of spills to the Lower River Shannon and make the WwTP compliant with the criteria outlined in the Department of Environment Heritage and Local Government 'Procedures and Criteria for Storm Water Overflows, 1995'.

As indicated in Figure 4, the proposed development will make provision for the following:

- Replacement of the existing storm pumps in the inlet pumping station including the modification of pipework and fittings.
- A 4,500m<sup>3</sup> capacity stormwater tank with sufficient capacity for the projected 10-year and 25-year loadings.
- Stormwater return pumping station to return flows from the stormwater tank for primary and secondary treatment.
- Upgrade of the existing preliminary treatment screens to cater for higher flows.
- Construction of a new grit trap to provide redundancy to the preliminary treatment process.
- Installation of decking over the existing inlet works structure and installation of odour abatement equipment.
- A new forward feed pumping station which will transfer flows to primary treatment. Wastewater will be pumped to an elevated splitter chamber to allow flows gravitate through the primary treatment process.
- Installation of primary treatment filtration units in a proposed treatment building. The structure will also be used for the installation of control panels, operational equipment and instrumentation.

- Construction of a new primary sludge holding tank which will store sludge removed from primary treatment. Sludge will be pumped to the upgraded dewatering plant within the site.
- Upgrade of the existing secondary treatment tanks with an integrated fixed film activated sludge (IFAS) process.
- Installation of tube settlers (or similar) within two of the existing clarifiers to increase flow through each tank.
- A new scum pumping station will collect, and transfer scum removed from the clarifiers to the thickened sludge storage tank.
- The existing 7.1m diameter 'Picket Fence Thickener' (PFT) will be repurposed as a thickened sludge storage tank.
- A new larger diameter PFT will be constructed.
- The existing sludge dewatering equipment will be upgraded with new centrifuges. Internal modifications to the existing sludge treatment building first floor will be required for the equipment.
- Sludge storage skips will be located on external concrete plinths. Sludge transfer pipework and valves will be installed to control sludge transfer from the dewatering units to the skips.
- An odour abatement unit will be installed external of the sludge treatment building.
- Two bulk storage tanks will be installed with integrated bunds to contain Ferric Sulphate ( $\text{Fe}_2\text{SO}_4$ ) for phosphorous removal, complete with eye-wash station and dosing pumps.
- A flood event pumping station is required to allow the plant to remain operational during high river levels. The walls of the existing final effluent inspection chamber will be increased to protect from flood water.
- A tank will be installed adjacent the existing groundwater well on site to provide storage. The borehole is used to supply washwater to various existing treatment processes and will also be used for proposed upgrades. The storage tank will ensure sufficient supply is available to meet peak demands.

The collective suite of works to be carried out involves the upgrade of the existing Castletroy WwTP to increase capacity from 39,000 PE to 77,500 PE to cater for a 10-year growth period.



### 3.2 Commissioning and Construction

The proposed works will be undertaken on the basis of a construction contract which will be awarded following a full procurement process, to be undertaken pursuant to any grant of planning permission.

The duration of the construction phase for the civil works on the subject lands is anticipated to span a period of 24 – 36 months. Programme restrictions apply due to the presence of a badger sett and the need to carry out the secondary treatment upgrade works during the summer months when the plant loading is low. Therefore, the exact duration will depend upon when the contract commences.

This process will be governed by strict environmental controls, as well as health and safety procedures. An Outline Construction and Environmental Management Plan (OCEMP) accompanies this application (Appendix 5.1 EIAR). It sets out a detailed suite of environmental protection measures to be implemented on site during the construction phase. The CEMP identifies all the potential issues which are relevant to the project, such as construction safety; traffic management; environmental risk assessment and management; waste management; and environmental management. The OCEMP specifically outlines how to address these and to provide solutions which are satisfactory to all concerned. Having regard to this, contract-specific CEMPs will be further prepared by the Contractor (subject to Client approval) at construction stage.

To facilitate the works areas, a number of construction compounds will be used by the contractor. The OCEMP indicates that the contractor will be required to prepare a Construction Compound Management Plan.

All staff vehicles/ construction vehicles shall use Harvard Close via Junction 1 – Plassey Park Road/ Harvard Close travelling to/ from the site. Using the internal roads of the University of Limerick travelling to/ from the site is prohibited in order to minimize the impacts to public. Delivery vehicles will not utilise Blood Stoney Road to access the works site.



# Legislative and Planning Policy Context

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Chapter 17 of the accompanying EIAR sets out in detail the legislative context governing the planning and development of the proposed project. This section of the statement provides a summary of key guiding provisions.

## 4.1 European Context

### 4.1.1 Urban Wastewater Treatment Directive (91/27/EEC)

The Urban Wastewater Treatment Directive sets standards to be met in the collection and treatment of wastewater as well as the monitoring requirements for wastewater discharges from urban areas.

On 1 January 2014, the management of urban wastewater collection and treatment infrastructure transferred from local authorities to Irish Water. Compliance with the requirements of the directive is monitored by the Environmental Protection Agency (EPA).

The licensing or certification of wastewater discharges was introduced in 2007 under the Wastewater Discharge (Authorisation) Regulations 2007. The regulations identify the EPA as the regulator that authorises discharges from wastewater treatment plants.

