

Limerick WWTP Upgrade and Regional Bioresource Centre

ElAR Chapter 5 Planning and Policy

June 2026

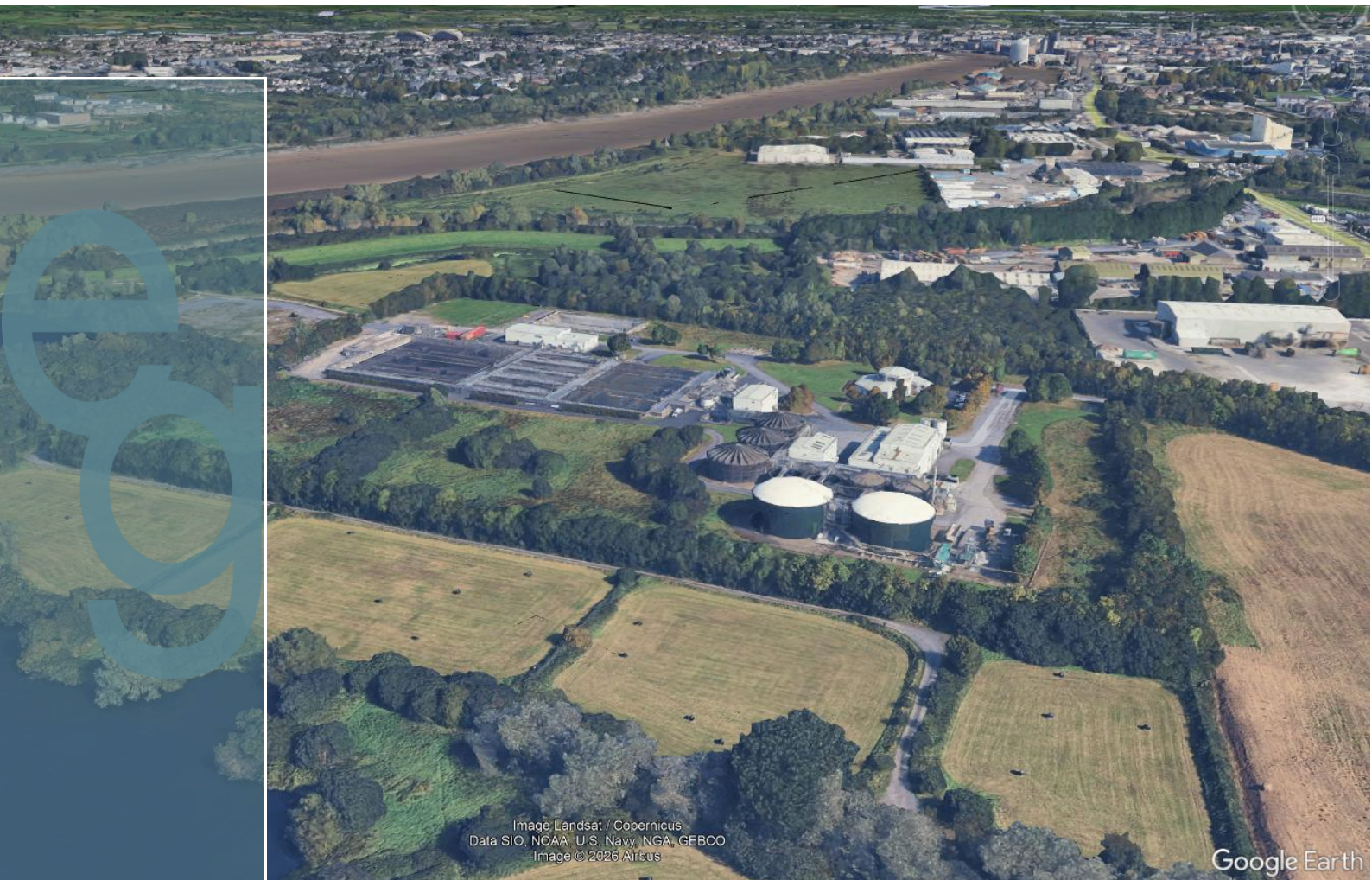


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Glossary and Defined Terms

Acronym	Description
AA	Appropriate Assessment
AASR	Appropriate Assessment Screening Report
ACP	An Coimisiún Pleanála
AD	Anaerobic Digestion
AGS	Aerobic Granular Sludge
AER	Annual Environmental Report
BOD	Biochemical Oxygen Demand
BC	Bioresource Centre
C	Carbon
CAFÉ	Clean Air for Europe Directive
CHP	Combined Heat and Power
DIN	Dissolved Inorganic Nitrogen
ECJ	European Court of Justice
EIAR	Environmental Impact Assessment Report
ELV	Emission Limit Value
EPA	Environmental Protection Agency
ESB	Electrical Supply Board
EU	European Union
FOG	Fats Oils and Grease
FST	Final Settling Tank
GHG	Greenhouse Gas
HGV	Heavy Goods Vehicle
MLPS	Main Lift Pumping Station
MCA	Multi-Criteria Analysis
MRP	Molybdate Reactive Phosphate
IDA	Industrial Development Agency
IFAS	Integrated Fixed-Film Activated Sludge
N	Nitrogen
NDP	National Development Plan
NHA	National Heritage Area
NIS	Natura Impact Statement
NPF	National Planning Framework
NSO	National Strategic Outcomes
NSS	National Spatial Strategy
NWSMP	National Wastewater Sludge Management Plan
P	Phosphorous
PE	Population Equivalent - The amount of wastewater received at a treatment plant (and its design capacity) is measured in units known as population equivalent (or PE). The wastewater received from all sources, e.g. industrial, tourism, commercial, residential, etc., is converted into these units, with one unit of PE representing the wastewater treatment load typically generated by a single person.
PFF	Pass Forward Flow

Acronym	Description
SEA	Strategic Environmental Assessment
SBR	Sequencing Batch Reactor
SHC	Sludge Hub Centre
SIA	Stable Isotope Analysis
SID	Strategic Infrastructure Development
Sludge	Solid by-products of wastewater
SPA	Special Protection Area
SS	Suspended Solids
UWWTD	Urban Wastewater Treatment Directive
WFD	Water Framework Directive
WWDA	Wastewater Discharge Authorisation
WWTP	Wastewater Treatment Plant
WSPS	Water Services Policy Statement
ZTV	Zone of Theoretical Visibility
PS	Pumping Station
QI	Qualifying Interest
RAS	Return Activated Sludge
RBC	Regional Bioresource Centre
RSES	Regional Spatial and Economic Strategy
SAC	Special Area of Conservation
TDS	Total Dry Solids
THP	Thermal Hydrolysis Process
PFT	Picket Fence Thickener
pNHA	Proposed National Heritage Area

Departments and Stakeholders

Departments & Stakeholders	Acronym (where applicable)
An Bord Pleanála (now know as An Coimisiún Pleanála)	ABP (ACP)
Department of Public Expenditure and Reform	DPER
Department of Climate Action, Communication Networks and Transport	CACNaT
Department of Communications, Climate Action and Environment – Changed in 2020	DCCAE
Department of Culture, Heritage and the Gaeltacht – Changed in 2020	DCHG
Department of Finance	DoF
Department of Housing, Planning and Local Government – Changed in 2020	DHPLG
Department of Housing, Local Government and Heritage	HLGaH
Environmental Protection Agency	EPA
Geological Survey Ireland	GSI
Group Water Schemes	GWS
Inland Fisheries Ireland	IFI
Irish Rail (Iarnród Éireann)	IR
Uisce Éireann	UÉ
Limerick City & County Council	LCCC
Local Authority	LA
National Monuments Service	NMS
National Parks & Wildlife Service	NPWS
National Roads Authority	NRA
National Transport Authority	NTA
Office of Public Works	OPW
Ordnance Survey Ireland	OSi
Southern Regional Assembly	SRA

5 PLANNING AND POLICY CONTEXT

5.1 Introduction

5.1.1 Purpose of this Report

This chapter sets the planning context for the development and implementation of Limerick WWTP and Regional Bioresource Centre Project (hereinafter referred to as the “Proposed Development”). It identifies and considers the existing policy framework for the Proposed Development in the context of the relevant international, European, national, regional and local planning strategies, plans and policy documents.

