



Planning Statement

Proposed Upgrades to Limerick Wastewater Treatment Plant & Development of Regional Bioresource Centre at Ballykeeffe, Corkanree and Courtbrack (townlands), Dock Road, Limerick.

Client: Uisce Éireann

August 2026

Contents

1. Introduction	3
1.1 Site Location and Description	3
1.2 Application Details	5
1.2.1 A Critical Infrastructure Project	5
1.2.2 Strategic Infrastructure Development (SID)	6
1.2.3 Other Consents	6
1.2.4 Environmental Impact Assessment Report (EIAR)	6
1.2.5 Stakeholder Engagement	6
1.2.6 Other Engagement	7
1.2.7 Additional Land Consideration	8
1.2.8 Duration of Planning Permission	8
2. Project Context	9
2.1 Planning History and Project Background	9
2.2 Existing Conditions	10
2.3 Need for Upgrades	11
3. Proposed Development	13
3.1 Development Overview	13
3.1.1 Treatment Capacity	13
3.1.2 Stormwater Management	13
3.1.3 Regional Bioresource Centre	14
3.2 Development Description	14
3.3 Commissioning and Construction	17
4. Legislative and Planning Policy Context	19
4.1 European Context	19
4.1.1 Urban Wastewater Treatment Directive (91/27/EEC)	19
4.1.2 EU Water Framework Directive (2000/60/EC)	19
4.1.3 Environmental Impact Assessment Directive (Consolidated 2011/92/EU and 2014/52/EU)	19
4.1.4 Birds and Natural Habitats Directives	20
4.1.5 Public Participation Directive (2003/35/EC)	20
4.2 National Context	20
4.2.1 Section 37A of the Planning and Development (Strategic Infrastructure Act) 2006	20
4.2.2 Project Ireland 2040 – National Planning Framework	21
4.2.3 Project Ireland 2040: National Planning Framework First Revision (2025)	22
4.2.4 Water Services Strategic Plan 2015 – 2040	23
4.2.5 Water Services Policy Statement 2024-2030	23
4.2.6 Uisce Éireann Capital Investment Plan –2020 - 2024 (RC3) and 2025 – 2030 (RC4)	24
4.2.7 Climate Action Plan	24
4.2.8 National Wastewater Sludge Management Plan	24

4.3 Regional Context	25
4.3.1 Regional Spatial and Economic Strategy for the Southern Region	25
4.4 Local Context	26
4.4.1 The Limerick Development Plan 2022 -2028 (LDP)	26
4.4.2 The Clare County Development Plan 2023 -2029 (CCDP)	28
5. Key Planning Considerations	30
5.1 Principle of Development	30
5.2 Environmental Impact Assessment Report	31
5.2.1 EIAR Team	31
5.2.2 EIAR Findings	32
5.3 Water Quality	33
5.4 Odour and Air Quality	33
5.5 Noise and Vibration	34
5.6 Traffic and Transport	34
5.7 Cultural Heritage	35
5.8 Landscape and Visual	35
5.9 Flood Risk	36
5.10 Sludge Disposal	37
5.11 Appropriate Assessment	37
6. Conclusions	39

Introduction

This Planning Statement has been prepared by HW Planning in collaboration with the Egis Group, on behalf of Uisce Éireann (UÉ) who are seeking planning permission from An Coimisiún Pleanála (ACP) for the upgrade of the existing Limerick Wastewater Treatment Plant (WwTP) and the development of a Regional Bioresource Centre at Ballykeeffe, Corkanree and Courtbrack (townlands), Dock Road, Limerick under the provisions of The Planning and Development (Strategic Infrastructure) Act 2006.

The Act provides that applications for permission/approval for specified private and public strategic infrastructure developments be made directly to An Coimisiún Pleanála. The applicant entered into pre-application consultations with An Coimisiún Pleanála, with a meeting held on 10th March 2026 (ref ACP 323900-25). The Commission confirmed their opinion that the proposed development meets the definition of 'strategic infrastructure development' as defined in the legislation by means of formal notice dated 19th June 2026. The subject application is made pursuant to this determination.

This Planning Statement has been prepared in support of the project and sets out the background context for the proposals in question, a description of the planned works, summary of key guiding policy and objectives, as well as an overview of key planning assessment matters. This statement should be read in conjunction with the submitted Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and other submitted plans and particulars.

1.1 Site Location and Description

The Proposed Development is located in two sites: the Limerick (Bunlicky) WwTP Site (c. 9.18 ha) and the Corcanree Pumping Station (PS) Site (c. 2.16 ha), both approximately 3km west of the Limerick City Centre, in the townlands of Ballykeeffe, Corkanree and Courtbrack. The lands are bounded to the north by the River Shannon, a Special Area of Conservation (SAC) under the Habitats Directive, into which the nearby Ballinacurra Creek flows. Situated to the south is the Dock Road (R510), which connects with the Limerick South Ring Road (N18) national road and the Limerick Tunnel underneath the River Shannon, to the west of the subject lands. The WwTP site is accessed directly from a private entrance off the N18 Junction 2 roundabout to the south, with the PS site accessed via the Corcanree Business Park road.

As defined in the Limerick Development Plan 2022 – 2028, the lands are located in the western neighbourhood of 'Ballinacurra, South Circular Road and Dock Road', within the Tier 1 Limerick City and Suburbs (in Limerick), Mungret and Annacotty. The immediate area is characterised by a low population density and predominantly light industrial and commercial uses clustered along Dock Road. This is typified by the presence of Mr Binman, waste management service, located immediately to the south-east of the existing Limerick WwTP site, the Irish Cement works to the west and a Lower Tier Seveso Site – Grassland Agro, and other light industrial uses in the Corcanree Business Park located c. 250m to the south of the existing Corcanree PS.

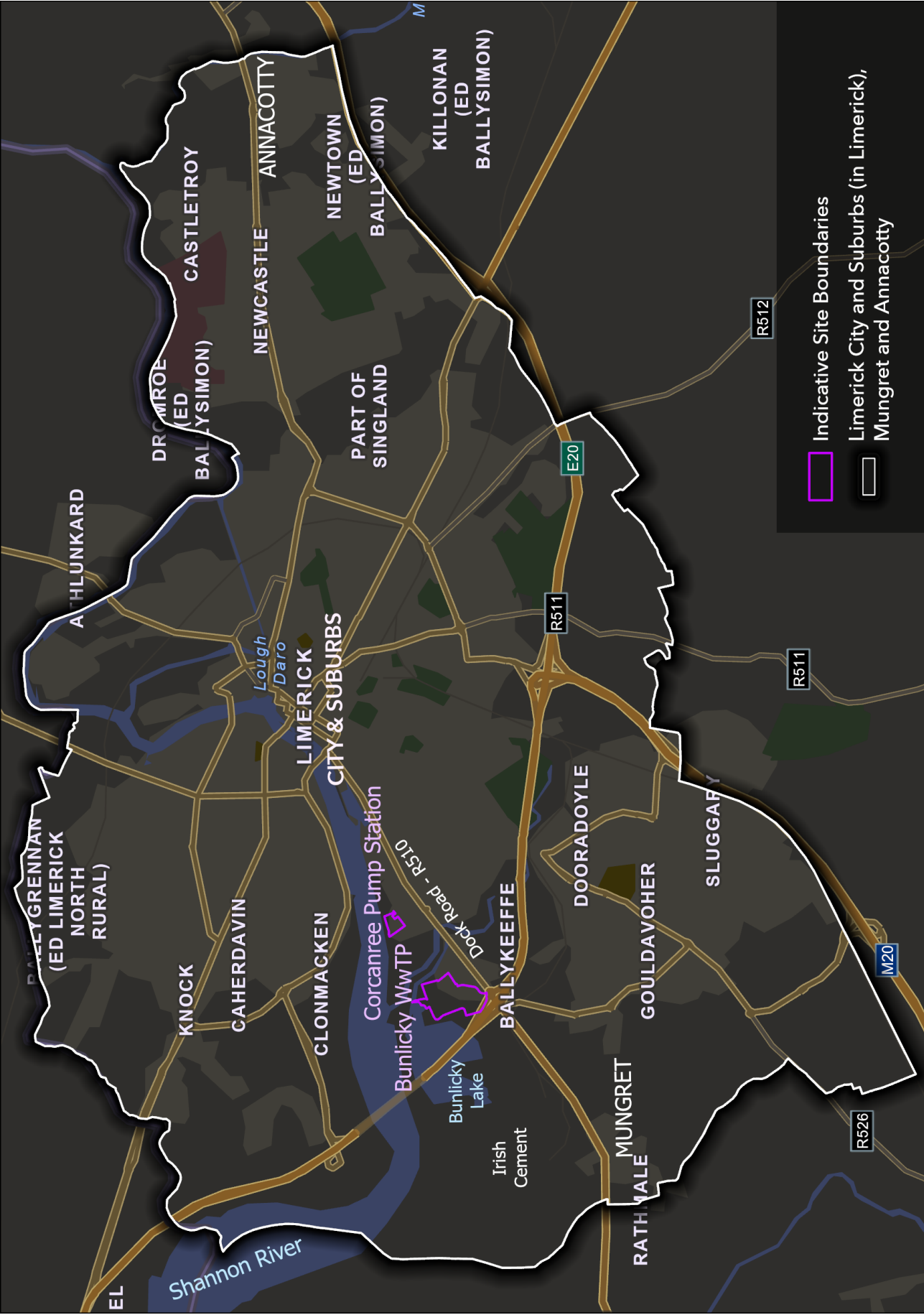


Figure 01: Site Context Map

The WwTP was originally permitted and constructed in the late 1990's, with the plant subsequently being subject to a range of improvements works.