Larger wastewater treatment plants are licensed, whereas smaller plants are subject to certification. The licenses set out conditions and remedial actions to be taken to ensure compliance with standards for various substances' discharges. Licenses also outline the actions needed for meeting obligations under a number of EU environmental Directives.

### 4.1.2 EU Water Framework Directive (2000/60/EC)

The Water Framework Directive (WFD) established a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater with the objective to protect and improve water quality in all waters to achieve good ecological status by 2015 or, at the latest, by December 2027. Specifically, the WFD aims to, inter alia, prevent further deterioration of and enhance the status of aquatic ecosystems; promote sustainable water use based on a long-term protection of available water resources; enhance, protect and improve the aquatic environment through measures such as the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances.

### 4.1.3 Environmental Impact Assessment Directive (Consolidated 2011/92/EU and 2014/52/EU)

Transposed into Irish Legislation, through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I. 296 of 2018), the EIAR that accompanies this application has been prepared in accordance with the provisions of this directive, which has been transposed into Irish legislation by the Planning and Development Acts 2000 to 2019 (the "Planning

Acts”), the Planning and Development Regulations, 2001 (as amended) and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I. 296 of 2018).

#### **4.1.4 Birds and Natural Habitats Directives**

Adopted in 1992, the Council Habitats Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora aims to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. It establishes the EU wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments. An Appropriate Assessment (AA) Screening Report carried out for the proposed development, in line with this legislative requirement, concluded that there was a possibility of significant effects to Natura 2000 sites and that a Natura Impact Statement (NIS) should be prepared. The accompanying NIS was carried out in accordance with the Directive.

#### **4.1.5 Public Participation Directive (2003/35/EC)**

The public participation part of the Aarhus Convention has been implemented by Directive 2003/35/EC. Under this, the general public has a right to participate effectively in decision-making in environmental matters. The requirements under the directive have been transposed into Irish planning law and legislation governing other environmental licenses and consents. All associated statutory obligations have been considered in full as part of the preparation of the subject application.

## **4.2 National Context**

### **4.2.1 Section 37A of the Planning and Development (Strategic Infrastructure Act) 2006**

Under Section 37A(1) of the Act, an application for permission for any development specified in the Seventh Schedule shall, subject to Section 37A(2), be made to An Bord Pleanála under section 37E and not to a planning authority.

Section 37A(2) of the Act includes guiding criteria to determine if a project qualifies as strategic infrastructure development. It states that the Board must be of the opinion that the proposed development would meet one or more of the following:

*(a) the development would be of strategic economic or social importance to the State or the region in which it would be situated,*

*(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Spatial Strategy or in any regional planning guidelines in force in respect of the area or areas in which it would be situated,*

*(c) the development would have a significant effect on the area of more than one planning authority.*

The Seventh Schedule identifies applicable infrastructure developments for the purposes of Sections 37A and 37B.

Part Three of the Seventh Schedule includes the following under the heading of Environmental Infrastructure.

*Development comprising or for the purposes of any of the following:*

- A waste water treatment plant with a capacity greater than a population equivalent of 10,000.

#### 4.2.2 Project Ireland 2040 – National Planning Framework

The National Planning Framework (NPF) outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The stated purpose of the NPF is to enable all parts of the country to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognizing Dublin's ongoing key role.

Water Infrastructure is listed as a strategic investment priority in the NPF. National Policy Objective 63 seeks to:

*Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.*

National Strategic Outcome 9 includes the stated aim to:

*Increase compliance with the requirements of the Urban WW Directive from 39% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040.*

The NPF establishes targeted growth objectives for the Southwest Region including the addition of 340,000 – 380,000 people and 225,000 additional jobs by 2040. An uplift in the population of 50,000 – 55,000 persons in Limerick City and Suburbs is included within this.

National Policy Objective	Southern Region
1. Growing Our Regions	+ 340,000 - 380,000 people (2m total)  +225,000 in employment (880,000 total)
2. Building Stronger Regions: Accessible Centres of Scale	Limerick City and Suburbs:  +50,000 - 55,000 people (at least 145,000 total)
3. Compact, Smart, Sustainable Growth	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints.  30% all new housing elsewhere, within existing urban footprints.

Table 1 - Extract from Table 2.1 of the National Planning Framework

The NPF identifies the following in respect of the future role of Limerick:

*It is necessary for Limerick to further strengthen its position as the principal focus within the Region and to continue to address the legacy of regional growth having occurred outside the City area.*

The framework identifies some key future growth enablers to achieve this, which includes

*Ensuring that water supply and waste-water needs are met by new national projects to enhance Limerick's water supply and increase waste-water treatment capacity.*

#### **4.2.3 Water Services Strategic Plan 2015 – 2040**

The Water Services Strategic Plan (WSSP) sets out strategic objectives for the delivery of water services over the next 25 years up to 2040. 'It details current and future challenges which affect the provision of water services and identifies the priorities to be tackled in the short and medium term'. In identifying priorities, it has taken into consideration national and regional strategic plans such as the National Spatial Strategy and River Basin Management Plans. The plan is subject to a 5 year review programme. It's strategic objectives are:

- Meet Customer Expectations
- Ensure a Safe and Reliable Water Supply
- Provide Effective Management of Wastewater
- Protect and Enhance the Environment
- Support Social and Economic Growth
- Invest in our Future

#### **4.2.4 Water Services Policy Statement 2018-2025**

The purpose of the Policy Statement, the first to be prepared under the Water Services Act 2017 is to clarify - for Irish Water and for others – the government's expectations for the delivery and development of water and wastewater services. It is also intended to inform decisions on rural water services.

