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# Uisce Éireann – Newcastle West Wastewater Treatment Plant Redevelopment

SID Pre-Application Report

Uisce Éireann

Project number: 60735051

November 2025


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# 1. Introduction

This Strategic Infrastructure Development (SID) pre-application report has been prepared by AECOM on behalf of Uisce Éireann (herein referred to as 'UÉ' or 'the prospective Applicant').

The prospective Applicant seeks a determination from An Coimisiún Pleanála (herein referred to as 'the Commission', or ACP) as to whether the proposed redevelopment of the Newcastle West Wastewater Treatment Plant (WwTP) in County Limerick (herein referred to as the 'Proposed Development') constitutes Strategic Infrastructure Development under Schedule 7 of the Planning and Development Act 2000, as amended or Schedule 1 of the Planning and Development Act 2024.

This document forms part of the prospective Applicant's formal request to engage with ACP in the pre-application determination process under Section 37B of the Planning and Development Act 2000, and Section 116 of the Planning and Development Act 2024, as to whether or not the Proposed Development would fall within the meaning of Strategic Infrastructure Development (SID) and to confirm whether an application should be submitted to the Commission or to Limerick City and County Council (LCCC).

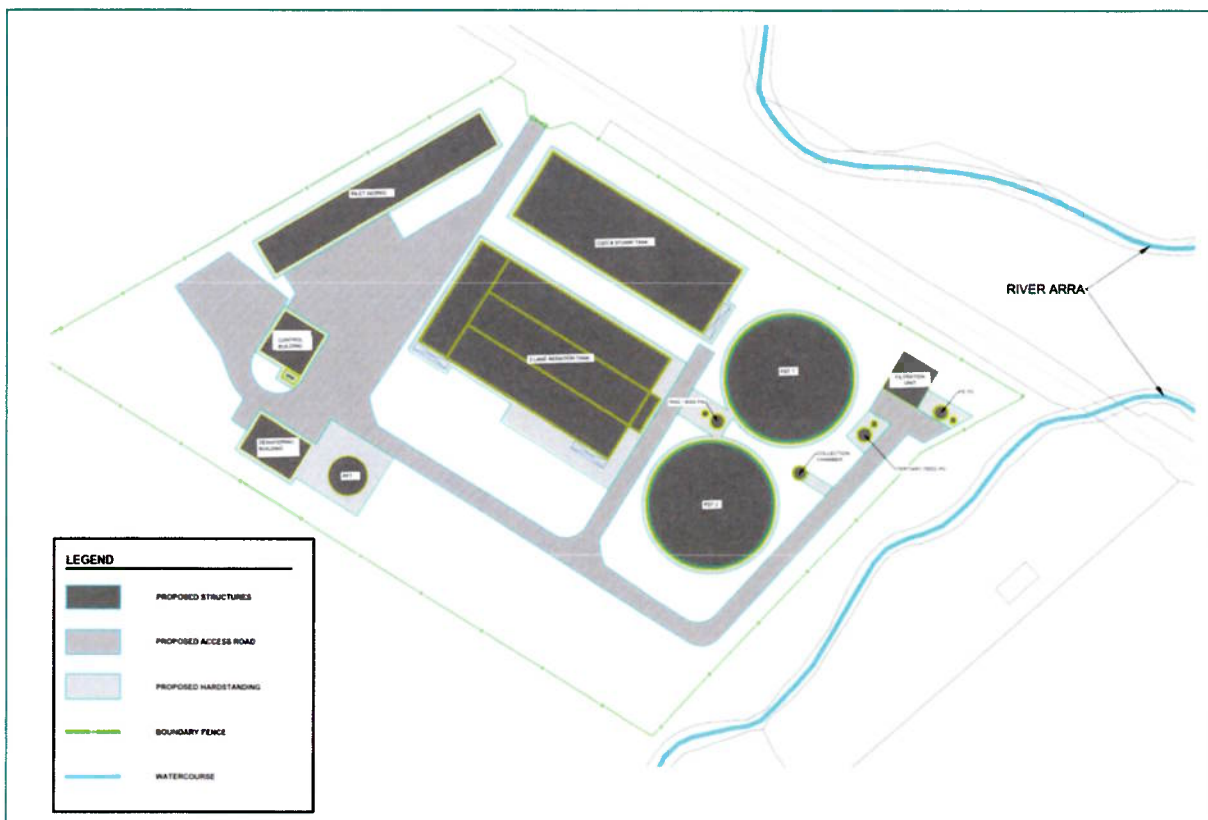
## 2. Proposed Development

The Proposed Development consists of the redevelopment of the WwTP, providing an increase in treatment capacity at the existing plant from the current 12,368 P.E. (Population Equivalent) to a proposed 23,700 P.E. – a proposed increase of 11,332 P.E.

The redevelopment of the WwTP will include the following works as illustrated on Figure 2-1:

- New inlet works;
- New storm tank;
- New Activated Sludge Plant (ASP) tank;
- Two new clarifiers;
- New tertiary treatment via two cloth filters;
- New picket fence thickener (sludge particle treatment);
- New sludge dewatering building;
- Refurbished control building;
- New Final effluent/storm pumping station;
- Compensatory flood storage on an adjacent site;
- A new 350m outfall to the River Deel (replacing existing); and,
- All ancillary works.

Ancillary works will include ground mounted solar panels (location TBC) (accounting for 10% of onsite energy generation) across 2no. arrays, additional internal roads and resurfacing for maintenance and the replacement of perimeter fencing.



