



An  
Bord  
Pleanála

## Inspector's Report ABP-302732-18.

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<b>Development</b>	Upgrade to Blessington Wastewater Treatment Plan.
<b>Location</b>	Burgage More, Blessington, County Wicklow.
<b>Planning Authority</b>	Wicklow County Council.
<b>Planning Authority Reg. Ref.</b>	18/255.
<b>Applicant</b>	Irish Water.
<b>Type of Application</b>	Permission.
<b>Planning Authority Decision</b>	Grant with conditions
<b>Type of Appeal</b>	Third Party against grant
<b>Appellants</b>	Ballymore Eustace T&S Anglers Ass.
<b>Observers</b>	Clane Trout & Salmon Anglers Assoc. North Kildare Anglers Assoc. Ballymore Eustace CDA Windlynn Ltd
<b>Date of Site Inspection</b>	14 <sup>th</sup> January 2019.
<b>Inspector</b>	Philip Davis.

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## 1.0 Introduction

This appeal is against the decision of the planning authority to grant permission subject to conditions for alterations to the existing wastewater treatment plant serving the town of Blessington in Wicklow. The grounds of appeal relate mostly to pollution issues in the upper Liffey river.

## 2.0 Site Location and Description

### 2.1. Burgage More

Burgage More townland is located in a shallow valley approximately 1km south-south-west of the centre of the town of Blessington in west Wicklow, close to the border with Kildare. The townland is characterised by farmland and a scattering of suburban and commercial developments extending south along the N81 as it enters Blessington. A country road, Kilmalum Road, runs west and parallel to the N81. A minor watercourse runs south between these two roads. This watercourse forms the boundary between Kildare County Council and Wicklow County Council and drains into the Poulaphouca Reservoir.

### 2.2. Appeal site

The appeal site is an Irish Water wastewater treatment facility located in farmland within the townland, linked to the N81 via a private road. It has no link to the Killmalum Road to the west. The site is rectangular and has an area given as 3 hectares in the application documentation, with a number of buildings totalling 266 square metres. The site is mostly occupied with a series of tanks, filters and other plant associated with wastewater treatment. It is surrounded by a palisade fence and is entirely surrounded by farmland, apparently used for sheep grazing. A number of houses on Kilmalum Road are within approximately 200 metres of the facility, with a housing estate directly north some 150 metres to the north. The site is connected via an underground pipe to a discharge point some 5.5 km to the south into the Liffey in a ravine between the Poulaphouca dam and the Golden Falls Lake/reservoir. The latter is part of the original hydroelectric scheme and is not used for the storage of drinking water. The western boundary of the site runs next to the stream forming the Kildare/Wicklow boundary.

### 3.0 Proposed Development

The proposed development is described on the site notice as the construction of two new primary treatment tanks, one new anoxic tank, associated pump sumps, tertiary treatment infrastructure and all associated site works. It is stated that it will increase capacity from 6,000 PE (persons equivalent) to 'up to' 9,000 PE.

### 4.0 Planning Authority Decision

#### 4.1. Decision

The planning authority decided to grant permission subject to 3 no. conditions. Condition 2 related to odour controls, condition 3 to construction details.

#### 4.2. Planning Authority Reports

##### 4.2.1. Planning Reports

- Notes that the use is established and on lands zoned Community, Education and Institutional in the Blessington LAP 2013-2019.
- It is noted that there is a road reservation for the N81 very close to the site, but it is considered that it does not interfere with it. No objection from Roads Office.
- Notes submission from **Kildare County Council** requesting additional information on the assimilative capacity of the Liffey.
- Notes **Inland Fisheries Ireland** does not agree with the submitted calculations for ammonia discharges.
- Notes proximity of Poulaphouca Reservoir SPA.
- Confirms that upgrade is required because of non-compliance with emission standards (the discharge license at Golden Falls Reservoir), not with future growth needs of the town.
- Further information was requested with regard to discharges to the Liffey.

- Following the submission of additional information the planners report noted comments by the Environment Section and that the golden Falls lake currently meets quality standards. It is considered that the discharges will meet the emission Limit values (ELV's) of the Discharge license. It is not considered reasonable to refuse on the basis of previous problems, and notes that the responsibility for monitoring the discharge lies with the EPA.  
Recommendation to grant permission.