The statement outlines plans for investment of €8.5 billion in public water services between 2018 and 2027. Among the policy objectives outlined in the plan include:

*Bringing and maintaining public water and wastewater services to acceptable international benchmarks, verified by independent monitoring and reporting.*

*Achieving improved outcomes in quality in respect of drinking water and in wastewater in relation to rural and private water services.*

*Adopting forward planning and risk management approaches to minimise the impact of non-compliances with all relevant EU Directives and to safeguard against future compliance risks.*

The document refers to the River Basin Management Plan for Ireland which aims, inter alia, to prioritise investment in urban wastewater treatment plants to support the protection of high-status waters and to achieve water quality improvements in other water bodies.

#### **4.2.5 Irish Water Capital Investment Plan –2020 - 2024 (RC3)**

The Capital Investment Plan 2020-2024 is Irish Water's investment plan for water and wastewater assets and infrastructure for the next 5 years. Irish Water has an approved amount of €5.35 billion to invest in public water and wastewater infrastructure between 2020 and 2024. The Plan sets out

where they intend to prioritise this investment to deliver the most urgently needed improvements in drinking water quality, leakage reduction, water availability, wastewater compliance, efficiencies and customer service. Irish Water has had regard to national policies and plans such as the Water Services Policy Statement 2018-2025, Project Ireland 2040, River Basin Management Plan 2018-2021 in determining where investment should be prioritised (or which have a dependence on the public water and wastewater infrastructure such as housing policies, job growth policies, and climate action plans). Compliance with regulatory standards and policies was also a key consideration. Completion of commenced projects were priorities. New projects were included based on three criteria:

- Strategic priorities;
- Tactical priorities;
- Operational priorities.

Castletroy WWTP project is included amongst six Limerick-based projects. The projects listed are expected to be either commenced, progressed or completed during the 2020 – 2024 period.

### 4.3 Regional Context

#### 4.3.1 Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy for the Southern Region (RSES) is a 12-year strategic regional development framework to guide development in the region. It establishes a broad framework for the way in which society, environment, economy and the use of land should evolve.

The Strategy indicates that collaboration between national, regional and local public bodies is crucial to ensuring our water and environmental resources are managed properly for the future, including incorporating a circular economic approach.

The RSES seeks the provision of infrastructure and services in a sustainable, planned and infrastructure led manner to ensure the sustainable management of water, waste and other environmental resources. The key Regional Policy Objectives (RPOs) relating to wastewater include:

RPO 211 - Irish Water and Wastewater

*It is an objective to support the implementation of Irish Water Investment Plans (prepared in five-year cycles) and subsequent investment plans, to align the supply of wastewater treatment facilities with the settlement strategy and objectives of the RSES and Metropolitan Area Strategic Plans for Cork, Limerick-Shannon and Waterford. Support the role of Irish Water Investment Plans in taking into account seasonal pressures on critical service infrastructure, climate change implications, and leakage reduction in the design of all relevant projects.*

RPO 212 - Strategic Wastewater Treatment Facilities

*a. It is an objective to support investment and the sustainable development of strategic wastewater treatment facilities by Irish Water in the Region arising from initiatives including Investment Plans, Strategic Drainage Area Plans subject to appropriate environmental assessment and the planning process.*

*b. For the management of wastewater, increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local*

*authorities to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality and to avoid adverse impacts on the integrity of the Natura 2000 network.*

RPO 214 - Eliminating Untreated Discharges and Long-term Planning

*It is an objective to support Irish Water and the relevant local authorities in the Region to eliminate untreated discharges from settlements in the short-term, while planning strategically for the long-term in tandem with Project Ireland 2040 and the RSES and in increasing compliance with the requirements of the EU Urban Wastewater Treatment Directive.*

The development strategy for the RSES includes a focused aspiration to strengthen the settlement structure of the Region through the delivery of compact growth:

RSES Strategy No. 1

*Strengthening and growing our cities and metropolitan areas; harnessing the combined strength of our three cities, as a counterbalance to the greater Dublin area, through quality development, regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas.*

Limerick is identified as largest urban centre in Ireland's Mid-West and Ireland's third biggest city. The defined Limerick Shannon Metropolitan Area is one of three key pillars in the overall growth strategy for the region and is supported by a focused Metropolitan Area Strategic Plan (MASP).

