



An
Coimisiún
Pleanála

Inspector's Report

ACP-323186-25

Development	Construction of a temporary foul sewer pumping station and wastewater treatment plant.
Location	Raynoldstown Village Haynestown, Dublin Road, Dundalk, Co. Louth.
Planning Authority	Louth County Council
Planning Authority Reg. Ref.	2560063
Applicant(s)	Groveview Builders Ltd.
Type of Application	Permission
Planning Authority Decision	Granted Permission
Type of Appeal	Third Party Normal Planning Appeal
Appellant(s)	1. Jennifer Lynch and Dundoogan Residents Association 2. Adolfo Carvalho 3. Jiwan Jodhani
Observer(s)	None

Date of Site Inspection

02/04/2026

Inspector

Fiona Fair

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1.0 Site Location and Description

- 1.1. The application site lies approximately 5km to the south of Dundalk Town Centre, in Haynestown, Dundalk. The N52 lies to the northwest / northeast of the site and the M1 lies to the west. The subject site forms part of the Raynoldstown Village Housing development which is currently under construction on a brownfield site. The site has access via the existing approved vehicular and pedestrian access from the Western Relief Road (WRR) to the west and the Dublin Road via The Boulevard to the east. The M1 can be accessed from the site via the R132 and N52.
- 1.2. The Raynoldstown Village Housing development was originally granted a 10 year permission on foot of Reg. Ref.03/1754, (decision date 24.01.2005) for construction of a residential & mixed use (retail/comm./residential) dev. consisting of 1,450 dwellings, comprising 779 houses., 285 apts. in 28 no. 3 storey blocks, 76 no. commercial units comprising offices, financial institution retail units, minimarket, 1 pub & restaurant, 1 creche, 1 community facility centre, & a reserved site for a primary school, 5 reserved sites for creches & the construction of the proposed distributor road to be located to the west of the site, to be constructed from the Clermont Rd. to the Marlbog Rd. & all associated site works with vehicular access provided by the Clermont Rd, Marlbog Rd, Dublin Rd & proposed distributor Rd for 1 no. dormer house from Chapel Rd. pumping station, outfall foul and surface water sewers, landscaping, boundary treatment, open spaces, surface & underground car parking & demolition of agricultural buildings.
- 1.3. The subject site for the TWWTP is located on a stated site area of c.0.31Ha, which forms part of the c. 1.22 (Ha) (3.01 Ac) area designated as a 'reserved site for educational / community facilities', as per the parent permission Reg. Ref. 03/1754 and the Masterplan for the overall lands.
- 1.4. The site is bounded to the North by the Boulevard Raynoldstown development, to the west by PL-500669-LK-26 / 2460785 a concurrent application, by Groveview Builders, for construction of 85 houses and all associated site works, no decision to date. Further to the north by PL-500399-LH-25 / Reg. Ref. 2460737 a concurrent application no decision to date, by Groveview Builders, for the construction of 80 no. dwellings and all other site works. Existing housing in Wadman Park is located to the north of this application and a further concurrent planning application by Groveview

Builders PL-500206-LH / Reg. Ref. 2460649 for the construction of 91 houses, with A Natura Impact Statement (NIS) is also under appeal to the north of Wadman Park. This gives rise to three applications for housing by Groveview Builders Ltd. the same applicant as the subject application, currently under appeal to An Coimisiún:

- PL-500399 / Reg. Ref. 2460737 No decision
- PL15.500669 LH - 25 / Reg. Ref. 2460785 - No decision
- PL15.500206 / Reg. Ref. 2460649 - No decision

1.5. Under Planning Reference 24/60512, Permission has been granted (10.03.2025) to Groveview Builders, to the northwest of the subject site, for the construction of neighbourhood facilities, in three number two storey detached buildings, at the proposed Village Green' neighbourhood facilities site, as per the Masterplan (see Planning History section of this report below).

2.0 Proposed Development

2.1. Planning Permission is sought for the construction of a temporary foul sewer pumping station and a temporary wastewater treatment plant to pre-treat wastewater prior to discharging to the public sewer with vehicular access via the substantially completed internal estate road ('The Boulevard', constructed under Ref.No:03/1754) and all associated development works on application site (red line) area of c.0.31Ha

3.0 Planning Authority Decision

3.1. Decision

Permission Granted subject to 14 conditions:

1. Standard.
2. Temporary period of 5 years from the date of the grant of permission after which time all structures shall be decommissioned and removed from the site at the developers expense and the lands shall revert back to their previous use unless a separate planning permission is granted.

3. a) If the upgrade to the public Blackrock Wastewater Treatment Plant is completed prior to the expiration of this permission, the developer shall decommission the utilities and structures granted under this permission and revert the lands back to their previous use and a full connection to the public sewer system shall be implemented within 6 months of the date of the completion of the upgrade works, unless agreed otherwise in writing with the Planning Authority.

b) Prior to the decommissioning of the utilities and structures granted under this permission the developer shall submit written confirmation from Uisce Éireann of the connection agreement confirming the required upgrades to the Blackrock Wastewater Treatment Plant have been completed and that a direct discharge to the Blackrock Wastewater Treatment Plant can be facilitated.
4. a) Upon completion of the temporary wastewater treatment plant, foul sewer pumping station and associated works granted under this permission a completion certificate shall be submitted by a suitably qualified professional with professional indemnity insurance confirming that the works have been constructed to the required standard as set out in the 'Code of Practice Wastewater Infrastructure', Clause 3.6 (Document Number: IW-CDS-5030-03 issued by Irish Water' or any updates of same.

b) The temporary wastewater treatment plant and foul sewer pumping station shall be managed and operated by a suitably qualified professional. Prior to the development becoming operational, details of the persons/company responsible for the operation and maintenance of the facility shall together with their qualifications and professional indemnity insurance shall be submitted for the written agreement of the Planning Authority.

c) Upon the temporary wastewater treatment plant and foul sewer pumping station becoming operational, the developer shall submit a maintenance and operational contract for the management and operation of the treatment plant and pumping station, for the written agreement of the Planning Authority.
5. Prior to the commencement of development, full details of all decommissioning and site remediation works to the structures and utilities associated with this permission shall be submitted for the written agreement

of the Planning Authority. This shall include a timeframe for carrying out these works.

6. (a) Prior to the operation of the temporary foul sewer pumping station and temporary wastewater treatment plant, all roadways and footpaths serving the said infrastructure shall be finished with a permanent durable surface course. The roadway shall be applied with line marking and road signage as per furnished drawings.

(b) Prior to the operation of the temporary foul sewer pumping station and temporary wastewater treatment plant, the street lighting in the vicinity and serving the said infrastructure shall be operational.

(c). Prior to the commencement of development, the applicant shall prepare and submit for the written agreement of the Planning Authority a Construction Management Plan for the works. This Plan shall fully detail:

- A Traffic Management Plan for all phases of the proposed development including Construction Traffic Access arrangements.

- The delivery and routing of materials to the site during the construction phase shall be organised so that deliveries do not conflict with the morning or evening periods of peak school traffic flow.

- The removal and routing of surplus material off site shall be so organised that haulage vehicles do not conflict with morning or evening periods of peak school traffic flow.

- If the Construction Management Plan should indicate that access over third party lands is required, evidence of landowner's Consent shall be submitted

7. A bond of €40,000

8. The developer shall enter into water and wastewater connection agreements with Uisce Éireann prior to commencement of development and all development shall be carried out in compliance with Uisce Éireann Standards codes and practices.

9. Hours of operation

10. Public road to be kept clear of soil, clay, gravel, mud or dust or other debris.

11. Road cleaning requirements.
12. The site shall be landscaped strictly in accordance with the submitted scheme. All planting shall be adequately protected from damage until established. Any plants which die, are removed, or become seriously damaged or diseased, within a period of 5 years from the completion of the development shall be replaced within the next planting season with others of similar size and species unless otherwise agreed in writing with the Planning Authority.
13. Prior to the commencement of development, the developer shall submit details of site specific measures to minimise the risk of water pollution during the construction stage to the Planning Authority for written agreement.
14. The development shall be operated to ensure that there will be no emissions or malodours, fumes, other deleterious matter such as would give reasonable cause for annoyance to any person in any residence in the vicinity.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The initial planners report acknowledges the proposed TWWTP / 'utilities' is acceptable on lands zoned "G1 Community Facilities" under the Louth County Development Plan 2021– 2027, which has the objective "To provide for and protect civic, religious, community, education, health care and social infrastructure".

The planners report states that the requirement for WWTP facilities is noted. However, this land was also identified as the location for a school and public open space under the permitted masterplan for the area, under parent permission ref no: 03/1754 and subsequent permitted applications in the immediate vicinity.

Further information was requested, with respect to 7 items, summarized as follows:

Item 1 Justification: Land was identified as the location for a school and public open space under the permitted masterplan for the area under parent permission ref no: 03/1754.

- In response, the applicant has submitted a planning report which outlines the requirement for the proposed development on a temporary basis to facilitate the

construction and occupation of some 317 houses, until the Blackrock WWTP upgrade is completed by UE by Q1 2030.

The proposed temporary WWTP site is 0.31 hectares in size located along the western boundary of the land and thus, the proposed development can proceed without impacting on the development of a school adjacent.

- It is stated that the developer anticipates that 50-60 residential units will be erected annually and, on this basis, it will be 4-5 years after the substantial completion of the permissions for the 65 and 96 units schemes (permitted under 22/688 and 23/60257) that construction work will begin on the 85-unit scheme (24/60785 / PL-500669-LH-26) which includes the proposed footpath and green space at this location. It is envisaged that it will be 5-6 years before the footpath and open space proposed at this location will be put in place.

The PA considered that subject to condition and given the temporary nature of the WWTP it is acceptable.

Item 2 Odour Treatment & Landscaping plan.

In response - It is stated that a suitable wastewater and pumping specialist company will manage the facility. The proposed biofiltration system will be used to treat odour by means of biological oxidation, neutral pH maintenance, recirculating irrigation and no chemical additives.

- It is stated that this system is a biological odour control technology that provides efficient, low maintenance, and eco-friendly treatment of a wide range of odorous emissions.

- Landscape plan from JBA Landscaping Consultants which incorporates a variety of native tree and hedgerow species to ensure visual screening, enhance biodiversity, and integrate the development with the surrounding landscape.

The PA considered the measures specified will ensure that the residential amenity of the area will be protected. Also, the proposed landscaping plan accords with Development Plan policy and is acceptable.

Item 3 Clarity with respect to wastewater treatment infrastructure and connectivity to roads and connectivity to the proposed housing development. Surface water

drainage, boundary details, access off the housing development road, entrance details and sightlines, public lighting.

The applicant submitted revised drawings showing compliance with FIR. The Placemaking Section of Louth County Council subsequently have submitted a report indicating satisfaction with the proposals. The PA have no objection subject to conditions.

Item 4 Clarity with respect to the proposed pumping station and connectivity to roads and connectivity to the proposed housing development. Surface water drainage, boundary details, access off the housing development road, public lighting and road layout.

The applicant contends all issues have been addressed in the FIR Response. The PA concurs with this submission.

Item 5 Details of vehicular traffic associated with the TWWTP.

The applicant's response states:

Details of the expected vehicular traffic associated with the temporary wastewater treatment plant:

- Tankers for sludge removal. Up to 2 two-way trips per week, depending on system loading.
- Maintenance/Service Vehicles (LCVs): 2–3 two-way trips per week.

The pumping station:

- Tankers for sludge removal. 2 two-way trips per year.
- Maintenance/Service Vehicles (LCVs). 2–3 two-way trips per week.

The PA consider the response satisfactory and are satisfied that it is of a minor nature which will not negatively impact on traffic safety in the area or significantly impact on residential amenity.

Item 6 Requests full details of emergency overflow arrangements from both the foul sewer pumping station and wastewater treatment plant inclusive of discharge points. The applicant's response submits, inter-alia, that as part of the temporary wastewater treatment solution, an emergency overflow tank will be installed at the pumping station.

The design includes the provision of overground precast sludge holding tank(s), capable of storing up to 20 days' worth of sludge at 2% dry solids concentration.

To support operational reliability, a GSM-based dial-out alarm and monitoring system will be installed, providing real-time alerts and enabling remote supervision.

Furthermore, a full-time operation and maintenance (O&M) contract will be implemented by the plant installer to ensure the system operates efficiently and remains compliant with all relevant UE and Louth County Council standards.

The PA considered the response satisfactory.

Item 7. Autotrack site layout plan with vehicle swept path analysis.

The applicant's response includes Drawing no. 4224 C1511 site layout plan with swept path analysis.

The PA consider the response is acceptable.

3.2.2. Other Technical Reports

- **Waste & Environment Section Report** (undated) no objection subject to conditions. Incl.
 - Standard condition re plans and drawings submitted.
 - Preparation of a Resource and Waste Management Plan for C&D Projects.
 - Site specific measures to minimise the risk of water pollution during the construction stage.
 - Limit to the hours of construction work.

- **Placemaking & Physical Development Section** – Initial report (12th March 2025) recommended a RFI. Subsequent report dated 23rd June 2025 states no objection subject to 8 No. conditions. With respect to:
 - Standard condition re plans and drawings submitted.
 - Road finishes

- Street lighting.
- CEMP
- Road opening licence
- Applicant responsible for full costs of repair in respect of any damage caused to the adjoining public road / footpath arising from construction work.
- Hoarding licence in accordance with section 254 of the Planning and Development Act, 2000 and the P&D Regulations 2001.
- All necessary measures, as may be determined by the Planning Authority, shall be taken by the developer/contractor/servants/agents to prevent the spillage or deposit of clay, rubble or other debris on adjoining public roads or footpaths during the course of the development works.

3.3. Prescribed Bodies

- Uisce Eireann – response received 27.03.2026
 - UÉ issued the applicant with a Confirmation of Feasibility (COF) letter for the proposed development, which specified the requirement for onsite treatment being provided, that would result in the same Emission Limit Values (ELV's) being achieved as those of the Blackrock Wastewater Treatment Plant (WWTP). In addition, it was also specified as a requirement for the temporary WWTP to treat Ammonia. Therefore, the proposed temporary treatment plant will contain stricter conditions than the existing UÉ Blackrock WWTP. This discharge will have no impact on the performance of the Blackrock WWTP and will be a pass-through flow (i.e. no increase in load).
 - The proposed temporary treatment plant will also treat an additional 63 no. existing housing units that are currently discharging to the Blackrock WWTP and therefore, will have the benefit of reducing the load going to Blackrock for treatment.