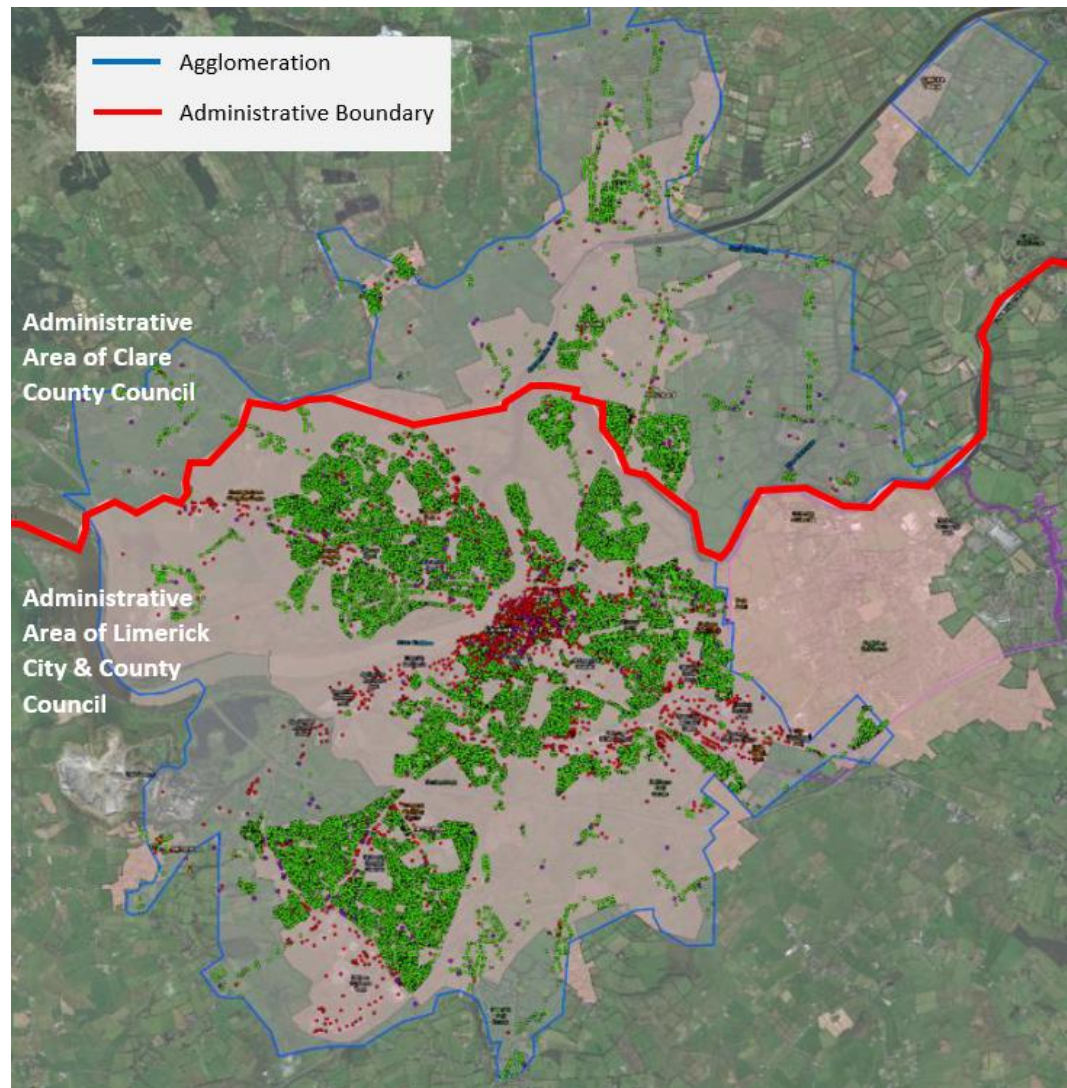


Figure 02: Administrative Context, Limerick (Bunlicky) EPA Agglomeration

While the Proposed Development is located in the administrative area of Limerick City and County Council, the Limerick City and Environs EPA agglomeration extends northwards into parts of the administrative area of Clare County Council such as Parteen, Ardnacrusha and Cloonlara. As such, the proposed wastewater treatment upgrades will provide some benefits to the agglomeration catchment in some focused areas in County Clare.

1.2 Application Details

1.2.1 A Critical Infrastructure Project

On the 24th July 2026, the Government designated nine national projects as critical infrastructure under the Critical Infrastructure Act, 2026. Alongside the Water Supply Project for the Eastern and Midlands Region and the Greater Dublin Drainage Project, the subject Limerick (Bunlicky) Wastewater Treatment Plant Upgrade and Bioresource Centre was identified as a priority project for accelerated infrastructure delivery. The designation includes a legal obligation that, among other

matters, requires public bodies to prioritise the performance of functions (administrative, technical and decision-making resources) to authorisation processes. The designation means the Proposed Development is of strategic national importance, recognising the essential role it will play in achieving national policy priorities, particularly housing growth.

1.2.2 Strategic Infrastructure Development (SID)

Planning applications for strategic infrastructure development are made directly to An Coimisiún Pleanála and not to the Local Authority. The Planning and Development (Strategic Infrastructure) Act 2006 categorises development which is of strategic economic or social importance (i.e., 'Strategic Infrastructure Development') under its Seventh Schedule, which includes wastewater treatment plants with a capacity greater than 10,000 PE under the heading 'Environmental Infrastructure'.

The Proposed Development relates to the upgrade of the Limerick (Bunlicky) WwTP and the upgrade of the existing Sludge Hub Centre (SHC) to a Regional Bioresource Centre (RBC) for the South-West. The existing design capacity of the WwTP is 130,000 PE and it is intended to upgrade the plant to 285,000 PE¹ with provision to meet the +25-year year growth projections of 325,000 PE.

The existing plant therefore exceeds the 10,000PE threshold and the proposed development will provide for an uplift of 155,000 PE. As outlined, An Coimisiún Pleanála has determined that the proposed development meets the definition of strategic infrastructure development and that the application should be made directly to them in accordance with associated legislative provisions.

1.2.3 Other Consents

In addition to planning permission, the following consents and considerations are also required for construction and operation of the proposed development.

The Waste Water Discharge (Authorisation) (WWDA) Regulations 2007 (as amended)

The project will be constructed in the area licensed (WWDL) for the Limerick City and Environs Agglomeration. The agglomeration was issued a wastewater discharge licence by the EPA in August 2009 (EPA ref D0013-01). Uisce Éireann are in process of submitting a license review for the Limerick City and Environs agglomeration to account for the upgrade project at the plant. The Proposed Development will be included in the license review.

1.2.4 Environmental Impact Assessment Report (EIAR)

The subject application is accompanied by an EIAR. Prior to lodgment of this application, the Department of Housing, Local Government and Heritage has been notified of this and of the locations at which the EIAR can be viewed along with the application plans and particulars. An acknowledgement of this submission to the Department is enclosed with this application to An Coimisiún Pleanála.

1.2.5 Stakeholder Engagement

Prescribed Bodies

¹ Including the 27,500 PE IDA allowance.

A copy of this application, including the plans and particulars and EIAR, has been issued to the following 'relevant' prescribed bodies, prior to its submission to An Coimisiún Pleanála.

Prescribed Bodies	
1. Minister for Housing, Local Government and Heritage	10. Inland Fisheries Ireland
2. Minister for Climate, Energy and the Environment	11. Transport Infrastructure Ireland
3. Limerick City and County Council	12. The Heritage Council
4. Clare County Council	13. An Taisce
5. South-western Regional Assembly	14. An Chomhairle Ealaíon
6. Commission for Regulation of Utilities	15. Fáilte Ireland
7. Marine Area Regulatory Authority	16. Health & Safety Authority
8. Health Service Executive	17. Geological Survey Ireland
9. Environmental Protection Agency	18. Office of Public Works

In addition to making hard copies of the application plans and particulars and the EIAR available for public inspection at the offices of An Coimisiún Pleanála and Limerick City and County Council, the application, drawings, NIS and EIAR are also available to view and download at the following website address:

<http://www.limerickwwtp.ie>

1.2.6 Other Engagement

As part of the preparation of this EIAR, Uisce Éireann undertook consultation with the public, elected representatives, statutory bodies, and interested groups in respect of the Proposed Development. Public engagement is an asset in the development of any infrastructure project and the aim was to promote and encourage participation in the consultation process and welcome feedback on the project.

The following consultation strategies were used:

- Webinars and two in-person public events for elected representatives and the public;
- Emails and letter drops to statutory and non-statutory stakeholders in advance of the Project launch and again at Public Consultation stage;
- Uisce Éireann Website updated when new relevant information becomes available;
- Project web page with newsletter bulletin for each project stage;
- Consultation Feedback Form; and
- Contact email address for submissions.

There was one round of non-statutory consultation, for a period of 4 weeks, which started on the 3rd of November, 2025. There were online and in-person information events, where design details and environmental elements of the project were presented. Relevant information such as environmental updates and project information were also made available on the project website. Stakeholders and interested parties had an opportunity at the information event to raise queries, with the project team contactable to discuss any matters arising. The issues raised and feedback provided during the public consultation period were summarised in the Consultation Report. All issues raised were considered by the project team in developing and finalising its planning application and EIAR.

Alongside the public engagement processes, pre-planning meetings / briefings also took place with Limerick City & County Council, as well as Clare County Council.

1.2.7 Additional Land Consideration

The Environmental Impact Assessment Report (EIAR) includes an assessment of the potential environmental effects associated with the use of a temporary construction compound located on southern lands adjacent to the existing WwTP site that may be utilised during the construction phase of the Proposed Development. However, the temporary compound does not form part of the Proposed Development for which consent is currently being sought and is not required to facilitate the delivery of the proposed development, as alternative construction arrangements located to the north of the site remain available and are also assessed in the EIAR. Accordingly, the proposed development can proceed without the use of this specific compound.