**Figure 2-1: Proposed Redevelopment of WwTP Site**

During construction the existing levels of treatment capacity will be maintained. The existing operational WwTP plant and the proposed construction area will be kept separate. Ultimately this will be a design and build contract, but the construction will likely comprise the excavation, construction of concrete tanks, mechanical fit out, surfacing and landscaping. At no point during construction will less capacity at the WwTP be provided than is currently provided at present.

## 2.1 Need for the Proposed Development

Between the years 2021 and 2025 the Population Equivalent (PE) serviced by Newcastle West WwTP increased by 11,322 PE (from 12,368 PE to 23,700 PE). The WwTP requires a considerable upgrade to cater for the expanding population growth. Wastewater Assimilative Capacity (WAC) calculations have also determined an extended discharge consent is required. The WwTP needs to be upgraded to ensure compliance with the Wastewater Directive<sup>1</sup> and to cater for the expanding population increase of the WwTP's / network's catchment area. The primary driver for the scheme is to provide an upgrade to the existing WwTP to cater for this growth within the agglomeration whilst ensuring that the quality requirements for the effluent discharge are achieved. The Proposed Development will ensure effluent compliance for a 10-year design horizon and a 25-year design horizon.

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<sup>1</sup> [Urban Waste Water Treatment Directive](#)

## 3. Existing Site

### 3.1 Site and Surrounding Environs

The Proposed Development is located within the boundary of the prospective Applicant's existing Newcastle West WwTP and extending into two adjacent fields (herein referred to as the 'Site'), which serves the Newcastle West agglomeration. The Site is situated within the administrative area of LCCC. It is located immediately outside of the south-eastern settlement boundary of Newcastle West, on the western side of the R520 regional road. The site is c.2.38 hectares (ha) in size.

The Site's Irish Traverse Mercator (ITM) coordinates and Google Maps link are included below:

- ITM Grid Reference (Centrepnt): x: 529583 y: 632905
- Google Maps Reference (Centrepnt): <https://maps.app.goo.gl/KEf6jdnm3LEc6y39>

The location of the Proposed Development is highlighted in red in Figure 3-1.



**Figure 3-1: Subject Site Location<sup>2</sup>**

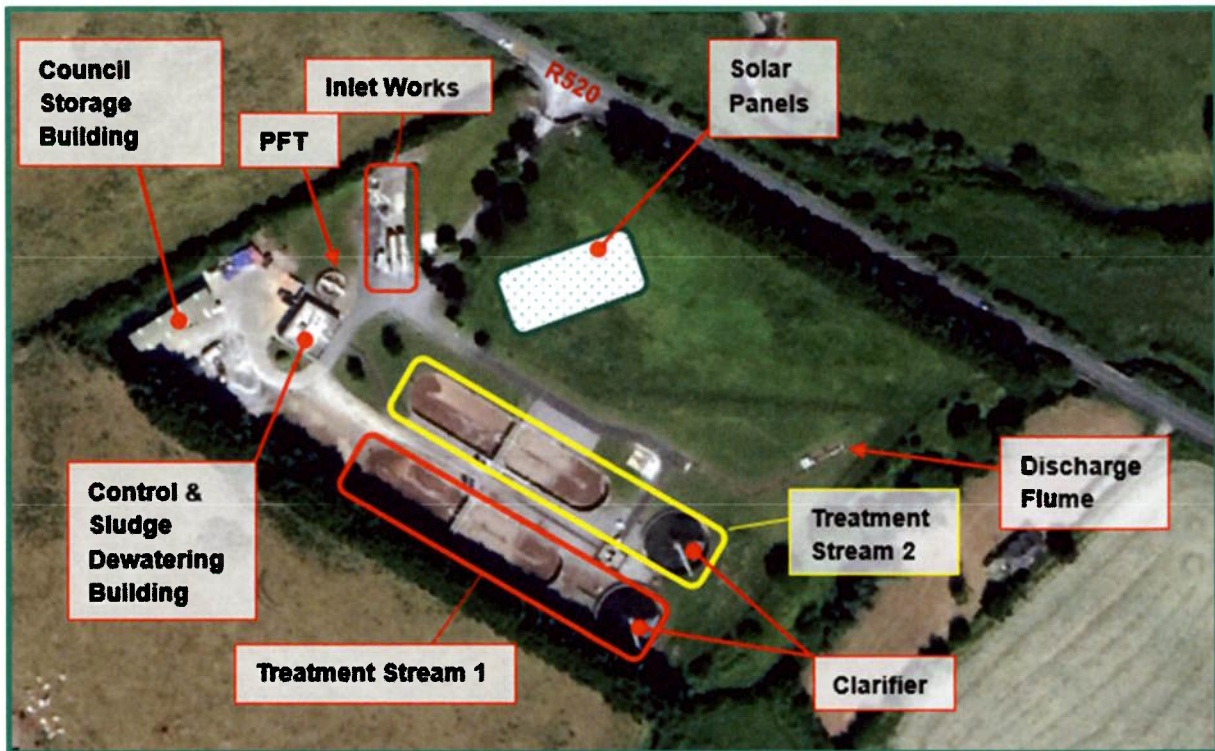
The existing WwTP site currently consists of a tree lined access road (from the R520), an internal road and pathway, hardscaped land and above ground treatment infrastructure (to be demolished / refurbished) on the southern and western sections of the site, as per Figure 3-2. The northern and eastern sections of the existing WwTP site are currently grassed land, with two rows of solar panels located upon the grass.