Limerick Shannon MASP Policy Objective 1

*a. It is an objective to strengthen the role of the Limerick Shannon Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region.*

The RSES includes a number of guiding principles to realise the vision for the MASP, which includes enabling infrastructure, including identifying infrastructure capacity issues and ensuring water services needs are met. This is underpinned by Limerick Shannon MASP Policy Objective 4:

Investment to Deliver Vision

*a. it is an objective to seek the identification of investment packages across State Departments and infrastructure delivery agencies as they apply to the Limerick Shannon MASP and seek further investments into the Limerick Shannon MASP to deliver on the seven Metropolitan Area Goals (See Volume 3).*

Section 4 of the RSES provides a list of National Enablers to support growth in the Limerick Shannon MASP, which includes, inter alia:

*Ensuring that water supply and wastewater needs are met by new national projects to enhance Limerick's water supply and increase wastewater capacity.*

Section 7.2 of the RSES promotes the consolidation and densification of housing and regeneration in Limerick City and Suburbs, with the delivery of key supporting infrastructure commensurate with development formalised under Limerick Shannon MASP Policy Objective 10.

*c. It is an objective to ensure investment and delivery of holistic physical, social and environmental infrastructure packages to meet growth targets that prioritises the delivery of compact growth and sustainable mobility in accordance with NPF and RSES objectives.*

## **4.4 Local Context**

The study area for the proposed development occupies parts of the separate administrative areas of Limerick City and County Council, and to a lesser extent Clare County Council.

### **4.4.1 The Limerick Development Plan 2022 -2028 (LDP)**

The Limerick Development Plan 2022 -2028 (LDP) came into effect on the 29th of July 2022 and is the principal planning strategy document for the development of Limerick City and County. The subject site is zoned for 'Utilities'.

The strategic vision of the LDP is as follows: *'Limerick – A Green City Region on the Waterfront - By 2030, Limerick will become a green City region on the Shannon Estuary connected through people and places. This will be achieved through engagement, innovation and resilient urban development and self-sustaining rural communities'.*

This is underpinned by 10 interlinked strategic objectives. Strategic Objective 1 sets out to: *"Grow Limerick's economy and create opportunity through maximising the potential for development through the promotion and enhancement of the competitive advantages of Limerick, including its strategic location, connectivity and accessibility to international markets, a skilled workforce and a high quality of life..."*.

Alongside this Strategic Objective 7 aims to: *"Protect, enhance and ensure the sustainable use of Limerick's key infrastructure, through the provision of support to utility providers including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation. This plan will also foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible"*.

Objective IN 06 Water services states that it is an objective of the Council to:

- a) Support Irish Water in the provision of water and wastewater infrastructure and services in accordance with the Service Level Agreement, until such time as the Agreement is terminated.*
- b) Collaborate with Irish Water in the protection of water supply sources to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change.*
- c) Liaise with Irish Water during the lifetime of the Plan to secure investment in the provision, extension and upgrading of the piped water distribution network and wastewater pipe network across Limerick City and County, to serve existing population and future population growth and sustain economic growth, in accordance with the requirements of the Core and Settlement Strategies.*
- e) Ensure that development proposals connecting to the public water and/or wastewater networks, now or in the future comply with Irish Water Standard Details and Codes of Practice. Where relevant ensure developments comply*

*with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.*

Section 8.5.3 of the LDP notes that:

*Irish Water's current wastewater treatment capacity register for County Limerick dated March 2022, states that there is capacity available in 41 no. of the 53 no. wastewater treatment plants (WWTPs). These include Bunlicky and Castletroy WwTPs, which serve the Limerick City Metropolitan Municipal District. These WWTPs require some upgrading and it is envisaged by Irish Water that with the completion of these upgrades, there will be sufficient spare capacity to accommodate the projected growth in Limerick City and Suburbs (in Limerick), Mungret and Annacotty as set out in the RSES and the Core Strategy, over the lifetime of the Plan, subject to planning and other approvals.*

Objective IN O9 Public Waste Water states that it is an objective of the Council to:

*a) Ensure adequate and appropriate wastewater infrastructure is available to cater for existing and proposed development, in collaboration with Irish Water, to avoid any deterioration in the quality of receiving waters and to ensure that discharge meets the requirements of the Water Framework Directive.*

Chapter 12 of the LDP sets out the land use zoning strategy. The objective in relation to the 'Utilities' zoning that pertains to the subject site is to:

*'To provide for the infrastructural needs of transport and other utility providers'.*

The stated purpose of this zoning '...provides for and preserves land for the provision of services such as electricity and gas networks, telecommunications, the treatment of water and wastewater etc'.