Limerick WWTP and RBC is aligned with and will support the direct realisation of key international, national, regional and local policies. The importance of the Proposed Development in this regard is underpinned by dedicated policies for its delivery, as contained in the National Planning Framework (NPF), the Regional Spatial & Economic Strategy for the Southern Region, the Limerick Development Plan (LDP) 2022-2028 and National Wastewater Sludge Management Plan.

5.1.2 Outline Project Description

The Proposed Development will cater for future population growth and industrial development in the area, in line with population projections for Limerick as set out in the National Planning Framework (NPF) Implementation Roadmap and the Regional Spatial & Economic Strategy for the Southern Region (RSES). It will provide 20% Headroom allowance, in line with Uisce Éireann guidelines for large urban settlements. It will also ensure the WWTP continues to comply with requirements of the EPA Wastewater Discharge License (WWDL), Urban Wastewater Treatment Regulations (UWWTR) and other relevant Uisce Éireann guidelines.

The initial upgrade works will cater for the +10-year growth projections, increasing the plant capacity from 130,000 PE to 285,000 PE including a future industrial committed load of 27,500 PE. There will be provision made in the civil infrastructural development of the plant (tank sizing and pipework) for the +25-year growth projections of 325,000 PE. However, a separate planning permission will be required before any uplift above 285,000 PE can be constructed.

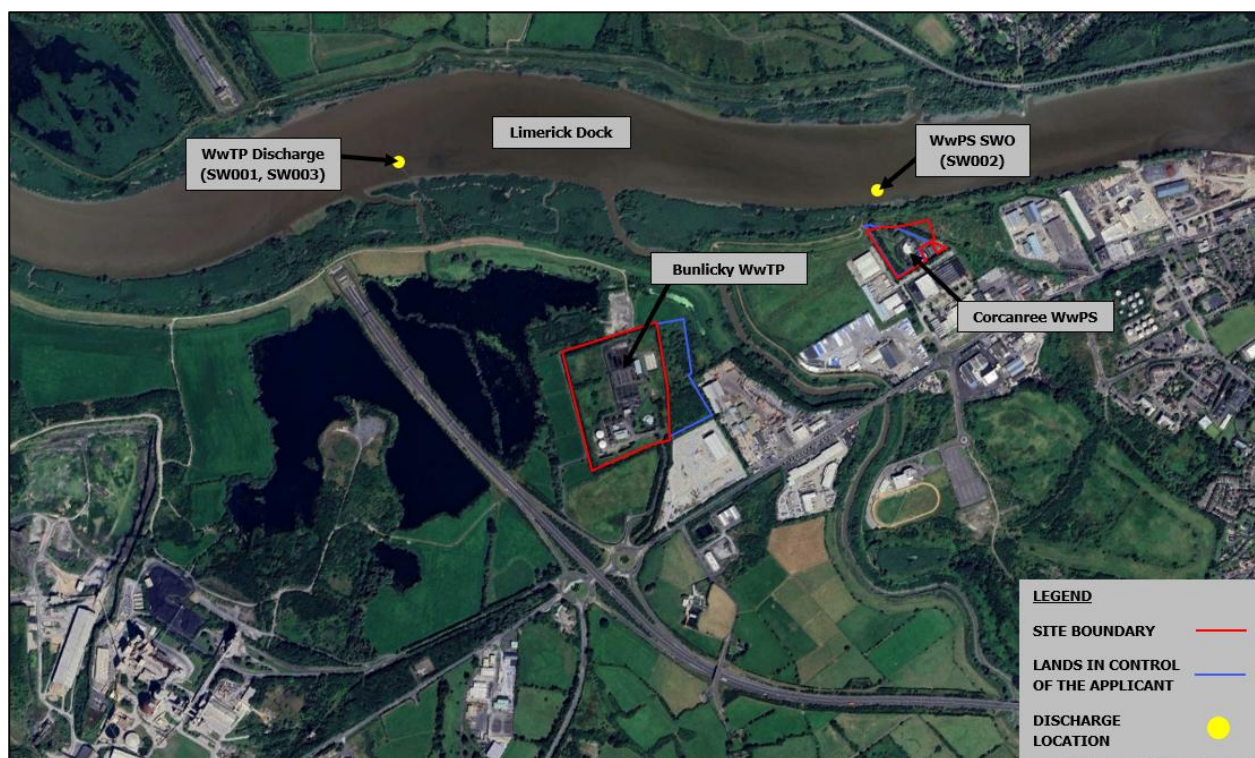


FIGURE 5-1 SITE LOCATION MAP

5.2 Policy Context

5.2.1 Introduction

Limerick WWTP and RBC is central to the delivery of planning and wastewater infrastructure policy objectives at EU, national, regional and Uisce Éireann level. The policy hierarchy and the key relevant policy documents are listed in Table 5-1.

TABLE 5-1: PLANNING AND POLICY DOCUMENTS

International Level
United Nations 2030 Agenda
European Level
European Union Green Deal 2019
EU Action Plan: Towards a Zero Pollution for Air, Water and Soil (2021)
EU Water Framework Directive (2000/60/EC)
Marine Strategy Framework Directive (2008/56/EC)
Urban Wastewater Treatment Directive (91/27/EEC)
Recast Urban Wastewater Directive (2024/3019/EU)
Sewage Sludge Directive
Birds and Natural Habitats Directives (92/43/EEC - 2009/147/EC)
Environmental Impact Assessment Directive (Consolidated 2011/92/EU and 2014/52/EU)
Public Participation Directive (2003/35/EC)
National Level
Project Ireland 2040: National Planning Framework: Project Ireland (2018) and First Revision (2025)
National Development Plan Review 2025
Water Services Policy Statement 2024 - 2030
The White Paper, Ireland's Transition to a Low Carbon Energy Future 2015 – 2030
Climate Action and Low Carbon Development (Amendment) Act 2021
Delivering Homes, Building Communities 2025-2030
Climate Action Plan 2025
River Basin Management Plan 2022 - 2027
National Waste Management Plan for A Circular Economy 2023 - 2029
Regional Level
Regional Spatial & Economic Strategy for the Southern Region 2020
Local Level
The Limerick Development Plan 2022 - 2028
Uisce Éireann Level
National Wastewater Sludge Management Plan
Water Services Strategic Plan (2025 – 2050)

5.2.2 International Policy Context

5.2.2.1 United Nations 2030 Agenda (2015)

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by both developed and developing countries in a global partnership.

The Limerick WWTP Upgrade & Bioresource Centre Project is aligned with the overarching goal of sustainable development and will directly contribute to 6 of the 17 SDGs as highlighted in Figure 5-2.



