

The Secretary
An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1

24th November 2025

HW Planning

5 Joyce House,
Barrack Square,
Ballincollig,
Co. Cork

www.hwplanning.ie

info@hwplanning.ie
+353 (0)21 487 3250

Directors:

Harold Walsh
Conor Frehill

Company Reg. No:

486211

Re: Strategic Infrastructure Development Pre-application Consultation Request. Proposed Upgrades to Limerick Wastewater Treatment Plant and Regional Bioresource Centre

Dear Sir/Madam,

We act on behalf of Uisce Éireann, with a registered address at Colvill House, 24-26 Talbot Street, Dublin 1, who are currently advancing plans for upgrade works to the Limerick (Bunlicky) Wastewater Treatment Plant (WwTP), to include provision of stormwater storage upgrade and construction of a regional bioresource centre. We note the provisions of the Planning and Development (Strategic Infrastructure) Act 2006 which provides generally for applications for permission/approval for specified private and public strategic infrastructure developments to be made directly to An Coimisiún Pleanála. We also note that it is a mandatory requirement for prospective applicants to enter into pre-application discussions with the Commission where there is the potential that a project could be classified as 'strategic infrastructure'. The purpose of this submission is to comply with this requirement and seek a formal determination on same.

We submit that the proposed upgrades to Limerick (Bunlicky) Wastewater Treatment Plant constitute 'strategic infrastructure' having regard to the provisions of the Planning and Development Act and established case precedent on such matters. The basis for this view, as well as site history, context and detailed project description is set out below.

We enclose a cheque for €4,500, being the relevant fee, and a checklist of pre-application requirements.

01. Background

The strategic infrastructure provisions of the 2006 Act came into effect on 31st January 2007. The Act allows planning applications for specified private and public strategic infrastructure developments to be made directly to An Coimisiún Pleanála¹. The Seventh Schedule to the 2000 Act lists the classes of infrastructure development which, if considered by the Board to be strategic infrastructure development, require direct application for permission to the Board instead of the local planning authority. It is a mandatory requirement on a prospective applicant for a Seventh Schedule project to

¹ Formerly An Bord Pleanála. Any reference to An Bord Pleanála in this statement reflects the legal naming of the authority at that time.

enter into pre-application consultations with the Commission, a process which inter alia, also provides for a determination of whether a proposal constitutes 'strategic infrastructure' in the first instance.

The prospective applicant in this case is Uisce Éireann. The proposed development relates to the upgrade of the Limerick (Bunlicky) WwTP. The existing design capacity of the plant is 130,000 PE and it is intended to upgrade the plant to 285,000 PE², with provision to meet the +25-year year growth projections of 325,000 PE.

The upgrade of the existing Sludge hub Centre (SHC) to a Regional Bioresource Centre (RBC) for the South-West. The RBC will cater for the 10 year growth projections of 637,000PE, including 352,500PE imported sludge load.

The upgrade works related to each element of the project are summarised in the following sections;

Limerick WWTP Capacity Upgrade

- Retain existing inlet works and construct 2nd new inlet works, designed for flows up to 1,110l/s.
- New inlet works to include screening complete with screenings removal, washing and compaction, grit trap, grit classification and inlet flow measurement.
- Install new odour control unit for the inlet works.
- Retain existing CAS process stream (primary settling, aeration, secondary settlement) and construct new parallel 157,000PE AGS process stream.
- New AGS process stream to include 2 no. AGS tanks each with 5 No. compartments and 1 No. central WLC/Sludge Buffer Tank.
- Upgrades to existing final effluent pumps.
- Connect new final effluent outfall pipe from AGS process to the existing (upgraded) configuration.

Corcanree PS (Storm Storage)

- New 12,500m³ (TBC) storm tank at Corcanree PS (30-40m diameter, 10-15m depth with 3m above ground for tidal variations).
- Storm tank is designed for (Formula A –FFT)* 2 hrs. Must also comply with recast requirement of < 4% DWF. DAP 4 to confirm.
- 2 no. storm pumps will be intercepted and divert to new storm tank (max. flow 2,400 l/s).
- There will be a gravity overflow from the new tank to the existing Corcanree outfall chamber.
- The tank return is a variable speed pump with a maximum pump rate of 670l/s.
- The pump rate from Corcanree foul wet well no. 2 will be increased to 879l/s. The RM will be diverted to a new process stream at the WWTP with no overflow.