The existing WwTP site is relatively flat and slopes toward the southern border (from 43.52 mOD to 44.78 mOD). Wastewater from the agglomeration is discharged into a manhole which is located just outside the treatment plant site boundary. The main sewage pipeline, which collects approximately 95% of the sewage discharged to the plant, is a 700 mm diameter pipe which enters the manhole from the north. The second pipeline, which collects the remainder of the sewage discharged (approximately 5%) for treatment, is a 300 mm diameter pipe which enters the manhole site from the west. The manhole then passes flows to the reception chamber, located just inside the site boundary at the upstream end of the inlet works via a 900 mm pipeline. Treated sewage is discharged via a gravity 900 mm diameter pipeline into the River Deel, approximately 250 metres southeast of the existing WwTP site boundary.

The two adjacent fields that fall within the redline boundary are two grassed agricultural fields, with hedged boundaries separating both from each other and the R522 to the west. There is no built infrastructure upon either

<sup>2</sup> Extract from [Google Maps](#) – Annotations Added

field and none will be introduced by the Proposed Development, with the furthest field to be used for compensatory flood storage.



**Figure 3-2: Existing Site Layout**

Ehernagh Stream is partially within the Site's eastern boundary, and the River Arra is located c.50m east, across the R520. The Deel River is located c.200m south-east of the Site. An ESB site (comprising a substation and office buildings) is located c.100m to the north-west, separated from the Site by an open field. The closest dwelling is located 50m to the west of the Site's boundary. This distance is, however, 350m from the actual built development on the WwTP site.

The proposed outfall will replace the existing outfall with an upsized diameter outfall which will retain the same route. It will exit the WwTP site from its eastern corner boundary, heading eastward for a length of c.150m, into the neighbouring field and across the Ehernagh Stream. From here, it will move north-east for a length of approximately 170m, to its discharge at the River Deel, crossing the R520 into the field opposite the Site. The proposed outfall can be seen in Figure 3-3.



**Figure 3-3: Proposed Outfall Location**

The proposed compensatory flood storage is located in the second field, furthest to the west, visible in Figure 3-1. The specific location and arrangement are shown in Figure 3-4.



Figure 3-4: Proposed Compensatory Storage Plan

## 3.2 Land Use Zoning

The relevant plans which were reviewed to inform this section are the Limerick Development Plan (LDP) 2022 – 2028 and the Newcastle West Local Area Plan (LAP) 2023 – 2029.

### 3.2.1 Limerick Development Plan 2022 - 2028

Section 12.1 of the LDP confirms that zoning designations apply only to lands within settlement boundaries. Newcastle West's zoning is not contained within the CDP but is rather detailed in the LAP.

### 3.2.2 Newcastle West Local Area Plan 2023 – 2029

The Site is mostly located outside of Newcastle West's settlement boundary as defined in the Local Area Plan (LAP) and is, therefore, unzoned / white land, as shown per Figure 3-5. The proposed outfall to the River Deel is also entirely within / beneath unzoned land. Part of the Site's north-western area is within 'Open Space and Recreation' zoned land, however, no development is proposed within the zoned land.

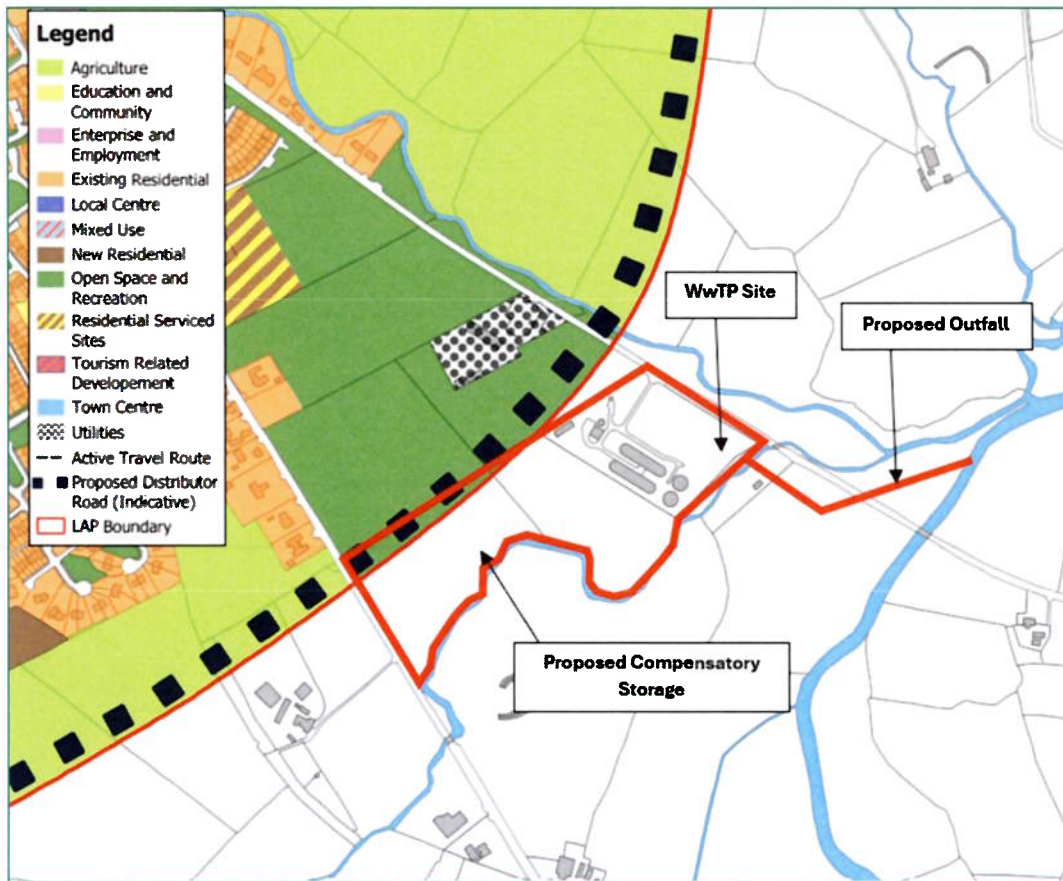


Figure 3-5: Extract from LAP's 'Zoning Map' [Annotations Added]