#### 4.2.2. Other Technical Reports

**Executive Scientist** (Environment Section). Notes a number of concerns and historic algal blooms in Golden Falls Lake. Notes that the proposed discharge would increase loadings of ammonia and orthophosphate to Golden Falls and the Liffey, because while the discharge concentration remains the same, the volume of discharge could increase by 3000PE. It is considered that there is sufficient assimilative capacity for this.

**Roads:** No objection.

**Roads Office Design/TII** – notes N81 Tallaght to Hollywood realignment proposal but states no impact likely.

**Kildare County Council:** Notes concern on impact of discharges on the Liffey.

#### 4.3. Prescribed Bodies

**Inland Fisheries Ireland:** Concerns expressed at some of the figures in the submission. And notes requirements under Water Framework Directive and known issues with algal growth in the Golden Falls lake.

#### 4.4. Third Party Observations

**Ballymore Eustace Anglers Association** submitted detailed objections to both the original application and the revised details.

##### 4.4.1. Planning History

None on file, the planners report refers to a Part 8 passed for an extension in 2006 bringing capacity to 6000 PE (**06/5001**). Prior to that another Part 8 for upgrading was approved in 1999 (**99/1331**).

## 5.0 Policy Context

### 5.1. Development Plan

The site is on land zoned 'Community, Education and Institutional' in the **Blessington LAP 2013-2019** (Map 1) and is in existing use as a wastewater treatment facility. Policy objective S2 '*To improve and expand wastewater treatment facilities sufficiently to ensure that no barriers exist in Blessington fulfilling its role as a moderate growth town as set out in the Wicklow 'Core Strategy' and Regional Planning Guidelines for the GDA 2010-2022.*

Blessington is indicated as a Level 4 'Moderate Growth Town' in the **Wicklow County Development Plan 2012-2022** (chapter 3). It is policy to facilitate the delivery of Irish Waters 'Water Services Investment Programme' (policy W16 of the CDP).

### 5.2. Natural Heritage Designations

The site is within 1 km of the Poulaphouca Lakes SPA and within 10 km of the SAC and SPA covering much of the Wicklow Mountains. The proposed works discharge treated effluent to the short stretch of the Liffey between Poulaphouca and the Golden Falls Lake (a small reservoir), which discharges ultimately to SAC's and SPA's in Dublin Bay.

### 5.3. EIA

The applicants submitted an EIA Screening Report with the original application which concluded that EIA was not required. It is noted that in Part 1 of Schedule 5 of the 2001 Regulations mandatory EIA is required for waste water treatment plans with a capacity exceeding 150000 population. Under Part 2 (11), the threshold is defined as wastewater treatment plants greater than 10,000 population (PE). As the proposed expansion is for 9,000 pe (persons equivalent) it is considered that it is sub-threshold. It is then submitted that there are no characteristics or cumulative impacts that would lead to significant effects on the environment.

## 6.0 The Appeal

### 6.1. Grounds of Appeal

#### **Ballymore Eustace Trout and Salmon Anglers Association**

- It is argued that Golden Falls Lake is unsuitable for discharge from Blessington WWTP.
- There is insufficient and inaccurate information in the submission with regard to the potential impacts on the Lake.
- In this regard the submission highlights a number of issues including that the discharge is to the Lake, not the river (as stated in the documents). It is also noted that in Appendix 3 of the further information it is stated that there is no water flow into the Lake from Poulaphouca Lake at recorded times in 2017. It is further noted that the EPA did not respond to a request for information from the County Council. It is also highlighted that little regard was given to cumulative impacts from other Irish Water discharges, notably those from the drinking water treatment adjoining the lake. Photos are attached with regard to discharges from the Ballymore Eustace water treatment works. It is further argued that the proposed works do not address the future growth of Blessington Village.

### 6.2. Applicant Response

- Irish Water submitted a response incorporating copious data on water quality and flow rates. The key arguments in response to the appeals are as follows:
- It is submitted that even on the minimum flow conditions the concentrations of Ammonia in the receiving water would be considerably below the 0.14 mg/L limit for 'good' status waters as outlined in the Environmental Objectives (Surface Water) Regulations and below the 0.17 value quoted in the appeal. It is submitted that regardless of the flow from the Poulaphouca Reservoir into Golden Falls, there is a constant discharge of 1.5 cubic metres per second from the Gold Falls reservoir.