## Limerick Development Plan 2022-2028

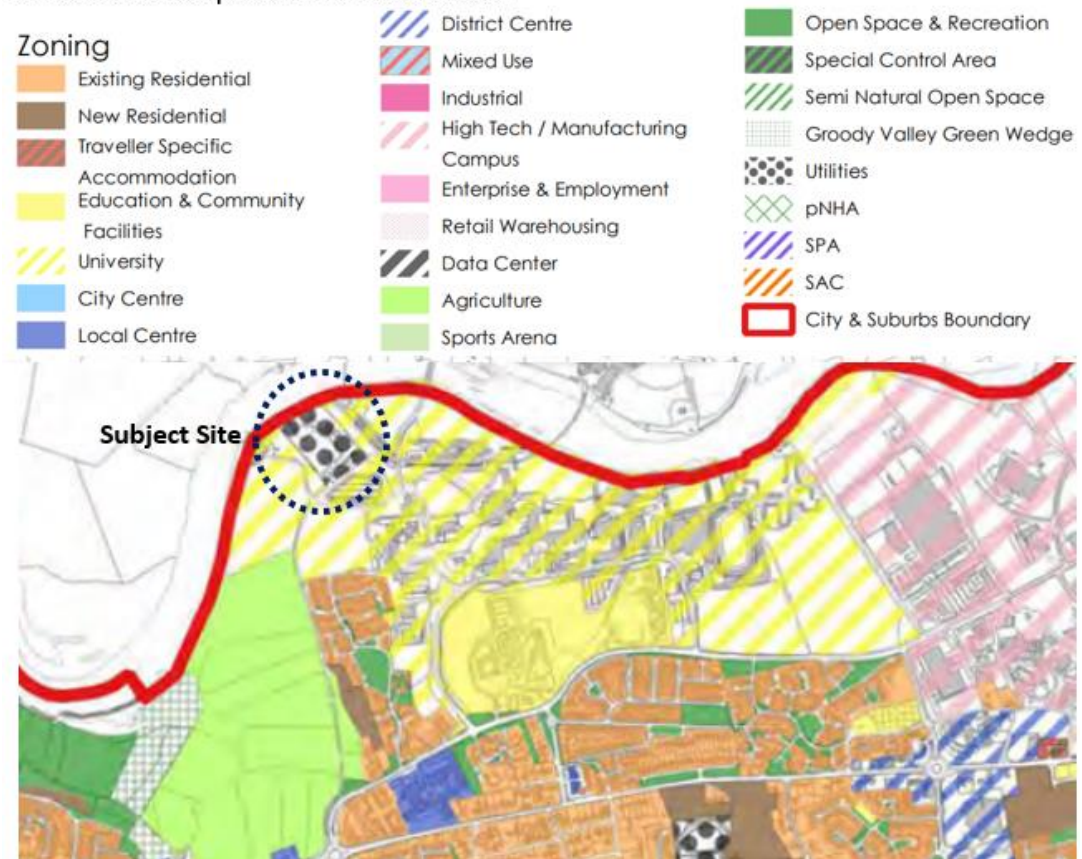


Figure 5 Site Zoning Context

### 4.4.2 The Clare County Development Plan 2017-2023

The Clare County Development Plan 2017-2023, as varied and extended, sets out an overall strategy for the proper planning and sustainable development of the functional area of Clare County Council over its life. The vision for the area is shaped by key defined goals which includes Goal VII – to support “strong economic growth and a high quality of life for all residents through the provision of efficient and robust physical infrastructure whilst having regard to environmental responsibilities and complying with European and National legislation”.

Development Plan Objective CDP8.24 - Water Services sets out that it is an objective of the Development Plan:

- a 'To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realise the development objectives of this Plan;*
- b To facilitate the provision of integrated and sustainable water services through effective consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of master plans;*
- c To ensure that adequate water services will be available to service development prior to the granting of planning permission and to require developers to consult Irish Water regarding available capacity prior to applying for planning permission;*

*d To ensure that development proposals comply with the standards and requirements of Irish Water in relation to water and waste water infrastructure to facilitate the proposed development.'*

#### **4.4.3 The Draft Clare County Development Plan 2023 - 2029**

The Development Plan Review process commenced in September 2020 and the Stage 2 Draft Clare County Development Plan 2017-2023 is the emerging plan for the county. Public consultation on the Draft Plan was undertaken between December 2021 and March 2022. The Draft Plan includes objective CDP 11.29 in relation to water services, with the prescribed text mirroring that set out in CDP 8.24 - Water Services - in the current plan.

# Key Planning Considerations

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## 5.1 Principle of Development

The proposed development is supported by statutory provisions and policy objectives, at national, regional and local level as evidenced in Section 4 of this statement.

The National Planning Framework (NPF) fulfills a strategic role of guiding national, regional and local planning policies and investment decisions up to 2040. In its own words, it represents a new strategy for delivering concentrated growth and calls for a major new policy emphasis on renewing and developing Ireland's principal cities Dublin, Cork, Limerick, Galway and Waterford. The NPF includes an ambitious growth target for Limerick City and Suburbs of at least 50% to 2040 with an objective to enhance its significant potential to become a city of scale. A core element of the framework is an emphasis on Limerick becoming a regional driver and working in partnership with Galway and Cork to function as a viable alternative to Dublin. The Southern Regional Spatial Economic Strategy (RSES) builds on this through the designation of the Limerick Shannon Metropolitan Area as the primary driver of growth in the mid-west region, where it is recognised that the achievement of growth is contingent on enabling infrastructure, including an increase in wastewater capacity.

Of note in this regard is the fact that Limerick City is serviced principally by two wastewater treatment plants only, namely Castletroy and Bunlicky. The subject project can be viewed as an important prerequisite to achieve the 50% population growth in Limerick City and Suburbs by 2040. The strategic importance of the proposal to the region is evident in this respect as it will more than double the capacity of the Castletroy Treatment Plant<sup>2</sup>, underpinning this planned growth.

Alongside this, deficiencies associated with the existing plant have led to non-compliance with its EPA Licence Conditions in recent years. The WwTP needs to be upgraded to reflect modern requirements and better cater for existing committed and future loads.

