



An
Coimisiún
Pleanála

Inspector's Report

ACP-323900-25

Development	Proposed upgrades to Limerick Wastewater Treatment Plant and Regional Bioresource Centre
Location	Bunlicky, Co. Limerick
Planning Authority	Limerick City and County Council
Applicant	Uisce Eireann
Type of Application	SID Pre Application Consultation under S.37B of the Planning and Development Act, 2000
Date of Site Inspection	5 th March 2026
Inspector	Alaine Clarke

1.0 Introduction

- 1.1. Irish Water requested pre-application consultations under Section 37B of the Planning and Development Act, 2000, as amended, for the proposed upgrade of an existing wastewater treatment plant at Castletroy, Co. Limerick. Pre-application consultations took place between An Coimisiún Pleanála and the prospective applicant in March 2026 (see appended signed Record of Meeting).
- 1.2. The primary purpose of the meetings was to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the 2000 Act, as amended by the Planning and Development (Strategic Infrastructure) Act, 2006, and to consider matters relating to the proper planning and sustainable development of the area or the environment which may have a bearing on the Commission's decision, and procedures involved in making the application.
- 1.3. The prospective applicant sought closure of the pre-application consultation by correspondence dated 17th April 2026.
- 1.4. This Report provides an overview of the project, a summary of the meeting and the advice provided by the Commission, the legislative provisions, and it recommends a list of Prescribed Bodies that should be forwarded copies of the application.

2.0 Site Location and Description

- 2.1. The proposed development is located in the townlands of Ballykeefe and Corkaneree (in an area known as Bunlicky), Co Limerick. There are two sites associated with the proposal. The larger of the sites comprises the existing Bunlicky/Limerick wastewater treatment plant (WWTP). The WWTP serves Limerick City and Environs agglomeration under EPA Waste Water Discharge Licence Reg. No. D0013-01, discharging treated effluent to the Shannon Estuary. The plant has operated as a Sludge Hub Centre since 2003, initially treating indigenous sludge and imports from smaller WWTPs in County Limerick.
- 2.2. The WWTP is located ca. 400m to the south of the southern bank of the River Shannon and ca. 280m to the west of Ballinacurra Creek although an unnamed watercourse is also located ca. 180m to the east of the site, between the site boundary and the Ballinacurra Creek. To the west of the site is a surface waterbody,

known as Bunlicky waterbody, across which the Limerick Shannon Ring Road (N18) passes. The WWTP is accessed off a five-arm roundabout which is connected to the N18. To the east and south east of the WWTP are existing industrial units. The plant has operated as a Sludge Hub Centre since 2003.

- 2.3. The smaller of the sites which comprises an existing pumping station facility is located ca. 700m to the east of the WWTP, in Corcanree Business Park, with outfall to River Shannon. Access is via a roundabout on Dock Road/R510. This site is bounded by the River Shannon to the north, a 38kV substation to the south-east and lands that are under construction for a permitted commercial/enterprise park.

3.0 Proposed Development

- 3.1. According to documentation submitted by the applicant, including that presented at the pre-application meeting, the WWTP is approaching hydraulic capacity and has limited stormwater storage, requiring upgrades to support future growth and maintain compliance. In respect of the pumping station, it has limited storm storage capacity with resulting frequent spill discharges to the River Shannon. A review of the EPA licensed is envisaged.
- 3.2. There are 3 principal components to the proposed development:
- Upgrades to the WWTP, comprising:
 - Proposed WWTP capacity upgrade which will be increased to 285,000 PE to accommodate projected +10-year growth, including:
 - 27,500 PE committed industrial load;
 - Civil infrastructure sized to allow future expansion to 325,000 PE (+25-year projection).
 - New inlet works and Aerobic Granular Sludge (AGS) treatment stream with capacity of 157,000 PE, operating in parallel with the existing process.
 - Diversion of one rising main from Corcanree Pumping Station to the new process stream, enabling an approximate 50:50 flow split between the new and existing works.