Landowner agreement for the use of the temporary compound has not yet been secured and Uisce Éireann will continue to engage with the relevant landowner in this regard. Should agreement be reached, any necessary statutory approvals or consents relating to the possible use of the temporary compound will be pursued separately, as appropriate. The assessment of the temporary compound has been included within the EIAR solely to ensure a comprehensive and transparent understanding of its potential environmental effects, including any potential cumulative effects that could arise should the compound be brought forward in the future.

1.2.8 Duration of Planning Permission

Uisce Éireann respectfully requests that, pursuant to Section 40 of the Planning and Development Act 2000 (as amended), the duration of any planning permission granted for the proposed development be ten years from the date of the final grant.

Uisce Éireann has adopted a policy of seeking ten-year planning permissions for major water and wastewater infrastructure projects going forward. This approach reflects the scale, complexity and strategic importance of such projects and recognises the extensive statutory, technical, environmental and procurement processes that are often required between the granting of planning permission and the commencement of construction. The delivery of large-scale water and wastewater infrastructure projects often extends beyond the standard permission period due to factors outside the control of the applicant.

In particular, project implementation may be affected by the need to acquire lands, easements and other property rights, including through compulsory purchase procedures where agreement cannot be reached. These processes can involve significant statutory timelines. In addition, commencement of development may be dependent on the completion of procurement processes, availability of suitably qualified contractors, detailed design development, the securing of additional environmental licences and consents, and the resolution of any legal or statutory challenges that may arise.

Uisce Éireann intends to commence construction of the proposed development as soon as possible following the grant of planning permission. However, given the strategic importance of the proposed development, the security of public funding for the project, and the range of statutory and regulatory processes that must be completed prior to construction, Uisce Éireann considers that a ten-year permission is both reasonable and necessary to facilitate the delivery of this critical infrastructure.

Accordingly, Uisce Éireann respectfully requests that the Planning Authority grant a ten-year duration for the proposed planning permission.

Project Context

2.1 Planning History and Project Background

On the 15th November 1996, as part of the Limerick Main Drainage Scheme, Limerick County Council granted planning permission to Limerick Corporation for the construction of a Wastewater Treatment Plant (WwTP) with a PE of 130,000 at Bunlicky, Limerick (ref. LCC 96/2230). The plant was designed to treat both domestic and non-domestic wastewater, with administration and other buildings, access road, outfall to the River Shannon and 2 no. pumping stations.

The scheme was constructed in the late 1990s and operational in the early 2000s. As part of the initial construction of the WwTP, significant upgrades to the sewer network were also carried out. This included approx. 45 km of large diameter interceptor sewers within Limerick City that discharge to the constructed pumping station at Corcanree, which is the main pumping station in the network, accounting for 90% of the flow. The second pumping station, Mungret PS, is located on the WwTP site.

Various improvement works have been undertaken subsequently 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.

Prior to 2022 Uisce Éireann was known as Irish Water. Irish Water’s 2017-2021 Investment Plan included 52 Wastewater ‘Above Ground’ (i.e. treatment) projects (bundled into nine separate Call Offs) which were identified nationally as requiring consultancy appointments to assist in progression of projects through the various Gates. The requirement for upgrade works had been identified to cater for future population growth and industrial development in the area. In November 2017, J B Barry and Partners Limited (now part of the Egis Group) and T J O’Connor Limited (TJOC) in association with RHDHV were appointed as consultants on Call Off 8 – Limerick as outlined below:

Project Oracle No	Project Title	Indicative Project Description
10015054	Limerick (Bunlicky) WWTP	Upgrade: Inlet, primary, secondary, sludge
10016965	Castletroy WwTP*	Upgrade: Primary, secondary, sludge

The Limerick WwTP Upgrade Project again formed part of Uisce Éireann’s 2020-2024 Capital Investment Plan with Uisce Éireann identifying that increased treatment capacity is needed in order to facilitate future development in Limerick. The existing Sludge Hub Centre (SHC) on site was also identified as the preferred location for the development of a Regional Bioresource Centre (RBC) to serve the south-western region in line with the National Wastewater Sludge Management Plan (NWSMP, 2016).

As the individual WwTP and RBC upgrade projects have interdependencies, they were merged by Uisce Éireann to be progressed as a single project, under a single planning application. Egis Group

was appointed to further develop the RBC feasibility study and design options, in combination with the WwTP upgrade design. This became the current Limerick Wastewater Treatment Plant Upgrade and Regional Bioresource Centre Project.

2.2 Existing Conditions



Figure 03: Existing WwTP

The existing Limerick WwTP operates as a Plug Flow Activated Sludge Plant and consists of the following elements:

- Mungret Pumping Station;
- Fine inlet screening complete with screenings removal, washing and compaction;
- Grit trap complete with classifier;
- Inlet flow measurement;
- Primary treatment tanks complete with chemically enhanced primary treatment;
- 3 no. plug flow rectangular aeration tanks with FBDA;
- 5 no. rectangular secondary clarifiers;
- 1 no. storm holding tank;
- Final effluent pumping station;
- Outfall to River Shannon;
- Sludge treatment facility;

- 2 no. anaerobic digestors;
- 1 no. 400kW CHP;
- 1 no. sludge drying facility;
- Sludge dewatering building complete with 3 no. centrifuges;
- Administration/Control Building;
- Emergency gravity overflow to outfall.

The existing Corcanree PS consists of the following elements:

- Pump station;
- Storm Tank;
- Outflow Chamber;
- Generator Building;
- Substation.



Figure 04: Existing Corcanree PS

2.3 Need for Upgrades

The existing plant and infrastructure are aging and currently operating at the limit of their design capacity. In addition, the existing stormwater storage tank capacity is insufficient resulting in a spill frequency in breach of the Urban Wastewater Treatment Directive (UWWTD) and latest Uisce Éireann Technical Standards. These factors coupled with the ambitious population growth target of an additional 44,000 residents for Limerick City and Suburbs between 2022 and 2040, in accordance with the First Revision of the National Planning Framework, are the key drivers for the expansion of the Limerick (Bunlicky) WwTP. Without intervention the projected growth of Limerick City and

Environs will not be deliverable due to WwTP capacity constraints, the WwTP will become overloaded in the coming years and the uncontrolled stormwater spills will continue to be in breach of environmental legislation. The Proposed Development is required to prevent the deterioration in the quality of the final effluent discharge, and any consequent negative effects on receiving water quality in the Shannon Estuary and SAC habitats.

Furthermore, there is an existing commitment to industrial licensees to provide capacity of 50,063 PE which is not being fully utilised. Full use of this allowance will cause the WwTP to exceed current treatment capacity. There is also an additional future industrial commitment of 27,500 PE if required. Alongside these commitments, in accordance with Uisce Éireann policy there is a requirement to provide 20% headroom on domestic, non-domestic and institutional loading.

In view of the above, the WwTP needs to be upgraded to reflect modern requirements and better cater for existing committed and future loads. Should the Proposed Development not be progressed it will directly and negatively impact upon future housing delivery, as well as economic and social development within its catchment area.

Separately, the existing Sludge Hub Centre at the WwTP has been selected as the preferred location for the development of a Regional Bioresource Centre to serve the south-west. This forms part of the National Wastewater Sludge Management Plan which aims to deliver a sustainable and standardised approach for wastewater sludge management. Indigenous and imported sludges will be treated with advanced anaerobic digestion (ADD) to become a 'Class A Biosolid', which is an organic recycled material that is biologically stable, free of contaminants and safe to re-use. Biogas produced as part of the treatment process will be used on site as source of renewable energy and will positively reduce the impact of the plant on the national grid supply.

Proposed Development

3.1 Development Overview

The Proposed Development makes provision for the upgrading of the Limerick (Bunlicky) WwTP, from its existing design capacity of 130,000 PE to 285,000 PE (including the 27,500 PE IDA allowance) with provision to meet the +25-year year growth projections of 325,000 PE. The Proposed Development includes stormwater storage upgrades to the Corcanree Pumping Station. In addition, it is proposed to upgrade 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.

3.1.1 Treatment Capacity

The Proposed Development is required to support future planned population growth and industrial development in the area, in line with population projections for Limerick as set out in the First Revision to the National Planning Framework, 2025 and the Regional Spatial and Economic Strategy for the Southern Region. It will ensure the WwTP continues to comply with Urban Wastewater Treatment Directive and Wastewater Discharge License requirements, while providing appropriate future treatment capacity and stormwater storage. The proposed upgrade design includes provision for 20% headroom allowance, in line with Uisce Éireann guidelines for large urban settlements.

It will provide for increased hydraulic and biological treatment capacity. Existing inlet works will be retained, and a new parallel inlet stream is proposed, designed for flows of up to 1,110 l/s. This facility will include modern screening systems with screenings removal, washing, and compaction, along with grit removal and flow measurement infrastructure. To improve operational resilience, a new odour control unit is also proposed. Downstream, the Conventional Activated Sludge (CAS) process will be maintained, while a new Advanced Granular Sludge (AGS) process stream will be developed to handle a 157,000 PE load. This includes two AGS tanks, each divided into five compartments, and a central water level control/sludge buffer tank. Supporting works will comprise upgrades to the final effluent pumping system and the integration of a new outfall pipe to the existing configuration.

3.1.2 Stormwater Management

A key component of the proposed upgrade is the provision of new stormwater storage facilities at the Corcanree PS. A 12,500 m³ storm tank is proposed, designed to meet Formula A compliance and recast standards of less than 4% dry weather flow spill. The tank will be circular, with a diameter of 30–40 metres and a depth of 10–15 metres, including three metres above ground to allow for tidal variation. It is proposed to re-direct four existing storm pumps to this new tank, with flow managed through both gravity overflow and variable-speed return pumping. Pumping capacity at Corcanree PS will be increased, with wet well 2 raised to 879 l/s and wet well 1 raised to 1,110 l/s, supported by an integrated control philosophy to balance flows between tanks. It is envisaged that the installation of this new stormwater storage tank will significantly reduce the annual rate of spills to the Lower River Shannon and make the WwTP compliant with the criteria outlined in the Department of

Environment Heritage and Local Government 'Procedures and Criteria for Storm Water Overflows, 1995'.