FIGURE 5-2: RELEVANT UN SUSTAINABLE DEVELOPMENT GOALS

The SDGs are integrated and recognise that action in one area will affect outcomes in others, and that development must balance social, economic and environmental sustainability. The scheme will align with the following goals:

- SDG 3: Contributing to creating a healthy and safe environment;
- SDG 6: Providing for continued effective wastewater treatment into the future and ensuring that projected growth will not result in negative effects on receiving water quality in the Shannon Estuary and SAC habitats;
- SDG 7: Producing clean biogas by using an anaerobic digestion system to process and safely treated sludges;
- SDG 9: Improving public infrastructure by upgrading and improving the existing wastewater treatment plant and sludge treatment facilities;
- SDG 11: Facilitating the sustainable development of Limerick and the region by providing adequate wastewater and sludge treatment capacity to allow further development economically and socially; and
- SDG 12: Producing a usable high-value end-product (Class A biosolid) from waste, promoting a circular economy and a responsible consumption and production cycle.

The Proposed Development is aligned with the overarching goal of sustainable development and will directly contribute to 6 of the 17 SDGs. The Proposed Development will align with these goals creating a healthy and safe environment (SDG 3), improve access to clean water and effective wastewater treatment (SDG 6), producing clean biogas by using an anaerobic digestion system to process and safely treat the sludge from the in situ wastewater treatment plant and the imported sludges from the region (SDG 7), improving the public realm by upgrading and improving public infrastructure with new and improved wastewater and sludge treatment infrastructure (SDG 9), facilitating sustainable development of Limerick and the region by providing adequate wastewater and sludge treatment capacity to allow further development economically and socially (SDG 11), producing a useable high value end product from waste promoting a circular economy and a responsible consumption and production cycle (SDG 12). The Proposed Development also ensures the realisation of the cross-cutting theme in all these goals, by safeguarding the receiving environment from any potential adverse impacts arising from projected growth.

5.2.3 European Policy Context

5.2.3.1 European Union Green Deal 2019

The EU Green Deal sets out key policies aimed at cutting emissions and preserving the natural environment. It commits the EU to a 90% cut in emissions by 2050 (when compared to 1990 levels), with a reduction of between 50 to 55% by 2030 (European Commission, 2019).

These initiatives are designed to enhance sustainable waste management practices, which are central to the Green Deal's commitment to promoting a circular economy. By increasing the capacity to treat and recycle waste, the upgraded facilities will significantly reduce environmental impact and contribute to resource efficiency. The conversion of sludge into bioresources exemplifies the principles of resource efficiency, reducing reliance on non-renewable resources and supporting the Green Deal's overarching goal of achieving climate neutrality by 2050. Additionally, optimized wastewater treatment processes will help lower greenhouse gas emissions, furthering climate action efforts.

The environmental benefits extend to biodiversity and ecosystem protection, as improved treatment capabilities will reduce pollutants discharged into water bodies, safeguarding natural habitats and biodiversity. This is in direct alignment with the Green Deal's emphasis on preserving natural ecosystems. The projects also

embody the Green Deal's support for innovation and technology, incorporating cutting-edge solutions to enhance efficiency and environmental performance.

5.2.3.2 EU Action Plan: Towards a Zero Pollution for Air, Water and Soil

In May 2021, the European Commission adopted the EU Action Plan: *'Towards a Zero Pollution for Air, Water and Soil'*, actively advancing the European Green Deal's vision for 2050 to reduce air, water, and soil pollution to levels that are not harmful to health and natural ecosystems (European Commission, 2021). The Commission translated this vision into key 2030 targets to accelerate pollution reduction at its source. The action plan serves as a compass to integrate pollution prevention into all relevant EU policies, enhance the implementation of EU legislation, and identify potential gaps. It emphasises the necessity for investments in clean and sustainable design, circular economy business models, cleaner transport and mobility, and low-emission technologies. The proposed development will actively support the protection of water quality, a shift towards circular economy and the reduction of sludge related transport movements at source, aligning with these objectives.

5.2.3.3 EU Water Framework Directive (2000/60/EC)

The Water Framework Directive (WFD) established a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater with the objective to protect and improve water quality in all waters to achieve good ecological status by 2015 or, at the latest, by December 2027.

Specifically, the WFD aims to:

- Prevent further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems;
- Promotes sustainable water use based on a long-term protection of available water resources;
- Aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances;
- Ensures the progressive reduction of pollution of groundwater and prevents its further pollution, and
- Contributes to mitigating the effects of floods and droughts.

The Water Framework Directive is linked to a number of other EU directives in several ways. These include Directives relating to the protection of biodiversity (Birds and Habitats Directives), directives related to specific uses of waters (drinking water, bathing waters and urban wastewater directives) and to directives concerned with the regulation of activities undertaken in the environment (Industrial Emissions and Environmental Impact Assessment directives). More recent directives on topics such as Floods and the Marine Strategy Framework have significant linkages with the WFD which is also supplemented by the Priority Substances Directive and the Groundwater Directive.

5.2.3.4 Marine Strategy Framework Directive (2008/56/EC)

The aim of the European Union's ambitious Marine Strategy Framework Directive (MSFD), adopted on 17 June 2008 is to protect more effectively the marine environment across Europe.

The Commission also produced a set of detailed criteria and methodological standards to help Member States implement the Marine Strategy Framework Directive. These were revised in 2017 leading to the new Commission Decision on Good Environmental Status.

Annex III of the Directive was also amended in 2017 to better link ecosystem components, anthropogenic pressures and impacts on the marine environment with the MSFD's 11 descriptors and with the new Decision on Good Environmental Status.

The Commission adopted a report on the first implementation cycle of the Marine Strategy Framework Directive in June 2020. This report, required by Article 20 of the Directive, shows that while the EU's framework for marine environmental protection is one of the most comprehensive and ambitious worldwide, it needs to be supplemented to be able to tackle predominant pressures such as overfishing and unsustainable fishing practices, plastic litter, excess nutrients, underwater noise and other types of pollution.

5.2.3.5 Urban Wastewater Directive (91/27/EEC)

The European Union Urban Wastewater Directive sets standards to be met in the collection and treatment of wastewater, as well as the monitoring requirements for wastewater discharges from urban areas. Since its adoption in 1991, it aims “to protect the environment from the adverse effects of urban wastewater discharges and discharges from certain industrial sectors” by mandating wastewater collection and treatment in urban agglomerations with a PE >2,000 and more advanced treatment in places with a PE >10,000 in sensitive areas.

The Directive pertains to protecting the environment from the adverse effects of urban wastewater. The proposed upgrades to the wastewater and sludge treatment process will accommodate the increase in Limerick City’s population, as well as commercial and industrial economic activity which is forecast to increase in the area.

Meeting the standards in the Directive is a key compliance issue for Ireland in protecting our environment from the adverse effects of wastewater discharges. Therefore, Uisce Éireann must provide the infrastructure to adequately collect and treat wastewater and prevent serious risks to human health and the environment in compliance with the Urban Wastewater Treatment Directive. The proposed upgrades will bring Limerick WWTP in line with the requirements of the Directive now and into the future.

In addition, the proposed infrastructure will treat the sludge generated in Clare, Limerick and Tipperary. This Proposed Development aligns with the objectives set out in this policy document. These objectives are outlined below:

- Discharges from urban wastewater treatment plants subject to treatment in accordance with Articles 4 and 5 shall meet the requirements shown in Table 1
- Discharges from urban wastewater treatment plants to those sensitive areas which are subject to eutrophication as identified in Annex IIA (a) shall in addition meet the requirements shown in Table 2 of this Annex.
- The points of discharge of urban wastewater shall be chosen, as far as possible, so as to minimize the effects on receiving waters.