Section 12.4 of the CDP and Section 10.1 of the LAP states that:

*Transitional Zoning Areas should be considered in the design of developments in order to avoid abrupt transitions in scale, density and use in the boundary areas of adjoining land use zones.*

Map 1 'Zoning Map' of the LAP identifies that the land immediately adjacent the Site to the north is zoned as 'Open Space and Recreation'. Table 10.3 of the LAP defines the Land-Use Zoning Matrix for Newcastle West, where the most applicable category for the Proposed Development would be 'General Public Administration' which is 'Generally Not Permitted' for the adjacent zoning. With the Proposed Development confined mainly to an existing WwTP boundary, the Proposed Development will not result in an abrupt transition in scale or density and so will not have a negative impact on the adjacent zoning.

### 3.3 Planning History

A desktop review of LCCC's online planning portal, MyPlan.ie's National Planning Application database and An Coimisiún Pleanála's (ACP) online portal was undertaken on 01/10/2025 to collate details of any approved developments on the Site or in proximity to the Proposed Development. Relevant planning applications approved within the last 10-years (available online) are included in Table 3-1. Minor applications (e.g. change of use or minor residential extensions) which are not relevant to the Proposed Development have been omitted.

Only one relevant planning application was identified on the Site (see Table 3-1 for details). AECOM will engage with LCCC to understand if there are any further historic applications of relevance to the Site for consideration.

Table 3-1: Relevant Planning History

Planning Ref.	Site Address	Development	Decision Date	Proximity to Subject Site
171207	Clooneyscrehane , Newcastle West, Co. Limerick.	30 KW of ground mounted solar panels and all associated works	27/03/2018	On Site

## 3.4 Archaeological and Built Heritage

A desktop review of the Department of Housing, Local Government and Heritage's Historic Environment Interactive Map Viewer<sup>3</sup> provides access to the records of the National Monuments Service (NMS) and the National Inventory of Architectural Heritage (NIAH). A review was undertaken for features of archaeological (Record of Monuments and Places – RMPs) or built heritage (Protected Structures) recorded on or near to the Site, as well as any Zones of Notification.

An extract is presented in Figure 3-6 confirming that there are no recorded monuments or Protected Structures within the Site's boundary. There are, however, two monuments in the adjacent field to the east / south, a ring fort and an enclosure (where the proposed outfall will be partially routed). There is also a Protected Structure (bridge) c.220m south-east, crossing the Deel River on the R520.

An Archaeological Screening Assessment (ASA) was undertaken for the Proposed Development, setting out the following requirements and recommendations, which will be implemented in the design of the scheme on receipt of future grant of permission:

- Given the potential for impacts to buried archaeological remains within the marginal grassed area within the northeast of the Proposed Development, it is recommended that archaeological testing be carried out at the pre-construction phase.
- The detail and scope of all archaeological works will be agreed with the National Monuments Service (NMS) and carried out in compliance with the National Monuments Acts 1930 – 2014; and Policy and Guidelines on Archaeological Excavation (Department of Arts, Heritage Gaeltacht and the Islands, 1999).
- The archaeological works will require a licence from the National Monuments Service on behalf of the Minister for Culture, Heritage and the Gaeltacht, in consultation with the National Museum of Ireland, all in accordance with the Provisions of the National Monuments Acts 1930 – 2014.
- Should archaeological material/features be encountered during the archaeological testing, the use of machinery shall cease, and further archaeological investigation (by hand) shall be carried out to determine the nature and extent of the archaeological remains. Archaeological deposits shall not be removed as part of the assessment process.
- The testing will be undertaken in advance of construction to allow adequate time to evaluate, record and, where necessary, mitigate any archaeological features that may be revealed.
- The appointed archaeologist will also undertake a cursory watching brief of pipeline works along the proposed replacement outfall pipe during the construction phase with particular attention paid to the sections closest to the large enclosure (SMR LI036-215) and at the northeast extent to the River Deel.