- As part of the planning application to Louth County Council, the case planner specifically asked for additional information on SUDs management and treatment of emergency overflows. The Planner's report showed satisfaction with SUDs management and on-site storage to limit any emergency overflows.
- Further the Louth County Council Case planner's report gives reasoned justification for screening out the development for Appropriate Assessment.
- The approach taken by the local authority seems to align with the principles relating to wastewater discharge in the judgement *Monkstown Road Residents Association and Others -v-An Bord Pleanála and Others* [2023 IEHC 9]
- EPA – response received 27.03.2026 which states:
 - More recently, new regulations introduced a registration regime with general binding rules for **new small waste water treatment plants <150 p.e.**, namely the [European Union \(Water Policy\) \(Small Wastewater Discharge Register\) Regulations 2026 \(S.I. 65 of 2026\)](#).
 - It is unclear from the application as to the size of the proposed temporary waste water treatment system. However, from the planning inspectors report it would indicate an initial 62 units will be connected to the system which is potentially greater than 150 p.e.
 - The EPA does not regulate point source discharges arising from waste water discharges from local authority or privately owned waste water treatment plants such as those servicing local authority housing estates or private housing estates. There is no legislation in place for the authorisation of such point source discharges. It is noted this planning application has been made by a private individual and not Uisce Eireann. This means that the works proposed will not be subject to authorisation by the EPA.
 - This planning application states that the waste water treatment plant is temporary in nature until such time as the UE network can facilitate the discharge into the Blackrock waste water works circa 2030. However, UE

have indicated this is subject to change. From the maps provided with the planning application the temporary discharge is into a small river waterbody that flows into Dundalk Bay SAC and SPA, located approximately 1.5Km downstream. It is unclear from the planning documentation if the impact of the discharges from the temporary waste water treatment plant on the small water body, it is proposed to discharge to, has been taken into account.

- Recommends clarification of issues

3.4. Third Party Observations

42 submissions were received in relation to this application. A full list of the submissions lodged are set out in the planner's report on file.

Points raised (as summarised in the planners report and I note relate to similar matters raised in the three third party appeals) include:

- Impact on residential amenity by reason of foul odour, poor air quality and noise within a developed residential area. Many dwellings are within 65m of the proposal and the engineering report does not make clear what odour control mechanisms are to be put in place.
- Possible impact on human health arising from leaks which could jeopardize local water quality.
- Possible impacts on local soil and groundwater quality.
- Industrial facility requiring heavy lorry traffic twice a week.
- The proposal represents profit before amenities.
- Lack of certainty relating to the timeline for the removal of the plant.
- Precedent in recent decisions by An Bord Pleanala relating to the lack of capacity in the sewerage network.
- Depreciate the value of property in the area.
- The proposal contravenes the permitted Masterplan for Raynoldstown and Development Plan zoning. The subject site was masterplanned for a school

under ref no: 03/1754 of which there is a high demand in area. If the proposal is permitted, this will delay the development of a school for 5-10 years.

- Piecemeal development. The applicant has multiple residential planning applications, many concurrent, which avoids the LRD system. Conditions have not been applied to these planning applications requiring the provision of the Neighbourhood Centre and community facilities.
- The temporary nature description of the works proposed is misleading. The Engineer's Report states that 2030 is the earliest that the public proposed connection could be completed which is a 5 years minimum duration of operation for this wastewater development and likely much longer during which the applicant's company could have been dissolved or no longer in operation in the area, falling on Louth County Council or Uisce Eireann to take these works in charge. We strongly request that this application is refused and that no more residential units are permitted in the area until the existing Blackrock Wastewater Treatment Plant upgrade works are complete while the Raynoldstown Creche & Community accommodation is prioritised for delivery over any more dwellings.
- Visual Impact. The proposed CAS tanks are dimensioned at 4.305m high with a 3.15m grassed berm which will not adequately screen this industrial plant from view for many residents, including the Boulevard houses that are 3 storey and within 68m of the proposed development.
- Local experience to date with unresolved planning compliance issues such as unforeseen water disruption events, pedestrian and cycle link through Greengates Manor public open space to the Dublin Road not completed and no provision of a children's playground, creche or bus shelters provided.
- Lack of public consultation and alternative location should be sought.
- Concerns about the weight given to objections and whether they are fully considered in the decision-making process.

4.0 Planning History

- **Planning Reference 24/60512**, Permission **GRANTED (10.03.2025)** to Groveview Builders for the construction of neighbourhood facilities in three number two storey detached buildings comprising of the following:
 - Building 1: A mini-market retail shop at ground floor and general practice medical related community uses at first floor with a total floor area of c. 1328m sq.;
 - Building 2: A pharmacy and cafe at ground floor and dental practice community related uses at first floor with a total floor area of c. 780m sq.m;
 - Building 3: A creche facility in two floors with a total floor area of c. 922m sq. on previously approved creche site (Ref. No: 22966);
 - The provision of a reserved site of c.0.024 ha for community use facilities; and for all associated ancillary carparking, secured covered bicycle parking, on and off site development works, ESB substation, boundary treatments and landscaping with existing pedestrian, cycle and vehicular access via the two previously approved access locations from the substantially completed internal estate road (The Boulevard, constructed under Ref. No:03/1754) on application site (redline) area of c. 1.37 ha.

This site is located to the north / northeast, west and south / southwest of the subject appeal site.

PL15.500669 LH - 25 / Reg. Ref. 2460785 – (Lands located directly to the west of the subject appeal lands Groveview Builders Ltd). Permission sought for Construction of 85 houses and all associated site works. NIS received with Further Information. Louth County Council **Refused** Permission (**19/12/2025**). Currently under appeal No Decision to date.

Three reasons for refusal related to:

- Blackrock waste water treatment plan does not have capacity and the necessary upgrade is not scheduled to be completed until Q1 of 2030. While an application for a temporary wastewater treatment plant to pre-treat effluent generated from the larger Groveview development is under consideration by

An Coimisiún Pleanála (PL15-323186) there is no decision on that appeal and in this context the application would be premature pending that decision.

- Spot Objective E (Raynoldstown Village) in the Dundalk LAP requires the provision of a neighbourhood centre with associated community uses and outdoor play and recreation area within Raynoldstown Village development in tandem with residential development and the preparation of a masterplan. The proposed development does not comply with policy objective KDCA 5 of the Dundalk LAP 2025 – 2031.
- Impact upon Natura Sites. Precluded from granting permission in absence of any means to treat wastewater.

PL. 500399-LH-25 / Reg. Ref. 2460737 (Located to the northwest of the subject site) Permission **Refused (10.11.2025)** for the construction of 80 no. dwellings and all other site works. For one no. reason for refusal:

1. Development of the type proposed is dependent upon a connection to the Uisce Éireann network to discharge wastewater into Blackrock Wastewater Treatment Plant (WWTP). It has been confirmed by Uisce Éireann, in correspondence to the Planning Authority dated 31st October 2025, that Blackrock WWTP does not have the capacity to cater for the proposed development and that the necessary upgrade of the existing WWTP facility is scheduled to be completed by Q4 of 2031. The Planning Authority is not satisfied that the applicant has demonstrated a sufficiently developed commitment and specific timeframe that shows that the proposed development would have access to an effective wastewater treatment system within the lifetime of the permission, if granted. In light of the foregoing, it is considered that the proposed development would be premature by reference to the existing deficiency in the capacity of existing sewerage facilities, which would set an undesirable precedent for other similar developments in the surrounding area and would, therefore, be contrary to the proper planning and sustainable development of the area.

This decision is currently subject to appeal with An Coimisiún Pleanála and there is no decision to date.

PL15.500206 / Reg. Ref. 2460649 – (Site to the North). Permission sought for Construction of 91 houses. A Natura Impact Statement (NIS) was submitted with this appeal. Lands to the East of the Western Relief Road South of the Marlbog Road & north of Wadman Park, Raynoldstown Village Haynestown , Dundalk Co. Louth. Louth County Council **Refused** Permission (**07/10/2025**). Currently under appeal. No Appeal Decision to date.

Three reasons for refusal related to:

- Inadequate NIS and in absence of any means to treat wastewater.
- Blackrock wastewater treatment plan does not have capacity and the necessary upgrade is not scheduled to be completed until Q3/Q4 of 2031.
- The proposed Layout is inadequate. Contrary to DMURS. It would endanger public safety by reason of a traffic hazard. Fencing is unsuitable to protect or provide residential amenity to future occupants or existing occupants along Marlbog Road.

Reg. Ref. 23/60257 - (To the north of application site). Permission **GRANTED (20.9.2023)** and under construction for Permission for development to consist of 96 houses and all associated ancillary site development works, boundary treatments, landscaping and open spaces on lands of circa 7.18Ha. (Previous Permission 03/1754) with existing vehicular and pedestrian access from the Dublin Road via The Boulevard, Raynoldstown Village, Haynestown, Dublin Road, Dundalk, Co. Louth. Groveview Builders.

Reg Ref. 22/688 - (To the west of the application site – Groveview Builders Applicant) Permission **GRANTED (06.07.2023)** for development on lands at Raynoldstown Village, Haynestown. The development will consist of the construction of 85 no. dwellings and all associated ancillary site development works, boundary treatments and landscaping, on lands of circa 3Ha. (Previous Permission 03/1754) with access via the existing approved vehicular and pedestrian access from the Western Relief Road to the west and the Dublin Road via the Boulevard to the east at Raynoldstown Village”.

Reg. Ref. 03/1754 - (P)(10 year permission 24.01.2005) dev. for construction of a residential & mixed use (retail/comm./residential) dev. consisting of 1,450 dwellings, comprising 779 houses, 285 apartments in 28 no. 3 storey blocks, 76 no. commercial units comprising offices, financial institution retail units, minimarket, 1 pub & restaurant, 1 creche, 1 community facility centre, & reserved site for primary school, 5 reserved sites for creches & the construction of the proposed distributor road to be located to the west of the site, to be constructed from the Clermont Rd. to the Marlbog Rd. & all associated site works with vehicular access provided by the Clermont Rd, Marlbog Rd, Dublin Rd & proposed distributor Rd for 1 no. dormer house from Chapel Rd. pumping station, outfall foul and surface water sewers, landscaping, boundary treatment, open spaces, surface & underground car parking & demolition of agricultural buildings. GRANTED but not fully built out.

5.0 Policy Context

The Louth County Council Development Plan 2021 - 2027 (as varied), is the current statutory plan for County Louth. The Core Strategy is provided in Chapter 2 and refers to the RSES, and that Dundalk and Drogheda are designated as Regional Growth Centres (RGCs). These are described in Table 2.4 – ‘Settlement Hierarchy for County Louth’: ‘Regional Growth Centres are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.’

As per Table 6.1 of the RSES and restated in the Development Plan under Table 5.2, Dundalk and Drogheda are designated as ‘Level 2’ – ‘Major Town Centres and County Towns.’

The following variations to the Louth County Development Plan have been made and are relevant:

Variation No. 1 (2022) – Updated the plan to take account of the Section 28 Guidelines ‘Housing Supply Target Methodology for Development Planning’ and the ‘Projected Housing Demand by Local Authority Area 2020-2031 – ESRI NPF Scenario Housing Supply Target’ provided by the Department of Housing, Local Government and Heritage in December 2020. Also updated the plan to ensure it’s

consistency with Part V of the Planning and Development Act as amended by the 'Affordable Housing Act, 2021'.

Variation No.2 (2024) – Updated the plan to take account of the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' published by the Department of Housing, Local Government and Heritage in January 2024 as issued under Section 28 of the Planning and Development Act 2000 (as amended). Section 28 of the Act provides that Planning Authorities shall have regard to Ministerial Guidelines, and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28(1C) of the Planning and Development Act 2000 (as amended), in the performance of their functions.

Variation No.3 (2025) – Updated the plan to take account of the Dundalk Local Area Plan, as adopted, and to ensure consistency between the Plans.

The Planning Authority have included a long list of relevant Objectives in their planning report.

5.1. **Local Area Plan**

The subject site is located within the designated area of the Dundalk Local Area Plan 2025 – 2031 and which came into effect on the 17th of April 2025. The subject lands are zoned "G1 Community Facilities" under the Dundalk Local Area Plan 2025 – 2031 and the Louth County Development Plan 2021– 2027 (as varied), which have the objective "To provide for and protect civic, religious, community, education, health care and social infrastructure". Utilities such as wastewater treatment plants are a permitted use under this zoning.

Permitted Use:

Allotments, Cemetery, Childcare Facility, Community Facility, Crematorium, Education Facility (Primary or Second Level), Education Facility (Third Level or Training Centre), E- Charging Facility, Health Care Centre, Healthcare Practitioner, Hospital, Nursing Home, Park/Playgrounds, Place of Worship, Recreational/Amenity Open Space, Recreational/Sports Facility, Recycling Facility (Civic & Amenity), Utilities.

'A1' 'Existing Residential' zoned lands surround the 'G1' zoned lands.

'A1' has the objective: 'To protect and enhance the amenity and character of existing residential communities.'

The subject lands were also identified as the location for a school and public open space under the permitted masterplan for the area, under parent permission ref no: 03/1754, and subsequent permitted applications in the immediate vicinity.

The site is located within the Raynoldstown Village Key Development Area and is detailed under Section 3.2.2 of the Dundalk Local Area Plan. The following sections are noted:

'The lands have the capacity to deliver c.1,250 - 1,450 units (inclusive of existing units built and occupied). Whilst the original grant of permission on the lands was in 2005, economic circumstances curtailed development activity. Infrastructure works completed to date include a 1km road between the Clermont Road and Marlbog Road and a pumping station in the south-eastern corner of the lands.

Over 600 residential units have been completed to date, with permission granted / construction ongoing on approximately 300 units (c.900 units complete/under construction/with an extant permission). This includes Marlmount to the north of Marlbog Road, which is close to completion; Wadman Park, Green Gates Manor and Dundoogan all of which are to the south of Marlbog Road.'

'In order to support the creation of a sustainable community in this part of the town, a requirement has been included in the LAP that a neighbourhood centre with associated community uses has commenced construction prior to no more than 1,000 units in Raynoldstown Village being occupied. Planning permission shall also be granted for a community building. This building shall be designed to ensure flexibility as to its future use.

A Spot Objective reflecting this requirement is included on the Maps in Volume 2. For further details see Spot Objective E in Section 3.4.2.

This Spot Objective shall be implemented through the Development Management process, with any planning application in Raynoldstown Village required to include details of the number of residential units complete and occupied/unoccupied and the number of units under construction at the time the application is made.'

The Spot Objective E is located to the west of the subject appeal site, outside of the site boundary, on the relevant Dundalk Local Area Plan maps.

I note Planning Reference 24/60512, on foot of which permission was granted (10.03.2025) to Groveview Builders for the construction of neighbourhood facilities in three number two storey detached buildings to the immediate west of the subject appeal site, see planning history section of this report above.

The site is located outside of Flood Zones A and B.

5.2. **National/ Regional Plans/Policies**

The Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy (RSES) defines Dundalk as a Regional Growth Centre and an important settlement on the Dublin – Belfast Economic Corridor. There is a target for the population to reach 50,000 by 2031. Under the Section Regional Policy Objectives, the following relevant objectives refer to the development of Dundalk:

‘RPO 4.19: A statutory Urban Area Plan (UAP) shall be prepared by Louth County Council for the Regional Growth Centre of Dundalk in collaboration with the EMRA. The UAP will support the development of Dundalk as an attractive, vibrant and highly accessible Regional Centre and economic driver. The UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.

RPO 4.20: Promote and enhance cross-border interactions to realise the growth potential of Drogheda-Dundalk-Newry as an important cross-border network for regional development.

5.3. **National Guidance**

The following is a list of Section 28 - Ministerial Guidelines, Manuals and Procedural Advice Notes considered of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- Project Ireland 2040 National Planning Framework.