- Reconfiguration of the pumping arrangement to distribute flows between the existing and new treatment streams.
- Stormwater storage capacity upgrade, comprising:
 - Land acquisition to accommodate new stormwater infrastructure.
 - Construction of a new 12,500 m³ stormwater storage tank with Gravity overflow to the existing Corcanree outfall chamber.
 - Retention of existing rising mains to the WWTP, with upgraded foul pumps to increase pumping capacity.
- A Regional Bioresource Centre at the WWTP site, comprising:
 - Sludge reception facilities – existing imported cake reception retained and new dewatered cake reception facility.
 - Cake storage and blending silo for management of imported sludge.
 - Installation of a Thermal Hydrolysis Plant (THP).
 - Additional anaerobic digestion capacity.
 - Biogas management and energy recovery, including additional gas storage and additional 800kW CHP capacity.
 - Digested sludge dewatering and biosolids export silos.
 - Supporting infrastructure, including odour control and upgraded wash water system with UV treatment.

4.0 Planning History

- Pre-application consultation ABP-310202: proposed upgrade to Limerick (Bunlicky) WWTP. Withdrawn.
- The original permission relating to the WWTP is file reg. ref. Limerick Council ref. 962230.
- Documentation submitted with the pre application consultation request states the plant was subject to improvements works, completed pursuant to a Section 5 Declaration.

- Adjoining: ACP ref. ABP-312559-22 granted permission for ground investigation works to inform the option selection and design of the proposed Limerick City and Environs Flood Relief Scheme.

5.0 Precedent Decisions

5.1. Relevant precedent decisions include:

- ACP-310201-21: the proposed upgrade of the existing WWTP at Castletroy, Co. Limerick constituted strategic infrastructure development.
- ACP-310980-21: upgrade of an existing WWTP at Mortarstown, Co. Carlow and upgrade of an existing wastewater pumping station, Kilkenny Road, Carlow.

6.0 Pre-Application Consultation Meeting

6.1. A pre-application consultation meeting was held on 10th March 2026. A record of the meeting is attached to this Inspector's Report. The main points discussed were:

- Outline of the proposed development and the case for SID (see section 7.0 below);
- Review of EPA Licence;
- The need or not for a Marine Area Consent;
- Land use zoning;
- WWTP options/design proposal to be considered in the EIAR;
- Flood Risk Assessment;
- Water Framework Directive Assessment;
- Quaternary treatment and the Wastewater Directive;
- EIAR environmental factors including Traffic, Major Accidents/Disasters and Climate;
- Appropriate Assessment;
- Renewable Energy generation.

7.0 Case Made by Prospective Applicant

7.1. According to application documentation, the key drivers for the expansion of the Limerick (Bunlicky) WwTP are as follows:

- The existing WwTP is overloaded hydraulically. The upgrades will ensure it meets the requirements of the Urban Wastewater Treatment Directive and conditions set out in the EPA Wastewater Discharge Licence;
- Provision of additional stormwater storage capacity for the network to reduce the number of untreated storm spills to the Shannon Estuary, thereby bringing the agglomeration into compliance with legislation;
- To support the population growth target for Limerick City by 2040;
- Development of a Bioresource Centre to serve the Southwest consistent with the National Wastewater Sludge Management Plan.

7.2. The prospective applicant's case is as follows:

- Works involves the upgrade of the existing Bunlicky WwTP to increase design capacity from 130,000 PE to 285,000 PE. This greatly exceeds the threshold of 10,000 PE for wastewater treatment plants set out in the seventh schedule of the Act and it therefore falls to be considered as a Strategic Infrastructure Development for the purposes of Section 37A and Section 37B of the Act.
- The National Planning Framework (NPF) includes an ambitious growth target for Limerick City and Suburbs of 44,000 people (at least 150,000) to 2040 with an objective to enhance its significant potential to become a city of scale. The framework identifies some key future growth enablers to achieve this, which includes “ensuring that water supply and waste -water needs are met by new national projects to enhance Limerick’s water supply and increase waste-water treatment capacity”
- National Strategic Outcome 9 of the NPF provides for sustainable management of water and environmental resources. This includes increased compliance with the requirements of the Urban Wastewater Directive (UWWD).

- The Regional Spatial and Economic Strategy (RSES) for the Southern Region includes an objective to strengthen the role of the Limerick Shannon Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region.
- The proposal is necessary to facilitate population growth in Limerick City and Suburbs to deliver on strategic national objectives and are an important precondition to enable growth. The project can be deemed to be of strategic importance to the state and region insofar as it is necessary to deliver on the growth target for Limerick City and Suburbs by 2040.
- The proposed development will fulfil national or regional spatial and economic strategy objectives, including
 - RSES: Limerick Shannon MASP Policy Objective 1: Limerick as a primary driver of economic and population growth in the Southern Region.
 - RPO 211 - support the implementation of Irish Water Investment Plans
 - RPO 212 - support investment and the sustainable development of strategic wastewater facilities by Irish Water
- The agglomeration served by the WWTP includes large parts of County Clare. It can be concluded that the development will have a significant effect on the area of more than one planning authority.