3.1.3 Regional Bioresource Centre

The development of the RBC will upgrade the existing Limerick Sludge Hub into a regional facility capable of treating both local and imported sludge. The works include the installation of a new imported sludge reception tank, a new dewatered sludge cake reception facility, and new mechanical thickening and polymer dosing systems. Existing digester feed tanks will be refurbished and integrated into the pre-Thermal Hydrolysis Process (THP) stream, supported by new dewatering centrifuges, storage silos, and odour control systems. The THP itself will be a central feature, enabling more efficient digestion and higher biogas yields. Supporting infrastructure will include options for an additional anaerobic digestion (AD) tank, biogas storage, combined heat and power (CHP) generation, and biomethane production. Finally, a new digested sludge tank and dewatering installation will be provided, alongside centrate return pumping designed to mitigate struvite formation risks, upgraded wash water systems, and new treated cake export facilities. Collectively, these works will ensure that the RBC is equipped to manage the projected 10+ year and 25-year sludge treatment demands for the region.

3.2 Development Description

In accordance with section 37E of the Planning and Development Acts (as amended) Uisce Éireann, gives notice that it proposes to seek the approval of An Coimisiún Pleanála for a period of 10 years for development off Dock Road, Ballykeeffe, Corcanree and Courtbrack (townlands), Limerick.

The development comprises upgrades to Limerick Wastewater Treatment Plant (WwTP) and Corcanree Pumping Station (PS) which include an increase in the capacity of the existing WwTP, the provision of additional stormwater storage capacity at Corcanree PS and the upgrading of the existing Limerick Sludge Hub to a Regional Bioresource Centre (RBC). The proposed upgrades to the Corcanree PS include a new stormwater storage tank and return pumping station, tank cleaning system, overflow screen, and upgrades to stormwater and foul pumping infrastructure.

The proposed upgrades to the Limerick WwTP consist of the construction of a new second parallel biological process stream which includes: new Aerobic Granular Sludge (AGS), influent buffer, sludge buffer and discharge tanks; new inlet works incorporating screens, grit traps, grit classifiers, air blowers, and odour control equipment; chemical dosing tank; transformer; Motor Control Centres (MCC) kiosks; upgrades to the existing final effluent pumps; and associated rising main and gravity outfall pipework connections and diversions.

The proposed upgrading of the existing Limerick Sludge Hub to a Regional Bioresource Centre comprises of the following: reuse of existing primary sludge tanks for sludge imports; new sludge reception building and pipe bridge structure; MCC kiosk; new pre-Thermal Hydrolysis Plant (THP) silo; repurposing of the existing sludge building as a THP building to include the installation of THP unit(s) and ancillary equipment; sludge screening platform and skips (covered); repurposing of the existing pre-digester sludge tanks to pre-THP blending tanks; increasing height of the existing post-digester sludge tanks and new tank covers; new thickened sludge storage tank and cover; Combined Heat and Power (CHP) unit and associated plant; new anaerobic digester tank and biogas membrane cover; gas bell storage; new sludge dewatering building with thickeners, polymer dosing and biosolids dewatering installations; silo storage for biosolids cake export; an upgraded wash

water system; Liquor Treatment Process (LTP) tank and LTP buffer tank; transformer; and replacement of existing thermal oxidiser with new odour control equipment.

The proposed development also includes site lighting (both task and internal access road lighting); landscaping; surface water drainage measures to include Sustainable Drainage Systems (SuDS), internal roads, parking and hardstanding areas and all associated and ancillary site development works including excavation works above and below ground.

The project will be constructed in the Limerick City and Environs Agglomeration area licenced under the Waste Water Discharge (Authorisation) (WWDA) Regulations 2007 (Licence D0013-01). This application relates to a proposed development which requires a review of the existing WWDA Licence.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and will be submitted to the Planning Authority with the application.



Figure 05: Proposed Development at Limerick WwTP

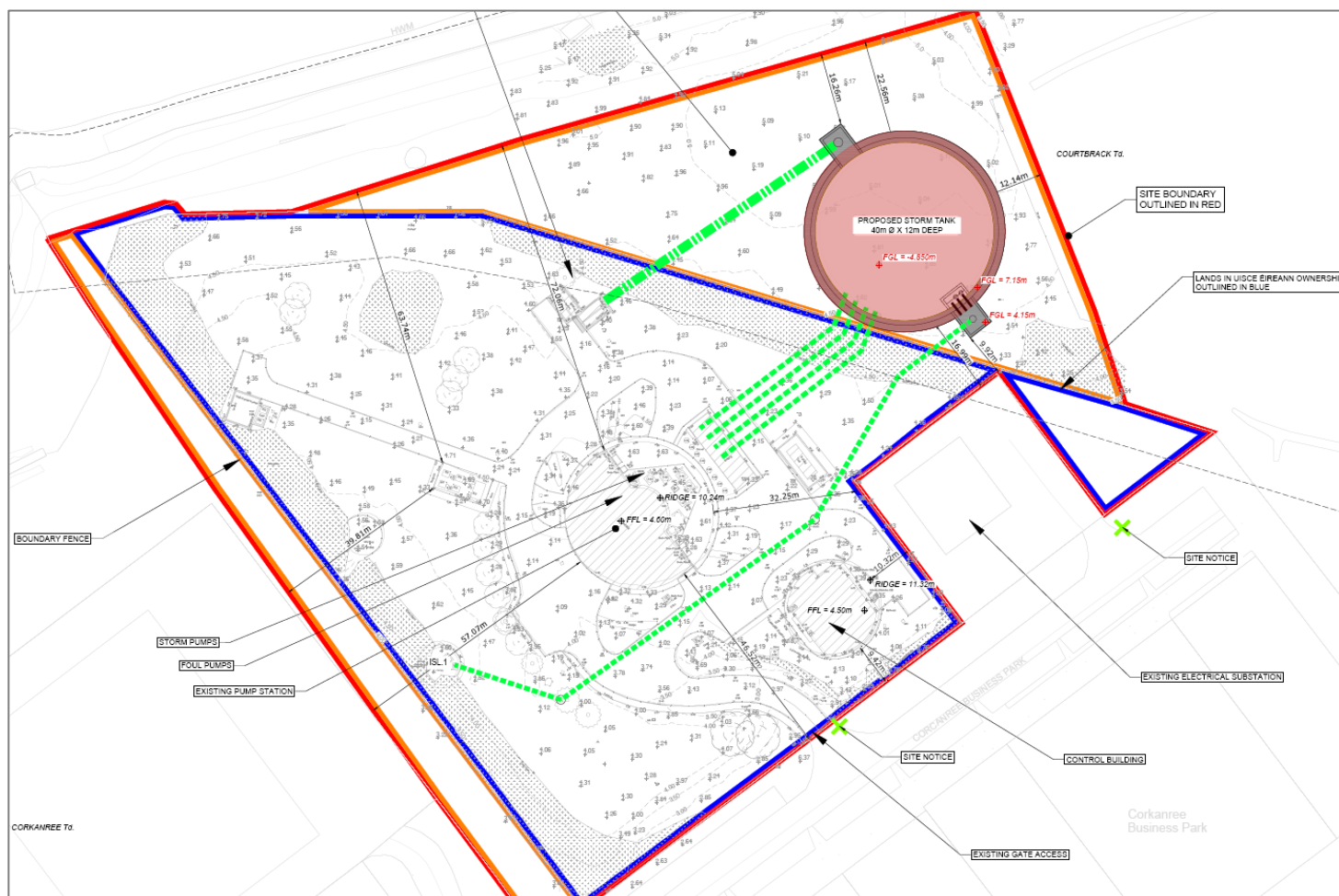


Figure 06: Proposed Development at Corcanree PS

3.3 Commissioning and Construction

The proposed works will be undertaken on the basis of a construction contract which will be awarded following a full procurement process, to be undertaken pursuant to any grant of planning permission.

The duration of the construction phase for the civil works on the subject lands is anticipated to span a period of 36 - 48 months. This process will be governed by strict environmental controls, as well as health and safety procedures. A Construction and Environmental Management Plan (CEMP) accompanies this application (Appendix 4.1 EIAR). It sets out a detailed suite of environmental protection measures to be implemented on site during the construction phase. The CEMP identifies 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. The CEMP specifically outlines how to address these and to provide solutions which are satisfactory to all concerned. Having regard to this, contract-specific CEMPs will be further prepared by the Contractor (subject to Client approval) at construction stage.

To facilitate the works areas, a construction compound to the north of the WwTP will be used by the contractor. The CEMP sets out appropriate environmental management measures that will be implemented at the construction compound. Following construction; the compound area will be cleared and reinstated to match pre-existing conditions.

A detailed Construction Traffic Management Plan (CTMP) will be prepared by the contractor(s) in advance of any works taking place on site and submitted to Limerick City and County Council for approval. The application identifies haul routes to/from the WwTP and PS sites, which will be managed to minimise the potential for impacts in the local environment, whilst allowing current plant operations to continue as normal, particularly the transportation of sludge.

Legislative and Planning Policy Context

Chapter 5 of the accompanying EIAR sets out in detail the legislative context governing the planning and development of the proposed project. This section of the statement provides a summary of key guiding provisions.

4.1 European Context

4.1.1 Urban Wastewater Treatment Directive (91/27/EEC)

The Urban Wastewater Treatment 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.

On 1 January 2014, the management of urban wastewater collection and treatment infrastructure transferred from local authorities to Uisce Éireann. Compliance with the requirements of the directive is monitored by the Environmental Protection Agency (EPA).