² Including the 27,500 PE IDA allowance.

- The total pump rate from Corcanree PS wet well no. 1 will increase to 1,110l/s. FFT will continue through the existing process stream and excess will spill to the WWTP storm tank.
- The variable sluice from Corcanree PS Inlet to foul wet well 2 will be opened so both wet wells will fill during normal operation.
- Control philosophy will be developed between the 2 no. storm tanks to balance spill rates.
- Land adjoining the Corcanree Pumping Station site will be required for the new 12,500m³ stormwater storage tank. Discussions are ongoing with UÉ land and Wayleaves and Shannon Foynes Port Company (SFPC) in relation to the acquisition. It is expected the land will be purchased by agreement, and CPO will not be required.

Regional Bioresource Centre (RBC)

- Retain/ replace existing imported sludge reception tank.
- Installation of new dewatered sludge cake reception facility.
- New mechanical thickening for WAS.
- New polymer dosing system for WAS thickening.
- Retain & refurbish existing 2. No digester feed tanks as pre-THP dewatering feed tanks.
- Upgrade mixing system and transfer pumps for pre-THP dewatering blend tank.
- New odour control system to cater for overall sludge hub installation.
- New dewatering centrifuge installation for pre-THP dewatering based on 12 hour/day operation
- New dewatered sludge cake silo for blending and storage of cake imports and pre-THP dewatered sludge cake.
- New Thermal Hydrolysis plant (THP).
- Options for introduction of new AD tank to allow operational flexibility
- Biogas production and storage
- CHP and Biomethane production options.
- New digested sludge tank adjacent to existing digesters – to be covered and connected to biogas headspace.
- New digested sludge dewatering installation to cater for full digested sludge load based on 12h/day operation.
- New centrate return PS located adjacent to digested sludge dewatering installation.
- Treated biosolid export storage silo sizing for silo and pumps.
- Upgraded wash water system with added UV treatment.

PROJECT JUSTIFICATION

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.

OTHER CONSENTS

Alongside the requirement for planning permission, it is envisaged that the following statutory consents will be necessary for the project:

- Review of EPA licensing.

02. Planning History

On the 15th November 1996, Limerick County Council granted planning permission to Limerick Corporation for the construction of a Wastewater Treatment Plant with ancillary buildings, administration building, access road and outfall to the river Shannon at Bunlicky, Limerick.

In more recent years, the plant was subject to improvements works including, inter alia, provision of anaerobic digestion tanks, enhanced primary treatment, chemical dosing equipment, gas flare stack, bio-gas compressor, enhanced odor treatment and dewatering equipment. These works were completed pursuant to a Limerick County Council issued Section 5 Declaration which confirmed that identified works were exempted development.

03. Legislative Context

Under Section 37A (1) of the Act, an application for permission for any development specified in the Seventh Schedule shall, subject to Section 37A(2), be made to the Commission under section 37E and not to a planning authority. The seventh schedule sets out infrastructure developments for the purposes of sections 37A and 37B. Part three of the Seventh Schedule, Environmental Infrastructure, refers to *“a waste water treatment plant with a capacity greater than a population equivalent of 10,000...”*.

Part three also refers to *“a sludge-deposition site with the capacity for the annual deposition of 50,000 tonnes of sludge (wet)”*. The proposed regional bioresource centre does not constitute a sludge-deposition site, albeit that this infrastructure forms an important component part of the subject upgrades.

Further, Section 37A (2) requires that the Commission must be of the opinion that the proposed development would meet one or more of the following:

- a) the development would be of strategic economic or social importance to the State or the region in which it would be situate;
- b) the development would contribute substantially to the fulfilment of any of the objectives in the National Spatial Strategy 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.

04. Assessment

COMPLIANCE WITH THRESHOLDS CONTAINED IN THE SEVENTH SCHEDULE OF ACT

The works to be carried out under the prospective application 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.