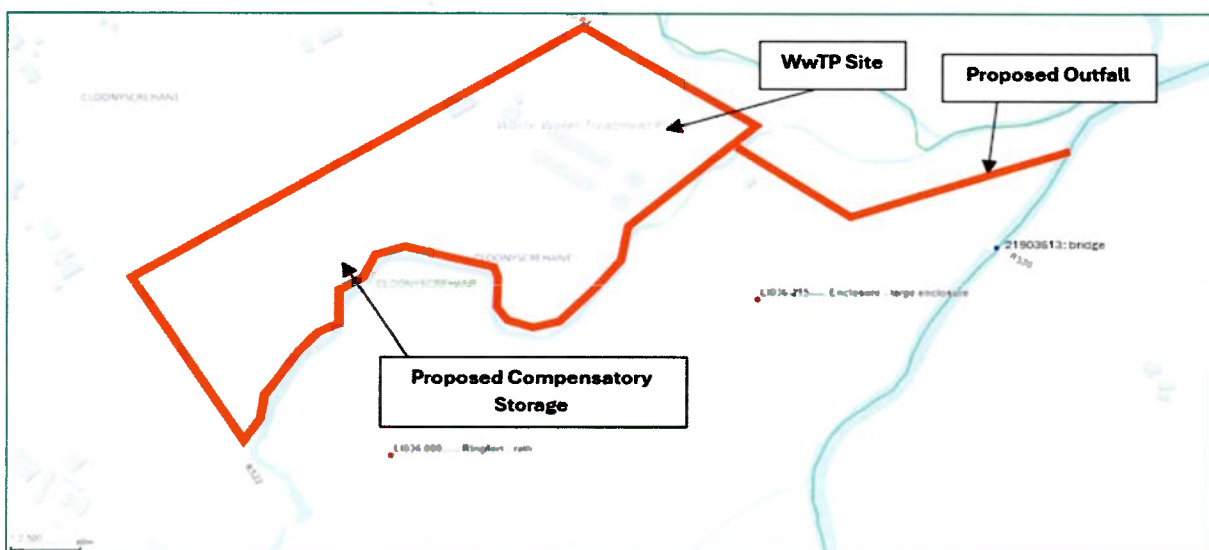
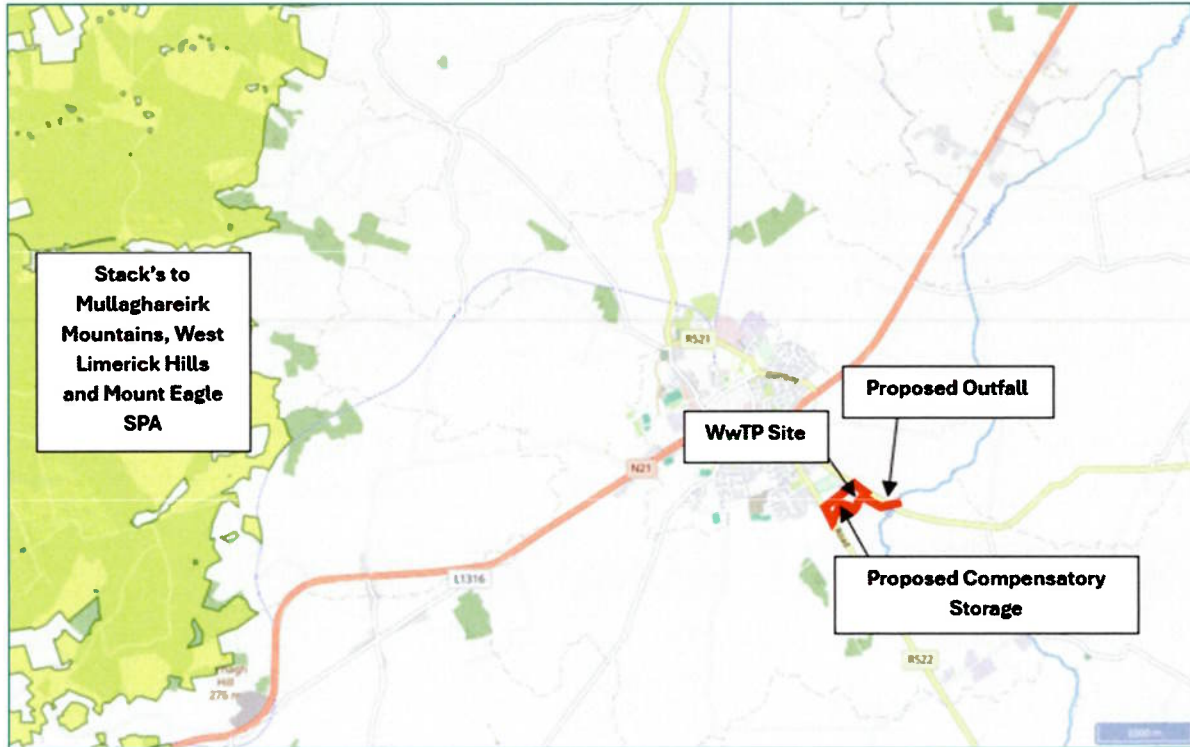


Figure 3-6: Extract from Historic Environment Viewer [Annotations Added]

<sup>3</sup> [Historic Environment Viewer application | National Monuments Service \(archaeology.ie\)](https://www.archaeology.ie/historic-environment-viewer)

## 3.5 Natural Heritage

The Environmental Protection Agency's (EPA) online mapping tools were reviewed to identify any protected sites at or within proximity to the Proposed Development sites, i.e., Special Areas of Conservation (SAC), Special Protection Areas (SPA), Natural Heritage Areas (NHA) and proposed NHAs (pNHA). An extract of EPA Mapping is presented in Figure 3-7.



**Figure 3-7: Protected Sites in Proximity to Proposed Development**

The Proposed Development does not lie within any identified protected areas. Located c.5.9km west, the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (004161) is the closest protected site. The Site borders the Ehernagh Stream and outfalls to the Deel River. As such, there is potential for hydrological linkages to protected sites. An Appropriate Assessment (AA) Screening was, therefore, undertaken.

The AA Screening concluded:

*In view of the best scientific knowledge, and on the basis of objective information in light of the Conservation Objectives of the relevant European sites, it can be stated beyond reasonable scientific doubt, that the Proposed Development will not have a significant effect on any European site, either individually or in-combination with other plans and projects.*

**An Appropriate Assessment is not required** before proceeding with the Proposed Development.

A net gain of 13,404 Habitat Units (achieved through the cultivation of amenity grasslands) will be provided as part of the Proposed Development. Other opportunities for enhancement have also been identified (creation of wet scrapes, creating/augmenting, hedgerows, provision of artificial refugia).

## 3.6 Flood Risk Assessment

A desktop review of the Office of Public Works' (OPW) national flood information portal<sup>4</sup> was undertaken, to identify any occurrences of past flooding at or near to the Proposed Development. A review of CDP and LAP mapping was undertaken to determine which 'Flood Zones' the Proposed Development falls within, to help assess the risk from flooding on the Site.