- Project Ireland 2040 National Development Plan 2018-2027.
- Design Manual for Urban Roads and Streets (DMURS) (2013).
- Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (DoHLGH, 2024).
- Quality Housing for Sustainable Communities (DoEHLG, 2007).
- The Planning System and Flood Risk Management including the associated Technical Appendices (DEHLG/ OPW, 2009).
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018.
- Delivering Homes, Sustaining Communities (2008).
- Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)
- Framework and Principles for the Protection of the Archaeological Heritage Department of Arts, Heritage, Gaeltacht and the Islands, 1999.
- Urban Wastewater Treatment in 2024, EPA
- Procedural Advice Note for Planning Authorities Developer-Led Infrastructure (DLI) Initiative for Wastewater Services to support Housing Delivery, March 2026, DHLG&H.
- The ‘Wastewater Treatment Manual: Treatment Systems for Small Communities, Business, Leisure Centres and Hotels (Environmental Protection Agency, 1999)’

5.4. Natural Heritage Designations

- Dundalk Bay pNHA (Site Code 000455) is c.1km to the south east of the subject site.
- Dundalk Bay SPA (Site Code 004026) is c.1km to the south east of the subject site.
- Dundalk Bay SAC (Site Code 000455) is c.1km to the south east of the subject site.
- Carlingford Mountain SAC (Site Code IE0000453) is 9.6 Km distant.
- Stabannon & Braganstown SPA (Site Code IE0004091) is 8.3 Km distant.

5.5. EIA Screening

Council Directive 85/337/EEC (as amended) on the assessment of the effects of certain public and private projects on the environment ('the EIA Directive') is designed to ensure that projects likely to have significant effects on the environment are subject to a comprehensive assessment of their environmental effects prior to development consent being given. The latest amendments to the EIA Directive are provided for under Directive 2014/52/EU and Circular letter PL 1/2017. The proposed development is a development type listed under Part 2 of Schedule 5 of the Planning & Development Regulations (PDR) 2001 (as amended), however, it is considered a sub-threshold development for the purposes of Schedule 7 PDR. Based on information provided and having considered the nature, size and location of the development, there is no real likelihood of significant effects on the environment and as such a mandatory EIS/EIAR is not required in this instance. See Appendix 1 Pre-Screening EIAR attached to this report.

6.0 The Appeal

6.1. Grounds of Appeal

Third Party Appeals by The Boulevard & Norhalton Residents c/o Adolfo Carvalho, Dundoogan Residents Association c/o Jeniffer Lynch & Jiwan Jodhani are summarised as follows:

- Do not accept that the provision of the TWWTP to serve a further 318 households constitutes orderly development, nor will it safeguard the residential amenities of the area.
- Temporary period of 5 years is disingenuous. The entire proposal is predicated on the Blackrock Wastewater Treatment Plant being at capacity, with upgrades not anticipated until 2030. This inherent uncertainty directly validates skepticism regarding the temporary nature of the WWTP.
- Condition 2. There is nothing to preclude the developer from applying for planning permission to extend the life of the consented and executed development.

- Condition 3 relates to the upgrades of the Blackrock WWTS and says that if an upgrade is completed prior to the expiration of this permission, the developer will decommission the utilities and revert the land back. The upgrade of the Blackrock WWTS should be fast tracked and not rely on a temporary solution. An Bord Pleanála have consistently refused developments of this nature.
 - Kill, Co. Kildare (ABP-300558-18) SID Application was refused because of an “existing deficiency in the provision of adequate sewage infrastructure serving the subject site”, deeming the development “premature pending the carrying out and completion of necessary upgrade works”. This president directly mirrors the situation in Raynoldstown village .
 - Middleton WWTP, Co. Cork (ABP-316399-23) A Planning application was refused due to a lack of wastewater treatment capacity in Middleton wastewater treatment plant and lack of certainty around the delivery of a pump station and rising main. Uisce Eireann’s own capacity register indicated the Middleton plant had a ‘Red’ capacity level, signifying no spare capacity and refusal emphasized the planning guidelines require existing capacity not merely future plans.
 - PL15.318894 Old Golf Links Road, Haggardstown, Dundalk, Co. Louth, Permission Refused 03/07/2025 for construction of 37 residential units due to lack of adequate capacity at Blackrock Wastewater Treatment Plant to accept wastewater from the facility it is considered that the proposed development would not be in accordance with Objective IU6 of the Louth County Development Plan 2021-2027 and Objective INF4 of the Dundalk Local Area Plan 2025-2029 which require that all new developments connect to the public supply where public water and wastewater infrastructure is available or likely to be available and which has sufficient capacity.
 - Clonsaugh WWTP, Dublin: Planning permission for the Greater Dublin Drainage Project - Intended to supplement the overcapacity Ringsend wastewater treatment plant was quashed by the High Court

due to An Bord Pleanála's failure to comply with the mandatory wastewater discharge regulations. The Board did not consult the Environmental Protection Agency as required specifically failing to seek EPA observations on the impact of wastewater discharges. The High Court ruled that this omission rendered the assessment legally flawed and without EPA input the Board couldn't fully assess environmental effects.

- Inadequate decommissioning plan and financial provision. €40,000 is wholly inadequate. Concern of reputable and competent supplier, installer and management of the facility.
- Condition 14 states that the development shall be operated to ensure that there will be no emissions or malodours. It is well known that both odour and noise are very difficult to enforce from a planning perspective. Odour complaints account for 40% of all complaints made to the EPA in 2017.
- Local Concern (Point Road, Dundalk): The proposed supplier and management company, EPS, manages the plant at Point Rd. in Dundalk, which according to residents' submissions is experiencing ongoing issues with capacity and foul odors and is the subject of many public complaints.
- This direct local example directly undermines confidence in the proposed operator's ability to prevent similar problems at the Raynoldstown site.
- Traffic and noise. Concern that large sewerage tankers will access the site at least 2-6 times a week. Large sewerage tankers accessing the site at least 2 – 6 times a week through an established high density residential development with DMURS road layout with tight radii and children playing is unsafe, unsightly and a high risk of malodour.
- EIAR and NIS deficiencies. The site is 1km from Dundalk Bay SPA/SAC. It is questionable as to whether the AA conclusion is correct- there is a stream approximately 135m away with a direct connection to Dundalk Bay SAC and SPA c. 1 Km away.

- Negative impact on the residential amenities of Wadman Park residents. By reason of noise, odour, disruption and stress. The separation distances between the proposed development and existing houses is inadequate.
- Sale of houses in The Boulevard and Wadman Park with false information and promise of a school and community area, as per the Masterplan, unjustified.
- Concern for impact to houses no. 50 & 52 The Boulevard, which are the closest with only 61 and 62 meters separation from the proposed development. Also house no. 46 to the west is only 52m distant to the house private boundary and rear garden.
- The EPA guidelines for distances from treatment systems sites 50 meters as the minimum distance, in this case c.600 number existing houses adjacent.
- The proximity to residential amenity is too close for comfort in a built up residential estate.
- Raynoldstown Creche and community development should be prioritised before any more dwellings are permitted.
- Concern standard operating controls which would be provided for during construction are mitigation measures and therefore works cannot be screened out for AA purposes and the decision is invalid. No consideration of in-combination effects.
- No requirement for a Waste Management Plan in the conditions. Insufficient details on decommissioning.
- Flood Risk Assessment is of concern. No reference is made to the Louth Flood Relief Scheme.
- Direct conflict with the statutory planning and loss of vital community and green space. The applicant's failure to offer or adequately explore alternative sites on adjacent industrially zoned land is a significant concern. There are large tracks of land in the area which could accommodate the proposed development.

- Should this application be permitted the prospect of a school being provided in this location is unlikely. Concern of EPA Guidelines for distance from treatment systems, which sites 50m as the minimum distance in this case, could be achieved.
- No-one should be expected to live play or work adjacent to an industrial plant area with tanks full of raw sewage.
- The attempt by the applicant to define a large industrial foul treatment plant as a community facility is highly tenuous.
- No consideration by LCC Planners Report of the LAP.
- Consultee Consultation. There should have been better consultation with the prescribed bodies An Taisce, Inland Fisheries and EPA.
- Visual Impact. The proposed development by reason of its size and scale will have a negative impact on the visual amenities of the area.
- Concern the applicant is not the legal owner. Application, landowners and signature omissions. Application form not signed.
- Enclosed with the Appeal
 - Acknowledgement of submissions to the PA
 - Planning Submission by Jennifer Lynch on behalf of Dundoogan Residents Association, dated 14/03/2025, containing the Raynoldstown signatures
 - Folio LH3154
 - Louth County Council decision.

6.2. Applicant Response

- **Response by MJC Planning and Development Ltd. Town Planning and Development Consultants, is summarized as follows:**
 - Groveview builders Ltd is primarily a residential development company.
 - It has constructed some 4500 family homes in Ireland and the UK since its establishment in 1981.

- The subject site forms part of the 57 hectare land holding in the Haggardstown and Haynestown townlands of the Dublin Rd. suburban area of Dundalk - bounded by the western infrastructure route (WIR) to the West, and the Chapel, Claremont and Dublin roads to the north, south and east that was the benefit of a grant of planning permission in 2005 (reference number 03/1754) for construction of 1,450 residential units, alongside commercial and community facilities, creches, four major parklands and a reserved site for a national school, after an associated master plan was agreed for its overall development.
- This application seeks permission for the construction of a temporary foul sewer pumping station and a temporary wastewater treatment plant, to pretreat wastewater prior to discharging to the public sewer along with the temporary access road via the existing approved (Reg. Ref. 03/1754) vehicular access from the WIR, and all associated site works at Raynoldstown village, Haynestown, Dublin Rd. Dundalk.
- The plant is to be placed on a 0.31 hectare section of undeveloped open lands in the western part of the village which is zoned GI: Community facilities in the Louth County Development Plan (2021 – 2027).
- Úisce Éireann (UE) have indicated that upgrade works are required to increase the capacity of the existing Blackrock wastewater treatment plant, currently a project on their investment plan, which will provide the necessary upgrading capacity scheduled to be completed by 01 2030 and that the proposed connection could be undertaken thereafter.
- UE have indicated that domestic treated effluent, meeting stated biological oxygen demand (BOD) and total suspended solids (TSS) discharge limits, will be accepted into the UE network.
- There are a number of small housing developments / applications which require pre-treatment and consequently a TWWTP system is needed. The intention is to 'borrow' temporarily, the foul drainage capacity of the 62 house Wadman Park development and transfer such to serve the planned 39 units that have been permitted. Subject to satisfactory drainage arrangements, on lands at the eastern frontage of Raynoldstown Village. There will remain

sufficient capacity after that to allow the neighborhood facilities centre to also avail of a direct connection with the public system.

- The temporary WWTP is designed to allow the servicing, for as long as it is needed, of 358 houses.
- The recently permitted neighborhood center (2460512) is subject to the provision of satisfactory foul drainage arrangements.
- The recently revised national planning framework plan brought forward details for €112 billion spend during the period 2026 to 2030 of which €2.5 billion has been allocated UE.
- The legal precedent cases set out by the appellant's, which lists applications for residential units refused by ABP / ACP, deemed premature due to inadequate infrastructure, are not the same as the proposed scheme, neither in scale or direct use of untreated drainage to the TWWTP, and therefore do not set a precedent in the assessment of the proposal to hand.
- It is acknowledged that the subject planning proposal seeks to place a wastewater treatment plant for a temporary period, only, on a section of the zoned community facilities area. The proposed pumping station and TWWTS are considered to be a utility, which is a permitted use within the GI zone. The development can be viewed as one which supports and serves the receiving community.
- The PA have accepted that the use of the subject site for the proposed temporary WWTP site would be in harmony with its GI community facilities zoning of the County Louth Development Plan 2021 – 2027.
- UE's commitment to the proposal is noted. The TWWTP would be installed in three phases. The effluent exiting the treatment system will be monitored, to ensure that it meets UE's requirements prior to entering its network.
- CFRAMS mapping of the subject site, indicates that it is not vulnerable to flooding.
- A further information request sought details in relation to surface water drainage, vehicular traffic and access, landscaping, boundary treatments,

odor control, emergency overflow, arrangements and the relationship with the site reserved for the provision of a National School. All matters were addressed to the satisfaction of the planning authority.

- The TWWTP and any perspective 8 – 16 classroom primary school can be accommodated on the 1.3 ha in area site, zoned GI.
- The access to the subject site is across a footpath and a short section of public open space, as per the masterplan, which is not yet in place. The residential construction strategy envisaged by Groveview builders, is to continue to build out the 65 and 96 unit schemes (22/688 and 23/60257 respectively) and thereafter the 18 (24/60331) and 21 (24/60496) houses at the Dublin Rd. frontage, then the 91 (24/60649), thereafter the 80 (24/60785) and then the 40 (permission to be sought) dwellings. Last to be built will be the 85 units (24/60785) which will include the footpath and green space.
- It is considered it will be c. 6 years minimum after the 65 and 96 schemes are nearing occupation before this footpath and open space strip are likely in place, by which time the Blackrock WWTP will have been upgraded and the temporary WWTP will have been removed.
- The planning authority are responsible for consultee consultation and all consultation was carried out in accordance with Article 28 of the Planning and Development Regulations, 2001, as amended.
- No alternative sites were considered by the applicant. The applicant is not in possession of any other land in Dundalk or its surroundings. The applicant seeks permission for the proposed temporary WWTP on its own land, as it is within the applicants control and it will benefit additional houses and commercial and community facilities also within the applicants control and ownership, serving the village.
- The detailed landscaping plan submitted indicates that a 3M high 5.3m wide berm will be wrapped around the temporary WWTP. There will be no view of the plant structures from outside the site.
- The wastewater treatment plant is located further than the required 50 meters distance from any house.

- Groveview Builders Ltd. and Clerking Property Company Ltd. are subsidiary companies of the Canon Kirk Group. As one and the same, therefore, the consent of the owner is not required as it is already given.
- As the application was made in electronic form there is no requirement for a signature on the application itself.
- Government policy to support and increase accelerated housing supply, to achieve 83,000 units per year to 2034, is noted. Raynoldstown village could provide an additional 335 dwellings along with neighborhood centre facilities, but only if the temporary wastewater treatment plant is granted.
- **Response by DCE IRL, is summarized as follows (I do not intend to repeat points here already addressed above):**
 - UE has confirmed by pre connection inquiries that wastewater connections for future developments at the site can be catered for. Extract from recent PCE at the site of 21 units at Raynoldstown (24/005716) (refer to appendix A Conformation of Feasibility (COF)) attached to the response, which states:
“Feasible subject to upgrades. Upgrade works are required to increase the capacity of the existing Blackrock WTP. UE currently has a project on our current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possibly practicable after these works. Prior to this domestic treated effluent meeting discharge limits of biological oxygen demand (BOD) 25 milligrams / liter and total suspended solids (TSS) 35 milligrams / litre, it will be accepted into the UE network. You are advised that you would be required to seek planning permission and any and all other necessary approvals, provide, operate and maintain any private on-site wastewater treatment plant at your own risk and that the treatment works will not be taken in charge by UE. The operation of such treatment works by you shall continue until such time as the proposed upgrade of the existing wastewater treatment plant by UE, as above, is completed and commissioned. The design of the private on site wastewater treatment plant should also include for the

decommissioning and bypassing of the plant once the proposed upgrade of the existing wastewater treatment plant is commissioned. Decommissioning and bypassing your private on-site wastewater treatment plant will be your responsibility and at your cost. Treated effluent failing to meet the above requirements will not be accepted into the UE network.”