For reference, and as outlined below, the existing domestic population component is 92,964 PE and it is forecasted that this will increase by 47,864 PE to 140,828 (excluding headroom) as part of the 10 years design horizon. When non-domestic, existing and future industrial PE is added, the design PE for 10 years increases to 285,000 PE, with provision to meet the +25-year year growth projections of 325,000 PE.

Design Year	Baseline	Current	Year 1	Year 10	Year 25
Domestic PE Growth @ 2.21% / .63%	92,964	105,992	115,677	140,828	166,777
Non-Domestic PE Growth @ 2.21% / .63%	20,467	23,336	25,468	31,005	37,325
Incl. 20% Headroom	-	-	-	206,199	244,923
Industrial PE -Existing	35,302	35,302	25,000	50,000	50,000
Industrial PE - Future	-	-	13,750	27,500	27,500
Total PE	148,733	164,630	179,895	285,000	<325,000

Figure 01: Design PE – 10 and 25-year Loading Projections including Headroom

Sample Precedent:

PC0152

In May 2018, An Bord Pleanála determined that that the proposed 500,000 PE WwTP at Clonshaugh, South Fingal was strategic infrastructure development³. The inspector's report noted generally that the capacity greatly exceeded the threshold of 10,000 PE for plants set out in the Seventh Schedule and the project therefore qualifies as strategic infrastructure development.

PC0202

An Bord Pleanála determined that the proposed 36,000 PE Arklow Sewerage Scheme Wastewater Treatment Plant constituted strategic infrastructure development. The inspectors report concluded that *"the scale of the Scheme significantly exceeds the threshold of 10,000 PE for wastewater treatment plants set out in the Seventh Schedule of the Act"*.

310201-21

An Bord Pleanála determined that the proposed upgrade of the existing waste water treatment plant at Castletroy, Limerick constituted strategic infrastructure development. The inspectors report confirmed the interpretation of Board that the 10,000 PE threshold *"should be related to the scale of the proposed development, whether initial development or addition or uplift in capacity o any existing plant"*. In the subject case, the uplift between existing capacity and proposed capacity was 38,500 *"with the result that the development would breach the threshold"*.

STRATEGIC ECONOMIC OR SOCIAL IMPORTANCE TO THE STATE OR REGION

The Government published the National Planning Framework (NPF) in February 2018 and it was reviewed in 2025. It fulfils the role previously occupied by the National Spatial Strategy guiding national, regional and local planning policies and investment decisions for the next two decades. In its own words, it represents a new strategy for delivering concentrated growth and calls for a major new policy emphasis on renewing and developing Ireland's principal cities Dublin, Cork, Limerick, Galway and Waterford. The NPF includes an ambitious growth target for Limerick City and Suburbs of 44,000 people (at least 150,000) to 2040 with an objective to enhance its significant potential to become a city of scale. A core element of the strategy is an emphasis on Limerick becoming a regional driver and working in partnership with Galway and Cork to function as a viable alternative to Dublin. The NPF identifies that *"it is necessary for Limerick to further strengthen its position as the principal focus within the Region and to continue to address the legacy of regional growth having occurred outside the City area"*. The framework identifies some key future growth enablers to achieve this, which includes *"ensuring that water supply and waste-water needs are met by new national projects to enhance Limerick's water supply and increase waste-water treatment capacity"*⁴. More generally, National Strategic Outcome 9 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 is positioned as an implementing strategy for the NPF, supporting the program for change set out in Project Ireland 2040. It includes an objective to *"strengthen the role of the Limerick Shannon Metropolitan Area as an*

³ The presented project included other significant elements such as an orbital sewer between Blanchardstown and Clonshaugh, long-sea outfall and bio-solids storage facility.

⁴ Page 45 of the National Planning Framework.

*international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region”.*⁵ Under Section 4 ‘National Enablers’ of the Metropolitan Area Strategic Plan, it outlines that the achievement of the vision is contingent on a number of key guiding principles including that waste-water needs are met by increasing treatment capacity.