- With regard to the submission that the discharge is to a lake, it is stated that the EPA confirms that the receiving water *'is currently defined as river water body channel and falls between Pollaphuca and Golden Falls'*.
- With regard to the above, it is stated that there would be no breach of the waterbodies 'Good' status.
- With regard to the argument that discharges from the Ballymore Eustace water treatment works were not included in the net emissions to the water system, it is argued that as this is a drinking water treatment plant, not a wastewater plant, and is not subject to EPA discharge license conditions, it was appropriate not to include it in the original submission. It is also stated that the pollution incident referred to by the appellant was a one-off isolated incident in 2013.
- With regard to the argument that there is insufficient flow to the site, it is argued that even the projected impacts are based on the minimum 1.5 cubic metre per second flow – refers to Part 6 of the Schedule to the Liffey Reservoir Act 1936, which sets a minimum flow. Figures are provided in the Appendix to this submission for the very low flow conditions during the summer 2018 drought.
- It is noted that there are additional streams entering the waterbody (Golden Falls) which were not included in the submission, but these add further dilution.
- It is submitted that all figures are based on worst case analyses, and these all indicate there is sufficient assimilative capacity for the proposed discharges.

Significant quantities of technical data are attached to the submission in support of the argument that there is sufficient assimilative capacity within the Liffey for the proposed discharge.

### 6.3. Planning Authority Response

No response to the grounds of appeal.



## 6.4. Observations

### **Windlynn Limited**

- Applicants for a SHD in Blessington for 340 units – in pre-planning with ABP they state that they were informed that the proposed development could not be considered favourably in the absence of consent for the upgrade of the waste water treatment facility (this pre-planning did not proceed to planning application stage and as such the information is not on the public file).
- It is argued that the facility is essential for the provision of additional housing in the Greater Dublin Area.
- Supports the proposed development for the above reasons.

### **Ballymore Eustace Community Development Association**

- Supports the appeal of the Ballymore Eustace Trout and Salmon Anglers Association.
- Argues that the original application was flawed as locals were not aware of the application (hence no submission during the application).
- Refers to a report on the Leixlip Treatment Plant dated April 2005 and data on water quantities permitted through Poulaphouca. It is argued in the light of the data that the applicant is failing to take account of the cumulative effects of various Water Services discharges to the Liffey. It is argued that the application should assess the cumulative impact of all Irish Water discharges from the upper Liffey to Dublin Bay.
- It is argued with regard to the proposed increase to 9,000pe that the cumulative impacts on the amenities of the Golden Falls Reservoir and the Liffey should be fully assessed.
- It is noted that the Water Quality Management Plan for the Liffey Catchment indicates that there have been breaches of total Phosphate levels and faecal Coliforms. It is stated that trout caught in the reservoir are used for human consumption.
- It is argued that the Golden Falls is a very significant amenity for the area.

- It is argued that the planning authority failed to take account of potential alternative options for the proposed works. In this regard, it is submitted that the possibility of connecting to the main Dublin treatment system at Leixlip has not been assessed.

#### **North Kildare Trout & Salmon Anglers Association**

- Supports the objection by the Ballymore Eustace Anglers Association.
- Refers to the Irish Water Report 'River Liffey at Ballymore Eustace: An Investigative Assessment which indicates that there is an ongoing pollution problem associated with water treatment plant chemicals in the Liffey.
- The submission by Inland Fisheries Ireland is noted with regard to the status of the river for trout and salmon.

#### **Clane Trout and Salmon Anglers Association**

- Supports the objection by the Ballymore Eustace Anglers Association.
- Notes issue of ongoing pollution from Irish Water facility at Ballymore Eustace.
- Notes letter from **Inland Fisheries Ireland** to the planning authority concerning the water status of the Liffey with regard to salmon and trout breeding and production.

#### **Department of Culture, Heritage and the Gaeltacht.**

- Notes proximity to the Poulaphouca Reservoir SPA and pNHA. The Department accepts the findings of the AA Screening Report.