- UE has confirmed that the permanent upgrade of the Black Rock WWTP is programmed with delivery targeted for Q1 2030 while the exact date may be subject to change due to planning, procurement, or funding processes, the upgrade forms part of UE’s National Investment Plan. The TWWTP does not replace this upgrade, but instead bridges the gap to avoid stagnation in development and a reduction of much needed housing in the area.
- Concerns about inflation and cost escalation are speculative. UE’s capital programs are well funded and the costs are modest in the context of facilitating much needed housing in the area.
- The application explicitly states that the TWWTP is temporary, limited to five years. This is also subject to Condition (2) by the PA in their decision to grant planning permission.
- The applicant accepts Condition 3 in full, which, relates to upgrades to the Blackrock WWTP and requires that ‘if’ an upgrade is completed prior to the expiration of this permission, the developer shall decommission the utilities and structures granted under Reg. Ref. 25/60063.
- The TWWTP addresses a clear and short-term infrastructure gap. Without it, there will be no further development on the site from a housing perspective, or the community facilities granted under planning permission Reg. Ref.24/40512.
- Without the TWWTP there will be no creche or community development permitted.
- Temporary wastewater treatment plants are a recognized planning tool.
- Modern above-ground temporary plants are designed to meet the highest standards these units are highly efficient, modular, and fully removable once permanent infrastructure is in place.

- The claim that they are “not environmentally neutral” overlooks the fact that discharges cannot legally occur unless in accordance with a valid connection offer from UE, ensuring protection of receiving Blackrock treatment plant and residential amenity.
- It is incorrect to suggest the condition 5 is unacceptable or that insufficient information has been provided. The decommissioning and reinstatement plan must be formally agreed with the local authority before works can commence and compliance is legally enforceable under the Planning and Development Act 2000.
- The €40,000 bond required under condition 7 has been deemed appropriate by Louth County Council. The applicant will be legally bound under both planning and any future UE connection offer to fully decommission and reinstate the site. Failure to do so would give rise to enforcement action. The bond is an additional safeguard not the sole mechanism of accountability.
- Condition 14 is enforceable, which requires strict order and noise controls with ongoing monitoring. Unlike older facilities, the proposed plant uses modern enclosed systems and filtration designed to prevent nuisance.
- While odor is a legitimate concern, the risks outlined are overstated. Modern biofiltration systems, including the proposed Monashell unit, are specifically engineered with safeguards against the very issues cited (e.g., monitoring of pH, temperature, and air flow; automated alarms, and regular maintenance protocols). Failures are not inherent but rather reflective of poor operation, which is preventable.
- Properly managed, these systems consistently achieve high order removal efficiency and are widely used internationally in sensitive environments.
- The applicant will have a reputable company engaged to operate the TWW TP. It is proposed that EPS Water or similar company will manage the facility. They have 25 years experience in asset management and manage over 330 water and wastewater treatment plants and pumping stations. The company will be available for service and repair at 24 hours a day, seven days a week, 365 days a year.

- The traffic movements associated with the operational phase of the development will be negligible in the context of the construction traffic in the vicinity of the site or the operational traffic associated with the residential development.
- As part of the proposed temporary wastewater treatment solution, an emergency overflow tank will be installed at the pumping station.
 - This tank is designed to provide 24 hour storage capacity in the event of a pumping station outage, with a proposed volume of 22 m³. The pumping station is configured to forward feed the temporary wastewater treatment plant.
 - The design of the wastewater treatment plant includes the provision of Overground precast sludge holding tank(s), capable of storing up to 20 days' worth of sludge at 2% dry solids concentration. A dedicated supernatant pump will return separated liquid to the inlet sump, maintaining hydraulic balance within the system.
 - To support operational reliability a GSM-based dial-out alarm and monitoring system will be installed, providing real-time alerts and enabling remote supervision. Furthermore, a full-time operation and maintenance (O&M) contract will be implemented at the plant installer to ensure the system operates efficiently and remains compliant with all relevant UE and Louth County Council standards.
- A CEMP will be submitted as a compliance document which is a standard and well-established planning practice. Prior to commencement conditions are utilized by Local Authorities and ACP and are fully consistent with standard planning practices.
- The wastewater network within Wadman Estate is a UE asset and any works to it has to be managed by UE and this will be the case where planning permission is granted. Wadman will not experience any inconvenience by the proposed 'switchover', and their service supply will not be interrupted.
- Based on the information on flood maps.ie at the time of the application, the site is not at risk from flooding.

6.3. Planning Authority Response

Response dated 25/08/2025 is summarised as follows:

- It is acknowledged that the provision of the temporary pump station and WWTP is not standard practice, it has been conditioned that the permission granted is for a 5-year period and that after such time all structures shall be removed from site.
- The permission for the TWWTP is on a temporary basis will facilitate the construction and occupation of some 317 housing units, a creche and neighbourhood centre.
- The applicant has also indicated if a proposal for a school on the lands zoned Community Facilities progresses permission will be given for the school to connect to the temporary treatment plant.
- Funding is in place for the upgrade works required at the Blackrock Wastewater Treatment Plant and that Úisce Eireann supports the provision of the temporary plant and pumping station on this basis.
- The PA are satisfied that the conditions pertaining to decommissioning and the bond are adequate to ensure the satisfactory removal of the plant and pumping station, and any required site remediation works.
- The PA are satisfied that this proposal will not impact on the development of a school on the adjoining lands immediately to the east and that both developments can be accommodated if required.
- Furthermore, it is considered that the provision of and amenity of the public open space at this location will not be compromised.
- It has been conditioned (no.4) that upon completion of the temporary plant and pumping station, a completion certificate shall be submitted by a suitably qualified professional with professional indemnity insurance confirming that the works have been constructed to the required standard as set out in the 'Code of Practice Wastewater Infrastructure', Clause 3.6 (Document Number: IW-CDS-5030-03 issued by Irish Water' or any updates of same and that it shall be managed and operated by a suitably qualified professional. Prior to

the development becoming operational, details of the persons/company responsible for the operation and maintenance of the facility, together with their qualifications and professional indemnity insurance shall be submitted for the written agreement of the Planning Authority. This provision coupled with the separation distances to existing dwellings is considered adequate to ensure that residential amenities are protected from odours or emissions.

- The PA is satisfied that the provision of 3m high grass berms and the landscaping proposed will help assimilate the proposal into the landscape.
- The PA have assessed the expected volume and type of vehicular traffic and are satisfied that it is of a minor nature which will not negatively impact on traffic safety in the area or significantly impact on residential amenities.
- The PA are satisfied that the proposed development, is sub-threshold development for the purposes of Schedule 7 PDR. Based on information provided and having considered the nature, size and location of the development, there is no real likelihood of significant effects on the environment and as such a mandatory EIS/EIAR is not required in this instance.
- Matters relating to AA and European sites in the area have been fully assessed in the planning reports on file.
- Issues relating to emergency overflow arrangements from the foul sewer pumping station and the wastewater treatment plant and SUDS were resolved.
- The PA are satisfied that the application as submitted complied with all requirements of the Planning and Development Regulations 2001 (as amended).
- Recommends Permission is granted.

6.4. Observations

- None received.

6.5. Further Responses

- None received.

7.0 Assessment

7.1. The main issues that arise for assessment in relation to this appeal can be addressed under the following headings:

- Nature & Principle of the Development
- Wastewater Disposal
- Other Issues
 - Traffic
 - Waste Management Plan (WMP)
 - Flood Risk Assessment (FRA)
 - Visual Impact
 - Proximity to residential dwellings (Odor / Noise)
 - Consideration of alternative location
 - Administrative Issues / Legal Issues / Validity Issues Raised.

7.2. Nature & Principle of the Development

7.2.1. It is proposed to construct a temporary pumping station and temporary wastewater treatment plant (TWWTP), to pre-treat wastewater prior to discharging to the public sewer, along with a temporary access road via the existing approved (Reg Ref. 03/1754) vehicular access from the Western Relief Road. The plant is to be placed on 0.31 ha section of undeveloped open lands in the western part of the Village (Raynoldstown Village). The lands on which the TWWTP are proposed is zoned 'GI': Community Facilities in the Louth County Development Plan (2021 – 2027), which has the objective "To provide for and protect civic, religious, community, education, health care and social infrastructure". The lands on which the proposed pumping station is proposed is zoned A1, 'Existing Residential' with the zoning objective 'to protect and enhance the amenity and character of existing residential communities'.

7.2.2. Permitted Use on 'GI' zoned lands include:

"Allotments, Cemetery, Childcare Facility, Community Facility, Crematorium, Education Facility (Primary or Second Level), Education Facility (Third Level or Training Centre), E- Charging Facility, Health Care Centre, Healthcare Practitioner, Hospital, Nursing Home, Park/Playgrounds, Place of Worship, Recreational/Amenity Open Space, Recreational/Sports Facility, Recycling Facility (Civic & Amenity), Utilities".

'Utilities' are also a 'Generally Permitted Use' on lands zoned 'A1'

The proposed pumping station and WWTS are considered to be "utilities".

7.2.3. Cognisance is had that this land was also identified as the location for a school and public open space under the permitted masterplan for the area under parent permission Reg. Ref. 03/1754 and subsequent permitted applications in the immediate vicinity.

7.2.4. Uisce Éireann's (UE) commitment to the proposal is noted. The applicant has submitted a Confirmation of Feasibility (CoF) from UE which states that in relation to wastewater connection, "upgrade works are required to increase the capacity of the existing Blackrock Wastewater Treatment Plant. UE currently has a project on its current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possibly practicable after these works. Prior to this, domestic treated effluent meeting discharges limits of Biological Oxygen Demand (BOD) 25 mg/l and Total Suspended Solids (TSS) 35 mg/l will be accepted into the Uisce Eireann network. You are advised that you will be required to seek planning permission and any and all other necessary approvals, provide, operate and maintain any private on-site wastewater treatment plant at your own risk and that the treatment works will not be taken in charge by Uisce Eireann. The operation of such treatment works by you shall continue until such time as the proposed upgrade of the existing Wastewater Treatment Plant by Uisce Eireann as above is completed and commissioned. The design of the private on-site wastewater treatment plant should also include for the decommissioning and bypassing of the plant once the proposed upgrade of the existing Wastewater Treatment Plant is commissioned. Decommissioning and

bypassing your private on-site treatment plant will be your responsibility and at your cost. Treated effluent failing to meet the above requirements will not be accepted into the Uisce Eireann network”.

- 7.2.5. It is clear from the information on file that the applicant's have engaged with UE and a temporary wastewater treatment system has been designed, as per Irish water upgrade requirements. There are a number of small housing developments / applications which require pre-treatment and consequently a TWWTP system is needed. The intention is to 'borrow' temporarily, the foul drainage capacity of the 62 house Wadman Park development and transfer such to serve the planned 39 units that have been permitted. Subject to satisfactory drainage arrangements, on lands at the eastern frontage of Raynoldstown Village. There will remain sufficient capacity after that to allow the neighborhood facilities centre (the subject of planning application reference number 2460512) to also avail of a direct connection with the public system, without pre-treatment.
- 7.2.6. In order to achieve this, it is proposed to install a Temporary Foul Pumping Station on the existing foul line from Wadman Park. Wadman park consists of 62 units. The pumping station will pump the untreated effluent from Wadman Park to the proposed Temporary Treatment System. The Temporary Foul Pumping Station will pump effluent from Wadman Park and the proposed developments applied under planning permission application reference numbers, 2460785 (85 units), 2460737 (80 units) and 2460649 (91 Units) and any future planning applications to the temporary wastewater treatment system.
- 7.2.7. The permission for the WWTP is on a temporary basis, the notification of decision to grant permission is for a 5 year period. The applicants submits that the temporary WWTP is designed to allow the servicing, for as long as it is needed, of some 358 houses.
- 7.2.8. The applicant has also indicated that the proposal will not impact on the development of the proposed school and there is sufficient lands to accommodate both if a proposal for a school on the lands zoned Community Facilities progresses within the next 5 years. I note and agree with the submission by the applicant that any proposed school would need the TWWTP to be in place, given the Blackrock WWTP is at capacity and due for upgrade in Q1 of 2030. The applicant has indicated

that they are more than willing to facilitate the Department of Education in connecting to the TWWTP. With respect to issues raised of impact upon permitted public open space and a short length of footpath, I consider the applicants response to be acceptable. The entrance to the TWWTP has been positioned at the northernmost extent of the strip of open space proposed to curve around the western and southern boundaries of the reserved school site. This particular position has been chosen to ensure that this open space is not split and its use and amenity is not comprised as a consequence. I agree that the impact would be temporary in nature, it would be 5 – 7 years before the aforementioned footpath and open space strip are in place, by which time the capacity of the Blackrock Treatment Plant will be increased and the Temporary WWTP and its associated vehicular entrance will have been removed. I recommend that should An Coimisiún grant planning permission that a condition be attached that the permission granted is for a 5-year period and that after such time all structures shall be removed from site.

- 7.2.9. The lands are suitably zoned for 'GI': Community Facilities, and I consider that the temporary nature of the development is acceptable in principle. The issues raised by third parties, will be considered further in the following sections of this report.

7.3. **Wastewater Disposal**

- 7.3.1. I consider the 'Procedural Advice Note for Planning Authorities on Developer-Led Infrastructure (DLI) Initiatives for Wastewater Services to Support Housing Delivery', March 2026. The associated circular (6th March 2026) on 'Developer Led Infrastructure (DLI) Initiative for Wastewater Services to support Housing Delivery', to be directly pertinent to the subject application. This application for a TWWTP and pumping station is located on lands, owned by the applicant's, Groveview Builders Limited. The proposed development is part of the larger Raynoldstown Village housing development which is under construction, permitted under a 10 year permission in January 2005 under Reg. Ref. 03/1754, see planning history section of this report, above, for details. The subject site is bounded to the north by the permitted 'Village Green' neighbourhood facilities site (ref. 24/60512) and to the south by Dundoogan and the Boulevard to the east. The development permitted on foot of Ref. Ref. 03/1754 was not fully built out. As set out in the planning history section of this report above, the applicants have sought and been granted planning permissions up to and including 2023 to build out parts of the 03/1754 permission.

Most notably Reg. Reference 24/60512, Permission GRANTED (10.03.2025) for the neighbourhood centre. They have however recently been refused permission for three small housing developments. PL15.500669 / LH 24/60785 for 85 housing units, PL500399 / LH 24/60737 for 80 housing units & PL15.500206 / LH 24/60649 for 91 housing units. Which are currently on appeal all having been refused permission by LCC, inter alia, for inadequate capacity in the Blackrock WWTP and the scheduled upgrade not being scheduled until Q1 of 2030 / Q4 of 2031. PL15.500669 / LH 24/60785 refused by Louth on the 19.12.2025 states in its first reason for refusal:

- Blackrock waste water treatment plan does not have capacity and the necessary upgrade is not scheduled to be completed until Q1 of 2030. While an application for a temporary wastewater treatment plant to pre-treat effluent generated from the larger Groveview development is under consideration by An Coimisiún Pleanála (PL15-323186) there is no decision on that appeal and in this context the application would be premature pending that decision.