The delivery of growth is a primary national objective of the NPF. A review of pre-application precedent since the publication of this framework suggests that the Commission are giving weight to the degree to which WwTP projects support this. While the subject project is not listed specifically as a strategic priority in the NPF or RSES, we consider that An Coimisiún Pleanála could reasonably form a view that the proposal is necessary to facilitate population growth in the defined Limerick City and Suburbs to deliver on strategic national objectives. This approach would be consistent with sample precedent set out below. Limerick is serviced primarily by two wastewater treatment plans, namely Bunlicky and Castletroy. Bunlicky is the largest of these, the planned upgrade of which will double the capacity of the plant, and such works can be viewed as an important precondition to enable growth. Further, the upgrading of Castletroy has also been progressed through the SID process. Collectively, these projects can be deemed to be of strategic importance to the state and region insofar that they may be considered necessary to deliver on the growth target for Limerick City and Suburbs by 2040.

Sample Precedent:

PC0152

An Bord Pleanála determined that that the proposed 500,000 PE WwTP at Clonshaugh falls within the scope of Section 37A (2) (a) of the Act having regard to the following - *“Providing supporting infrastructure is critical in facilitating the continued economic expansion of the Greater Dublin Region (GDA). The need to upgrade wastewater treatment infrastructure is highlighted in the recently adopted National Planning Framework. The need to provide additional housing in the short and medium term to address the current housing crisis and the need to adequately service such lands for housing and employment land uses is a key requirement for continued economic expansion of the Dublin Metropolitan Area. The proposal is necessary to facilitate the expansion of the north and west environs of Dublin City and is also necessary to divert the potential overloading of the Ringsend WWTP. The Greater Dublin Area is identified as a driver of national development and providing key wastewater infrastructure is critical in supporting and continuing this role. The current application will assist in increasing the capacity of the sewerage infrastructure of the Greater Dublin Area by 500,000 PE and as such, it is of strategic economic importance to the State and Region”.*

PC0202

An Bord Pleanála determined that the Arklow Sewerage Scheme Wastewater Treatment Plant constituted ‘strategic infrastructure’. In making a recommendation on same, the inspector outlined that future growth in Arklow is dependent on the provision of wastewater infrastructure and *“it is reasonable to conclude therefore that the proposed development comprises necessary infrastructure to harness the identified strategic role of the town as a Growth Town. I conclude that the development would be of strategic importance to the region in which it is situated and would fall under 37A (2) (a)”.*

310201-21

An Bord Pleanála determined that the proposed upgrade of the existing waste water treatment plant at Castletroy, Limerick constituted strategic infrastructure development. The inspector confirmed their view that the project was of strategic economic importance to the state and region.

⁵ Limerick Shannon MASP Policy Objective 1

“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”.

FULFILMENT OF NATIONAL OR REGIONAL SPATIAL AND ECONOMIC STRATEGY OBJECTIVES

Further to the above, some sample relevant strategic policies contained in the RSES include the following:

Limerick Shannon MASP Policy Objective 1:

- a. *“It is an objective to strengthen the role of the Limerick Shannon Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region.*
- b. *It is an objective to seek co-ordinated investment and delivery of holistic infrastructure packages across State Departments and infrastructure delivery agencies as they apply to the Limerick Shannon Metropolitan Area and seek further investments to deliver on the Metropolitan Area Goals”.*

RPO 211

“It is an objective to support the implementation of Irish Water Investment Plans (prepared in five year cycles) and subsequent investment plans, to align the supply of wastewater treatment facilities with the settlement strategy and objectives of the RSES and Metropolitan Area Strategic Plans for Cork, Limerick-Shannon and Waterford”.

RPO 212

- a. *“It is an objective to support investment and the sustainable development of strategic wastewater facilities by Irish Water in the Region arising from initiatives including Investment Plans, Strategic Drainage Area Plans subject to appropriate environmental assessment and the planning process;*
- b. *For the management of wastewater, increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local authorities to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality and to avoid adverse impacts on the integrity of the Natura 2000 network”.*

These policies are general in nature. The project is included in the Uisce Éireann Investment Plan, but it is not identified as a specific infrastructure project to meet any particular national or regional policy objectives.