### **6.5. Further Responses**

None on file.

## 7.0 Assessment

Having inspected the site and reviewed the file documents, I consider the application can be addressed under the following general headings:

- Principle of development
- Road issues
- Traffic
- Visual impact
- Traffic
- Appropriate Assessment
- Other issues

### 7.1. Principle of development

#### ***Overview of the proposed development***

The proposed development involves works within the existing boundary of a long established wastewater treatment plant for the town of Blessington. There are records of two previous upgrades, both approved under Part 8 - in 1999, and the more recent one in 2006. The current capacity is 6,000 pe, which is apparently now exceeded (it is described by Wicklow Council as 'biologically overloaded' and it is not meeting required Ammonia levels), with the proposed capacity of 'up to' 9,000 pe. The plant treats the towns effluent to a tertiary stage, with the wastewater pumped due south to the Liffey. It is submitted that the plant is required as the town of Blessington is now at capacity with the plant overloaded – it is implied in the submission documents and the planners report that the primary purpose of the works is to meet licensing requirements for emissions, with the extra capacity to allow for future population growth a secondary consideration. The discharge point for the treated effluent is in a gorge between the Poulaphouca dam and the lower secondary reservoir, at Golden Falls. The discharge is to a fast flowing river (essentially the overflow from the Poulaphouca dam), but is a short distance from the Golden Falls reservoir. The discharge point is close to the Ballymore Eustace treatment centre where most of the drinking water for Dublin is treated and is 5.5 km from the Blessington plant. It is stated in the application documents that the proposed works will lead to an increase in treated effluent volumes at the discharge,

but that capacity calculations have indicated that the receiving water has sufficient assimilative capacity to maintain 'Good' status. There have been previous appeals relating to the Ballymore Eustace plant with arguments submitted relating to the discharge of waste from the water treatment process (the most recent one is PL09.246476 – the Board upheld the decision of the planning authority to grant permission for an upgrade to the treatment works). The EPA has not commented on the application or appeal.

I note that the treatment plant is in open countryside, albeit quite close to a number of dwellings and one housing estate and is on lands zoned with a designation consistent with such infrastructure. The plant is some distant from both nearest roads and is not particularly visible from public areas. I note that there are no objections or comments on file with regard to complaints about odour or other related issues from local residents.

### ***Key issues with regard to the objections***

The key issue in this appeal, raised by all the appellants and the submissions with the original application, relate to the discharge of treated effluent to the Liffey River, and hence to the Golden Falls reservoir. The proposed development is subject to a discharge license from the EPA and as such the issues of the type and quantity of discharge is within the competence of the licensing regime of the EPA, not the planning system. Notwithstanding this, there are a number of planning issues raised by the discharge at this point of the Liffey, most notably I consider to be the suitability of the location for discharging an increased quantity of treated wastewater into the Liffey catchment upstream of the reservoir.

### ***Blessington town capacity issues***

**The Blessington Local Area Plan 2013-2019** designates the town as a 'Moderate Growth Town' with a projected 2022 population target of 7,500 people. It is part of the core strategy (Table 1.2 of the LAP) that the area is served with sufficient wastewater treatment capacity to cater for the projected population growth. It is indicated that the existing plant (6,000 pe) is insufficient and is already at capacity. I note in this regard that there is a significant part of the Blessington population catchment in County Kildare and it appears there has not always been a consistent approach in planning between the two counties.

The population (Table 2.2 of the LAP) is given as 6,000 in 2016, and projected to be 6,750 by 2019 and 7,500 by 2022. It is indicated that the long term growth of the village is considered to be around 4% per annum (Appendix A to the LAP). I note however, that the **Wicklow County Development Plan 2016-2022** states that there is a target 7,500 population to 2028 (Chapter 3, section on Blessington). The National Planning Framework (Appendix 2) gives the 2016 population as 5,520 permanent residents with 2400 resident workers. Significant areas of land have been zoned for residential development within the envelope of the village (I note that this is stated in the planners report to be additional to extant, but not yet built, permissions). It has also been raised by the appellants that if these lands are developed to the densities required in the most recent national guidance it the population growth could be higher, subject to planning permission. It is not clear from available information if the Blessington area as designated in the Plans is effectively the catchment of the wastewater plant, or if it the plant also serves housing or commercial units from a wider catchment, including in Kildare. I note in this regard that the existing 6,000 pe treatment system seems to have become biologically overloaded before the town has reached an official population of 6,000, which may be because of differing catchments or because of additional pressure from commercial developments in the town. If this is the case, then I would infer that the proposed development may become overloaded in turn before the population of the town officially reaches 9,000.