7.3.2. The Government's Housing Action Plan, '*Delivering Homes, Building Communities*' seeks to deliver 300,000 new homes by 2030. To support housing delivery, the strategy sets out the need for the provision of adequate and timely infrastructure, including wastewater infrastructure, to support residential development, particularly in locations where wastewater infrastructure capacity is constrained or absent. This objective is set out in Action 1.11 of the Housing Action Plan and is further referenced in Action 15(ii) of the '*Accelerating Infrastructure Taskforce Report & Plan*'.

7.3.3. The DLI Initiative procedural advice note states: "The absence of a centralised wastewater collection, treatment and disposal system in smaller settlements has been highlighted as a constraint on planned new housing development, in particular where such settlements are identified for new housing development in the relevant statutory development plan of the local authority. A further constraint to new housing development arises where an existing public wastewater treatment plant serving a settlement is at or exceeds its design capacity. While an increase in operational capacity may be planned or programmed for delivery in these circumstances, there can be a time lag of several years to effect delivery of the required upgraded infrastructure".

7.3.4. It sets out that wastewater infrastructural constraints have been identified as a limiting factor for housing delivery in settlements where existing Uisce Éireann wastewater treatment capacity is not immediately available. To address this, the Government is now enabling housing developers to deliver new wastewater infrastructure as part of their housing schemes. The Developer-Led Infrastructure (DLI) Initiative for wastewater services includes the following key coordinated elements:

- a structured partnership approach between Uisce Éireann and developers, enabling developers to construct wastewater infrastructure to Uisce Éireann standards, with transfer of ownership to Uisce Éireann for long-term operation and maintenance;
- regulatory reform to simplify environmental authorisations for discharges from small-scale treatment facilities; and
- specific guidance for developers from Uisce Éireann and the Environmental Protection Agency (EPA) in relation to standards and requirements.

7.3.5. A collaborative delivery model between developers and Uisce Éireann for the provision of new wastewater infrastructure is the core of the new arrangements. Under this model, the developer will finance and construct the required infrastructure in accordance with Uisce Éireann standards, with Uisce Éireann then taking ownership and responsibility for ongoing operation and regulatory compliance. The subject application which is for temporary bridging infrastructure for a wastewater facility to enable activation of housing development, is included in the DLI initiative. This is where, by agreement with Uisce Éireann, a developer can provide a temporary wastewater solution for their housing scheme during an interim period only before a scheduled increase in the capacity or provision of Uisce Éireann infrastructure is delivered, with removal of the temporary facilities thereafter.

7.3.6. The applicant has prior to the lodging of the planning application for the TWWTP submitted a Pre-Connection Enquiry (PCE) to UE. The proposal is in my opinion in compliance with EPA Guidance, national, regional and local planning policy and relevant European Directives. I note the UE submission on file (dated 27 March 2026) that advises:

- “UÉ issued the applicant with a Confirmation of Feasibility (COF) letter for the proposed development, which specified the requirement for onsite treatment

being provided, that would result in the same Emission Limit Values (ELV's) being achieved as those of the Blackrock Wastewater Treatment Plant (WWTP). In addition, it was also specified as a requirement for the temporary WWTP to treat Ammonia. Therefore, the proposed temporary treatment plant will contain stricter conditions than the existing UÉ Blackrock WWTP. This discharge will have no impact on the performance of the Blackrock WWTP and will be a pass-through flow (i.e. no increase in load)".

7.3.7. The EPA submission dated 27 March 2025 is also noted. However, the response suggests the discharge from the temporary WWTP is to a surface water, but this is not the case. The wastewater from the TWWTP is to discharge into the existing sewer and into the Blackrock WWTP. The treated discharge will contain stricter conditions than the existing UÉ Blackrock WWTP. This discharge will have no impact on the performance of the Blackrock WWTP and will be a pass-through flow (i.e. no increase in load).

7.3.8. With respect to the 3rd party concerns that An Bord Pleanála have consistently refused developments of this nature. Specifically citing legal precedent cases:

- Kill, Co. Kildare (ABP-300558-18) SID Application was refused because of an “existing deficiency in the provision of adequate sewage infrastructure serving the subject site”, deeming the development “premature pending the carrying out and completion of necessary upgrade works”.
- Middleton WWTP, Co. Cork (ABP-316399-23).
- PL15.318894 Old Golf Links Road, Haggardstown, Dundalk, Co. Louth, Permission Refused 03/07/2025 for construction of 37 residential units due to lack of adequate capacity at Blackrock Wastewater Treatment Plant to accept wastewater from the facility it is considered that the proposed development would not be in accordance with Objective IU6 of the Louth County Development Plan 2021-2027 and Objective INF4 of the Dundalk Local Area Plan 2025-2029 which require that all new developments connect to the public supply where public water and wastewater infrastructure is available or likely to be available and which has sufficient capacity.
- Also Clonshaugh WWTP, Dublin.

- 7.3.9. However, it is my opinion that the legal precedent cases set out by the appellant's, are not the same as the subject proposed scheme. The subject proposal is for a TWWTP and pumping station in line with planning applications for DLI – for wastewater services to support residential development. UE have not indicated concerns for the proposal and their report is positive in favor of the proposal.
- 7.3.10. With respect to concerns by third parties of the 'temporary nature' of the proposal being disingenuous, inadequate decommissioning plan and inadequate financial provision or Bond of, only, €40,000. I note, UE has confirmed that the permanent upgrade of the Blackrock WWTP is programmed with delivery targeted for Q1 2030 while the exact date may be subject to change due to planning, procurement, or funding processes, the upgrade forms part of UE's National Investment Plan. The TWWTP does not replace this upgrade, but instead bridges the gap to avoid stagnation in development and a reduction of much needed housing in the area. I recommend that in order to alleviate concerns and to ensure sufficient funds are available to the planning authority that the bond be increased from €40,000 to €100,000, thereafter, I would be satisfied that the conditions pertaining to decommissioning and the bond are adequate to ensure the satisfactory removal of the plant and pumping station, and any required site remediation works. In any case, I believe, it would not be in the developer's interest not to remove the TWWTP and be fully compliant with the parent permission and subsequent planning permissions.
- 7.3.11. I agree with the applicant that concerns about inflation and cost escalation are speculative. UE's capital programs are well funded and the costs are modest in the context of facilitating much needed housing in the area. The application explicitly states that the TWWTP is temporary, limited to five years. This is also subject to Condition (2) by the PA in their notification of decision to grant planning permission. The applicant has indicated that they accept Condition 3 in full, which, relates to upgrades to the Blackrock WWTP and requires that 'if' an upgrade is completed prior to the expiration of this permission, the developer shall decommission the utilities and structures granted under Reg. Ref. 25/60063. I agree that the TWWTP addresses a clear and short-term infrastructure gap. Without it, there will be no further development on the Raynoldstown Village site from a housing perspective, and the needed community facilities and creches could be jeopardized.

- **Other Issues**

7.4. Traffic

7.4.1. The expected vehicular traffic associated with both the temporary wastewater treatment plant and the pumping station is described as follows:

Temporary Wastewater Treatment Plant Operational Phase

- Tankers for sludge removal:
 - Number of trips: Up to 2 two-way trips per week, depending on system loading.
- Maintenance/Service Vehicles (LCVs):
 - Number of trips: 2–3 two-way trips per week.
 - Purpose: Routine maintenance, equipment checks, and consumables delivery.

Pumping Station Operational Phase

- Tankers for sludge removal if required:
 - Number of trips: based on EPS experience 2 two-way trips per year are envisaged.
- Maintenance/Service Vehicles (LCVs):
 - Number of trips: 2–3 two-way trips per week.
 - Purpose: Routine maintenance, equipment checks, and consumables delivery.

7.4.2. I have assessed the expected volume and type of vehicular traffic and I agree with the planning authority, that it is of a minor nature which will not negatively impact on traffic safety in the area or significantly impact on residential amenities.

7.4.3. I note that Drawing no. 4224 C1511, at a scale of 1:250, details sightlines at the entrance to the Temporary Wastewater Treatment Plant. Sightlines have been provided in accordance with DMURS Table 4.2 for a 30km speed limit. A sightline of 24m from a point 2.4m back from the road edge have been provided. The vehicle swept path analysis confirms that the anticipated operational vehicles can safely manoeuvre and turn within the proposed site boundaries where required, eliminating the need to reverse onto the estate road. As part of the standard operating

procedure, maintenance vans servicing the pumping station will be required to reverse into position. As part of the standard operating procedure for the pumping station where desludging of the pumping station is required this will be marshalled by the desludging company for the short period of time they are on site.

- 7.4.4. I am satisfied that the proposed entrance location and design is acceptable and would not result in traffic hazard.
- 7.4.5. The internal road design is in accordance with the Design Manual for Urban Roads and Streets. No public lighting will be provided for the pumping station, the pumping station will be illuminated via the adjacent housing development road lighting.
- 7.4.6. I am satisfied that having regard to the modest scale of development proposed and to the condition, width and alignment of surrounding roads, that the existing road network and junctions can accommodate the additional traffic movements associated with the development.

7.5. Waste Management Plan (WMP)

- 7.5.1. Third party concern is raised with respect to the lack of an adequate waste management plan. I note the overlap in issues with the preceding section of this report 'Wastewater Disposal' and to the assessment set out in Appendix 2: Form 2 – EIA Preliminary Examination and Appendix 3: Screening for AA, attached to this report. There are potential indirect effects resulting from deterioration in water quality, arising from construction activities and discharge of foul and surface water. However, it is my opinion in tandem with the opinion of ÚE and the Planning Authority that the employment of standard engineering measures and the construction and waste management plan (C&WMP) will ensure that any possible indirect effects from the site works on the European Sites will be negligible and do not give rise to any reasonable scientific doubt regarding potential adverse effects.
- 7.5.2. I note and agree with the response by the applicant that a CEMP will be submitted as a compliance document which is a standard and well-established planning practice. Also that 'prior to commencement' conditions are utilized by Local Authorities and ACP and are fully consistent with standard planning practices.

7.5.3. I believe this matter can be dealt with by way of condition and compliance. I recommend that if permission is forthcoming a condition be attached in this regard, see Condition 12.

7.6. Flood Risk Assessment (FRA)

7.6.1. A review of the site has been undertaken in accordance with the Planning System and Flood Risk Management (Guidelines for Planning Authorities) - DOEHLG and OPW (November 2009). The proposed development is located in Haynestown, Dundalk within the Neagh Bann Catchment Flood Risk Assessment and Management Studies (CFRAMS). On review of the CFRAMS mapping, the mapping illustrates that the proposed development is not vulnerable to Fluvial or Coastal flooding.

7.6.2. The planning authority concludes that there is no indication of flooding from coastal, pluvial, fluvial or groundwater sources.

7.6.3. In conclusion, there is no evidence of groundwater flooding on the site at present. Given the nature and scale of the proposed development, I am satisfied that the development will not result in an unacceptable flood risk to existing or future development.

7.7. Visual Impact

7.7.1. Third party concern has been raised that the proposed development by reason of its size and scale will have a negative impact on the visual amenities of the area. The view is expressed that the proposed CAS tanks are dimensioned at 4.305m high with a 3.15m grassed berm which will not adequately screen this industrial plant from view for many residents, including the Boulevard houses that are 3 storey and within 68m of the proposed development.

7.7.2. It is acknowledged that the subject planning proposal seeks to place a wastewater treatment plant for a temporary period, only, on a section of the zoned community facilities area (GI zoned lands). The proposed pumping station and TWWTS are considered to be a utility, which is a permitted use within the GI zone. I note the applicants opposing view to the appellants that the development can be viewed as one which supports and serves the receiving community, on a temporary basis. That the proposal enables housing and delivery of community facilities.

- 7.7.3. The TWWTP has been designed to be temporary, compact and will be fully decommissioned once the Blackrock WWTP upgrade is delivered. The above ground form is noted, however cognizance is had to its temporary nature and the complexity of construction costs that underground tanks would entail. It avoids significant excavation and complex construction costs, particularly for an interim facility of limited lifespan.
- 7.7.4. I note the Landscape Planting Plan (Drawing No.PZL-JBAI-XX-XX-M2-L-0001-A3-C01) - which illustrates proposed planting around the TWWTS. It includes a landscaped berm, planting and screening. The temporary Cas plant elevations Drawing no. C1507 indicates that the grassed berms are 3.150 m high and the elevation of the above ground WWT tanks are some 4.304 m high. I note also the proposed indicative contiguous elevations and views on file.
- 7.7.5. Planting consists of native trees and hedgerow species as listed in the planting schedule. Also on the drawing is a Landscape Section which illustrates the relationship of the proposed planting on a screening mound with the site perimeter.
- 7.7.6. The detailed landscaping plan submitted indicates that a 3M high 5.3m wide berm will be wrapped around the temporary WWTP. I am satisfied that the provision of 3m high grass berms and the landscaping proposed will help assimilate the proposal temporarily into the landscape. Government policy to support and increase accelerated housing supply, to achieve 83,000 units per year to 2034, is noted. Raynoldstown village could provide an additional c. 358 dwellings incl. neighborhood centre facilities, but only if the temporary wastewater treatment plant is granted, a balance needs to be found and it is my opinion the proposal in this instance is justified, given the planning history, is adequate and timely infrastructure and in line with national guidance.
- 7.7.7. I recommend that should the Commission agree permission should be forthcoming, that a condition be attached, that the boundary fence be agreed with the planning authority. I recommend that an alternative to a 2.4m high palisade fence be constructed. While security at the TWWTP is noted, the use of palisade fencing within a residential setting is undesirable, incongruous and visually obtrusive.

7.8. Proximity to residential dwellings Odor / Noise

- 7.8.1. Third party concerns have been raised with regard to negative impact on the residential amenities of Wadman Park residents. By reason of noise, odour, disruption and stress. It is argued that the separation distances between the proposed development and existing houses is inadequate.
- 7.8.2. Regard is had to the guidance set out in the 'Environmental Protection Agency's Wastewater Treatment Manual: Treatment Systems for Small Communities, Business, Leisure Centres and Hotels, 1999'. Table 4 sets out recommended distances from treatment systems. There should be a buffer zone around wastewater treatment systems to avoid odour and noise nuisance. The Manual states the following: "Residential developments should not occur within the buffer zone except in exceptional circumstances and in no case should residential development be undertaken within the distances outlined in Table 4." Table 4 states that a system serving >161 system size p.e., >41 houses should be 50m from existing development. I note concern raised for impact to houses no. 50 & 52 The Boulevard, which are the closest with some 61 and 62 meters separation from the proposed development. Also house no. 46 permitted to the west is 52m distant to the house private boundary and rear garden. As the temporary wastewater treatment plant is located further than the required 50 meters distance from any house, it meets the required buffer distances. I am satisfied that the matter can be addressed by condition. As the proposal complies with the EPA Treatment Manual I consider that the proposed on site temporary wastewater treatment plant would not be prejudicial to public health.
- 7.8.3. I note the applicant's detailed response to operation and management of the facility. How it proposes to treat odours. It is acknowledged that odor is a legitimate concern, however, modern biofiltration systems, including the proposed Monashell unit, are specifically engineered with safeguards against the very issues cited (e.g., monitoring of pH, temperature, and air flow; automated alarms, and regular maintenance protocols). I tend to agree that failures are not inherent but rather reflective of poor operation, which is preventable.
- 7.8.4. The Mónashell system proposed is a biological odour control technology that provides efficient, low-maintenance, and eco-friendly treatment of a wide range of

odorous emissions. Should permission be granted, I recommend that the Commission attach conditions for connection agreement with Uisce Eireann, the setting up of a management company for the management of the treatment plant while in operation and a bond to be agreed with the local authority to secure the satisfactory completion and decommissioning of the plant.