TABLE 5-2 URBAN WASTEWATER DIRECTIVE TABLE 1

Parameters	Concentration	Minimum Percentage of Reduction	Reference Method of Measurement
Biochemical Oxygen Demand	25mg/l	70-90	Homogenized, unfiltered, undecanted sample. Determination of dissolved oxygen before and after five-day incubation at 20°C ± 1°C, in complete darkness. Addition of a nitrification inhibitor
Chemical Oxygen Demand	125mg/l	75	Homogenized, unfiltered, undecanted sample Potassium dichromate
Total Suspended Solids	35mg/l	90	- Filtering of a representative sample through a 0.45µm filter membrane. Drying at 105 °C and weighing - Centrifuging of a representative sample (for at least five mins with mean acceleration of 2 800 to 3 200 g), drying at 105 °C and weighing

TABLE 5-3 URBAN WASTE WATER DIRECTIVE TABLE 2

Parameters	Concentration	Minimum Percentage of Reduction	Reference Method of Measurement
Total phosphorus	2 mg/1 P (10 000 - 100 000 p.e.) 1 mg/1 P (more than 100 000 p.e.)	80	Molecular absorption spectrophotometry
Total nitrogen	15 mg/1 N (10 000 - 100 000 p.e.) 10 mg/1 N (more than 100 000 p.e)	70-80	Molecular absorption spectrophotometry

Furthermore, there is a commitment to achieve 100% renewable energy usage in treatment plants by 2045. Establishing a Regional Bioresource Centre will contribute to this target as the regional management of sludge will improve treatment efficiency, cut transport emissions, and increase energy recovery.

5.2.3.6 Recast Urban Wastewater Directive (2024/3019/EU)

On the 5th of November 2024, the European Council accepted the recast Urban Wastewater Treatment Directive (rUWWTD). The rUWWTD signifies a significant step in adapting wastewater management to address current and future challenges. Uisce Éireann must factor these changes into the future planning and delivery of wastewater services.

The key changes include the progressive reinforcement of treatments, with the application of secondary treatment to all urban wastewater discharged into the environment for agglomerations of 1,000 people or more by 2035. Additionally, tertiary treatment will be mandatory for larger plants by 2039, and quaternary treatment for all plants over 10,000 people by 2045. The Directive also aims to promote water reuse in water-stressed areas, improve monitoring of contaminants like microplastics, and implement the polluter pays principle with extended producer responsibility.

To futureproof the design against both the Recast Directive and the projected demand for the next 25 years, it is proposed to retain ample space within the site for a third reactor. This modular design approach during this period of uncertainty will ensure that any infrastructure associated with the current design is not rendered redundant. It also allows the compatibility in facilitation of the Recast Directive requirements, once confirmed. When the recast requirements are confirmed, the inclusion of a third reactor on a modular basis will improve operational flexibility.

5.2.3.7 Sewage Sludge Directive (86/278/EEC)

The main European legislation in relation to use of wastewater sludge is the Council Directive 86/278/EEC of 12 June 1986 on the protection of the environment, and in particular of the soil, when wastewater sludge is used in agriculture (Sewage Sludge Directive).

The Directive facilitates the use of sludge in agriculture subject to specified technical requirements, without the need for a specific waste authorisation. This directive has been transposed into Irish legislation by S.I. No. 148 of 1998 — Waste Management (Use of Sewage Sludge in Agriculture) Regulations, 1998, as amended by the SI No. 267 of 2001.

The Sewage Sludge Directive aims to protect humans, animals, plants and the environment by ensuring that heavy metals in soil and sludge do not exceed set limits and secondly, to increase the amount of sewage sludge used in agriculture.

The proposed infrastructure will increase the amount of sludge used in an agricultural context by treating the sludge generated in Clare, Limerick and Tipperary and producing a Class A Biosolid suitable for land spreading.

5.2.3.8 Birds and Natural Habitats Directives (92/43/EEC - 2009/147/EC)

Adopted in 1992, the Council Habitats Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora aims to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. It forms the cornerstone of Europe's nature conservation policy with the Birds Directive 2009/147/EC and establishes the EU wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments.

An Appropriate Assessment (AA) Screening Report was initially carried out in June 2020 by JB. Barry and Partners (now Egis Engineering Ireland). This concluded that there was a possibility of significant effects to Natura 2000 sites and that a Natura Impact Statement (NIS) should be prepared. An AA Screening/NIS has subsequently been prepared by MKO Environmental Consultancy. The MKO AA Screening concurs with the earlier study's conclusion that the potential for a significant effect on the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA cannot be ruled out. The NIS assesses the individual qualifying features of the European Sites in light of their Conservation Objectives, and identifies a number of qualifying features where there is the potential for likely significant effects through the pathway of:

- Water quality deterioration via discharge/run off of pollutants to surface water drains, groundwater pathways, and flood risk during the Construction Phase;
- The discharge from Limerick WWTP during the Operational Phase; and
- Indirect effect via disturbance of SCI bird species as a result of Construction Phase.

The NIS is supported by a Wintering Bird Survey Report and an Estuarine Ecological Survey Report and includes a detailed assessment of all potential direct or indirect adverse effects on European Sites. It also assesses the potential for in-combination effects on European site with other plans and projects.

The NIS concludes that, with appropriate measures in place, there will be no significant effect on the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA and states:

"Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within the NIS. The measures ensure that the construction and operation of the Proposed Development does not adversely affect the integrity of European sites.

Therefore, it can be objectively concluded that the Proposed Development, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site".

5.2.3.9 Environmental Impact Assessment Directive (Consolidated 2011/92/EU and 2014/52/EU)

Environmental Impact Assessment (EIA) is a procedure under the terms of European Directives on the assessment of the effects of certain public and private projects on the environment. The EIA Directive (2014/52/EU) became applicable in Ireland from May 16th, 2017, and amends Directive 2011/92/EU. The EIA Directive(s) have been transposed into Irish legislation by the Planning and Development Acts 2000 to 2019 (the "Planning Acts"), as amended, and the Planning and Development Regulations, 2001 - 2018. The most recent 2014 EIA Directive has been transposed into Irish Legislation, through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I. 296 of 2018) which came into effect on 1 September 2018 and the EIAR has been prepared in accordance with these Regulations.

Projects for which an EIA is mandatory under Annex I of the Directive have been listed under Part 1 of Schedule 5 of the Planning and Development Regulations 2001 – 2018 (as amended). These include:

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

The Proposed Development provides for the capacity upgrade of Limerick WWTP to 285,000 PE to cater for the +10 year growth projection, this includes a future committed industrial load of 27,500 PE. In addition. Therefore, the Proposed Development exceeds the threshold so 150,000 PE set out under Part 1 of Schedule 5(13) and a mandatory EIA is required.

Similarly, Part 2 of Schedule 5 outlines thresholds above which other projects also require EIA, as per Annex II of the Directive. Part 2, Class 13, (a) includes:

"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 Proposed Development constitutes an extension to an existing WWTP capacity (130,000 PE) and will result in a 119.2% increase in capacity (i.e. providing capacity for 285,000 PE). The resulting increase in development is greater than 25% of the existing capacity.

Part 2 Class 11 (c) is described as *"Wastewater treatment plants with a capacity greater than 10,000 population equivalent as defined in Article 2(6), of Directive 91/271/EEC not included in Part 1 of Schedule V"*. The Proposed Development has an existing capacity of 130,000 PE and will increase the capacity to 285,000 PE which is above the threshold of Part 2, Class 11 (c).

The EIA Screening undertaken by the EGIS Group concluded that the Proposed Development falls within Schedule 5, Part 1, Class 13; Part 2, Class 11(c); and Part 2, Class 13(a) of the Planning and Development Regulations 2001–2018 (as amended). Accordingly, the preparation of an EIAR is deemed to be required.