There are no indications on the file as to whether it is projected that the proposed plant is required simply for growth within the immediate future (i.e. the lifetime of the current Plan, or is to provide a longer term capacity. As it is clear that the plant is already over capacity, it seems reasonable to conclude that an increase in scale to 9,000 pe will provide little more than capacity for the existing quantum of zoned land if it is developed within the current plan period, so if growth continues at the current rate a further expansion in the near future may well be required.

This raises the overall question of whether it is appropriate to facilitate incremental increases to what appears to be a less than satisfactory arrangement for final disposal of the effluent. While the location of the treatment plant is uncontroversial, discharging to the Liffey directly upstream of a lake seems questionable in the light of known issues with maintaining water quality in both the lake and the overall

catchment. An obvious solution would be to direct the discharge to downstream of Golden Falls dam where there would be greater assimilative capacity, although there is no information on file to indicate if this would address all the known issues, in particular due to problems known from apparent discharges from the other Irish Water treatment plant at Ballymore Eustace.

The appellant also raised the issue of connecting to the greater Dublin scheme, but there is no information available to state whether this is practical or appropriate.

I note with regard to the assimilative capacity of the Liffey between the two dams that flow rates are subject to statutory levels set out in the original enabling act for the ESB works at Poulaphouca. But it seems that this is difficult to achieve these levels during times of water stress and may result in problems up to at least the implementation of a future additional drinking water supply scheme for the region.

I also note the sensitivity of the local environment. The reservoir is a significant local amenity, as is the Liffey. The Poulaphouca Reservoir is an SPA. The ravine between the two does not however appear to be easily accessible to the public, although it was once a well-known tourist attraction prior to the construction of the two dams.

### ***Conclusions***

I have very strong concerns that the proposed development represents a short term iterative response to an ongoing and serious issue, with local under-capacity in wastewater treatment leading to the increased use of an outfall which seems suboptimal in terms of modern requirements. It is a matter for the EPA to decide if the discharge would meet statutory requirements, but having regard to the cumulative impact of other developments in the area and the uncertainty over whether the capacity is enough for more than short term needs for Blessington, I would consider the approach of the applicants to be questionable. It is my opinion that granting permission for this development is not addressing the need to satisfy the broader policy objectives for Blessington as set out in the LAP and Development Plan. I would note that a somewhat larger development would result in the development being in excess of 10,000 pe, which would bring it within Schedule 2 of the EIA regulations, and as part of this a full assessment of cumulative and indirect impacts would be required, in addition to an assessment of alternatives.

There are very significant areas of ambiguity in the stated aim of the proposed works and how it fits in with projected future growth for Blessington in the context of the National Planning Framework and CDP and LAP objectives. The proposed works seem primarily intended to address existing overloading and to provide scope for relatively short term future growth in the town. I would be concerned that this represents an inappropriate approach to ongoing problems with what I would consider to be a suboptimal solution to disposing of the effluent to allow for both the protection of the water catchment and allow for reasonable projections of future growth for Blessington.

If the proposed development was for a short term upgrade pending a full review, I would consider it possibly justified, but in the absence of a clear technical case that the ongoing use of the discharge to above the Golden Falls reservoir is the best available solution, I would recommend a refusal of permission for the proposed development. I conclude that there is sufficient uncertainty about the appropriateness of the scale and design of the proposed development with regard to the amenities of Golden Falls lake to refuse permission.

If the Board is minded to grant permission, I would recommend that it seeks clarification from the applicant as to when it is anticipated a further upgrade would be required having regard to proposed planned increases in population for the Blessington catchment, and to address other possible alternatives for discharge including to below the Golden Falls reservoir; connection with other systems in the region; or other technical solutions such as the use of reedbeds for further treatment of effluent prior to discharge.