The licensing or certification of wastewater discharges was introduced in 2007 under the Wastewater Discharge (Authorisation) Regulations 2007. The regulations identify the EPA as the regulator that authorises discharges from wastewater treatment plants.

Larger wastewater treatment plants are licensed, whereas smaller plants are subject to certification. The licenses set out conditions and remedial actions to be taken to ensure compliance with standards for various substances' discharges. Licenses also outline the actions needed for meeting obligations under a number of EU environmental Directives.

4.1.2 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, inter alia, prevent further deterioration of and enhance the status of aquatic ecosystems; promote sustainable water use based on a long-term protection of available water resources; enhance, protect and improve the aquatic environment through measures such as 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.

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

Transposed into Irish Legislation, through the European Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I. 296 of 2018), the EIAR that accompanies this application has been prepared in accordance with the provisions of this directive, which has been transposed into Irish legislation by the Planning and Development Acts 2000 [as amended] (the "Planning Acts"), the Planning and Development Regulations, 2001 (as amended) and the European

Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I. 296 of 2018).

4.1.4 Birds and Natural Habitats Directives

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 establishes the EU wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments. An Appropriate Assessment (AA) Screening Report carried out for the proposed development, in line with this legislative requirement, concluded that there was a possibility of significant effects to Natura 2000 sites and that a Natura Impact Statement (NIS) should be prepared. The accompanying NIS was carried out in accordance with the Directive.

4.1.5 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. The requirements under the directive have been transposed into Irish planning law and legislation governing other environmental licenses and consents. All associated statutory obligations have been considered in full as part of the preparation of the subject application.

4.2 National Context

4.2.1 Section 37A of the Planning and Development (Strategic Infrastructure Act) 2006

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 An Coimisiún Pleanála under section 37E and not to a planning authority.

Section 37A(2) of the Act includes guiding criteria to determine if a project qualifies as strategic infrastructure development. It states that the Board 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 planning guidelines in force in respect of the area or areas in which it would be situate,

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

The Seventh Schedule identifies applicable infrastructure developments for the purposes of Sections 37A and 37B.

Part Three of the Seventh Schedule includes the following under the heading of Environmental Infrastructure.

Development comprising or for the purposes of any of the following:

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

As outlined, it has been determined by An Coimisiún Pleanála that the proposed development meets the definition of 'strategic infrastructure development'.

4.2.2 Project Ireland 2040 – National Planning Framework

The National Planning Framework (NPF) 2018 outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The stated 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 recognizing Dublin's ongoing key role.

Water Infrastructure is listed as a strategic investment priority in the NPF. National Policy Objective 63 seeks to:

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.

National Strategic Outcome 9 includes the stated aim to:

Increase compliance with the requirements of the Urban WW Directive from 39% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040.

The NPF establishes targeted growth objectives for the Southwest Region including the addition of 340,000 – 380,000 people and 225,000 additional jobs by 2040. An uplift in the population of 50,000 – 55,000 persons in Limerick City and Suburbs is included within this.

National Policy Objective	Southern Region
1. Growing Our Regions	+ 340,000 - 380,000 people (2m total) +225,000 in employment (880,000 total)
2. Building Stronger Regions: Accessible Centres of Scale	Limerick City and Suburbs: +50,000 - 55,000 people (at least 145,000 total)
3. Compact, Smart, Sustainable Growth	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints. 30% all new housing elsewhere, within existing urban footprints.

Table 1 - Extract from Table 2.1 of the National Planning Framework

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 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 .

4.2.3 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 Framework's intention to achieve its vision by developing a region-focused strategy for managing growth in line with the National Development Plan. 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 2040, an increase of 44,000 residents from the 2022 Census population.

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.

In respect of the proposed development, the First Revision includes the following amongst the key future growth enablers for Limerick:

"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".

4.2.4 Water Services Strategic Plan 2015 – 2040

The Water Services Strategic Plan (WSSP) sets out strategic objectives for the delivery of water services over the next 25 years up to 2040. '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 identifying priorities, it has taken into consideration national and regional strategic plans such as the National Spatial Strategy and River Basin Management Plans. The plan is subject to a 5 year review programme. It's strategic objectives are:

- Meet Customer Expectations
- Ensure a Safe and Reliable Water Supply
- Provide Effective Management of Wastewater
- Protect and Enhance the Environment
- Support Social and Economic Growth
- Invest in our Future

4.2.5 Water Services Policy Statement 2024-2030

The Policy Statement builds on the work of the previous Statement, prepared under the Water Services Act 2017, with the purpose of establishing objectives and priorities to provide a framework for Uisce Éireann to consolidate and develop water and wastewater services through its Strategic Funding Plan.

Key objectives for water services to 2030 are:

Availability & Reliability: water services will support regionally balanced economic and social development through accessible, dependable and reliable water services

Safety & Quality: water services will be safe and protect human health

Sustainability: water services will be efficient, resilient and sustainable in the long term

Under these objectives the Statement identifies priorities which include:

- Investing to maintain existing water services.
- Planning and delivering new capacity – specifically referencing wastewater capacity requirements to support housing and economic development in the major population centres, in line with 28 growth priorities set out in the National Planning Framework.
- Effective regulatory oversight of water services.
- Decarbonise the energy and materials used in water services.
- Implementation of the Programme of Measures in River Basin Management Plans. A priority objective of this Government is to bring wastewater services to full compliance with the Urban Wastewater Treatment Directive and wastewater discharge authorisation requirements.

4.2.6 Uisce Éireann Capital Investment Plan –2020 - 2024 (RC3) and 2025 – 2030 (RC4)

The Capital Investment Plan 2020-2024 is Uisce Éireann's 5 year investment plan for water and wastewater assets and infrastructure. Uisce Éireann has an approved amount of €5.35 billion to invest in public water and wastewater infrastructure between 2020 and 2024. The Plan sets out where they intend to prioritise this investment to deliver the most urgently needed improvements in drinking water quality, leakage reduction, water availability, wastewater compliance, efficiencies and customer service. Uisce Éireann has had regard to national policies and plans such as the Water Services Policy Statement 2018-2025, Project Ireland 2040, River Basin Management Plan 2018-2021 in determining where investment should be prioritised (or which have a dependence on the public water and wastewater infrastructure such as housing policies, job growth policies, and climate action plans). Compliance with regulatory standards and policies was also a key consideration. Completion of commenced projects were priorities. New projects were included based on three criteria:

- Strategic priorities;
- Tactical priorities;
- Operational priorities.

Limerick (Bunlicky) WwTP project is included amongst six Limerick-based projects.

The current regulatory cycle covers Revenue Control 4 (RC4), which runs from 2025 to 2029. This sets out a multi-annual strategic funding plan requiring €16.9 billion to 2029, which includes an estimated €10.3 billion in infrastructure investment and €6.6 billion in operational costs. All projects and programmes in the latter are subject to regulatory approval by the CRU, the availability of Government funding, and Uisce Éireann's internal governance processes. Limerick (Bunlicky) WwTP project is included amongst twelve Limerick-based projects, with the strategic aim to facilitate growth. The upgrade works to the 2 no. Primary Sludge Balancing Tanks at the WwTP which are currently being undertaken are also listed as 'Interim sludge works', with the strategic aim to protect the environment.

4.2.7 Climate Action Plan

The Department of the Environment, Climate and Communications published the Climate Action Plan 2025 in April 2025 which sets out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. A key pillar of the plan is achieving the transition to a more circular, less wasteful economy through the designing out of waste and supporting processes for reuse.

4.2.8 National Wastewater Sludge Management Plan

The National Wastewater Sludge Management Plan (NWSMP) sets out a nationwide standardised approach to ensure that treated wastewater sludge is effectively managed, stored, transported, and re-used in a sustainable way, to safeguard public health and the environment. The implementation of the NWSMP provides a framework and standard for the sustainable management of wastewater sludge from treatment to reuse. It identifies Limerick (Bunlicky) WwTP site as the preferred location for a Bioresource Centre to serve the Southwest Region.

4.3 Regional Context

4.3.1 Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy for the Southern Region (RSES) is a 12-year strategic regional development framework to guide development in the region. It establishes a broad framework for the way in which society, environment, economy and the use of land should evolve.

The Strategy indicates that collaboration between national, regional and local public bodies is crucial to ensuring our water and environmental resources are managed properly for the future, including incorporating a circular economic approach.

The RSES seeks the provision of infrastructure and services in a sustainable, planned and infrastructure led manner to ensure the sustainable management of water, waste and other environmental resources. The key Regional Policy Objectives (RPOs) relating to wastewater include:

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 Uisce Éireann 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.

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, though 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).

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.

The RSES includes a number of guiding principles to realise the vision for the MASP, which includes enabling infrastructure, including identifying infrastructure capacity issues and ensuring water services needs are met. This is underpinned by Limerick Shannon MASP Policy Objective 4:

Investment to Deliver Vision

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

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.

Section 7.2 of the RSES promotes the consolidation and densification of housing and regeneration in Limerick City and Suburbs, with the delivery of key supporting infrastructure commensurate with development formalised under Limerick Shannon MASP Policy Objective 10.

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

4.4 Local Context

4.4.1 The Limerick Development Plan 2022 -2028 (LDP)

The Limerick Development Plan 2022 -2028 (LDP) came into effect on the 29th of July 2022 and is the principal planning strategy document for the development of Limerick City and County.

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...".