- 7.8.5. Unlike older facilities, the proposed plant will use modern enclosed systems and filtration designed to prevent nuisance. Based on the technical information provided, I am satisfied that odour and noise can be dealt with by way of condition and compliance. Should permission be granted, it is recommended that a condition be attached for the implementation of noise mitigation measure and the certification of works.

7.9. Consideration of alternative locations.

- 7.9.1. Third party concern is raised that no alternative sites were considered by the applicant. The applicants' Groveview Builders have indicated that they are not in possession of any other land in Dundalk or its surroundings. The applicant seeks permission for the proposed temporary WWTP on its own land, as it is within the applicants' control and it will benefit additional houses and commercial and community facilities also within the applicants control and ownership, serving the village.

From the planning history of the site and information on file I consider the response is reasonable and it would be unreasonable to refuse planning permission on grounds that alternative sites, within the area, have not been considered. As stated earlier in this report the applicant has three separate applications for small housing developments on adjoining lands, see planning history section of this report, dependent upon the WWTP.

7.10. Administrative Issues / Legal Issues / Validity Issues Raised.

- 7.10.1. I note and agree with the response by the applicant to matters raised with respect to validity of the application and procedural matters.

- 7.10.2. The planning authority are responsible for consultee consultation and all consultation was carried out in accordance with Article 28 of the Planning and Development Regulations, 2001, as amended.
- 7.10.3. Groveview Builders Ltd. and Clerking Property Company Ltd. are subsidiary companies of the Canon Kirk Group. As one and the same, therefore, the consent of the owner is given.
- 7.10.4. As the application was made in electronic form there is no requirement for a signature on the application itself.
- 7.10.5. I do not consider the procedural matters raised would constitute reasonable reasons for refusal.

7.11. **AA Screening**

- 7.12. I have considered the proposed development in light of the requirements of section 177U of the Planning and Development Act 2000 (as amended). This is attached as an appendix to this report.
- 7.13. I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on the Dundalk Bay SAC and the Dundalk Bay SPA and on any other European Site in view of the conservation objectives of those sites and Appropriate Assessment is therefore not required.
- 7.14. This determination is based on:
- the scale and nature of the development,
 - distance from European site,
 - the AA screening determination,
 - the lack of impact mechanisms that could significantly undermine the conservation status of qualifying interests,
 - No mitigation measures, other than standard measures, were required to reach the conclusion.

8.0 Water Framework Directive Screening

- 8.1. The Haggardstown Stream flows on a north to south axis 140m to the east of the TWWTP site. A small stream / channel flows along the southern boundary of the site, the proposed pumping station and rising main directly abuts the stream, to the south, for a short distance. This stream albeit not showing up on the WFD Catchment maps exists on the ground (visible during my site visit) and is visible in GIS mapping. It flows into Haggardstown Stream to the south east of the application site.
- 8.2. I have assessed the development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. I have undertaken a WFD Impact Assessment Stage 1: Screening and which is included in Appendix 3 of this report. This assessment considered the impact of the development on:
- Louth (IEGBNI_NB_G_019) – Groundwater
 - Haggardstown_010 (IE_NB_06H080570) – Stream to the east of the site.
 - Inner Dundalk Bay (IE_NB_040_0100) – 1km to the south east of the site.
- 8.3. The impact from the development was considered in terms of the construction and operational phases. Through the nature of the development and measures taken to protect the stream, all potential impacts can be screened out.

Conclusion

- 8.4. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.
- 8.5. The reason for this conclusion is as follows:
- the low risk status of the Louth groundwater body

- the low risk of potential impacts having regard to the proposed drainage measures and mitigation measures as follows:
 - standard best construction and the construction management plan,
 - disposal of surface water on site via SUDS measures, soakpits with pollution controls,
 - disposal of pre treated foul discharge via temporary on site WWTP to Blackrock WWTP in accordance with UE standards for discharge (which is operating within ELV limits set by EPA) and direct connection to this public network upon planned upgrades to the Blackrock WWTP to improve performance and capacity.

9.0 Recommendation

9.1. I recommend that permission be Granted.

10.0 Reasons and Considerations

Having regard to:

- The sites planning history;
- The temporary nature of the wastewater treatment plant and its location on lands with a 'GI' 'community facilities' zoning;
- The policies and objectives in the Louth County Development Plan 2021 – 2027 (as varied) and the Dundalk Local Area Plan 2025 - 2031;
- Temporary nature, scale and design of the proposed development;
- Pattern of existing development in the area;
- The Rebuilding Ireland Action Plan for Housing and Homelessness 2016;
- Regional Spatial and Economic Strategy for the Eastern and Midland Region, 2019 – 2031;
- The provisions of Housing for All – A New Housing Plan for Ireland issued by the Department of Housing, Local Government and Heritage in September 2021

- Project Ireland 2040 National Planning Framework (First Revision), provided by the Department of Housing, Local Government and Heritage in April 2025.
- ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’, published by the Department of Housing, Local Government and Heritage in January 2024
- The Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March 2013;
- The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’) 2009;
- The ‘Wastewater Treatment Manual: Treatment Systems for Small Communities, Business, Leisure Centres and Hotels (Environmental Protection Agency, 1999)’
- Urban Wastewater Treatment in 2024, EPA
- Procedural Advice Note for Planning Authorities Developer-Led Infrastructure (DLI) Initiative for Wastewater Services to support Housing Delivery, March 2026, DHLG&H.
- Submissions and observations received; and
- Chief Executives Report.

It is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would be acceptable in terms of odour, noise, wastewater treatment and pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

11.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars received by the planning authority on the 10th June 2025, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity.</p>
2.	<p>This permission is for a temporary period of 5 years from the date of the grant of permission after which time all structures shall be decommissioned and removed from the site at the developers expense and the lands revert back to their previous use unless a separate planning permission has first been granted by the Planning Authority or An Coimisiun Pleanala (on appeal) for the maintenance and operation of the structures on site.</p> <p>Reason: To define the terms of the permission and to cater for orderly development of the area and to permit the Planning Authority to re-assess the situation in light of the circumstances at that time.</p>
3.	<p>a) If the upgrade to the public Blackrock Wastewater Treatment Plant is completed prior to the expiration of this permission, the developer shall decommission the utilities and structures granted under this permission and revert the lands back to their previous use.</p> <p>b) Prior to the decommissioning of the utilities and structures granted under this permission the developer shall submit written confirmation from Uisce Éireann of the connection agreement confirming the required upgrades to the Blackrock Wastewater Treatment Plant have been completed and that a direct discharge to the Blackrock Wastewater Treatment Plant can be facilitated.</p> <p>c) The developer shall provide for the disconnection and removal of the</p>

	<p>Temporary Bridging Infrastructure following the direct connection of the development to the public wastewater network when notified to do so by Uisce Éireann. The Connection Agreement(s) between the developer and Uisce Éireann shall specifically provide for such arrangements.</p> <p>d)The developer shall provide for the disconnection and removal of the Temporary Bridging Infrastructure following the direct connection of the development to the public wastewater network when notified to do so by Uisce Éireann. The Connection Agreement(s) between the developer and Uisce Éireann shall specifically provide for such arrangements.) The developer shall enter into a Connection Agreement(s) with Uisce Éireann to provide for a connection(s) to the proposed wastewater treatment infrastructure and adhere to the standards and conditions set out in that agreement. The Connection Agreement(s) shall also confirm the requirements for the Developer-Led Wastewater Treatment Infrastructure to be vested in Uisce Éireann. The Connection Agreement shall be in place prior to any works commencing on site in respect of the wastewater infrastructure development.</p> <p>Reason: In the interest of public health and to provide adequate wastewater facilities.</p>
4.	<p>a) Upon completion of the temporary wastewater treatment plant, foul sewer pumping station and associated works granted under this permission a completion certificate shall be submitted by a suitably qualified professional with professional indemnity insurance confirming that the works have been constructed to the required standard as set out in the 'Code of Practice Wastewater Infrastructure', Clause 3.6 (Document Number: IW-CDS-5030-03 issued by Irish Water' or any updates of same.</p> <p>b) The temporary wastewater treatment plant and foul sewer pumping station shall be managed and operated by a suitably qualified professional. Prior to the development becoming operational, details of the persons/company responsible for the operation and maintenance of the facility shall together with their qualifications and professional indemnity</p>

	<p>insurance shall be submitted for the written agreement of the Planning Authority.</p> <p>c) Upon the temporary wastewater treatment plant and foul sewer pumping station becoming operational, the developer shall submit a maintenance and operational contract for the management and operation of the treatment plant and pumping station, for the written agreement of the Planning Authority.</p> <p>Reason: In the interests of clarity and orderly development</p>
5.	<p>The development shall be registered by Uisce Éireann in accordance with the European Union (Water Policy) Small Wastewater Discharge (Register) Regulations 2026. The Connection Agreement(s) between the developer and Uisce Éireann shall specifically provide for such arrangements.</p> <p>Reason: In the interest of public health.</p>
6.	<p>Prior to the commencement of development, full details of all decommissioning and site remediation works to the structures and utilities associated with this permission shall be submitted for the written agreement of the Planning Authority. This shall include a timeframe for carrying out these works.</p> <p>Reason: In the interests of clarity and orderly development.</p>
7.	<p>(a) Prior to the operation of the temporary foul sewer pumping station and temporary wastewater treatment plant, all roadways and footpaths serving the said infrastructure shall be finished with a permanent durable surface course. The roadway shall be applied with line marking and road signage as per furnished drawings.</p> <p>(b) Prior to the operation of the temporary foul sewer pumping station and temporary wastewater treatment plant, the street lighting in the vicinity and serving the said infrastructure shall be operational.</p>

	<p>(c). Prior to the commencement of development, the applicant shall prepare and submit for the written agreement of the Planning Authority a Construction Management Plan for the works. This Plan shall fully detail:</p> <ul style="list-style-type: none"> - A Traffic Management Plan for all phases of the proposed development including Construction Traffic Access arrangements. - The delivery and routing of materials to the site during the construction phase shall be organised so that deliveries do not conflict with the morning or evening periods of peak school traffic flow. - The removal and routing of surplus material off site shall be so organised that haulage vehicles do not conflict with morning or evening periods of peak school traffic flow. - If the Construction Management Plan should indicate that access over third party lands is required, evidence of landowner's Consent shall be submitted. <p>Reason: In the interest of traffic safety and to protect the residential amenities of property in the vicinity of the site</p>
8.	<p>Prior to the commencement of development the developer shall lodge with the Council a cash deposit of €100,000 (or as may be adjusted on the 1st January each year, based on the changes to the Wholesale Price Index for building construction, published by the Central Statics Office) as security to ensure the satisfactory completion of the development or to enable the Council to undertake the necessary completion or reinstatement of the site, (including all necessary demolition and removal) if deemed necessary. The deposit, or part thereof, will be refundable to the developer/applicant following the decommissioning of the temporary wastewater treatment plant and foul sewer pumping station and all required site remediation works. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.</p>

	Reason: To ensure the satisfactory completion of the development
9.	<p>Prior to the commencement of development, the developer shall enter into Connection Agreements with Uisce Éireann (Irish Water) to provide for service connections to the public water supply and wastewater collection network.</p> <p>Reason: In the interest of public health and to ensure adequate water/wastewater facilities.</p>
10.	<p>Prior to the commencement of development, the developer or any agent acting on its behalf, shall prepare a Resource Waste Management Plan (RWMP) as set out in the EPA's Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects (2021) including demonstration of proposals to adhere to best practice and protocols. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be submitted to and agreed in writing with the planning authority and shall be made available for inspection at site offices at all times.</p> <p>Reason: In the interest of sustainable waste management.</p>
11.	<p>Prior to commencement of development, a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the planning authority. The CEMP shall include but not be limited to:</p> <p>a) phase controls for dust, noise and vibration, waste management, protection of soils, groundwaters, and surface waters, site housekeeping, emergency response planning, site environmental policy, and project roles and responsibilities. The CEMP shall include all relevant construction mitigation measures as agreed in writing with the planning authority.</p> <p>b) The CEMP shall include a site location map showing the nearest noise sensitive locations, give details of the predicted noise and vibration impact in addition to proposed mitigation measures. The CEMP and noise abatement measures shall comply with the recommendations of BS 5228, 'Code of Practice for Noise and Vibration Control on Construction and</p>

	<p>Open Sites'. The noise sensitive locations shall be taken to be the nearest residential buildings unless otherwise agreed in writing with the planning authority. Noise levels attributable to the proposed development activities when assessed at the nearest noise sensitive locations shall comply with the noise threshold limit values set out as follows:</p> <p>During the operational phase of the proposed development the noise level shall not exceed (a) 55 dB(A) rated sound level between the hours of 0700 to 2300, and (b) 45 dB(A) 15min and 60 dB LAfmax, 15min at all other times, corrected for a tonal or impulsive component, as measured at the nearest dwelling.</p> <p>Reason: In the interest of residential amenities, public health and safety, and environmental protection.</p>
12.	<p>Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays, and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the Planning Authority.</p> <p>Reason: In order to safeguard the amenities of property in the vicinity.</p>
13.	<p>a) The landscaping scheme shown on drawing number PZL-JBAI-XX-XX-M2-L-0001-A3-C01, as submitted to the planning authority on the 10/06/2025 shall be carried out within 12 months of the date of commencement of development.</p> <p>b) All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p>c) The developer shall submit proposals for a secure boundary fence, 2.4m in height, other than a palisade fence. Revised drawings showing compliance with this requirement shall be submitted to, and agreed in</p>

	<p>writing with, the planning authority prior to commencement of development.</p> <p>Reason: In the interests of visual and residential amenity.</p>
14.	<p>Prior to the commencement of development, the developer shall submit details of site specific measures to minimise the risk of water pollution during the construction stage to the Planning Authority for written agreement. The submission shall demonstrate compliance with guidance document “Control of water pollution from construction sites- Guidance for consultants and contractors” published by the Construction Industry Research and Information Association (CIRIA C532) or similar approved. In particular there must be adequate measures in place to prevent the discharge or overflow of contaminated rainwater during construction and operation.</p> <p>Reason: Prevention of pollution</p>
15.	<p>The development shall be operated to ensure that there will be no emissions or malodours, fumes, other deleterious matter such as would give reasonable cause for annoyance to any person in any residence in the vicinity.</p> <p>Reason: In the interests of orderly development and public health and to safeguard the residential amenities of property in the vicinity.</p>

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Fiona Fair

28.04.2026

Appendix 1 - Form 1

EIA Pre-Screening

[EIAR not submitted]