8.0 Legislative Provisions

8.1. The relevant legislative provisions, as follows:

37A.— (1) An application for permission for any development specified in the Seventh Schedule (inserted by the Planning and Development (Strategic Infrastructure) Act 2006) shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority.

(2) That condition is that, following consultations under section 37B, the Board serves on the prospective applicant a notice in writing under that section stating that,

in the opinion of the Board, the proposed development would, if carried out, fall within one or more of the following paragraphs, namely—

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

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,

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

8.2. The relevant provision in the Seventh Schedule of the Act under the heading of Environmental Infrastructure which states:

‘Development comprising or for the purposes of the following:

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

8.3. **Environmental Impact Assessment**

8.3.1. Section 37E(1) of the Planning and Development Act, 2000, as amended requires that an application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Commission and shall be accompanied by an environmental impact assessment report in respect of the proposed development. Therefore, the submission of an EIAR is mandatory.\

8.4. **Appropriate Assessment**

8.4.1. The Lower River Shannon SAC (site code 002165) generally follows the River Shannon and the Ballinacurra Creek. The River Shannon and River Fergus SPA (site code 004077) generally follows the River Shannon and the Ballinacurra Creek but includes park of Bunlicky Lake adjacent to the WWTP. The SAC and SPA are also Water Framework Directive (WFD) protected areas.

9.0 Assessment

9.1. Seventh Schedule Development

9.1.1. As set out in Section 37A of the Planning and Development Act, 2000 (as amended) the first test is whether the form of development proposed meets the classes of development set out in the Seventh Schedule of the Planning and Development Act, 2000 (as amended).

9.1.2. The current SID thresholds are set out within the 7th Schedule of the Planning and Development Act 2000, as amended. In the case of the proposed development the subject of this pre-application request, the relevant provision in the Seventh Schedule of the Act is Part 3 under the heading of Environmental Infrastructure which states:

‘Development comprising or for the purposes of the following:

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

9.1.3. The current interpretation of the Commission on the issue in the context of this type of development is that the 10,000 population equivalent threshold should be related to the scale of the proposed development, whether initial development or addition or uplift in capacity of an existing plant. In the circumstances of this pre-application request the capacity of the existing plant is stated to be 130,000 population equivalent (PE) with the additional capacity proposed to be 155,000 PE with the result that the development would breach the threshold, to a total of 285,000 PE. I am satisfied that the development accords with Section 37A(1) of the Act.

9.1.4. On the basis of the above, I am satisfied that the nature of the proposed development is such that it meets the requirement of the Seventh Schedule and falls to be assessed under the criteria set out in s.37A(2) of the Act.

9.2. In addition, under Section 37A(2), the proposed development must fall within one or more of the following conditions/tests:

9.3. Test Under s.37A(2) of the Planning and Development Act, 2000 (as amended)
(a) Whether the development would be of strategic economic or social importance to the State or the region in which it would be situate.

9.3.1. The National Planning Framework, First Revision, states that Limerick has the potential to generate and be the focus of significant employment and housing growth. The NPF Strategy supports the ambitious growth targets to enable Limerick to grow by at least 50% to 2040 and establishes targeted growth objectives for Limerick City and Suburbs of 44,000 people (at least 150,000 target population in total) with 50% of new city housing to be built within existing city and suburb footprints. The NPF identifies some key future growth enablers to achieve this, including:

- “ensuring that water supply and waste-water needs are met by new strategic projects to enhance Limerick’s water supply and increase waste-water treatment capacity.”

9.3.2. NPF, National Strategic Outcome (NSO) 9, Sustainable Management of Environmental Resources includes priority objectives:

- of bringing and maintaining public water and wastewater services to acceptable international benchmarks, verified by independent monitoring and reporting.
- Of ensuring the growth of our five cities of Dublin, Cork, Galway, Waterford and Limerick, together with the regional centres identified in the NPF, is supported by the provision of water services investment.