Alongside this Strategic Objective 7 aims to: *"Protect, enhance and ensure the sustainable use of Limerick's key infrastructure, through the provision of support to utility providers including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation. This plan will also foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible".*

Objective IN 06 Water services states that it is an objective of the Council to:

- a) Support Uisce Éireann in the provision of water and wastewater infrastructure and services in accordance with the Service Level Agreement, until such time as the Agreement is terminated.*
- b) Collaborate with Uisce Éireann in the protection of water supply sources to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change.*
- c) Liaise with Uisce Éireann during the lifetime of the Plan to secure investment in the provision, extension and upgrading of the piped water distribution network and wastewater pipe network across Limerick City and County, to serve existing population and future population growth and sustain economic growth, in accordance with the requirements of the Core and Settlement Strategies.*
- e) Ensure that development proposals connecting to the public water and/or wastewater networks, now or in the future comply with Uisce Éireann Standard Details and Codes of Practice. Where relevant ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.*

Section 8.5.3 of the LDP notes that:

Uisce Éireann's 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 Uisce Éireann 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 09 Public Waste Water states that it is an objective of the Council to:

- a) Ensure adequate and appropriate wastewater infrastructure is available to cater for existing and proposed development, in collaboration with Uisce Éireann, to avoid any deterioration in the quality of receiving waters and to ensure that discharge meets the requirements of the Water Framework Directive.*

Chapter 12 of the LDP sets out the land use zoning strategy. The existing WwTP and PS sites are zoned 'Utilities' to:

'To provide for the infrastructural needs of transport and other utility providers'.

The stated purpose of this zoning '...provides for and preserves land for the provision of services such as electricity and gas networks, telecommunications, the treatment of water and wastewater etc'.

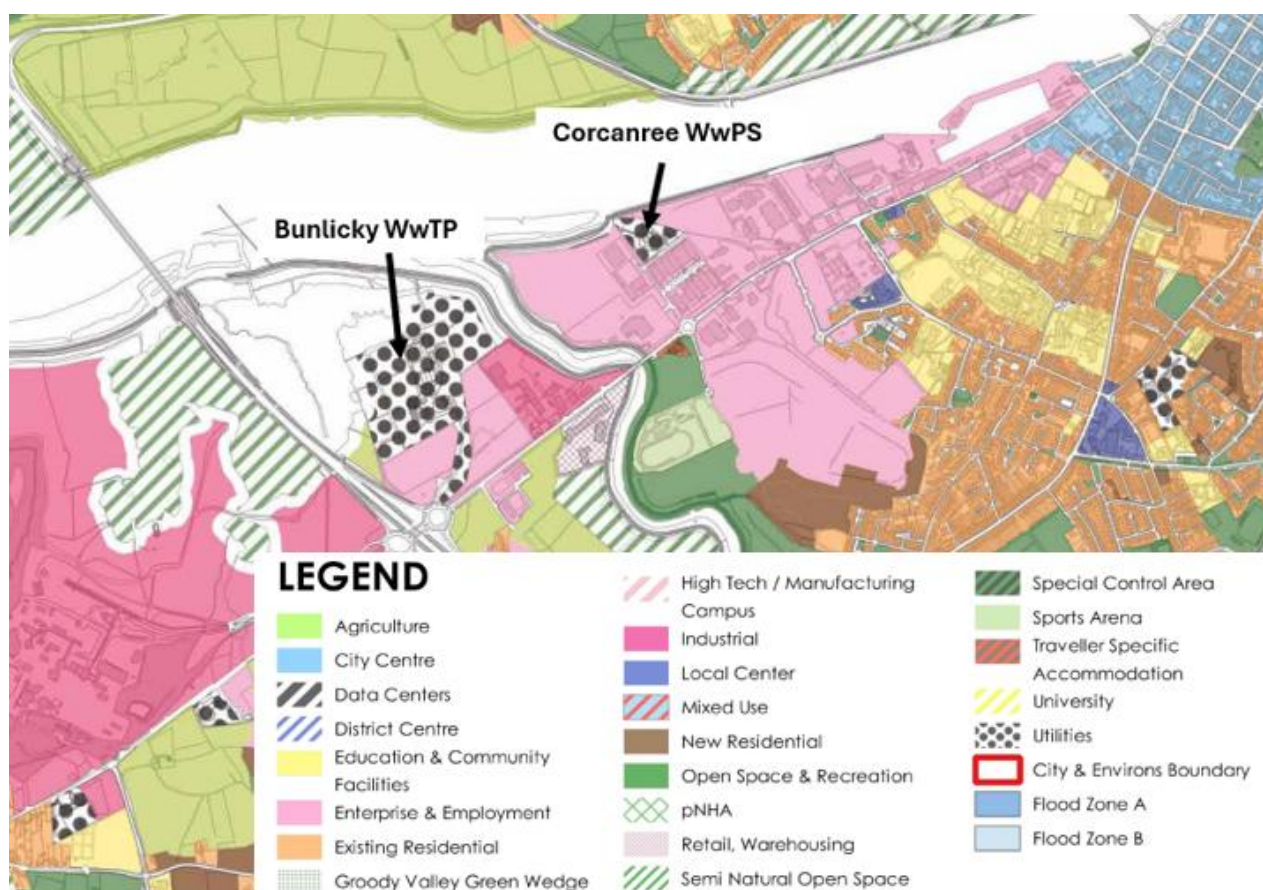


Figure 07: Limerick Site Zoning Context

The lands within the red-line boundary to the east of the existing Corcanree PS are zoned 'Enterprise & Employment'. The land use zoning matrix in the LDP does not preclude the development of utilities on such lands, including the extension of adjoining utilities sites, as per the proposed development. This policy position has been corroborated with Limerick City and County Council.

4.4.2 The Clare County Development Plan 2023 -2029 (CCDP)

As outlined, and while the entirety of the Proposed Development works are contained within the administrative area of Limerick City & County Council, the agglomeration for the operational development does include some focused areas in County Clare.

The CCDP sets out 20 key Goals through which the vision for the County will be realised. Amongst these is:

Goal X: A county that supports strong economic growth and a high quality of life for all residents through the provision of efficient and robust physical

infrastructure whilst having regard to environmental responsibilities and complying with European and national legislation.

Section 3.4.3 'Settlement Hierarchy and Strategy' of the CCDP notes that the population targets in the Core Strategy Table should be used as a framework for the provision of water and wastewater services in the county, with the important role of the Limerick-Shannon Metropolitan Area Strategic Plan in the settlement hierarchy highlighted.

Section 11.4 of the Plan notes that the provision of a good quality water supply and effective wastewater disposal infrastructure are critical requirements for the future economic development, quality of life and sustainable growth of the County. Development Plan Objective CDP 11.29 set out that it is an objective of Clare County Council:

a) To work closely with Uisce Éireann to identify and facilitate the timely delivery of the water services required to realise the development objectives of this Plan.

Key Planning Considerations

5.1 Principle of Development

The proposed development is supported by statutory provisions and policy objectives, at national, regional and local level as evidenced in Section 4 of this statement.

The National Planning Framework (NPF) fulfills a strategic role of guiding national, regional and local planning policies and investment decisions up to 2040. In its own words, it represents a 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 at least 50% to 2040 with an objective to enhance its significant potential to become a city of scale. A core element of the framework 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. This can only be realized through planned growth, ably supported by infrastructure. The Southern Regional Spatial Economic Strategy (RSES) builds on this through the designation of the Limerick Shannon Metropolitan Area as the primary driver of growth in the mid-west region, where it is recognised again that the achievement of growth is contingent on enabling infrastructure, including an increase in wastewater capacity.

Of note in this regard is the fact that Limerick City is serviced principally by two wastewater treatment plants only, namely Limerick (Bunlicky) and Castletroy. The subject project can be viewed as an important prerequisite to achieve the 50% population growth in Limerick City and Suburbs by 2040. The strategic importance of the proposal to the region is evident in this respect as it will more than double the capacity of the WwTP, underpinning planned growth.

Alongside this, deficiencies associated with the existing plant have led to non-compliance with its EPA Licence Conditions in recent years. The WwTP needs to be upgraded to reflect modern requirements and better cater for existing committed and future loads, in compliance with the Urban Wastewater Treatment Directive. Furthermore, and as outlined in Section 4.3 of this document, the RSES includes a number of general policy objectives such as RPO 211, RPO 212 and RPO 214, related to support of Uisce Éireann's water/wastewater infrastructure investment programmes and elimination of untreated discharges, which the subject project will contribute to the fulfillment of directly.

In the local context, the principle of the proposed development is supported in land use terms. The principle of the proposed development is also in line with LDP Strategic Objectives SO1 and SO7 which relate to growing the Limerick economy and protecting, enhancing and sustainably using key infrastructure. The proposal is also consistent with infrastructure objectives IN06 and IN09 which set out to support the role of Uisce Éireann in terms of provision and appropriate updating of wastewater infrastructure to accommodate projected growth and safeguard the receiving environment.

Similarly, the proposed development is supported by the goals and objectives of the Clare County Development Plan (CCDP). The proposed upgrading and increased capacity of the Limerick WwTP

is in line with Goal X of the CCDP which sets out to support strong economic growth and a high quality of life for all residents through the provision of efficient and robust physical infrastructure whilst having regard to environmental responsibilities and complying with European and national legislation. It is also consistent with objective 11.29 of the Plan which set out to facilitate Uisce Éireann in the delivery of water services provision.

At the highest national level, the importance and support for the Proposed Development is reflected in its recent designation as ‘critical infrastructure’ under the Critical Infrastructure Act, 2026. The designation means the Proposed Development is of strategic national importance, recognising the essential role it will play in achieving national policy priorities, particularly housing growth.

5.2 Environmental Impact Assessment Report

The subject application is accompanied by an EIAR. The Seventh Schedule of the Planning and Development Act 2000, as amended, categorises development which are of strategic economic or social importance. It includes the following class of development, under the heading ‘Environmental Infrastructure’:

A waste water treatment plant with a capacity greater than a population equivalent of 10,000 and, for the purpose of this provision, population equivalent shall be determined in accordance with Article 2, point 6, of Council Directive 91/271/EEC.