An Coimisiún Pleanála Case Reference	ACP.323186-25		
Proposed Development Summary	Permission for the construction of a temporary foul sewer pumping station and a temporary wastewater treatment plant to pretreat wastewater prior to discharging to the public sewer.		
Development Address	Raynoldstown village, Haynestown, Dublin Road, Dundalk, County Louth.		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? <small>(that is involving construction works, demolition, or interventions in the natural surroundings)</small>	Yes	X	
	No		
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes		Class.....	
No	X		Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			
		Threshold	Comment (if relevant)
No		N/A	Conclusion
Yes	X	11 (c) Part 2, Schedule 5: Development for the Purposes of Part 10 of the Planning and Development Regulations, 2001, as amended.	As the proposed TWWTP has a 1,050 population equivalent (i.e only 10% of the minimum figure) the subject
			Proceed to Q.4

	<p>Other Projects (c) - : Waste water treatment plants with a capacity greater than 10,000 population equivalent as defined in Article 2, point (6), of Directive 91/271/EEC not included in Part 1 of this Schedule.</p> <p>(Require an Environmental Impact Assessment to be prepared)</p>	proposal is a subthreshold project.	
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4. Has Schedule 7A information been submitted?		
No	X	Preliminary Examination required
Yes		Screening Determination required

Inspector: _____ Date: _____

Appendix 2
Form 2 - EIA Preliminary Examination

Case Reference	ACP.328186-25
Proposed Development Summary	Groveview Builders Ltd. are seeking permission for the construction of a temporary foul sewer pumping station and a temporary wastewater treatment plant to pretreat wastewater prior to discharging to the public sewer.
Development Address	Raynoldstown Village, Haynestown, Dublin Road, Dundalk, Co. Louth.
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
<p>Characteristics of proposed development</p> <p>(In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).</p>	<ul style="list-style-type: none"> • Construction of a temporary foul sewer pumping station. • Construction of a temporary wastewater treatment plant (TWWTP) to pre-treat wastewater prior to discharging to the public sewer. • Vehicular access via the substantially completed internal estate road (‘The Boulevard’, constructed under Ref. No:03/1754) • On an application site (red line) area of c.0.31Ha of undeveloped open lands in Raynoldstown Village. • The above ground TWWTP is designed to allow for the temporary servicing, of 358 residential units, in Wadman Park (62) located to the north-west, 91 units (2460649) located to the north of Wadman Park, 80 units (2460737) located to the north-west of subject proposal, 85 units (2460785) located immediately to the west, and (the to be sought) 40 residential units upon lands that lay adjacent to the Boulevard / WIR Junction. All upon lands owned by Groveview Builders.

	<ul style="list-style-type: none"> • Uisce Eireann (UE) have recently indicated that it will not permit further discharges of untreated foul drainage to the Blackrock wastewater treatment plant, the system which serves in the main the southern suburbs of Dundalk of which Raynoldstown village is a part, until planned improvement works are undertaken. • The permission for the TWWTP is being sought in accordance with the UE confirmation of feasibility (COF) and solely to facilitate the continued provision of housing and the community developments in the area pending the delivery of the publicly funded and operated Blackrock wastewater treatment plant upgrade. <p>Materials and construction methods would be typical of a project of this nature.</p> <p>Construction and operational nuisance may occur due to noise, dust, odour and construction vehicles but would be short term and managed.</p> <p>Strict odour and noise controls with ongoing monitoring. The proposed plant uses modern enclosed systems and filtration designed to prevent nuisance during operation phase.</p> <p>Visual Impact due to overground nature of the proposal will be mitigated through the use of a landscaped berm, planting and screening.</p> <p>No accidents/ disasters are foreseen.</p>
<p>Location of development</p> <p>(The environmental sensitivity of geographical areas likely to be affected by the development)</p>	<p>The development is located on undeveloped grounds to the south of Dundalk and which forms part of the overall Raynoldstown development lands. There are no structures on site, it is fenced off and construction of housing, roads and services is underway on</p>

<p>in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p>	<p>adjoining lands. A small stream flows on an east to west axis to the southern and eastern side of the site.</p> <p>There are no designated sites within or adjacent to this site.</p>
<p>Types and characteristics of potential impacts</p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>No significant effects are foreseen on environmental sites. The proposed development will have a long term beneficial impact by allowing further delivery of housing units and supporting infrastructure to proceed, while securing the long-term delivery of community development and services, incl. possible neighbourhood facilities (Creche & school) in Dundalk.</p>
<p>Conclusion</p>	
<p>Likelihood of Significant Effects</p>	<p>Conclusion in respect of EIA</p>
<p>There is no real likelihood of significant effects on the environment.</p>	<p>EIA is not required.</p> <p>The proposed development has been subject to preliminary examination for environmental impact assessment.</p> <p>The proposed development is a development type listed under Part 2 of Schedule 5 of the Planning & Development Regulations (PDR) 2001 (as amended) however it is considered a sub-threshold development for the purposes of Schedule 7</p>

	<p>PDR. Based on information provided and having considered the nature, size and location of the development, there is no real likelihood of significant effects on the environment and as such a mandatory EIS/EIAR is not required in this instance.</p> <p>Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.</p>
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Inspector: _____ **Date:** _____

Appendix 3

Screening for Appropriate Assessment Test for likely significant effects	
Brief description of project	<p>This application seeks permission for the construction of a temporary foul sewer pumping station and a temporary wastewater treatment plant. The site forms part of a much larger on-going development known as Raynoldstown Village, which is currently under construction. The Raynoldstown development lands are located to the south of Dundalk. The subject site is bounded to the north by the proposed 'Village Green' neighbourhood facilities site (ref. 24/60512) and to the south by Dundoogan and the Boulevard to the east. There are currently no structures on site. A small stream (Haggardstown Stream) flows a short distance to the south and east of the site.</p> <p>The area is served by public water supply and foul drainage, however, the Blackrock WWTP is at capacity and works necessary for its upgrade will not be complete until 2030/ 2031.</p> <p>I note that as part of the temporary wastewater treatment solution, an emergency overflow tank will be installed at the pumping station. This tank is designed to provide 24-hour storage capacity in the event of a pumping station outage, with a proposed volume of 22 m³. The pumping station is configured to forward-feed the temporary wastewater treatment plant.</p> <p>The design includes the provision of overground precast sludge holding tank(s), capable of storing up to 20 days' worth of sludge at 2% dry solids concentration. A dedicated supernatant pump will return separated liquid to the inlet sump, maintaining hydraulic balance within the system.</p> <p>To support operational reliability, a GSM-based dial-out alarm and monitoring system will be installed, providing real-time alerts and enabling remote supervision. Furthermore, a full-time operation and maintenance (O&M) contract will be implemented by the plant installer to ensure the system operates efficiently and remains compliant with all relevant UE and Louth County Council standards.</p> <p>I note that a Confirmation of Feasibility (CoF) from Úisce Eireann (UE) has been submitted which states that in relation to wastewater connection, upgrade works are required to increase the capacity of the</p>

	<p>existing Blackrock Wastewater Treatment Plant. UE currently has a project on their current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possibly practicable after these works. <u>Prior to this</u>, domestic treated effluent meeting discharges limits of Biological Oxygen Demand (BOD) 25 mg/l and Total Suspended Solids (TSS) 35 mg/l will be accepted into the UE network.</p> <p>The applicants have stated that they 'have engaged with UE and a temporary wastewater treatment system has been designed, it is proposed to install a temporary wastewater treatment system, as per Irish water upgrade requirements. In order to facilitate the installation of the TWWTS that would cater for some 358 residential units, significant rerouting of existing pipework would be required. It was discussed with UE that if existing housing units were removed from the UE network and pre-treated (Wadman Park) then the 21 units could discharge directly to the UE network without pre-treatment. It was also discussed with UE that if existing housing units were removed from the UE network and pre-treated then the commercial development the subject of planning application reference number 2460512 could discharge directly to the UE network without pre-treatment.</p> <p>In order to achieve this, it is proposed to install a Temporary Foul Pumping Station on the existing foul line from Wadman Park. Wadman park consists of 62 units. The pumping station will pump the untreated effluent from Wadman Park to the proposed Temporary Treatment System. The Temporary Foul Pumping Station will pump effluent from Wadman Park and the proposed developments applied under planning permission application reference numbers, 2460785 (85 units), 2460737 (80 units) and 2460649 (91 Units) and any future planning applications of the site to the temporary wastewater treatment system.</p> <p>The proposed TWWTP would not significantly increase any additional source of potential environmental impacts that have already been evaluated in the AA for the permitted and proposed housing schemes surrounding the TWWTP, on the applicants' lands, including, inter alia, land take, resource requirements, emissions, or construction, operational impacts.</p>
<p>Brief description of development site</p>	<p>Four European Sites, comprising two SACs and two SPAs occur within the wider area surrounding the project site. All other European Sites are located at a</p>

<p>characteristics and potential impact mechanisms</p>	<p>remote distance from the project site. European sites located in proximity to the subject site include:</p> <ul style="list-style-type: none"> • Carlingford Mountain SAC, Site Code: 000453, 9.6Km distant • Dundalk Bay SAC, Site Code:000455, 1Km distant. • Dundalk Bay SPA, Site Code:004026, 1Km distant. • Stabannon & Braganstown SPA: Site Code:004091, 8.3Km distant. <p>Potential Impact Mechanisms include:</p> <ul style="list-style-type: none"> • Release of dust during demolition and construction phases. • Noise and traffic nuisance during demolition, construction and operational phases. • Pollution of water courses during the construction and operational phase of the development. <p>Given the distance between the subject site and Stabannon & Braganstown SPA: Site Code:004091 and Carlingford Mountain SAC, Site Code: 000453 and the lack of a pathway between them, I am satisfied that both of these site can be screened out.</p> <p>The Project is located 1Km from Dundalk Bay SAC (000455) and Dundalk Bay SPA (004026). Therefore, there is no potential for loss or alteration of QI listed habitats as a result of the Proposed Development.</p> <p>The proposed TWWTP is located a short distance to a water course (Haggardstown Stream). The most likely source of negative impacts are associated with impacts on surface/ ground water quality. The water course discharges to Dundalk Bay SAC & SPA approximately 1km from the application site. Any impact on the water quality of this watercourse or hydrological regime could have an impact on the water quality of Dundalk Bay and the Conservation objectives of the European sites associated with Dundalk Bay.</p> <p>I note at the outset that the treated discharge from the TWWTP is to the existing sewer and into the Blackrock WWTP and NOT to a waterbody / the nearby stream. The discharge from the TWWTP will have no impact on the performance of the Blackrock WWTP as it will be a pass-through flow (i.e. no increase in load). UÉ issued the applicant with a Confirmation of Feasibility (COF) letter for the proposed development, which specified the requirement for onsite treatment being provided, that would result in the same Emission</p>
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	<p>Limit Values (ELV's) being achieved as those of the Blackrock Wastewater Treatment Plant (WWTP). In addition, it was also specified as a requirement for the temporary WWTP to treat Ammonia. Therefore, the proposed temporary treatment plant will contain stricter conditions than the existing UÉ Blackrock WWTP.</p> <p>The Haggardstown Stream does not directly abut the TWWTTP site, however, the proposed pumping station and rising main directly abuts the stream, to the south, for a short distance.</p> <p>I note that the applicant's agent in response to a request for further information (RFI) sets out that modern best practices aim to replicate natural processes by slowing, storing, and filtering water, rather than directing it straight to sewers or watercourses. The sites for the Pumping Station & TWWTTP are not to be hard surfaced. The surfacing to the site is to be permeable hardcore as detailed on drawing no. 4224 C1511. This ensures source control of the surface water.</p> <ul style="list-style-type: none"> • The access is to be permeable hardcore; • The area around the tanks and kiosks is to be permeable hardcore; • The area under the above ground tanks is to be permeable hardcore; • The roads leading to the Temporary Wastewater Treatment Plant and Pumping Station are to be drained in accordance with the relevant planning permissions for the site (surface water runoff from the new roads, footpaths and buildings will be collected in a new gravity sewer network within the roads and footpaths of the new development). Hardcore roadways exist on site at present leading to the Temporary Wastewater Treatment Plant and Pumping Station locations. • Condition No. 13 of the notification of decision to grant planning permission, for the subject development, L.C.O.505/2025 Ref. No. 25/60063 states: "Prior to the commencement of development, the developer shall submit details of site specific measures to minimise the risk of water pollution during the construction stage to the Planning Authority for written agreement. The submission shall demonstrate compliance with guidance document "Control of water pollution from construction sites- Guidance for consultants and contractors" published by the Construction Industry Research and Information Association (CIRIA
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	<p>C532) or similar approved. In particular there must be adequate measures in place to prevent the discharge or overflow of contaminated rainwater during construction and operation”.</p> <p>This condition was recommended by the Waste & Environment Section of LCC, who had no objection subject to standard condition.</p> <p>It is the opinion of ÚE and the Planning Authority that the employment of standard engineering measures and the construction and waste management plan (C&WMP) will ensure that any possible indirect effects from the site works on the European Sites will be negligible and do not give rise to any reasonable scientific doubt regarding potential adverse effects.</p> <p>Construction works are confined to the area specified. Site specific conservation objectives (SSCO) have been compiled for the Dundalk Bay SAC (NPWS, 2011) and are outlined below in this AA Screening Report. The SSCO compiled for the Dundalk Bay SPA (NPWS, 2011) are also outlined.</p> <p>I have applied the source-pathway-receptor model in determining possible impacts and effects of the Pumping Station and TWWTP development. The proposed development will not result in any direct effects on any European Site.</p> <p>In carrying out my assessment I have had regard to the nature and scale of the project, the distance from the site to Natura 2000 sites, and any potential pathways which may exist from the development site to a Natura 2000 site, aided in part by the EPA Appropriate Assessment Tool (www.epa.ie), as well as by the information on file, and I have also visited the site.</p> <p>As set out in the preceding section of this assessment, there are potential indirect effects resulting from deterioration in water quality, arising from construction activities and discharge of foul and surface water. However, the employment of standard engineering measures and the construction and waste management plan (C&WMP) will ensure that any possible indirect effects from the site works on the European Sites will be negligible and do not give rise to any reasonable scientific doubt regarding potential adverse effects.</p>
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Screening report	No
Natura Impact Statement	No
Relevant submissions	<ul style="list-style-type: none"> • EIAR and NIS deficiencies. The site is 1km from Dundalk Bay SPA/SAC. It is questionable as to whether the AA conclusion is correct- there is a stream approximately 135m away with a direct connection to Dundalk Bay SAC and SPA c. 1 Km away. • Concern standard operating controls which would be provided for during construction are mitigation measures and therefore works cannot be screened out for AA purposes and the decision is invalid. • No consideration of in-combination effects.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

The proposed development is not located within or adjacent to any designated site. therefore, the proposed development would not result in any direct effects such as habitat loss on any European Site.