5.2.3.10 Public Participation Directive (2003/35/EC)

The public participation part of the Aarhus Convention has been implemented by Directive 2003/35/EC. Under this, the general public has a right to participate effectively in decision-making in environmental matters. Public authorities should enable the public to comment on, for example proposals for projects affecting the environment, or plans and programmes relating to the environment. The outcome of the public participation process should be taken into consideration in the decision-making process. To facilitate this, information should be made available to help members of the public participate in the decision-making process and understand the reasons for it. The requirements under the directive have been transposed into Irish planning law and legislation governing other environmental licenses and consents.

5.2.3.11 Summary of European Policy Alignment

The Proposed Development demonstrates strong alignment with key European environmental and sustainability policies.

- It directly supports the objectives of the European Green Deal by promoting circular economy principles, reducing emissions, and improving resource efficiency through enhanced wastewater and sludge treatment processes.
- The project contributes to the EU Zero Pollution Action Plan by reducing contaminants at source and improving water quality, thereby protecting human health and ecosystems.
- It is consistent with the Water Framework Directive by preventing the deterioration of water bodies, specifically the Shannon Estuary, enhancing aquatic ecosystems, and promoting sustainable water use.
- Alignment with the Marine Strategy Framework Directive is achieved through reduced pollutant discharges, supporting the protection of marine environments.
- The Proposed Development ensures compliance with the Urban Wastewater Treatment Directive and its recast provisions by upgrading capacity and treatment standards to meet current and future regulatory requirements.
- It also supports renewable energy and emissions reduction targets through improved sludge management and energy recovery.
- The proposal aligns with the Sewage Sludge Directive by facilitating the safe and beneficial reuse of treated biosolids in agriculture.
- Furthermore, it reflects the objectives of the Birds and Habitats Directives by safeguarding biodiversity and sensitive ecological sites through Appropriate Assessment and mitigation.
- Compliance with the Environmental Impact Assessment Directive ensures that environmental effects are fully assessed and addressed.

Overall, the Proposed Development is firmly grounded in European policy, supporting climate action, environmental protection, and sustainable infrastructure delivery in line with EU legislative and strategic objectives.

5.2.4 National Policy Context

5.2.4.1 Project Ireland 2040: National Planning Framework (2018)

The National Planning Framework (NPF) was adopted and published by Government on 6th February 2018, as a strategy to replace the National Spatial Strategy, for the purposes of Section 2 of the Planning and Development Act 2000, as amended. The NPF is the Government's high-level strategic plan for shaping the future growth and development of the state to the year 2040.

The purpose of the NPF is to enable all parts of the country to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role.

The NPF includes the following policies relevant to this project:

- National Policy Objective 4 – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.
- National Policy Objective 7 – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.
- National Policy Objective 8 – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.
- National Policy Objective 15 – Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on the four Cities of Cork, Limerick, Galway, and Waterford.
- National Policy Objective 76 – Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.
- National Policy Objective 92 – Ensure 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.

The NPF identifies the following in respect of the future role of Limerick:

"It is necessary for Limerick to further strengthen its position as the principal focus within the Region and continue to address the legacy of regional growth having occurred outside the City area."

The framework also identifies some key future growth enablers to achieve this, which include:

"Ensuring that water supply and wastewater needs are met by new national projects to enhance Limerick's water supply and increase wastewater treatment capacity."

5.2.4.2 Project Ireland 2040: National Planning Framework First Revision (2025)

In line with the legislative provision for the NPF to be revised or replaced every six years, the first revision of the NPF was adopted in April 2025. The revisions have regard to changes that have occurred since the original 2018 publication, including changes in the national demographic profile, evident from the 2022 Census data, and increased national policy emphasis on decarbonisation and climate action, as established under the Climate Action Plans 2019 - 2024.

It reaffirms the Frameworks intention to achieve its vision by developing a region-focused strategy for managing growth in line with the National Development Plan. The National Policy Objectives (NPOs) 4, 7 and 8 noted above are carried over from the 2018 NPF into the First Revision. The target population for Limerick City and Suburbs has increased by 5,000 in the First Revision to a population of at least 150,000 by 2024.

A significant shift is highlighted in the Framework's focus, moving from a low carbon society to a carbon-neutral society, reflecting the government's legally binding commitment to achieving climate neutrality by 2050 and a 51% reduction in greenhouse gas emissions by 2030. In this context, strategies must be developed to manage and mitigate climate change risks through a combination of medium and long-term responses.

For securing compact and sustainable growth, the Framework emphasises "compact growth and higher densities in areas served by existing or planned infrastructure, including water services with sufficient capacity, or with potential for future sustainable services." This approach maximises the use of existing infrastructure, reduces additional investment costs, and incorporates demand management activities like water conservation (e.g., rainwater harvesting) to decrease drinking water demand. Additionally, the use of Nature-Based Solutions can enhance capacity in existing combined sewers. The upgrades will incorporate a substantial portion of the existing assets at Limerick WWTP into the Proposed Development, maximising the use of existing infrastructure.

The First Revision also includes amongst the key future growth enablers for Limerick that are directly related to the Proposed Development:

"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;

Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, water conservation, water re-use and SuDS and the circular economy".

5.2.4.3 National Development Plan 2025 – 2030

The National Development Plan (NDP) was published in conjunction with the NPF in February 2018 and was updated initially in October 2021 and again in July 2025. The NDP is the national plan setting out investment priorities to guide national, regional, and local planning and investment decisions, establishing departmental capital ceilings to 2030 and overall expenditure ceilings to 2035 to cater for an expected population increase to approximately 5.75 and 6.30 million people by 2040.

The NDP prioritises investment in high-quality infrastructure to enable the provision of the Programme for Government target of 300,000 new homes by 2030. It identifies that a total of €12 billion has been earmarked specifically for critical water infrastructure investment across all sources, including the NDP investment.

The Proposed Development is consistent with the NDP Priority Investment and sectoral Plans outlined in Section 5.8 of the NDP specifically the delivery of water infrastructure recognised as a critical NDP Priority Infrastructure.

5.2.4.4 Water Services Policy Statement 2024 - 2030

The Water Services Policy Statement (WSPS) 2024-2030 outlines the Government's expectations for the delivery and development of water and wastewater services in the years ahead against the three key objectives:

- Availability & Reliability;
- Safety & Quality; and
- Sustainability.

Under the objective of availability and reliability, priorities include planning and delivering new capacity, particularly in major population centres, to support economic development. This is of particular relevance in Limerick where population projections are in the region of 50% by 2040.

Sustainability, decarbonisation of the energy and materials used in water services is another key priority under the WSPS. As previously outlined, the draft Recast Urban Wastewater Treatment Directive sets very ambitious targets for energy neutrality in the wastewater sector. The recovery of energy from the anaerobic digestion of sludge will generate sufficient energy to cover the demands of the WWTP and RBC which will assist Uisce Éireann in improving its overall energy performance.

The Water Service Policy Statement provides a framework for Uisce Éireann to consolidate and develop public water services through its Strategic Funding Plan (SFP). In the SFP, Uisce Éireann has identified its business planning priorities for capital investment in line with the Water Services Policy Statement. The Plan sets out expected expenditure, income, and funding requirements over a multiannual period, while also meeting environmental requirements such as obligations under the Urban Wastewater Treatment Directive, the Drinking Water Directive and the EU Water Framework Directive mandated River Basin Management Plans.

The project is aligned with the Governments Water Services Policy Statement 2024-2030 three key objectives as upgrades at Limerick WWTP will involve enhancing treatment processes to ensure the effluent meets stringent water quality standards. These upgrades will also ensure Limerick WWTP will be efficient, resilient and sustainable in the long term, in line with the Policy Statement's 'Sustainability' Objective.