An extract from OPW mapping is presented in Figure 3-8 which indicates that no past flooding events were recorded within or in proximity to the site, with the closest recorded c.250m north of the site. No occurrences of

<sup>4</sup> <https://www.floodinfo.ie/map/floodmaps/>



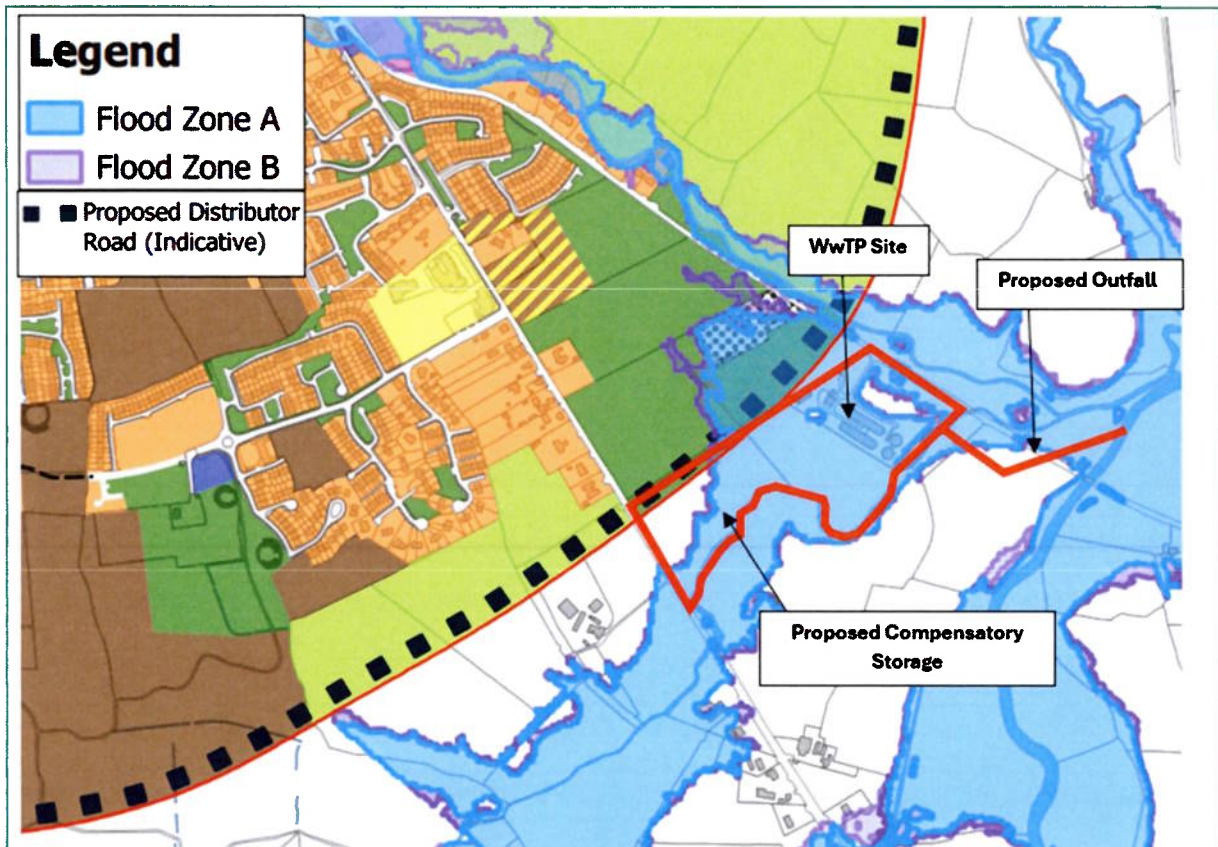


Figure 3-9: Extract from LAP's 'Flood Map' [Annotations Added]

### 3.7 Landscape and Visual

The Site is confirmed to be within the 'Agricultural Lowlands' Landscape Character Area (LCA) as set out in the CDP's mapping. Table 6.1 of the CDP defines the Agricultural Lowlands LCA as:

*"The largest of the Landscape Character Areas in Limerick and comprises almost the entire central plain. This landscape is a farming landscape and is defined by a series of regular field boundaries, often allowed to grow to maturity. This well-developed hedgerow system is one of its main characteristics. In terms of topography, the landscape is generally rather flat with some locally prominent hills and ridges. The pastoral nature of the landscape is reinforced by the presence of farmyards."*

A relevant objective of the LCA, as set out in Table 6.1 of the LDP, is to:

*"Encourage retention of existing landscape features such as hedgerows and trees and their incorporation into landscaping for new developments".*

Existing boundary hedging and internal trees are planned to be retained.

There are no views or prospects designated within the CDP or LAP situated on or across the site.

### 3.8 Proposed Distributor Road

The LAP's 'Zoning Map' identifies an indicative 'Proposed Distributor Road' route which routes directly through the field to the north of the site, as visible on Figure 3-5. Engagement with LCCC will be undertaken in advance of any submission to confirm the status of the planned distributor road and whether this route is still being pursued.

## 4. Relevant Legislative Provisions

The relevant legislation, relating to the Proposed Development being potentially SID, is listed below under the appropriate headings. As of the time of writing (September 2025), SID is still determined by the current Planning and Development Act 2000, as amended. For clarity, however, the relevant provisions of the forthcoming Planning and Development Act 2024 are also covered, as the forthcoming Act continues to be phased in. The full Act is expected to be adopted by Quarter 2 of 2026 on current projections.