Sample Precedent:

PC0152

An Bord Pleanála determined that that the proposed WwTP at Clonsbaugh would contribute substantially to the fulfilment of a number of objectives and statements contained in the NPF and Regional Planning Guidelines (in place at that time) based on the following: *“Water and wastewater are identified as key infrastructure requirements in the NPF. The Plan recognises that key future growth enablers for Dublin include, - ‘Ensuring that water supply and waste-water needs are met by new national projects to enhance the city’s and the wider Greater Dublin Area’s water supply and increase waste water treatment capacity’. The Regional Planning Guidelines for the Greater Dublin Area note that ‘In many locations the scale of investment in new facilities has only just kept pace with the levels of growth experienced, necessitating the need for the development of further facilities to meet the RPG Strategy”*.

It is recognised that inspector also gave weight to the fact that the Regional Planning Guidelines then in place had a table of critical strategic projects for wastewater and surface water which referenced the need to *“identify a suitable site for the new Greater Dublin Regional Drainage Project – Regional Waste Water Treatment Plant, Marine Outfall and Orbital Drainage System and the development of plant and network connections”*.

PC0202

In their pre-application determination of the aforementioned Arklow WwTP, the board inspector made a number of references to general compliance with ‘broad objectives’ and ‘statements’ contained within the NPF and Regional Planning Guidelines to reach a view that the development would contribute substantially to the achievement of objectives - *“The proposed development contributes to the fulfilment of a number of broad objectives and statements contained in the National Planning Framework and the Regional Planning Guidelines. Water and wastewater are identified as key infrastructure requirements in the National Planning Framework. The Scheme would respond to the NPF policy to increase compliance with the requirements of the UWWD. The development would provide necessary infrastructure to facilitate planned growth in the Wicklow-Arklow Core identified in the RPGs”*.

SIGNIFICANT EFFECT ON THE AREA OF MORE THAN ONE PLANNING AUTHORITY

The Bunlicky WwTP is located in the administrative area of Limerick City and County Council, however, the agglomeration extends northwards into large parts of the administrative area of Clare County Council such as Parteen, Ardnacrusha and Cloonlara. This is illustrated in Figure 02 below.

Based on the review of precedent, the tests on the applicability or otherwise of section 37A (2) (c) to a project are typically based on (1) proximity of a proposal to the functional area of any other local authority and (2) the degree to which a prospective project could directly or indirectly have a significant effect on more than one planning authority. In this case, the project will clearly treat wastewater in two administrative areas. On this basis, it can reasonably be concluded that the development will have a significant effect on the area of more than one planning authority.