5.2.4.5 Climate Action and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 (Department of the Environment, 2021) establishes a fundamental objective to reduce emission. As outlined above, the Act legally binds Ireland to have net-zero emissions no later than 2050 and to a 51% reduction in emissions by 2030, against a baseline of 2018 emissions. The Act states the following:

"The first two carbon budgets proposed by the Advisory Council shall provide for a reduction in greenhouse gas emissions such that the total amount of annual greenhouse gas emissions in the year ending on 31 December 2030 is 51 per cent less than the annual greenhouse gas emissions reported for the year ending on 31 December 2018, as set out in the national greenhouse gas emissions inventory prepared by the Agency."

The delivery of the proposed WWTP upgrades will reduce aeration energy requirements by 40% in comparison to other options at this scale (Refer to Chapter 2 (Alternatives) for further detail), and the proposed RBC will result in increased biogas production and energy recovery, supporting the targets set out in the Climate Action Low Carbon Development (Amendment) Act 2021.

5.2.4.6 Delivering Homes, Building Communities 2025-2030

This action plan on housing supply and targeting homelessness replaces the Government's previous housing plan *Housing for All* launched in 2021. The Plan is aligned with the First Revision to the NPF, in terms of population projections and anticipates a population of approximately 5.74 million by 2031. It sets out to deliver of 300,000 homes by 2030 and commits to prioritising the availability of a strong pipeline of zoned and serviced to support this. In Section 1.3 of the action plan, the Government undertakes to increase investment in critical infrastructure, including water and wastewater capacity via Uisce Éireann to ensure that more new homes can be built. It also sets out to bring 'efficiencies to infrastructure development by reforming structures, identifying and tackling barriers, and supporting delivery agencies involved in infrastructure development.'

5.2.4.7 Climate Action Plan 2025

The Government has approved its streamlined Climate Action Plan 2025 (CAP25), the fifth overall update to the plan and the third since Ireland committed in law to reducing its greenhouse gas emissions by 51% by 2030 (relative to 2018 levels) and achieving climate neutrality by signing the Climate Action and Low Carbon Development (Amendment) Act 2021.

The Plan emphasises how it is essential that Ireland acts now to increase the rate of key decarbonisation activities across all sectors of the economy. The proposed upgrades will contribute to reducing greenhouse gas emissions and improving sustainability in wastewater management.

The NWSMP aims to optimise the sludge treatment process, reduce transport emissions and promote energy recovery, thus supporting the goals of the Climate Action Plan. Furthermore, the proposed RBC development will produce a Class A biosolid from the waste sludge, which is a high value end product. This is a responsible consumption and production cycle that supports Ireland's transition to a circular economy.

5.2.4.8 River Basin Management Plan 2022 – 2027

River Basin Management Plans (RBMPs) provide the mechanism for implementing an integrated approach to the protection, improvement and sustainable management of the water environment and are published every six years. The third cycle RBMP 2022 – 2027 was published by the Department of Housing, Local Government and Heritage in September 2024.

The Water Action Plan 2024: A River Basin Management Plan for Ireland outlines essential measures to protect and restore water quality, with a focus on sustainable management of freshwater resources. The plan addresses the primary causes of water quality decline, including agricultural pollutants, inadequately treated wastewater, and physical impacts on water bodies. Key strategies include targeted measures, integrated catchment planning, and increased public participation. For wastewater treatment plants, the plan emphasises significant investment in infrastructure, with Uisce Éireann committing over €2.3 billion to upgrade 108 No. WWTPs, 77 No. collection networks, and 92 No. related national programs by 2024. This investment aims to enhance wastewater treatment and reduce pollution, contributing to improved water quality and supporting climate change mitigation and biodiversity.

For those 1,649 water bodies 'At Risk' of failing to meet the objectives of WFD, 46% face a single significant pressure, while 54% are affected by multiple pressures. Agriculture impacts 1,023 water bodies, followed by hydromorphology (448), forestry (216), and urban wastewater (197). Since the last assessment in 2018, there has been a slight reduction in impacts from forestry, urban wastewater, domestic wastewater, and industry, with minimal changes in other pressure categories like agriculture and hydromorphology. Improved assessment methodologies may have contributed to a perceived reduction in domestic wastewater impacts.

The proposed upgrade of the Limerick agglomeration wastewater treatment capacity, including the provision of the Regional Bioresource Centre (RBC), is located within the Shannon Estuary catchment, with treated effluent discharged via the existing outfall to the Shannon. By increasing treatment capacity and improving the level of wastewater and sludge treatment, the project directly supports the objectives of the River Basin Management Plan. In particular, the proposal will reduce the discharge of harmful pollutants to the Shannon Estuary, thereby protecting the receiving environment and avoiding ecological impacts associated with untreated or inadequately treated urban wastewater.

Accordingly, the project aligns with the RBMP objectives:

- to ensure full compliance with relevant EU water legislation;
- prevent deterioration in the status of surface waters;
- protect, enhance and restore surface waters with the aim of achieving good ecological and chemical status;
- progressively reduce pollution from priority substances and phase out emissions of priority hazardous substances;
- support improved operational and maintenance practices at wastewater treatment facilities;
- deliver targeted investment in wastewater treatment infrastructure; and
- promote research and innovation in the management of urban wastewater.

5.2.4.9 National Waste Management Plan for A Circular Economy 2023 - 2029

The National Waste Management Plan for a Circular Economy 2024 – 2030 (RWPO, 2024) is Ireland's new roadmap for waste planning and management. The Regional Waste Management Planning Offices, under the auspices of the County and City Management Association National Oversight Group, have co-ordinated the preparation of this plan which is the first National Waste Management Plan for a Circular Economy. The Plan focuses more on preserving resources by creating a circular economy and shifts away from waste disposal.

The Plan aims to transition from waste disposal and treatment towards prolonging the productive use of materials and products. This shift is achieved by implementing a policy framework that discourages resource wastage and promotes reuse, ultimately rewarding circularity. Additionally, the plan holds producers of disposable goods environmentally accountable for their products, ensuring they take responsibility for the environmental impact of their goods. Furthermore, the plan supports sustainable economic models by

encouraging the use of recycled materials over virgin materials, the plan promotes the use Article 27 by-product notifications and Article 28 end-of-waste processes for end waste materials.

The Proposed Development is in line with the plan's circular economy principles and sets out to improve resource efficiency through enhanced wastewater and sludge treatment processes.

5.2.4.10 Summary of National Policy Alignment

The Proposed Development will support the delivery of a range of national policy objectives:

- It demonstrates strong alignment with objectives set out in Project Ireland 2040 and the National Planning Framework. It will facilitate compact and sustainable urban growth in Limerick City by providing essential wastewater infrastructure to accommodate projected population and economic expansion;
- The project is consistent with the National Development Plan by delivering critical water services infrastructure, which is identified as a key investment priority to support housing and economic development;
- It aligns with the Water Services Policy Statement by enhancing capacity, reliability, and sustainability of wastewater services, while improving treatment standards and long-term resilience;
- The development supports national climate policy by reducing energy demand, increasing energy recovery, and contributing to emissions reduction targets under the Climate Action and Low Carbon Development Act and Climate Action Plan;
- It also facilitates housing delivery objectives by enabling the provision of serviced land, in line with Delivering Homes, Building Communities;
- In addition, the project contributes to the River Basin Management Plan by improving water quality, reducing pollutant discharges, and protecting the Shannon Estuary; and
- The Proposed Development is closely aligned with the principles of the National Waste Management Plan for a Circular Economy. By promoting resource efficiency and the beneficial reuse of sludge, it will support Ireland's transition to a circular economy.