### 4.1 Planning and Development Act 2000, as amended

Section 37(a)–1 defines that:

*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.*

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'*

### 4.2 Planning and Development Act 2024

Under the Planning and Development Act 2024, Section 84(2) states that:

*An application for permission for Chapter 4<sup>6</sup> development shall be made to the Commission in accordance with Chapter 4.*

Section 82(1)(b)(i) defines that 'Strategic Infrastructure' falls within the remit of Chapter 4. Page 217 of the Act confirms that "strategic infrastructure development" means a development specified in Schedule 1". The relevant provision in the First Schedule of the Act is Part 3(f) under the heading of Environmental Infrastructure which states:

*'a waste water treatment plant with a capacity greater than a population equivalent of 10,000 and, for the purpose of this provision, "population equivalent" shall be construed in accordance with paragraph 6 of Article 2 of Council Directive 91/271/EEC of 21 May 1991<sup>26</sup> concerning urban waste water treatment,'*

Per Section 116(c):

*A person (in this Chapter also referred to as a "prospective applicant") who intends, and is eligible to apply, for permission for Chapter 4 development (other than Chapter 4 State authority emergency*

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<sup>6</sup> Planning Applications Directly to Commission

*development) shall, prior to the making of the application concerned, request a consultation with the Commission under this section.*

## 4.3 Proposed Development Triggers

The Proposed Development consists of the redevelopment of the WwTP, providing an increase in treatment capacity at the existing plant from the current 12,368 P.E. (Population Equivalent) to a proposed 23,700 P.E. – a proposed increase of 11,332 P.E (for a WwTP already above 10,000 PE). It was found, through analysis of Application 311036<sup>7</sup> (a UÉ project), that ACP's interpretation is that the threshold should be related to the scale of the proposed development, whether initial development or addition or uplift in capacity of an existing plant. With the Proposed Development above 10,000 PE, currently and the proposed uplift also exceeding 10,000, this definition of the Seventh Schedule and First Schedule is triggered and pre-application consultation with ACP is compulsory, to determine the determining authority of application.

## 4.4 Section 37B(2) of the Planning and Development Act 2000, as amended

Section 37B(2) of the current Planning and Development Act 2000, as amended, states that consideration will also be given to the following, with the Proposed Development needing to meet at least one of these definitions in addition to Seventh / First Schedule definitions to be classified as SID:

- The Proposed Development is of strategic economic or social importance to the State or the region in which it would be situated;
- The Proposed Development would contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or in any regional spatial and economic strategy in respect of the area or areas in which the development would be situate; and,
- The Proposed development would have a significant effect on the area of more than one planning authority.

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<sup>7</sup> (Nenagh Wastewater Treatment Plant, Co. Tipperary, which would result in a 12,000 PE increase from an existing 10,042 to 22,042)

## 5. Recent Precedents

This section sets out recent precedent cases for similar developments (all on behalf of UÉ). Whilst not all directly comparable in terms of scale, location or PE increase, the precedents are presented in Table 5-1, showcasing a varying mix of decisions from the Commission on whether WwTP projects were SID or not.

**Table 5-1: Recent Precedents**

Ref	Proposed Development	Similarity to Proposal	PE Increase	Decision
301798	10-year permission for development of the Ringsend wastewater treatment plant upgrade project including a regional biosolids storage facility	PE increase at a key WwTP for one of Ireland's key agglomeration areas	400,000 (2million to 2.4million)	SID
301908	Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility.	PE increase at a key WwTP for one of Ireland's key agglomeration areas	500,000	SID
312131	Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility	PE increase at a key WwTP for one of Ireland's key agglomeration areas	500,000	SID – Application Granted
306719	Extension and upgrade of an existing 5,850 p.e. (approx.) wastewater treatment plant to approximately 14,000 p.e. within the existing site boundary.	Similar development and PE increase	8150 (5850 to 14000)	Withdrawn
310202	Proposed upgrade to Limerick (Bunlicky) Wastewater Treatment Plant	A WwTP within Limerick, similar in location and scale	Figures Not Available	Pending
310201	Proposed upgrade of an existing wastewater treatment plant at Castletroy, Co. Limerick	A WwTP within Limerick, similar in location and scale	32,500 (45,000 PE to 77,500 PE including a future IDA load of 5,500PE)	SID
316168	Proposed upgrade of the existing Castletroy Wastewater Treatment Plant	Within County Limerick – 30,500 PE increase, making it similar in scale and location	32,500 (45,000 PE to 77,500 PE including a future IDA load of 5,500PE)	SID – Application Granted
311036	Proposed upgrade to Nenagh Wastewater Treatment Plant, Co. Tipperary	Similar in regard to PE increase, referenced similarly within the RSES and both being geographically close.	10042 (12,000 to 22,042)	Not SID (Not considered to be of strategic economic importance to the state or region)
302556	Wastewater Treatment Plant, Arklow, Tinahask Lower and Ferrybank, Co. Wicklow.	New WwTP, however comparable to site redevelopment proposed at Newcastle West	36,000	SID
310980	Upgrade of an existing Wastewater Treatment Plant at Mortarstown Co Carlow and the upgrade of an existing wastewater pumping station, Kilkenny Road Carlow.	Redevelopment of an existing WwTP site	Figures Not Available	Pending

## 6. Environmental and Technical Considerations

### 6.1 Appropriate Assessment (AA) Screening

An AA Screening was prepared by AECOM, concluding:

*In view of the best scientific knowledge, and on the basis of objective information in light of the Conservation Objectives of the relevant European sites, it can be stated beyond reasonable scientific doubt, that the Proposed Development will not have a significant effect on any European site, either individually or in-combination with other plans and projects.*

**An Appropriate Assessment is therefore not required** before proceeding with the Proposed Development.

### 6.2 Environmental Impact Assessment (EIA) Screening

An EIA Screening was undertaken by AECOM, concluding that there is a requirement for progression to a full Environmental Impact Assessment Report (EIAR).