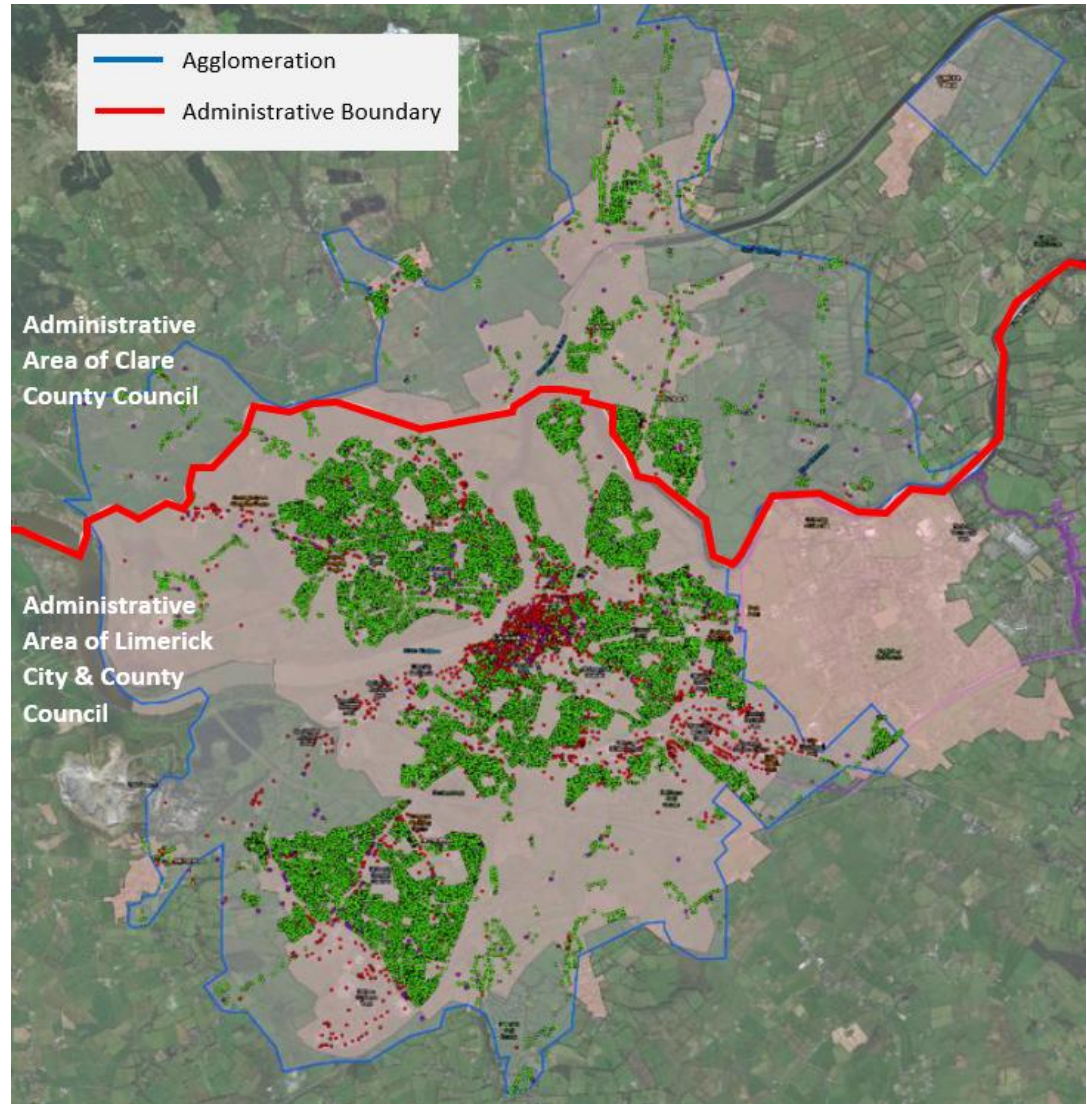


Figure 02: Administrative Context, Limerick (Bunlicky) EPA Agglomeration

Sample Precedent:

PC0202

As part of the SID pre-application for revisions to the Ringsend Wastewater Treatment Plant, the board determined that the project fell within Sections 37A (2) (a) (b) and (c) of the Act. With specific reference to Section 37A (2) (c), it was noted that the project treated wastewater from different administrative areas and that it could reasonably be concluded to have a significant effect on the area of more than one planning authority.

PC0195

In determining that the Ballybofey / Stranorlar Wastewater Treatment Plant did not constitute strategic infrastructure, the board inspector satisfied himself that the project was generally remote from other planning authority areas with an absence for potential direct or indirect impacts - *“Due to the distance of the proposed development from the functional area of any other planning authority (in excess of 15 km) and the lack of any perceptible direct or indirect impact for authorities beyond County Donegal, I advise that the proposed development would not be likely to*

have a significant effect on the area of more than one planning authority and therefore the proposed development would not fall within paragraph 37A (2) (c) of the Act".

310201-21

In their pre-application determination of the Castletroy WwTP upgrades, the board inspector noted that 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 and that the three outfall pipelines are centrally located in the river for flow purposes and maximisation of dilution. It was further noted that "*Limerick City and Suburbs settlement boundary extends across the Shannon into County Clare, areas of which are serviced by a pump station which lifts across the River Shannon to the Castletroy agglomeration. Thus, I conclude that the development will have a significant effect on the area of more than one planning authority*".

05. Preliminary Planning Considerations

Environmental Impact Assessment

Article 93 and Schedule 5 of the 2001 Planning and Development Regulations sets out the classes of development for which a planning application must be accompanied by an environmental impact assessment report (EIAR).

Part 1 and Part 2 Schedule 5 of the Planning and Development Regulations, 2001 defines the categories and thresholds of developments requiring EIA.

Part 1, Class 13 of the regulations identifies that an EIAR should be prepared for the following:

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

Part 2, Class 13(a) of the regulations identifies that an EIAR should be prepared for the following:

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

The subject upgrades are above the threshold of 150,000 and consequently, it does fall under Part 1 Class 13. The proposed extension is also greater than 25% of the existing capacity. It follows that an EIAR is required for the project.