We consider that the proposed upgrades will contribute to the realisation of growth objectives in the RSES related to the Limerick Shannon MASP. In this regard, we note that the addressing of wastewater needs to increase capacity is explicitly identified as a 'National Enabler' for the MASP, and this is further supported by policy to fulfill growth ambitions including through MASP Policy Objective 10.

Furthermore, as outlined in Section 4.3 of this document, the RSES includes a number of general policy objectives such as RPO 211, RPO 212 and RPO 214, related to support of Irish Water' water/wastewater infrastructure investment programmes and elimination of untreated discharges, which the subject project will contribute to the fulfillment of directly.

In the local context, the principle of the proposed development is supported by the zoning of the subject site for 'Utilities' use in the Limerick Development Plan 2022 (LDP). This specifically

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<sup>2</sup> By the +25 year design horizon

*'provides for and preserves land for the provision of services such as electricity and gas networks, telecommunications, the treatment of water and wastewater etc'.*

The principle of the proposed development is also in line with LDP Strategic Objectives SO1 and SO7 which relate to growing the Limerick economy and protecting, enhancing and sustainably using key infrastructure. The proposal is also consistent with infrastructure objectives IN06 and IN09 which set out to support the role of Irish Water in terms of provision and appropriate updating of wastewater infrastructure to accommodate projected growth and safeguard the receiving environment.

Similarly, the proposed development is supported by the goals and objectives of the current and draft Clare County Development Plan (CCDP). The proposed upgrading and increased capacity of the Castletroy WwTP is in line with Goal VII of the CCDP which sets out to support strong economic growth through the provision of efficient and robust physical infrastructure whilst having regard to environmental responsibilities. It is also consistent with objective 8.24 of the current plan and objective 11.29 of the draft plan which set out to facilitate Irish Water in the delivery of water services provision.

## **5.2 Environmental Impact Assessment Report**

The subject application is accompanied by an EIAR. Article 93 and Schedule 5 of the 2001 Planning and Development Regulations sets out the classes of development for which a planning application must be accompanied by an Environmental Impact Assessment Report (EIAR). Part 1 and Part 2 Schedule 5 of the Planning and Development Regulations, 2001 defines the categories and thresholds of developments requiring EIA. Part 1, Class 13 of the regulations identifies that an EIAR should be prepared for the following:

*'Waste water treatment plants with a capacity exceeding 150,000 population equivalent as defined in Article 2, point (6), of Directive 91/271/EE'.*

With a proposed capacity of 75,500 PE, the subject upgrades are below the threshold of 150,000 and consequently, it does not fall under Part 1 Class 13. Part 2, Class 13(a) of the regulations identifies that an EIAR should be prepared for the following:

*'Any change or extension of development which would (i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and (ii) result in size greater than 25%, or an amount equal to 50% of the appropriate threshold, whichever is the greater'.*

The proposed development constitutes an extension to an existing WwTP (39,000PE) and will result in a 99% increase in capacity (77,500PE) in a 10 year growth period. The resulting development falls under Class 13(a) as it is greater than 25% of the existing capacity. An EIAR was therefore deemed a requirement for the project.

### **5.2.1 EIAR Team**

Article 5(3)(a) of amended EIA Directive (2014/52/EU) (EIA Directive) states that 'the developer shall ensure that the environmental impact assessment report is prepared by competent experts'. The EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022 highlights the need for competent experts to be involved in the EIA process and in the preparation of the EIAR.

The EIA for this project has been prepared by J. B. Barry & Partners with additional specialist input provided by competent experts in a variety of disciplines. Responsibility for individual sections of the EIA is as listed in the table below. A description of experts who have contributed to this EIA, their qualifications, experience and any other relevant credentials is provided in each individual section of the accompanying EIA.

EIA Section	Consultant
Non-Technical Summary	J.B. Barry and Partners Ltd.
Introduction	J.B. Barry and Partners Ltd.
Background	J.B. Barry and Partners Ltd.
Assessment of Alternatives	J.B. Barry and Partners Ltd.
Description of Proposed Development	J.B. Barry and Partners Ltd.
Construction Strategy	J.B. Barry and Partners Ltd.
Planning and Policy	HW Planning
Traffic and Transport	J.B. Barry and Partners Ltd.
Odour	Aona Environmental Consulting
Air Quality and Climate	Aona Environmental Consulting
Noise and Vibration	Aona Environmental Consulting
Biodiversity	MKO
Cultural Heritage	Archaeological Consultancy Services
Land and Soils	J.B. Barry and Partners Ltd.
Landscape and Visuals	JBA Consulting
Water	J.B. Barry and Partners Ltd.
Resource and Waste Management	J.B. Barry and Partners Ltd.
Population and Human Health	HW Planning
Material Assets	J.B. Barry and Partners Ltd.
Summary of Mitigation and Monitoring	J.B. Barry and Partners Ltd.
Overall Co-ordination and Management of EIA	J.B. Barry and Partners Ltd.

### 5.2.2 EIAR Findings

Please refer to the EIAR, supporting appendices and non-technical summary for the environmental report's key findings. On the basis of the assessment of potential impacts and the recommended mitigation measures in the EIAR, it has been determined that the proposed development is not likely to impose any significant adverse effects on the environment. The majority of impacts on the environment are either non-existent or of imperceptible/slight significance.