9.3.3. NPF, National Policy Objective (NPO) 92 is to ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.

9.3.4. The Regional Spatial and Economic Strategy (RSES) for the Southern Region designates Limerick Shannon Metropolitan Area as the primary driver of growth in the mid-west region, where it is recognised that the achievement of growth is contingent on enabling infrastructure. The Limerick Shannon Metropolitan Area

Strategic Plan (MASP) which forms part of the RSES includes a number of guiding principles which includes enabling infrastructure and will be elaborated upon in the following section.

- 9.3.5. I consider the applicant has made a favorable case that the facility will be of strategic economic importance to the State and the Region. Providing supporting infrastructure is critical in facilitating the continued economic expansion of the Limerick Shannon Metropolitan Area. The need to upgrade wastewater treatment infrastructure is highlighted in the NPF. The need to service lands for housing and employment land uses is a key requirement for continued economic expansion of the Limerick Shannon Metropolitan Area. The proposed development will assist in increasing the capacity of the sewerage infrastructure of the Limerick City and Suburbs area and as such, it is of strategic economic importance to the State and Region.
- 9.3.6. Having regard to the national and regional policy context and the details of the subject proposal outlined above, I am satisfied that the development would be of strategic economic importance to the State and the Region and would, therefore, comply with the condition set out in section 37A(2)(a) of the Act.

9.4. **Test Under s.37A(2) of the Planning and Development Act, 2000 (as amended)**
(b) Whether the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,

- 9.4.1. The following objectives and statements contained in the NPF, First Revision, are relevant:
- National Policy Objective 92 seeks to “ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.”
 - National Strategic Outcome 9, includes priority objectives:

- of bringing and maintaining public water and wastewater services to acceptable international benchmarks, verified by independent monitoring and reporting.
- Ensuring that public and private water services investment decisions are aligned with the broad strategic aims of the NPF.
- Of ensuring the growth of our five cities of Dublin, Cork, Galway, Waterford and Limerick, together with the regional centres identified in the NPF, is supported by the provision of water services investment.
- Biological treatment and increased uptake in anaerobic digestion with safe outlets for bio stabilised residual waste;
- Adequate capacity and systems to manage waste,...

9.4.2. I note the targeted growth objectives set out in the NPF, set out above at section 9.3 of this report, and the requirement that 50% of new city housing would be within Limerick City and Suburbs. The NPF recognises that the implementation of the Framework requires that plans for public services are aligned which means ensuring the growth of our five cities of Dublin, Cork, Galway, Waterford and Limerick, together with the regional centres identified in the NPF, is supported by the provision of water services investment.

9.4.3. The RSES for the Southern Region focuses on compact growth in strengthening settlement structure. The population projections for the Limerick Shannon Metropolitan Area, which reflect the original NPF, is projected to increase from 132,420 in 2016 to 177,552 in 2031, with additional jobs to 2031 extrapolated to be in the order of at least 28,200.

9.4.4. The RSES includes a number of general policy objectives related to compliance and investment in water/wastewater facilities, including Regional Policy Objectives, RPO 211, RPO 212 and RPO 214. The following Limerick Shannon Metropolitan Area Strategic Plan (MASP) policy objectives and guiding principles are relevant:

- Policy Objective 1 (Limerick Shannon Metropolitan Area)
 - (a) It is an objective to strengthen the role of the Limerick-Shannon Metropolitan Area as an international location of scale, a complement

to Dublin and a primary driver of economic and population growth in the Southern Region.

- Policy Objective 4 (Investment to Deliver Vision)

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

- Policy Objective 10 (Housing and Regeneration)

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

9.4.5. One of the guiding principles for sustainable development identified in the MASP is to enable infrastructure; to identify infrastructure capacity issues and ensure water services needs are met and improve sustainability in terms of energy, waste management and water conservation. This is also reflected in the identified national enablers set out Limerick Shannon MASP to support growth in the Limerick Shannon Metropolitan Area which includes ensuring that water supply and wastewater needs are met by new national projects to enhance water supply and increase wastewater treatment capacity.

9.4.6. Having regard to the above, I am satisfied that the development would meet relevant national policy objectives of the NPF, First Revision and would serve to fulfil the relevant regional policy objectives of the RSES for the Southern Regional Assembly. The development would, therefore, satisfy the requirement set out in section 37A(2)(b) of the Act.

9.5. **Test Under s.37A(2) of the Planning and Development Act, 2000 (as amended)**
(c) Whether the development would have a significant effect on the area of more than one planning authority.