## **7.2. Road issues**

It is noted that the proposed upgrade to the N81 goes past the appeal site. The planning authority are satisfied that the proposed works do not interfere with any likely alignment.

## **7.3. Traffic**

The construction works would raise local traffic levels on the N81 but the existing site is wide with reasonably good sight lines so I do not consider that either construction or operational traffic would result in congestion or a hazard.

#### 7.4. Visual impacts

The proposed development would increase the size and scale of the existing plant generally within the envelope of the existing site. The site is largely screened from views from the road to the west by vegetation, both along the road and around the site. Hedges and walls block most views from the N81. There are no views of the site from any particularly sensitive locations around the village or from protected structures or other historic features.

#### 7.5. Appropriate Assessment

The applicants submitted a screening assessment. It notes the proximity of the processing site and outfall to the Poulaphouca SPA, site code 4063. It is also within 10km of Red Bog SAC (north of Blessington) and the Wicklow Mountains SAC and SPA. But the only site very close or in hydraulic continuity is potentially Poulaphouca, which at its closest is 400 metres from the plant. The stream running along the western boundary of the site enters the SPA (Poulaphouca Reservoir) directly after a few hundred metres. The effluent discharge is 850 metres south of the SPA and the flows from the discharge point run away (west) from the designated habitat area. The Screening does not address it, but I note that the Liffey ultimately drains to a number of Natura 2000 designated sites in Dublin Bay.

The Screening concludes that neither the construction works nor operations will impact on the conservation objectives of the qualifying interests – which in the case of Poulaphouca Reservoir are two bird species, the **greylag goose** and the **lesser black-backed gull**. It states that neither species are sensitive to the types of work proposed. It also states that the area around the site is not suitable for foraging habitat for **merlin** or **peregrine falcon**, which are the qualifying interests for the Wicklow Mountains SPA.

Notwithstanding my comments in the sections above about my concerns regarding cumulative impacts on the Golden Falls Lake, I do not consider that this would have an impact on the qualifying interests of the Poulaphouca or Wicklow Mountains SPA's or of any other Natura 2000 sites. I note the comments by **Inland Fisheries Ireland** on the presence of Annex II species (salmonids) in the Liffey, but I note that these are not qualifying interests for any of the designated sites.



I would therefore consider it reasonable to conclude on the basis of the information on the file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the European site No 4063, or any other European site, in view of the site's Conservation Objectives.

#### **7.6. Other issues**

I do not consider that there are other issues raised in this appeal. The proposed works are not subject to development contributions under the Section 48 adopted Scheme.

### **8.0 Recommendation**

I recommend that the proposed development is refused planning permission for the following reasons and considerations.

### **9.0 Reasons and Considerations**

Having regard to:

- Stated housing targets within the Blessington Local Area Plan 2013-2019 and the Wicklow County Development Plan 2016-2022 and the quantum of lands zoned within the town,
- Policy objective S2 of the Blessington LAP which states that it is policy to improve and expand wastewater treatment facilities sufficiently to ensure that no barriers exist in Blessington fulfilling its role as a moderate growth town as set out in the Wicklow Core Strategy and Regional Planning Guidelines for the GDA 2010-2022, and
- The amenity value and sensitivity to pollution of the Golden Falls Reservoir and the location of the outfall for the Blessington wastewater treatment works upstream of this waterbody,

the Board is not satisfied, having regard to future projections for growth in the Blessington area, that the proposed increase in treated effluent to a section of river upstream from the Golden Falls Reservoir would not, by way of cumulative impacts with other developments in the area, result in an unacceptable pollution impact on a

waterbody of significant amenity use. It is considered that a facility with a capacity of 'up to' 9,000 PE has not been demonstrated to be adequate for foreseeable future growth of Blessington and the proposed development has not been demonstrated to be the most environmentally appropriate approach to addressing the disposal of treated effluent. It is considered that in the absence of a full assessment of future needs for Blessington and appropriate alternative strategies for wastewater disposal, the proposed development would be contrary to policy objective S2 of the Blessington Local Area plan and may result in pollution to a watercourse. The proposed development would therefore, be contrary to the proper planning and sustainable development of the area.

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Philip Davis  
Planning Inspector

25<sup>th</sup> January 2019