For development coming under the Seventh Schedule (including the proposed development), An Coimisiún Pleanála (ACP) must consider whether the development meets the criteria listed in Section 37A(2) of the Act, and must determine, following consultations under Section 37(B) of the said Act, whether or not the proposed development is deemed to be Strategic Infrastructure Development (SID).

It was determined by ACP on 19 June 2026 that the proposed development is considered ‘Strategic Infrastructure Development’ in accordance with Section 37A of the Act. Consequently, the consent application for the proposed development will be made to ACP, under Section 37E of the Act. A requirement of the Section 37E application process is that the application should be accompanied by an Environmental Impact Assessment Report.

5.2.1 EIAR Team

Article 5(3)(a) of amended EIA Directive (2014/52/EU) (EIA Directive) states that ‘the developer shall ensure that the environmental impact assessment report is prepared by competent experts’. The EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022 highlights the need for competent experts to be involved in the EIA process and in the preparation of the EIAR.

The EIAR for this project has been prepared by Egis with additional specialist input provided by competent experts in a variety of disciplines. Responsibility for individual sections of the EIAR is as listed in the table below. A description of experts who have contributed to this EIAR, their qualifications, experience and any other relevant credentials is provided in each individual section of the accompanying EIAR.

EIAR Section	Consultant
Non-Technical Summary	Various

Introduction	Egis
Assessment of Alternatives	Egis
Description of Proposed Development	Egis
Construction Strategy	Egis
Planning and Policy	HW Planning
Traffic and Transport	Egis
Odour	TMS
Air Quality	AWN Consulting
Climate	AWN Consulting
Noise and Vibration	Aona Environmental
Archaeology, Architectural and Cultural Heritage	Archaeological Consultancy Services Unit
Biodiversity (Terrestrial and Aquatic)	MKO & Aquafact
Landscape and Visuals	JBA Consulting
Land and Soils	Egis
Water	Egis
Resource and Waste Management	Egis
Material Assets	Egis
Population and Human Health	HW Planning
Major Accidents and Natural Disasters	Egis
Cumulative Effects and Interactions	Egis
Summary of Mitigation and Monitoring	Egis
Overall Co-ordination and Management of EIAR	Egis

5.2.2 EIAR Findings

Please refer to the EIAR, supporting appendices and non-technical summary for the environmental report's key findings. On the basis of the assessment of potential impacts and the recommended mitigation measures in the EIAR, it has been determined that the proposed development is not likely

to impose any significant adverse effects on the environment. The majority of impacts on the environment are either non-existent or of imperceptible/slight significance.

5.3 Water Quality

The Water chapter of the accompanying EIAR assesses the potential impacts likely to occur as a result of the proposed development on the receiving water environment, in terms of hydrology, surface water quality and flood risk.

The construction phase of the proposed development at the Limerick WwTP site poses a potential risk of negatively impacting surface water quality in respect of the receiving environment. However, with the implementation of the mitigation measures outlined in the chapter and adherence to a robust Construction Environmental Management Plan (CEMP), no significant impact on Bunlicky Lake, Ballinacurra Creek, or downstream environments is anticipated.

At the Corcanree PS site the storm tank construction works will take place c. 50m from the Shannon Estuary channel, with a portion of the site lying within a mapped coastal flood zone. These conditions have the potential to support sediment mobilisation and uncontrolled runoff if water management measures are not implemented. Again, with the controls outlined in the chapter in place, the construction of the storm tank will not result in significant effects on the Shannon Estuary or the surrounding water environment.

In terms of the operational phase, the main characteristics will include implementation of site drainage and SuDs measures; an improvement in the quality of treated effluent with reduced pressure on the existing system and new process stream in place; and addition of 12,500m³ stormwater storage capacity, which will greatly reduce uncontrolled spills to the Shannon Estuary. Overall, the chapter concludes that predicted impacts are localised and consistent with Water Framework Directive objectives and the protection of designated sites. In accordance with EPA Guidelines (2022), the Proposed Development is considered to result in a long-term imperceptible to neutral impact on water quality, i.e. an effect that alters the character of the environment without affecting its sensitivities.

5.4 Odour and Air Quality

The EIAR includes chapters on Odour and Air Quality to assess the potential impact of the proposed upgrade on the residential and commercial receptors in the vicinity of the proposed development site. The odour assessment considers that while the construction stage has potential for some release of odour emissions, the effects are assessed as either brief or temporary and all potential effects are assessed as imperceptible or not significant.

There is some potential for odour emissions to arise during the Operational Phase of the Proposed Development. However, the completed dispersion modelling assessment demonstrates that odour nuisance will not occur beyond the site boundary. Effects are assessed as either brief or temporary and all potential effects are assessed as not significant.

The impact to air quality from construction phase activities emitting dust is assessed at sensitive receptors within 250m of the development boundary, although in practice, it is accepted that the majority of dust deposition occurs at 50m. Of the 45 no. sensitive receptors assessed, only 4 no. are residential and all of these are more than 200m from the site boundary. The remaining receptors are commercial or industrial, with no significant impacts identified. Designated ecology sites in proximity have also been assessed. With identified mitigation in place, impacts will be short-term, direct,

localised, negative and not significant in nature. The operational impacts are considered imperceptible.

There is no mitigation required for the operational phase of the proposed development as impacts to air quality are predicted to be imperceptible.

5.5 Noise and Vibration

The noise assessment carried out as part of the enclosed EIAR notes that there is potential for temporary and intermittent increases in noise levels during the construction phase of the proposed upgrade at the nearest residential properties arising from activities such as truck movements of excavated and construction materials, excavator, loader and concrete mixer noise sources and sheet-piling and heavy goods vehicle (HGV) movements. However, a worst-case assessment of construction noise indicates that there will be no exceedance of the daytime construction noise limit of 65 dB LAeq, at any noise sensitive receptors in the area. The construction phase noise impact at the identified sensitive receptors is therefore predicted to be a negative, slight, short-term impact. No construction phase vibration impacts are anticipated.

The operation of the existing Limerick WwTP and Corcanree PS site currently has no significant impact on noise levels at existing residential properties in the surrounding area. The potential for additional noise impacts during operations extends to vehicular traffic and additional plant operations. The operational WwTP will not generate a significant number of site traffic movements in terms of both staff cars and sludge tankers, as such, will not result in any significant noise impacts. Assessed against the existing operational facility, the noise prediction model of the operational development confirms the upgraded plant will result in a worst-case noise level increase of <3 dB(A) at all receiver locations. This is not a significant noise level and in terms of the Institute of Environmental Management & Assessment classification of impact from the change in sound levels the Proposed Development will result in a Negligible, Not Significant, Long-Term Impact.

5.6 Traffic and Transport

The EIAR traffic and transportation chapter has also assessed the potential traffic related impacts associated with the construction and operation of proposed WwTP upgrade works. The analysis indicates that construction traffic from the proposed development will have a slight negative short-term impact on the surrounding road network. It proposed that a temporary traffic management plan will be developed for Council approval in relation to the use of the access roads to/ from the site. A suite of mitigation measures are proposed in the EIAR Traffic and Transportation Chapter and the Construction and Environmental Management Plan to minimise any potential impacts. Having regard to this, there will be no potential for any significant impacts in the local environment.

During present operations, there are 24 trips per day (of which 10 trips for sludge imports, 1 trip for sludge export and 13 trips for leachate/water waste imports) for HGVs, and 8 trips for staff vehicle (of which 6 trips relate to the Limerick WwTP Site and 2 trips relate to the Corcanree PSt site). Additionally, the proposed regional bioresource centre development is consistent with the objectives of the National Wastewater Sludge Management Plan, which promotes the consolidation of sludge treatment at regional centres. By rationalising sludge transport across the wider region, the hub is expected to improve overall transport efficiency and reduce CO₂ emissions, delivering a net positive effect on regional sludge movements, despite small increases in site-level activity. Overall, it is anticipated that during operational phase, there will be in total 34 trips per day (of which 14 trips for sludge imports, 7 trips for sludge export and 13 trips for leachate / water waste imports)

for HGVs, and 10 trips for staff vehicle (of which 8 trips for the Limerick WwTP Site and 2 trips for the Corcanree PS Site) in both the morning and evening peak hours. As such, the estimated additional trips as a result of the Proposed Development will be in total 10 trips per day for HGV, and 2 trips for staff vehicle in both the morning and evening peak hours. The estimated additional trips associated with the Proposed Development will be less than 1.6% of the existing traffic flows on the adjoining road network. The operational phase is anticipated to result in a negligible, increase in traffic volumes on the surrounding road network.

5.7 Cultural Heritage

As part of the accompanying EIAR an Archaeology, Architecture and Cultural Heritage assessment was carried out on-site. The proposed development sites contain no Protected Structures or features recorded in the National Inventory of Architectural Heritage (NIAH). While a slight visual impact is predicted on the nearest such site, Spillane's Tower (PS ID 3258; NIAH Reg. No. 21527001), given the existing presence of the Corcanree PS and the tree cover present, the additional effect arising from the Proposed Development is considered to be negligible. Cartographic sources indicate the presence of a previously unrecorded townland boundary within the Corcanree PS site. While no evidence of remains of the embankment was recorded during a site visit, there is potential for a direct effect on previously unknown archaeological heritage by uncovering subsurface remains during the construction phase. Therefore, proposed mitigation measures include archaeological monitoring of all groundworks by an experienced, licence-eligible archaeologist working under licence from the Department of Housing Local Government and Heritage, and recording of any subsurface remains. Following the implementation of these mitigation measures the residual construction phase effects are assessed as imperceptible. No significant operational phase effects were identified.