9.5.1. Finally, as to whether or not the development would have a significant effect on the area of more than one planning authority, the site of the proposed development adjoins the River Shannon which forms the administrative boundary of Clare County Council to the north and Limerick City and County Council to the south. The prospective applicant states that the agglomeration served by the WWTP includes large parts of County Clare, Figure 02, Administrative Context which accompanies the Request documentation indicates a map of the area served in Counties Clare and Limerick. Having regard to the foregoing, I am satisfied that the proposed development would have a significant effect on the area of more than one planning authority. Accordingly, I am of the opinion that the proposal would come within the scope of this requirement to be considered as complying with section 37A(2)(c) of the Act.

9.6. In conclusion, I am satisfied that the proposed development does come within the provisions of Part 3 of the Seventh Schedule of the Planning & Development Act 2000 (as amended), Environmental Infrastructure, necessitating an application direct to An Coimisiún Pleanála. I also consider that the proposed development would satisfy the requirements of paragraph (a) (b) and (c) of section 37A(2) of the Planning & Development Act 2000 (as amended).

10.0 **Prescribed Bodies**

10.1. In view of the scale, nature, and location of the proposed development, as described in this report, it is recommended that the prospective applicant should consult with the prescribed bodies listed in the attached Appendix in respect of any future application for approval.

Note: The prospective application is advised to submit a standalone document (which may form part of the EIAR) with the planning application, which outlines the mitigation measures, in the interest of convenience and ease of reference.

11.0 Recommendation

11.1. Based on the foregoing assessment, it can be concluded that the proposed development would exceed the threshold set out in the Seventh Schedule of the Planning and Development Act 2000, as amended, and therefore satisfies Section 37A(1) of the Act. It can also be concluded that the development is of strategic importance by reference to the requirements of Section 37A(2)(a) and Section 37A(2)(b) of the Act.

11.2. I recommend that the Commission serve a notice on the prospective applicant, pursuant to Section 37(B)(4) of the Planning and Development Act 2000, as amended, stating that it is of the opinion that the proposed development which comprises the following:

- upgrade of existing Bunlicky/Limerick wastewater treatment plant (WWTP) from 130,000 P.E. to 285,000 P.E.,
- upgrade of existing sludge hub centre to a Regional Bioresource Centre at the WWTP facility,
- Increase in stormwater storage capacity at Corcanree Pumping Station and associated upgraded foul pumps

would constitute a strategic infrastructure development within the meaning of Section 37A of the Act for the reasons and considerations set out below.

Reasons and Considerations

Having regard to the size, scale and location of the proposed waste water treatment plan upgrade and related development, and to the policy context, it is considered that the proposed development comprising the development of:

- upgrade of existing Bunlicky/Limerick wastewater treatment plant (WWTP) from 130,000 P.E. to 285,000 P.E.,
- upgrade of existing sludge hub centre to a Regional Bioresource Centre at the WWTP facility,
- increase in stormwater storage capacity at Corcanree Pumping Station and associated upgraded foul pumps

on sites at Ballykeefe and Corkanree townlands constitutes development that falls within the definition of environmental infrastructure in the Seventh Schedule of the Planning and Development Act 2000, as amended, thereby satisfying the requirements set out in section 37A (1) of the Act.

The proposed development is also considered to be of strategic importance by reference to the requirements of Section 37A(2)(a), 37A(2)(b) and 37A(2)(c) of the Planning and Development Act 2000, as amended.

An application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under Section 37E of the Act.

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.

Alaine Clarke

Inspector

21st May 2026

Prescribed Bodies

The following is a schedule of prescribed bodies considered relevant for the purposes of Section 37E (3) (c) of the Principal Act.

- i. Minister for Housing, Local Government and Heritage
- ii. Minister for Climate, Energy and Environment
- iii. Limerick City and County Council
- iv. Clare County Council
- v. South-western Regional Assembly
- vi. Commission for Regulation of Utilities
- vii. Marine Area Regulatory Authority
- viii. Health Service Executive
- ix. Environmental Protection Agency
- x. Inland Fisheries Ireland
- xi. Transport Infrastructure Ireland
- xii. The Heritage Council
- xiii. An Taisce
- xiv. An Chomhairle Ealaíon
- xv. Failte Ireland
- xvi. Health and Safety Authority
- xvii. Geological Survey of Ireland
- xviii. Office of Public Works

Further notifications should also be made where deemed appropriate.