### 6.3 Archaeological Screening Assessment

AECOM produced an Archaeological Screening Assessment. Based on the Assessment's recommendations, given the potential for impacts to buried archaeological remains within the marginal grassed area in the northeast of the Proposed Development, archaeological testing will be carried out at the pre-construction phase. The testing will be undertaken in advance of construction to allow adequate time to evaluate, record and, where necessary, mitigate any archaeological features that may be revealed.

If any archaeological features are uncovered during construction, the appointed Archaeologist and the National Monuments Service will be consulted to determine the appropriate mitigation measures which may include preservation in situ, or preservation by record, through systematic archaeological excavation and/or monitoring of specific construction activities during the construction phase.

### 6.4 Flood Risk Assessment

AECOM produced a site-specific Stage 2 and Stage 3 flood risk assessment (FRA) for the Proposed Development. The Stage 3 FRA assesses the flood risk in sufficient detail, providing a quantitative appraisal of potential flood extents. The Stage 3 FRA estimates the potential flood risk impact elsewhere and the effectiveness of any proposed mitigation measures and includes modelling.

A post-development model was run, whereby all the proposed ground raising and alterations to the existing infrastructure on site was included in the 2D aspect of the model to assess if there was any impact on flood risk. The results of the post-development model showed that the proposed infrastructure is out-with the 1% AEP HEFS floodplain, due to their assigned design level, which is therefore causing a loss of flood storage on site, potentially causing increases in flood risk to the surrounding area or downstream of the site.

Compensatory storage analysis was conducted by first analysing the flood volume that was lost from the site by the proposed ground raising. The second part of the compensatory storage analysis is to locate and analyse areas that are desirable for compensatory storage. In line with the Newcastle West Strategic Flood Risk Assessment guidance, the proposed area is located out with the 1%AEP floodplain (Flood Zone B & Flood Zone C). The most desirable area out-with the floodplain was identified to be on the second field to the south of the development, close to the Ehernagh Stream (flooding mechanism), a location plan is shown in Figure 6-1.



Figure 6-1: Proposed Compensatory Storage Location Plan

## 7. SID Analysis

With reference to Table 5-1, five previous WwTP applications were confirmed as SID and submitted to ACP (301798, 301908, 312131, 316168 and 302556). These all related to WwTPs with Population Equivalents ranging from 35,000 (Arklow in Wicklow) to over two million (Ringsend in Dublin) and so the Proposed Development at Newcastle West is much lower. The PE changes for each determined as SID are listed below:

- **301798:** Additional 400,000 PE to existing 2.4 million PE;
- **301908:** A new 500,000 PE WwTP;
- **312131:** A new 500,000 PE WwTP;
- **316168:** 45000 PE to 77500 PE (Additional 30,500); and,
- **302556:** A new 36000 PE WwTP.

Application 316168 relates to an upgrade to the Castletroy WwTP and is considered to be of particular relevance, given it too is located in Limerick and is similar in terms of level of increase to PE (Increase from 45,000 PE to 77,500 PE including allowance for a future IDA load of 5,500PE in addition to the 77,500 PE, if required in the future). It was determined to be SID following pre-application consultations with ACP under case ref: 310201. ACP considered that the proposals would contribute to National and Regional Objectives and impact on the Council area of Clare in addition to Limerick.

Only one instance was identified where the 10,000 PE threshold had been exceeded and the application was determined not to be SID (The Nenagh WwTP upgrade which proposed an increase in PE from 12000 to 22042 – ACP Ref.311036). Furthermore application 306719 at Market Street, Kenmare, Co. Kerry was withdrawn and the PE instead changed to 9800 indicating that the ACP are relatively rigid with applying the 10,000 PE threshold. The Nenagh example is comparable to the Proposed Development at Newcastle West, with both proposing similar PE increases, referenced similarly within the RSES and both being geographically close.

The following points are raised for consideration in relation to the Proposed Development:

- It will potentially be of strategic economic or social importance to the Region, potentially aligning with the required housing and population growth identified in national, regional and local policy.
- Within the NPF, National Strategic Objective 9 includes the sustainable management of water. The NPF also sets regional population growth objectives for the southern region. The NPF does not, however, include any specific policies or objectives in relation to Newcastle West.
- There are a number of general objectives within the RSES that relate to water and wastewater facilities, including RPO 211, RPO 212 and RPO 214. None of these objectives make specific reference to Newcastle West.
- Newcastle West is classified as a 'Key Town' within the region's settlement hierarchy (primary location for employment and population). Newcastle West has its own sub-chapter within the RSES. "Wastewater treatment and water services improvements" are identified amongst its 'Key Infrastructural Requirements'.
- RPO22 of the RSES directly sets out a Policy requirement "To support the delivery of the infrastructural requirements identified for Newcastle West subject to the outcome of the planning process and environmental assessments".
- The Site is wholly contained within the boundary of LCCC and significantly distanced from the boundary of any other Local Authority and so it is not likely that the Proposed Development will have a significant effect on the area of more than one planning authority.

## 8. Conclusion

Pre-application consultations with ACP are mandatory as a result of Part 3 of the Seventh Schedule of the current Planning and Development Act 2000, as amended, and Part 3(f) of the First Schedule of the forthcoming Planning and Development Act 2024 and precedents submitted to the Commission.

Based on the points presented in Section 0 and analysis of the precedent cases, it is clear that the Proposed Development potentially constitutes SID. However, based namely the comparable case at Nenagh in Tipperary (311036), the prospective Applicant considers that it does not constitute SID. We look forward to the Commission's determination and respectfully request that the Commission serve a notice at their earliest convenience on the prospective applicant, confirming their decision, after which the prospective Applicant can begin the application process to the Commission or alternatively to the Local Planning Authority in LCCC.