Appropriate Assessment

The River Shannon is designated both a Special Area of Conservation (Lower River Shannon) and a Special Protected Area (River Shannon and River Fergus estuaries). An Appropriate Assessment Screening and Natura Impact Statement will be prepared to support An Coimisiún Pleanála in their decision-making role as the competent authority under Article 6(3) of the Habitats Directive (92/43/EC). This will be informed by suitable engagement with the National Parks and Wildlife Service.

Construction and Environmental Management

The construction phase of the project will be governed by strict environmental controls, as well as health and safety procedures. A planning stage Construction and Environmental Management Plan (CEMP) will accompany any application. It will set out a detailed suite of environmental protection measures to be implemented on site during the construction phase. The CEMP will identify all the potential issues which are relevant to the project, such as construction safety; traffic management; environmental risk assessment and management; waste management; and environmental management. It will specifically outline how to address these and provide solutions which are satisfactory to all concerned. A final CEMP will be further developed by the appointed contractor and will include a detailed traffic management plan and risk assessed method statements. The document will be agreed, where relevant, with Limerick City and County Council prior to the commencement of any development.

06. Conclusions

Based on the foregoing, we consider that the proposed upgrade of the Limerick (Bunlicky) WwTP can reasonably be considered to constitute development that falls within the definition of Environmental Infrastructure in the Seventh Schedule of the Planning and Development Act 2000 (as amended). The existing plant and existing domestic population component significantly exceed the 10,000 PE threshold prior to any proposed upgrades. The project will double the size of the plant to 285,000 PE, with provision to meet the +25-year year growth projections of 325,000 PE.

We consider that the project falls within the scope of Section 37A (2) (c) of the Act insofar that its influence extends to the functional area of more than one planning authority.

We consider that the proposal is necessary to facilitate population growth in the defined Limerick City and Suburbs to deliver on strategic national objectives, and as such, is of strategic importance to the State and Region as per Section 37A (2) (a) of the Act. This view may be influenced by the fact that Limerick City is serviced principally by two wastewater treatment plants only, and the upgrade of the second of these at Castletroy has also been progressed through the SID process. Collectively, the Bunlicky and Castletroy WwTP projects bring into sharp focus the need for wastewater improvements to facilitate future growth and development.

A formal determination is sought from An Coimisiún Pleanála on whether the project constitutes 'strategic infrastructure' as defined under applicable provisions contained within the Planning and Development (Strategic Infrastructure) Act 2006 (the 2006 Act). It is our independent view that the project meets the criteria to be classified as 'strategic infrastructure' and as such, that the subsequent application for planning permission should be made to An Coimisiún Pleanála.

We will await confirmation of a pre-consultation meeting date with the Commission.



Please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink that reads 'Conor Frehill'.

Conor Frehill
HW Planning

Enclosures:

- Site Location mapping by Egis;
- Outline plans of proposed WwTP upgrades and associated infrastructure by Egis;
- Cheque for the appropriate fee;
- Digital copy of the submission on USB.

STRATEGIC INFRASTRUCTURE DEVELOPMENT CHECKLIST

Name/Address of Applicant	Name: Uisce Éireann Registered Address: Colvill House, 24-26 Talbot Street, Dublin 1
Name/Address/Contract Details of Agent	Name: Conor Frehill, HW Planning Address: 5 Joyce House, Barrack Square, Ballincollig, Co. Cork Contact: info@hwplanning.ie / phone no. (021) 487 3250
Development Description	Proposed upgrades to Limerick (Bunlicky) Wastewater Treatment Plant.
Site Address/Brief Description	Lands at Bunlicky and Corkanree, Limerick
Site Location Map(s)	Enclosed
Confirmation of Legal Interest in Land	The subject lands are in ownership/control.
Applicable Class of Development (7th Schedule)	Section 37A of the Planning and Development (Strategic Infrastructure) Act 2006.
Relevant Planning Authority	Limerick City and County Council
Statement as to why or why not the prospective applicant considers the proposed development should be regarded as strategic infrastructure development.	Enclosed