### 5.3 Water Quality

The Water chapter of the accompanying EIAR assesses the potential impacts likely to occur as a result of the proposed development on the receiving water environment, in terms of hydrology, surface water quality and flood risk. To contextualize this, the chapter reviews the baseline conditions at the WwTP. It notes reportable environmental incidences common to Castletroy WwTP which include large spillages and uncontrolled releases caused mainly by adverse weather combined with absence of stormwater storage. Since 2018, the plant has had on average of 10 reportable incidences per annum. It notes the plant has been non-compliant with the conditions of the EPA wastewater discharge licence (WWDL) for the agglomeration in recent years due to breaches in Emission Limit Values (ELVs); ortho-Phosphate in 2018 and 2021, and Ammonia in 2019. It concludes that these isolated incidences were likely caused by WwTP deficiencies i.e., lack of stormwater storage overloading and/or breakdown of aging plant equipment.

The construction phase of the proposed development poses a potential risk of negatively impacting on surface water quality in terms of run off associated with construction activities, particularly due to the close proximity of the works to the Lower River Shannon. However, with adequate mitigation measures put in place, as set out in the Chapter, the rating significance of the impact is considered to be of negative quality, significant but unlikely, reversible and of temporary duration.

In terms of the operational phase, the assessment considers the future discharge from the WwTP and the changes arising from the increase in the final effluent flow, together with changes in the quality of the final effluent. It concludes that the potential impact on the surface water environments during the operation phase is considered to have a long term, imperceptible/neutral impact on water quality, i.e. an effect which alters the character of the environment without affecting its sensitivities.

### 5.4 Odour and Air Quality

The EIAR includes chapters on Odour and Air Quality & Climate to assess the potential impact of the proposed upgrade on the sensitive residential and educational receptors in the vicinity of the proposed development site. The odour assessment considers that the construction activities will not give rise to odour emissions. The predicted difference between the modelled worst-case scenario in the operational phase after the upgrades and the existing situation indicates a 68% – 81% reduction in odour concentrations at the nearest sensitive receptors when compared with the 'do-nothing' scenario. It anticipates that there will be a "Slight, Permanent Positive Impact" with proposed design WwTP upgrade improvements.

During the construction phase the magnitude of dust emissions ranges from small to medium, however the sensitivity of the area is considered low in term of potential impacts from dust soiling and similarly low in terms of human health impacts. While a medium risk of ecological impacts exists before mitigation measures are put in place, with mitigation this reduces to negligible. The

operational impacts and impacts on climate are not considered significant. As per the noise assessment completed in respect of nearby sensitive receptors, the predicted operational daytime and night-time noise will be quieter than the existing WwTP, due to specified improvements to plant which include upgrades to the existing Aerzen blowers, the covering of the inlet works and building pressure system improvements.

## **5.5 Noise and Vibration**

The noise assessment carried out as part of the enclosed EIAR notes that there is potential for temporary and intermittent increases in noise levels during the construction phase of the proposed upgrade at the nearest residential properties arising from activities such as truck movements of excavated and construction materials, excavator, loader and concrete mixer noise sources and sheet-piling and heavy goods vehicle (HGV) movements. However, a worst-case assessment of construction noise indicates that there will be no exceedance of the daytime construction noise limit of 65 dB LAeq,T at any noise sensitive receptors in the area.

The operational WwTP will only generate occasional site traffic movements in terms of both staff cars and sludge tankers, as such, will not result in any significant noise impacts.

## **5.6 Traffic and Transport**

The EIAR traffic and transportation chapter has been designed to assess the potential traffic related impacts associated with the construction and operation of proposed WwTP upgrade works. The analysis indicates that construction traffic from the proposed development will have a minimal impact on all the nearby road junctions examined. It proposed a temporary traffic management plan in relation to the use of the Limerick City and County Council access road which will be served as a main access to/ from the site. The duration of the impact of these works will be short term in nature, with no residual impacts.

As previously outlined, the operational phase is anticipated to result in a negligible increase in traffic volumes on the surrounding road network.

## **5.7 Cultural Heritage**

As part of the accompanying EIAR an Archaeology and Cultural Heritage assessment was carried out on-site. While the site is located within Castletroy/Dromore Conservation Area, the proposed development site contains no Recorded Monuments listed within the Record of Monuments and Places for County Limerick. The nearest recorded monument to the site, an enclosure (CL063-015) is located c. 0.66km to the northeast. Similarly, the site contains no sites listed within the National Inventory of Architectural Heritage (NIAH), with Plassey Mills (RPS 1601, NIAH Reg. No. 21900504) being the closest such structure located to the east of the site. The assessment concludes that there is no potential for direct impacts on known archaeology and cultural heritage. There is some limited potential for the development to impact upon unknown, buried archaeological remains if such are present within the site. However, the assessment concludes that the implementation of the proposed mitigation measures will sufficiently mitigate any such potential impacts. These measures provide for archaeological monitoring of all groundworks associated with the development by a suitably qualified archaeologist in line with a method statement, and under license from the Department of Housing, Local Government and Heritage.