5.2.5 Regional Policy Context

5.2.5.1 Regional Spatial & Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy (RSES), which came into effect on 31 January 2020, is the primary strategic plan for the Southern Region. The RSES is a 12-year strategic regional development framework. It establishes a broad framework for the way in which our society, environment, economy, and the use of land should evolve. It includes Metropolitan Area Strategic Plans (MASPs) for Cork, Limerick-Shannon and Waterford and a regional strategy for our Key Towns, towns, villages, and rural areas.

The RSESs are designed to translate the high-level national policies such as Project Ireland 2040, the NPF and the National Development Plan 2018-2027 into regional and local contexts, ensuring that the overarching goals of balanced regional development, sustainable growth, and infrastructural investment are effectively realised across all regions of Ireland.

The development strategy for the RSES includes a focused aspiration to strengthen the settlement structure of the Region through the delivery of compact growth:

RSES Strategy No. 1

"Strengthening and growing our cities and metropolitan areas; harnessing the combined strength of our three cities, as a counterbalance to the greater Dublin area, through quality development, regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas."

Limerick is identified as largest urban centre in Ireland's Mid-West and Ireland's third biggest city. The defined Limerick Shannon Metropolitan Area is one of three key pillars in the overall growth strategy for the region and is supported by a focused Metropolitan Area Strategic Plan (MASP).

The Strategy emphasises the need to invest in critical infrastructure, including wastewater treatment, as part of its broader goals to support economic growth, environmental sustainability, and quality of life in the region.

Specifically, the Limerick-Shannon Metropolitan Area Strategic Plan addresses the need for enhanced wastewater infrastructure to accommodate future growth and development. Section 4 of the RSES provides a list of National Enablers to support growth in the Limerick Shannon MASP, which includes, inter alia:

"Ensuring that water supply and wastewater needs are met by new national projects to enhance Limerick's water supply and increase wastewater capacity".

The revised NPF will be incorporated into the RSESs, which are required to be updated within six months of the adoption of the revised NPF. This integration ensures that the regional strategies align with the updated national planning framework, reflecting changes in government policy on issues such as climate transition, regional development, and demographic shifts. The RSESs will guide the development of the City and County Development Plans, facilitating coordinated planning and investment at the local level. This alignment will help achieve the NPF's goals of promoting city-based growth, enhancing regional economic performance, and ensuring equitable development across urban and rural areas.

While informed by national, EU and international policies, the RSES is driven at the local level by elected members, local authorities, stakeholders, community groups and individual citizens who have shaped this shared strategy.

The key Regional Policy Objectives (RPOs) relating to wastewater include:

RPO 5 – Population Growth and Environmental Criteria

Increased population growth should be planned with regard for environmental criteria 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 avoids adverse impacts on the integrity of Natura 2000 sites and their conservation objectives.

RPO 211 – Uisce Éireann and Wastewater

It is an objective to support the implementation of Uisce Éireann 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. Support the role of Uisce Éireann Investment Plans in taking into account seasonal pressures on critical service infrastructure, climate change implications, and leakage reduction in the design of all relevant projects.

RPO 212 – Strategic Wastewater Treatment Facilities

- a. It is an objective to support investment and the sustainable development of strategic wastewater treatment facilities by Uisce Éireann 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 Uisce Éireann 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.

RPO 214 - Eliminating Untreated Discharges and Long-term Planning

It is an objective to support Irish Water and the relevant local authorities in the Region to eliminate untreated discharges from settlements in the short-term, while planning strategically for the long-term in tandem with Project Ireland 2040 and the RSES and in increasing compliance with the requirements of the EU Urban Wastewater Treatment Directive.

5.2.5.2 Summary of Regional Policy Alignment

The delivery of the Proposed Development is critical to the realisation of a number of the key objectives of the Southern RSES. It will:

- Support the delivery of compact and sustainable growth within the Limerick-Shannon Metropolitan Area;
- Reinforce Limerick's role as a key regional growth centre by providing essential wastewater infrastructure required to accommodate future population and economic development;
- The project is consistent with RSES objectives to invest in critical infrastructure, particularly wastewater treatment capacity, as a key enabler of regional development and improved quality of life;
- It aligns with Regional Policy Objectives by supporting Uisce Éireann's investment plans and the sustainable development of strategic wastewater infrastructure; and
- The development also ensures that population growth can be managed in an environmentally sustainable manner, protecting water quality and avoiding adverse impacts on Natura 2000 sites.

The Proposed Development supports the coordinated delivery of regional planning objectives by integrating infrastructure provision with long-term environmental protection and sustainable growth.

5.2.6 Local Policy Context

5.2.6.1 The Limerick Development Plan 2022 - 2028

The Limerick Development Plan (LDP) 2022-2028 provides a strategic planning direction for the Limerick City and County. The plan identifies key development areas and sets policies to guide development.

The strategic vision of the LDP is as follows:

"Limerick – A Green City Region on the Waterfront – By 2030, Limerick will become a green City region on the Shannon Estuary connected through people and places. This will be achieved through engagement, innovation and resilient urban development and self-sustaining rural communities".

This is underpinned by 10 interlinked strategic objectives. Strategic Objective 1 sets out to:

"Grow Limerick's economy and create opportunity through maximising the potential for development through the promotion and enhancement of the competitive advantages of Limerick, including its strategic location, connectivity and accessibility to international markets, a skilled workforce and a high quality of life..."

Section 8.5.3 of the LDP notes that:

"Irish Water's¹ current wastewater treatment capacity register for County Limerick dated March 2022, states that there is capacity available in 41 no. of the 53 no. Wastewater treatment plants (WWTPs). These include Bunlicky and Castletroy WWTPs, which serve the Limerick City Metropolitan Municipal District. These WWTPs require some upgrading and it is envisaged by Irish Water that with the completion of these upgrades, there will be sufficient spare capacity to accommodate the projected growth in Limerick City and Suburbs (in Limerick), Mungret, and Annacotty as set out in the RSES and the Core Strategy, over the lifetime of the Plan, subject to planning and other approvals".

Objective IN O9 Public Wastewater states that it is an objective of the Council to:

"Ensure adequate and appropriate wastewater infrastructure is available to cater for existing and Proposed Development, in collaboration with Irish Water, to avoid any deterioration in the quality of receiving waters and to ensure that discharge meets the requirements of the Water Framework Directive".

Section 8.7.3 Sludge Management of the LDP refers to the National Waste Water Sludge Management Plan, in which it notes that Uisce Éireann proposes to expand on the provision of 'sludge centres' and satellite facilities

¹Uisce Éireann was previously known as Irish Water

in Limerick. It notes that these proposals include upgrading the existing sludge centre at Bunlicky. The Council sets out formal support for this proposal in Objective IN 019.

“Objective IN 019 Sludge Management:

It is an objective of the Council to: a) Support the provision of sludge management infrastructure at suitable locations in accordance with Irish Water’s National Waste Water Sludge Management Plan, whilst not compromising environmental obligations.

b) Restrict the provision of sludge management facilities to the sites of existing public wastewater treatment facilities due to the nature and characteristics of existing operations on these sites and the need to strictly control the treatment of sludge. c) Require that the treatment and management of sludge waste is carried out in a safe, efficient and sustainable manner, having regard to the protection of the environment and public health and in compliance with the Waste Framework Directive, the Nitrates Directive, the Waste Management Act and all relevant statutory instruments.”

The development of Limerick over the lifetime of this plan focuses on the sustainable growth of the built environment, employment generation and the provision of community and social services, together in a low carbon, compact, consolidated and connected pattern of development. Delivering on these objectives will result in an enhanced quality of life for all citizens.