European Site (code)	Qualifying interests and conservation objectives	Distance from proposed development	Ecological connections	Consider further in screening g Y/N
Dundalk Bay SAC (000455)	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Perennial vegetation of stony banks [1220] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Conservation objectives – refer to NPWS Conservation Objectives	1km to the east of the subject site.	There is a watercourse to the eastern side of the TWWTP and to the south of the pumping station site, Haggardstown Stream which discharges to Dundalk Bay. Therefore, there is a direct hydrological link. Specific measures on SUDs management and on-site storage to limit any emergency overflows and	N

	<p>Dundalk SAC and Dundalk SPA, Dept. Arts, Heritage and the Gaeltacht, 19 July 2011, version 1.0</p>		<p>specific measures to minimise the risk of water pollution during the construction stage, are outlined above.</p> <p>While there is a direct hydrological connection, via Haggardstown Stream. Surface water will be treated on site through proposed SUDs measures as standard for development of this nature.</p> <p>In particular there will be adequate measures in place to prevent the discharge or overflow of contaminated rainwater during construction and operation.</p> <p>There is an indirect hydrological pathway to this SAC via foul wastewater. The discharge from the temporary WWTP is NOT to a surface water. The treated discharge would be into the existing sewer and into the Blackrock WWTP.</p> <p>The TWWTP will contain stricter conditions than the existing UÉ Blackrock WWTP and will be a pass-through flow</p>	
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			(i.e. no increase in load).	
Dundalk Bay SPA (004026)	<p>Great Crested Grebe (<i>Podiceps cristatus</i>) [A005]</p> <p>Greylag Goose (<i>Anser anser</i>) [A043]</p> <p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Shelduck (<i>Tadorna tadorna</i>) [A048]</p> <p>Teal (<i>Anas crecca</i>) [A052]</p> <p>Mallard (<i>Anas platyrhynchos</i>) [A053]</p> <p>Pintail (<i>Anas acuta</i>) [A054]</p> <p>Common Scoter (<i>Melanitta nigra</i>) [A065]</p> <p>Red-breasted Merganser (<i>Mergus serrator</i>) [A069]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137]</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Lapwing (<i>Vanellus vanellus</i>) [A142]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Black-tailed Godwit (<i>Limosa limosa</i>) [A156]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Curlew (<i>Numenius arquata</i>) [A160]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Common Gull (<i>Larus canus</i>) [A182]</p> <p>Herring Gull (<i>Larus argentatus</i>) [A184]</p>	1 km to the east of the subject site.	<p>There is a watercourse to the eastern side of the site, Haggardstown Stream and which discharges to Dundalk Bay, therefore there is a direct hydrological connection.</p> <p>Surface water will be treated on site through proposed SUDs measures as standard for the development of this nature.</p> <p>As stated above. there is an indirect hydrological pathway to this SAC via foul wastewater.</p> <p>The discharge from the temporary WWTP is NOT to a surface water. The treated discharge would be into the existing sewer and into the Blackrock WWTP.</p> <p>The TWWTP will contain stricter conditions than the existing UÉ Blackrock WWTP and will be a pass-through flow (i.e. no increase in load).</p>	N

	<p>Wetland and Waterbirds [A999]</p> <p>Conservation objectives – refer to NPWS Conservation Objectives Dundalk SAC and Dundalk SPA, Dept. Arts, Heritage and the Gaeltacht, 19 July 2011, version 1.0</p>			
<p>Carlingford Mountain SAC (000453)</p>	<p>Northern Atlantic wet heaths with Erica tetralix [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Transition mires and quaking bogs [7140]</p> <p>Alkaline fens [7230]</p> <p>Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110]</p> <p>Calcareous rocky slopes with chasmophytic vegetation [8210]</p> <p>Siliceous rocky slopes with chasmophytic vegetation [8220]</p> <p>Conservation objectives – refer to NPWS Conservation Objectives Carlingford Mountain SAC, Dept. Arts, Heritage and the Gaeltacht, 17 Dec 2021, version 1.0</p>	<p>9.6 km to the north east of the subject site.</p>	<p>No direct hydrological or ecological connections.</p>	<p>N</p>

Stabannan-Braganstown SPA (004091)	Greylag Goose (Anser anser) [A043] Conservation objectives – refer to NPWS Conservation Objectives Stabannan-Braganstown SPA, Dept. Arts, Heritage and the Gaeltacht, 15 th Nov 2022, version 1.0	8.3 km to the south west of the subject site.	No direct hydrological or ecological connections.	N
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Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

In terms of Carlingford Mountain SAC and Strabannan-Braganstown SPA, there are no direct or indirect impacts foreseen.

There is a direct hydrological connection, via Haggardstown Stream, to the Dundalk Bay SAC and Dundalk Bay SPA and an indirect hydrological pathway to this SAC via foul wastewater.

Surface water will be treated on site through proposed SUDs measures as standard for development of this nature. There will be adequate measures in place to prevent the discharge or overflow of contaminated rainwater during construction and operation.

The treated discharge would be into the existing sewer and into the Blackrock WWTP. The TWWTTP will contain stricter conditions than the existing UÉ Blackrock WWTP and will be a pass-through flow (i.e. no increase in load).

With standard mitigation no significant likely potential direct or indirect impacts, alone or in combination, on Dundalk Bay SAC and Dundalk Bay SPA during the construction and operational phases of this development is foreseen.

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Dundalk Bay SAC (000455)	<u>Direct</u> There will be no direct impact on the SAC or its QIs as it is located entirely outside of the footprint of the proposed developmental site. Due to the distance of 1km, the nature	No

	<p>and scale of the project, no direct effects on the terrestrial QI features are identified.</p> <p><u>Indirect:</u></p> <p>There is a hydrological connection to Dundalk Bay through the Haggardstown Stream which is located to the east and south of the subject site and which discharges to Dundalk Bay.</p> <p>Potential indirect effects resulting from deterioration in water quality arising from construction activities and discharge of foul and surface water was considered. In order to comply with Policies and Objectives of the Louth County Development Plan standard construction phase surface water management measures, will be implemented for the project during its construction phase. These measures are standard measures that are implemented at construction sites to prevent the generation and release of contaminate surface water runoff. These measures relate to SUDs management, on-site storage to limit any emergency overflows, erosion and sediment control and the release of contaminating</p>	
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	<p>substances used during the construction phase.</p> <p>There is an indirect connection through the public foul drainage system.</p> <p>The treated discharge would be into the existing sewer and into the Blackrock WWTP which discharges to Dundalk Bay.</p> <p>The Blackrock WWTP is at capacity and upgrade works will not be complete before 2030.</p> <p>The 2024 EPA report, 'Urban Wastewater Treatment in 2024' on Wastewaters does not include Blackrock as a 'problem' plant.</p> <p>However, the Uisce Éireann Wastewater Treatment Capacity Register, published in August 2025, indicates that the Blackrock WWTP (Reg. No. D0188) is "Red" and that a WWTP Project is planned/underway. • Red = no spare capacity available at present.</p> <ul style="list-style-type: none">• UÉ issued the applicant with a Confirmation of Feasibility (COF) letter for the proposed development, which specified the requirement for onsite treatment being provided, that would result in the same Emission Limit Values (ELV's) being achieved as those of the Blackrock	
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	<p>Wastewater Treatment Plant (WWTP). In addition, it was also specified as a requirement for the temporary WWTP to treat Ammonia.</p> <p>The TWWTP will contain stricter conditions than the existing UÉ Blackrock WWTP and will be a pass-through flow (i.e. no increase in load).</p> <p>The proposed temporary treatment plant will also treat an additional 63 no. existing housing units that are currently discharging to the Blackrock WWTP (Wadman Park Estate) and therefore, will have the benefit of reducing the load going to Blackrock WWTP for treatment.</p> <p>The employment of standard engineering measures and the construction and waste management plan will ensure that any possible indirect effects from the site works on the European Sites will be negligible and do not give rise to any reasonable scientific doubt regarding potential adverse effects.</p>	
	<p>Likelihood of significant effects from proposed development (alone): N</p>	
<p>Dundalk Bay SPA (004026)</p>	<p><u>Direct.</u></p> <p>There will be no direct impact on the SPA or its QIs as it is located entirely outside of the footprint of the proposed developmental site. Due</p>	<p>No.</p>

to the distance of 1km, the nature and scale of the project, no direct effects on the terrestrial QI features are identified.

Indirect:

There is a hydrological connection to Dundalk Bay through the Haggardstown Stream which is located to the east and south of the subject site and which discharges to Dundalk Bay.

Potential indirect effects resulting from deterioration in water quality arising from construction activities and discharge of foul and surface water was considered. In order to comply with Policies and Objectives of the Louth County Development Plan standard construction phase surface water management measures, will be implemented for the project during its construction phase. These measures are standard measures that are implemented at construction sites to prevent the generation and release of contaminate surface water runoff. These measures relate to SUDs management, on-site storage to limit any emergency overflows, erosion and sediment control and the

	<p>release of contaminating substances used during the construction phase.</p> <p>There is an indirect connection through the public foul drainage system.</p> <p>The discharge from the temporary WWTP is NOT to a surface water. The treated discharge would be into the existing sewer and into the Blackrock WWTP which discharges to Dundalk Bay.</p> <p>The Blackrock WWTP is at capacity and upgrade works will not be complete before 2030.</p> <p>The 2024 EPA report, 'Urban Wastewater Treatment in 2024' on Wastewaters does not include Blackrock as a 'problem' plant.</p> <p>However, the Uisce Éireann Wastewater Treatment Capacity Register, published in August 2025, indicates that the Blackrock WWTP (Reg. No. D0188) is "Red" and that a WWTP Project is planned/underway. • Red = no spare capacity available at present.</p> <ul style="list-style-type: none"> • UÉ issued the applicant with a Confirmation of Feasibility (COF) letter for the proposed development, which specified the requirement for onsite treatment being provided, that 	
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	<p>would result in the same Emission Limit Values (ELV's) being achieved as those of the Blackrock Wastewater Treatment Plant (WWTP). In addition, it was also specified as a requirement for the temporary WWTP to treat Ammonia.</p> <p>The TWWTP will contain stricter conditions than the existing UÉ Blackrock WWTP and will be a pass-through flow (i.e. no increase in load).</p> <p>The proposed temporary treatment plant will also treat an additional 63 no. existing housing units that are currently discharging to the Blackrock WWTP (Wadman Park Estate) and therefore, will have the benefit of reducing the load going to Blackrock WWTP for treatment.</p> <p>The employment of standard engineering measures and the construction and waste management plan will ensure that any possible indirect effects from the site works on the European Sites will be negligible and do not give rise to any reasonable scientific doubt regarding potential adverse effects.</p>	
	<p>Likelihood of significant effects from proposed development (alone): N</p>	

In the absence of appropriate mitigation measures, the objective to restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC and the SPA have been selected may be difficult to achieve.

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

The employment of standard engineering measures and the construction and waste management plan will ensure that any possible indirect effects from the site works on the European Sites will be negligible and do not give rise to any reasonable scientific doubt regarding potential adverse effects. Construction works are confined to the area specified. Furthermore, given that nature and scale of the proposed development and separation distances involved, I am satisfied that it will not have an impact on any European site by reason of noise, emissions, lighting, and human activity/disturbance. Therefore, it is reasonable to conclude that on the basis of the information on the file, which I consider adequate in the order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any European Sites, in view of the sites conservation objectives and a stage 2 AA is not therefore required.

Appendix 5: Water Framework Directive

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Coimisiún Pleanála ref. no.	ACP-323186-25	Townland, address	Raynoldstown Village, Haynestown, Dublin Road, Dundalk, Co. Louth.
Description of project		Construction of a temporary foul sewer pumping station and temporary wastewater treatment plant.	
Brief site description, relevant to WFD Screening		<p>The development is located on undeveloped grounds to the south of Dundalk and which forms part of the overall Raynoldstown development lands. There are no structures on site, it is fenced off and construction of housing, roads and services is underway on adjoining lands which form part of the Reynoldstown Village scheme.</p> <p>A small stream flows on an east to west axis to the southern and eastern side of the site.</p>	

Proposed surface water details	Surface water to be disposed on site/ into the public surface water drainage system.
Proposed water supply source & available capacity	Public Supply – For Dundalk, the Uisce Éireann Capacity Register dated August 2025, and accessed on the 22 nd of April 2026, indicates that there is ‘Capacity Available – LoS improvement required’.
Proposed wastewater treatment system & available capacity, other issues	<p>The subject proposal is for a private temporary wastewater treatment plant as the Blackrock Wastewater Treatment Plant is currently at capacity and planned upgrade works are forecast for 2030. The Uisce Éireann Capacity Register dated August 2025, and accessed on the 22nd of April 2026, indicates that the available capacity for the Blackrock WWTP is Red, but a ‘WWTP Project is planned/ is underway’. Red means there is no spare capacity available at present.</p> <p>The applicant has submitted a Confirmation of Feasibility from Uisce Eireann which states that in relation to wastewater connection, upgrade works are required to increase the capacity of the existing Blackrock Wastewater Treatment Plant. The CoF states: ‘Uisce Eireann currently has a project on our current</p>

		investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by Q1 2030 (this may be subject to change) and the proposed connection could be completed as soon as possibly practicable after these works'.				
Others?		N/A				
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
e.g. lake, river, transitional and coastal waters, groundwater	Underlying site	Louth (IEGBNI_NB_G_019)	Good	Not at Risk	N/A	Discharge to Groundwater

body, artificial (e.g. canal) or heavily modified body.						
	0m – Drain / small stream to the south of the proposed pumping station location which flows east to Haggardstown Stream c. 140m to the east.	Haggardstown_010 (IE_NB_06H080570)	Poor	Review	Unknown	Direct and through groundwater.
	1km to the south east	Inner Dundalk Bay (IE_NB_040_0100)	Poor	Monitoring	Unknown	Through Haggardstown Stream and indirect through Wastewater Treatment

Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.

CONSTRUCTION PHASE

No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Site clearance & Construction	Louth (IEGBNI_NB_G_019)	Indirect impact via Potential hydrological pathway	Water Pollution Surface water run-off	Disposal on site through a SuDS designed system and also final disposal into	No	Screen out at this stage.

					the public surface water drainage system.		
2.	Site clearance & Construction	Haggardstown_010 (IE_NB_06H080570)	Direct impact via hydrological pathway.	Water Pollution	Use of Standard Construction Practice	No	Screen out at this stage.
3.	Site clearance & Construction	Inner Dundalk Bay (IE_NB_040_0100)	Direct impact via hydrological pathway.	Water Pollution	Use of Standard Construction Practice and dilution effect	Unknown – Potential from cumulative development in the area.	Screen out at this stage.
OPERATIONAL PHASE							
4.	Site clearance & Construction	Louth (IEGBNI_NB_G_019)	Indirect impact via Potential hydrological pathway	Water Pollution	Disposal on site through a SuDS designed system and	No	Screen out at this stage.

				Surface water run-off	also final disposal into the public surface water drainage system.		
5.	Surface Water Run-off	Haggardstown_010 (IE_NB_06H080570)	Indirect impact via Potential hydrological pathway	Water Pollution	SuDS features incorporated into development	No	Screen out at this stage.
6.	Surface Water Run-off and indirect from foul drainage	Inner Dundalk Bay (IE_NB_040_0100)	Indirect impact via Potential hydrological pathway -	Water Pollution	SuDS and suitable foul drainage on site.		Screen out at this stage.
DECOMMISSIONING PHASE							
5.	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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