## 5.8 Landscape and Visual Impact

The accompanying EIA includes a Landscape and Visual Assessment of the proposed development. The assessment notes that the majority of works involve improvements to the existing WwTP, with the addition of tree and herbaceous planting. While limited tree removal will occur to facilitate the proposed development, none is proposed along the perimeter of the site. Therefore, no further views will be opened towards the site from the surrounding areas. No significant potential landscape and visual impacts are expected to arise from the proposals during the construction or the operational phase. With the implementation of the proposed planting, it is expected that there will be long-term positive impacts to the landscape and visual amenity.

## 5.9 Flood Risk

Castletroy WwTP flooded to varying degrees in 2009 and 2016 and this caused disruption to the plant and surcharging of the network. The plant is within the scope of the OPW's Shannon Catchment and Flood Risk Assessment and Management (CFRAM) project. A portion of the subject site is at flood risk for both the 1% and 0.1% AEP (Annual Event Probability) and as such is located in Flood Zone A. On this basis a Stage 2 - Site Specific Flood Risk Assessment (FRA) has been prepared by J. B. Barry and Partners Limited. The FRA considered that the proposed development is defined as 'Highly Vulnerable Development (including essential infrastructure)' and notes that the CFRAMS map indicates that the 1% AEP fluvial flood level at the site is +6.37mOD and 0.1% AEP fluvial flood level is +6.93mOD.

The FRA recommends construction of any new development within Flood Zone C of the current site, and that all highly essential infrastructure be constructed at an elevation higher than the 1% AEP flood level with a suitable freeboard and an allowance for the effects of climate change. To protect the proposed development against flooding and to preserve the existing flood plain and avoid flooding elsewhere, it recommends that any new infrastructure be built outside of Flood Zone A and Flood Zone B. Where it is not possible to locate new infrastructure in Flood Zone C due to physical or hydraulic constraints, it is recommended that tanks are covered, and compensatory storage is provided so as not to increase flood risk elsewhere. These recommendations have directly informed the design of the proposed development.

## 5.10 Sludge Disposal

The sludge produced by the proposed development will be thickened and dewatered to a minimum 18% dry solids, for appropriate disposal in accordance with the Irish Water National Wastewater Sludge Management Plan. As set out in the application documentation, the anticipated peak daily volume of dewatered sludge cake which will be produced is estimated at 26 m<sup>3</sup> per day, which will require 2 no. lorry removals per day.

It is noted that there are future plans to develop anaerobic digestion infrastructure for energy recovery at the Bunlicky Sludge Hub Centre in Limerick. This new Regional Sludge Hub will also produce a Class A biosolid for reuse in agriculture. The project is currently at concept design stage and will form part of a separate future planning application. When operational, it is envisaged that sludge from Castletroy WwTP will be transferred to this facility. In the medium term, sludge produced at Castletroy will continue to be treated by lime stabilization, with dewatered sludge transferred to one or a number of licensed facilities. Final disposal will comply with Code of Practice, Domestic Waste Water Treatment Systems (2021), EU Code of Good Practice for Use of Biosolids in Agriculture and all other relevant legislation.



## 5.11 Appropriate Assessment

The River Shannon is designated both a Special Area of Conservation (Lower River Shannon) and a Special Protected Area (River Shannon and River Fergus estuaries). An Appropriate Assessment (AA) Screening and Natura Impact Statement (NIS) have been prepared by MKO to support An Bord Pleanála in their decision-making role as the competent authority under Article 6(3) of the Habitats Directive (92/43/EC). The AA Screening concluded that while the SPA is located 8.2km downstream of the subject site, taking a precautionary approach a potential pathway for indirect effects on the supporting habitat of all SCI species '*Wetlands and Waterbirds [A999]*' was identified in the form of deterioration of water quality during construction activities.

An NIS was undertaken to document the potential direct and indirect effects in relation to Wetlands and Waterbirds as this reflects the identified pathway for effect on all SCI species. Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction and operation of the proposed development do not adversely affect the integrity of European sites. Therefore, it can be objectively concluded that the proposed development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

## Conclusions

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The subject application for the upgrade works to the Castletroy Wastewater Treatment Plant is being made by Irish Water under the provisions of The Planning and Development (Strategic Infrastructure) Act 2006. The project is listed in the Irish Water Capital Investment Plan 2020-2024, and as such, is a recognised priority. It will directly address pollution issues related to uncontrolled releases and non-compliant emission limit values at the facility. The application is the culmination of a detailed review of associated issues and consensus has been established that the proposed works represent the most appropriate and feasible option to remedy this problem. The proposed development has been subject to detailed environmental investigation and assessment, and it has been demonstrated that it will not give rise to any adverse impacts.

As outlined, the project is supported by a large number of European, national, regional and local policy objectives and it will ensure that WwTP consistently meets the conditions of its current and any future EPA Wastewater Discharge Licence. It will conserve and improve water resource in a manner that supports a healthy society, economic development, and a cleaner environment. In line with provisions of the National Planning Framework, Limerick City will be a focus for significant growth over the next two decades. The proposed development is a pre-requisite for the achievement of this and will contribute importantly to aspirations to enhance Limerick as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region.



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