Such future sustainable growth is contingent on the delivery of the Proposed Development. As noted above the Proposed Development has both direct policy support on Objectives IN 09 and IN 019, but also aligns with many of the wider sustainable growth objectives set out in the LDP.

5.2.6.2 Limerick Climate Action Plan 2024 – 2029

The Limerick Climate Action Plan (LCAP) sets out four key ambitions for Limerick. These include:

- Embracing the River Shannon’ as a public amenity and creating new recreational opportunities for residents and visitors;
- Pioneering Limerick as a ‘Green Region’ which develops as an environmentally sustainable and carbon neutral economy; and
- Building Limerick to be ‘A Sustainable, Innovative and Competitive Economy”.

The Proposed Development is integral to the delivery of the cross—cutting theme of sustainability, at the heart of these ambitions. By delivering wastewater treatment capacity it will support the future sustainable growth of Limerick City’s population and employment sector. It will allow for this growth while protecting the water quality of the Shannon Estuary, safeguarding its role as a vital recreational amenity and resource.

5.2.6.3 Summary of Local Policy Alignment

The Proposed Development aligns closely with the Limerick Development Plan 2022–2028 by supporting the provision of adequate wastewater infrastructure necessary to facilitate sustainable population and economic growth.

It directly supports Objectives IN 09 and IN 019 through the upgrade of wastewater and sludge treatment facilities, ensuring environmental protection and compliance with regulatory standards.

The development also underpins the Plan’s strategic vision of a low-carbon, compact and resilient city by enabling growth while safeguarding water quality in the Shannon Estuary.

Furthermore, it supports the Limerick Climate Action Plan by contributing to sustainable infrastructure, environmental protection, and the transition to a green and climate-resilient region.

5.2.7 Uisce Éireann Policy Context

5.2.7.1 National Wastewater Sludge Management Plan

In 2016, Uisce Éireann² published the current National Wastewater Sludge Management Plan (NWSMP) which sets out a nationwide strategy to deliver a sustainable and standardised approach to managing wastewater sludge now, and over the next 25 years. The NWSMP outlines the short, medium, and long-term strategy for management of sludge produced at wastewater treatment plants under the control of Uisce Éireann².

The NWSMP, in conjunction with the associated Strategic Environmental Assessment, takes into account current legislation and guidance documents in relation to the treatment and utilisation of wastewater sludge in addition to potential environmental impacts and sustainability of proposals. The proposals of the NWSMP are used to inform future capital and operational activities in relation to sludge management.

Following a period of public consultation in 2019, Jacobs and Tobin Consulting Engineers were commissioned by Uisce Éireann² to develop a Sludge Hub Centre (SHC) Site Selection Report for the Southern Region. The terminology has evolved over time and it is now referred to as a Regional Bioresource Centre (RBC). The Site Selection Report confirmed Limerick WWTP as the preferred site for the RBC.

The development of the RBC in the Southwest will meet the following objectives of the NWSMP;

- To avoid endangering human health or harming the environment;
- To ensure that all regulatory and legislative controls are met, and due regard is taken of non-statutory Codes of Practice and industry guidance;
- To establish long term, secure and sustainable disposal routes and outlets;
- To ensure cost-effective and efficient treatment and reuse/disposal techniques;
- To extract energy and other resources where economically feasible; and
- To drive operational efficiencies, e.g. through use of Bioresource Centres.

Uisce Éireann has commenced the process of updating the current NWSMP. This revision will provide a progress update on the objectives identified in the original NWSMP and to what extent they have been achieved. It will also include detail on biosolid management activities and how these activities impact climate change, sustainability and circular economy initiatives. The potential of thermal treatment technologies will also be discussed further, including alternative outlet options to agricultural land.

5.2.7.2 Water Services Strategic Plan (2025 – 2050)

The Water Services Strategic Plan (WSSP) is Uisce Éireann's long-term strategic plan which is required to be prepared under the Water Services No. 2 Act 2013. It sets out the strategic objectives for the delivery of water services for the next 25 years up to 2050. It details current and future challenges which affect the provision of water services and identifies the priorities to be tackled in the short and medium term.

In developing the plan, Uisce Éireann have considered its interaction with other national and regional strategic plans such as the National Spatial Strategy and River Basin Management Plans. This plan (Tier 1) also provides the context for subsequent detailed implementation plans (Tier 2) which will document the approach to be used for key water service areas such as water resource management, wastewater compliance and sludge management. Protecting and improving the long-term quality of the water environment enables safe, affordable water services as well as protecting human health and biodiversity.

Current priorities outlined in the plan include complying with the Urban Wastewater Treatment Directive, specifically addressing the lack of wastewater treatment at 44 No. urban centres and improving treatment at the 38 No. larger urban areas that do not meet the required standards. Additionally, the plan prioritises upgrades at sites of serious pollution, particularly those adversely impacting Bathing Waters.

² (then Irish Water)

The proposed developments in wastewater treatment facilities and the RBC in Limerick supports and upholds all of the strategic objectives outlined in the Uisce Éireann Services Strategic Plan as detailed below:

- Strategic Aim 6 Providing for Growth. We will manage the availability of capacity to support housing and the economy in line with national policy.
- Strategic Aim 7 Protecting our Water Environment. We will play our part in protecting and restoring our water environment.
- Strategic Aim 8 Playing our part under the Water Framework Directive. We will work with others to progressively deliver on Water Framework Directive (WFD) objectives.
- Strategic Aim 9 Contributing to positive Biodiversity. We will manage our assets to have biodiversity net gain.
- Strategic Aim 11 Adopting circular approaches. We manage our assets to maximise resource recovery and resource efficiency and minimise waste.
- Strategic Aim 12 Managing our assets. We will manage the risk and resilience of our services through best practice asset management.
- Strategic Aim 14 Securing long-term funding. We will work with our stakeholders to secure long-term funding for efficient and resilient services.

As the proposed upgrades will assist Uisce Éireann in improving energy efficiency targets and catering for future growth, the proposals are considered to support the objectives of the Water Services Strategic Plan.

5.2.7.3 Summary of Overall Policy Alignment

The Proposed Development demonstrates strong alignment with European, national, regional, local and Uisce Éireann policies by delivering essential wastewater and sludge treatment infrastructure that supports sustainable growth, environmental protection and climate action.

- At a European level, it complies with key directives and strategies by improving water quality, reducing pollution, supporting biodiversity, and promoting circular economy principles through resource recovery;
- Nationally, the project enables the delivery of Project Ireland 2040 objectives by facilitating compact urban growth, supporting housing delivery, and providing critical infrastructure for economic development;
- It is consistent with the NDP and Water Services Policy Statement by enhancing capacity, reliability, and sustainability of wastewater services;
- The development also contributes to national climate targets through improved energy efficiency and increased energy recovery from sludge treatment processes;
- At a regional level, it supports the objectives of the Southern RSES by reinforcing Limerick's role as a key growth centre and enabling infrastructure-led development;
- Locally, the project aligns with the Limerick Development Plan by providing the infrastructure necessary to support sustainable, compact and low-carbon growth while protecting the receiving environment; and
- It also safeguards the ecological integrity of the Shannon Estuary through enhanced treatment standards and reduced pollutant discharges.

Furthermore, the development is consistent with Uisce Éireann's strategic objectives by supporting long-term capacity, operational resilience, and resource efficiency. Overall, the Proposed Development represents a key enabling infrastructure project that integrates policy objectives across all levels, ensuring coordinated delivery of sustainable growth and environmental protection.

5.3 Difficulties encountered in Compiling Information

No difficulties were encountered during the preparation of this Chapter of the EIAR.

5.4 References

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