5.8 Landscape and Visual

A Landscape and Visual Impact Assessment has been completed for the proposed development. The assessment notes that construction will be contained entirely within the existing WwTP and PS sites. Due to the existing mature vegetation surrounding both sites and existing building on site, views of construction activities and associated materials, machinery, and personnel will be intermittent, experienced primarily through glimpse views from the riverside walk visiting the Spillane's Tower by the Corcanree PS, or surrounding buildings. Temporary removal of a maximum of 5m of vegetation is proposed for site access, but this will be reinstated. Removal of the tree line between existing and new areas at Corcanree PS will be permanent, but a new tree line on the outer perimeter of the new site will compensate loss and provide screening. Short-term, reversible and no significant potential effects on landscape character are expected to arise from the proposals during the construction phase.

In terms of visual amenity, a number of receptor groups were identified including residential, community, open space, commercial, town centre and protected focal points and views. During the construction and operational phases, the potential effect on all receptors, with the exception of Mungret Community College, was deemed to be slight or imperceptible. With regard to the protected view from Mungret Community College to the Monastic Complex, the potential construction and operational phase effects are assessed as moderate and negative.

However, in addition to the reinstatement of removed vegetation, further tree and herbaceous planting is proposed aiming to increase the baseline provision of habitat following the recommendations of the project ecologist. With the implementation of the proposed planting, it is

expected that there will be long-term positive impacts to landscape and visual amenity. These measures are expected to reduce further any visual impacts to the assessed visual receptors in the long term as vegetation reaches maturity.

Overall, the consistent presence of screening elements and the integration of the proposed development within an already developed and visually complex landscape ensure that there would be no significant adverse visual effects arising. The uniform assessment of permanent, imperceptible negative impacts across all viewpoints confirms that the proposed development will not materially alter the existing visual environment.

5.9 Flood Risk

Appendix 16.2 of the accompanying EIAR includes a Stage 2 Flood Risk Assessment (FRA) prepared by Egis. It notes that the development sites are located on the banks of Limerick Dock which is a transitional waterbody predominantly governed by tidal movements. The WwTP site has no history of flooding. A single flood event was recorded in relation to the Corcanree PS site, which CFRAMS shows as partially impacted with the northern portion of the site lying within Flood Zone B where there is a moderate risk of tidal flooding. The FRA notes that both the WwTP and the PS sites are in a “Defended Area” indicating that the sites benefit from existing embankments, drainage schemes or flood defenses. Excluding defenses, the Limerick Strategic Flood Risk Assessment identified both sites as located in Flood Zone A, where the probability is greater than 0.5% or 1 in 200 year for coastal flooding.

The FRA categorises the Proposed Development at the WwTP and the PS as ‘*highly vulnerable development*’. Due to the vulnerability and flood zoning assigned to each site, they were both subject to a Justification Test. This concludes that when the need for development, the lack of other suitable sites and the mitigation measures recommended are combined the proposed development is appropriate in flood risk terms and will not increase flood risk either on-site or elsewhere.

It is noted that in response to the Shannon CFRAM study, Limerick City & County Council, in partnership with the OPW, have developed the Limerick City & Environs Flood Relief Scheme (FRS) to mitigate flood risks in and around the Limerick area. Measures to be implemented under the scheme include protection that satisfies the 1% AEP fluvial flood event and the 0.5% AEP tidal flood event.

The FRA includes a series of mitigation measures which include:

- the use of flood-resistant or resilient construction techniques to prevent or minimize flood damage and support quick recovery.
- design coastal flood levels using the 0.5% AEP MRFS flood level and allowance for freeboard (300mm), resulting in the values of +5.64 mOD for the WwTP site and +5.61 mOD for the PS site. All sensitive infrastructure such as electrical equipment and open channel and tank walls are at or above the design flood level to mitigate flood risk.

Other mitigation measures include safeguarding site access, inclusion of SuDS and flood resilience measures and construction management measures.

It has been robustly demonstrated that with the implementation of flood risk mitigation measures recommended, it is considered that the risk of flood damage to the proposed infrastructure and to operators will be minimised.

5.10 Sludge Disposal

The application includes a Resource and Waste Management assessment. Currently sludge produced by the existing WwTP, supplemented by imported waste from external sources, is thickened and dewatered on-site to produce a sludge cake. The on-site sludge treatment system includes anaerobic digestion which stabilises the sludge and generates biogas for on-site energy recovery. Approximately 14 tonnes of dewatered sludge cake are processed per day. This material is temporarily stored on-site prior to removal and is exported off-site on a daily basis, by an appropriately authorised and licensed waste collection contractor, typically via 30-tonne articulated trailers. The currently produced sludge cake is classified as a waste product and is transported to an authorised waste facility where it undergoes lime stabilisation treatment to produce a stabilised Class A Biosolid suitable for reuse, typically in agriculture, subject to regulatory compliance.

The proposed Regional Bioresource Centre will be designed to accommodate a design load of 41 tonnes of Total Dry Solids (TDS) per day, comprising indigenous sludge and imported sludges from Counties Limerick, Clare and Tipperary. The plant will have capacity to treat 50 TDS/day in the future based on the 10-year design horizon. The current national strategy is to regionalise sludge treatment and achieve a Class A Biosolid through a combination of Anaerobic Digestion (AD) and heat treatment. This will be achieved by the treatment of the sludge via Thermal Hydrolysis Processing (THP) to the required Code of Good Practice standard for reuse of Biosolids in Agriculture, in alignment with the National Wastewater Sludge Management Plan (NWSMP).

The Proposed Development will enhance the capacity and efficiency of the Anaerobic Digestion plant, resulting in increased biogas generation. As set out in EIAR Chapter 3 the facility receives c. 19 deliveries of dewatered sludge cake per week, it is projected that this will increase to c. 55 deliveries per week, however there will be a corresponding reduction in liquid sludge imports and therefore a neutral effect on transport movement on site will result. The Proposed Development will positively support delivery of the NWSMP, including circular economy aspirations contained within the Climate Action Plan, as well as regional and local policy objectives.

5.11 Appropriate Assessment

The River Shannon is designated as both a Special Area of Conservation [SAC] (Lower River Shannon) and a Special Protected Area [SPA] (River Shannon and River Fergus estuaries). The outfall for the existing WwTP is located in the SAC and SPA. An Appropriate Assessment (AA) Screening and Natura Impact Statement (NIS) have been prepared by MKO 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).

The AA Screening determined that it could not be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the Proposed Development, individually or in combination with other plans and projects, would be likely to have a significant effect on Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA. As a result, a Stage 2 Natura Impact Statement (NIS) was required. It was determined that there is potential for the operation of the Proposed Development to result in significant effect on the SAC and SPA in terms of water quality deterioration and that given the potential hydrological connectivity a potential pathway for likely significant indirect effect was identified in the form of deterioration in water quality via discharge/run off of pollutants to surface water drains, groundwater pathways, and flood risk during construction of the Proposed Development. In addition, in the context of the SPA a potential for likely significant effect on SCI bird species via disturbance due to construction works was

identified, which required further assessment. With regard to the SAC the precautionary principle was followed and given the presence of suitable foraging habitat for otter and known presence, a pathway for indirect effect was identified via disturbance of otter as a result of construction activities that also required further assessment.

An NIS was undertaken to:

- Determine which individual qualifying features have the potential to be adversely affected by the Proposed Development.
- Provide information with regard to the Conservation Objectives and site-specific pressures and threats for those qualifying features that have the potential to be adversely affected.

Following detailed assessment, the NIS concluded that following implementation of avoidance, design and mitigation measures, the Proposed Development will not result in any residual adverse effects on any of the European Sites, their integrity or their conservation objectives when considered on its own. There is no potential for the Proposed Development to contribute to any cumulative adverse effects on any European Site when considered in-combination with other plans and projects.

In the review of the projects that was undertaken, no connection, that could potentially result in additional or cumulative impacts was identified. Neither was any potential for different (new) impacts resulting from the combination of the various projects and plans in association with the Proposed Development.

Taking into consideration the reported residual impacts from other plans and projects in the area and the predicted impacts with the current proposal, no residual cumulative adverse effects have been identified with regard to any European Site.

Conclusions

The subject application for upgrade works to the Limerick Wastewater Treatment Plant and development of a Regional Bioresource Centre is being made by Uisce Éireann under the provisions of The Planning and Development (Strategic Infrastructure) Act 2006. The project is listed in both the Uisce Éireann Capital Investment 2020-2024 Plan and the current regulatory cycle (2025 to 2029), and as such, is an on-going recognised priority. This is underlined by the projects recent designation as ‘critical infrastructure’ under the Critical Infrastructure Act, 2026. The designation means the Proposed Development is of strategic national importance, recognising the essential role it will play in achieving national policy priorities, particularly housing growth.

The Proposed Development is in line with provisions of the National Planning Framework and supports the growth ambition for Limerick City and Suburbs over the next two decades. The proposed development is a pre-requisite for the achievement of this and will contribute importantly to aspirations to enhance Limerick as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region.

Alongside this, the Proposed Development aligns with and will help to positively deliver on the provisions of the National Wastewater Sludge Management Plan (NWSMP) to regionalise sludge treatment and achieve Class A Biosolid output, required for reuse of Biosolids in Agriculture. The proposed Regional Bioresource Centre will accommodate indigenous sludge and imported sludges from Counties Limerick, Clare and Tipperary, achieving the transition to a more circular, less wasteful economy through the designing out of waste and supporting processes for effective reuse.

The Proposed Development has been subject to detailed environmental investigation and assessment, and it has been demonstrated that it will not give rise to any adverse impacts. It is necessary to address deficiencies associated with the existing wastewater treatment plant and meet modern requirements and better cater for existing committed and future loads, in compliance with the Urban Wastewater Treatment Directive. It will conserve and improve water resource in a manner that supports a healthy society, economic development, and a cleaner environment.



HW Planning
5 Joyce House,
Barrack Square,
Ballincollig,
Cork
P31 KP84

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

Directors:
Harold Walsh
Conor Frehill

Company Reg. No. 486211