**DIRECTOR GENERAL'S REPORT**
**SECTION 37 E (4) OF THE PLANNING AND DEVELOPMENT ACT 2000 (as amended).**

**Limerick Wastewater Treatment Plant Upgrade and Regional Bioresource Centre**

**Strategic Infrastructure Development to An Coimisiún Pleanála**

**An Coimisiún Pleanála Case Reference** – ACP-PA91.324584

**Limerick City & County Council** – 26/324584

**Development Address** – Dock Road, Ballykeeffe, Corcanree and Courtbrack, Limerick

**Development Description** – 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

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## 1. Introduction

This report has been prepared in accordance with the requirements of Section 37E (4) and (5) of the Planning and Development Act, 2000, as amended, following on from the submission of a Strategic Infrastructure Development (SID) to An Coimisiún Pleanála (ACP) for proposed works for the upgrade of the existing Limerick Waste water Treatment Plant (WwTP) and the development of a Regional Bioresource Centre at Ballykeeffe, Corcanree and Courtbrack (townlands), Dock Road, Limerick. The purpose of this report is to set out the views of the planning authority on the potential effects of the proposed development on the environment and the proper planning and sustainable development of the authority's area, having regard to the considerations set out under Section 34(2) of the Planning and Development Act 2000, as amended. Section 37E (5) of the Act requires that before this report is submitted to An Coimisiún Pleanála, the Director General shall submit the report to the members of the authority and seek the views of the members on the proposed development. The members may, by resolution, decide to attach recommendations to the report (Section 37E (6) of the 2000 Act refers).

## 2. Proposed Development

This application relates to upgrades to the Limerick Wastewater Treatment Plant and the Corcanree Pumping Station which include an increase in the capacity of the existing WwTP, the provision of additional stormwater storage capacity at Corcanree Pumping Station and the upgrading of the existing Limerick Sludge Hub to a Regional Bioresource Centre.

Limerick WwTP has been providing services to the area since the early 2000s. Biosolids are the bioresource output from the process. Biogass is the other output. The existing plant was last upgraded in 2017 and currently already treats sludge produced at the plant itself and imports from smaller plants in Limerick, Clare and Tipperary. Uisce Eireann has identified that the WwTP is reaching capacity and an upgrade is required to support the existing and future growth and development of Limerick City. The proposed upgrade works will extend the existing WwTP from 130,000PE to 285,000 PE while the new Aerobic Granular Sludge (AGS) process stream will have a capacity of up to 157,000 PE and which will operate in parallel with the existing conventional activated sludge (CAS) process.

The WwTP has also been selected as the preferred location in the Southern Region for the development of a Regional Bioresource Centre, accepting indigenous and imported sludges from smaller plants in Limerick, Clare and Tipperary. This forms part of the National Wastewater Sludge Management Plan which aims to deliver a sustainable and standardised approach for wastewater sludge management. The current national strategy is to regionalise sludge treatment and achieve a Class A Biosolid through a combination of Anaerobic Digestion and heat treatment. Through Anaerobic Digestion, the plant can generate biogas, a source of renewable energy, which will be used to generate electrical power for use on site and to produce heat which is required for the AD process. There will be liquor treatment plant for centrate

returns from the RBC to the main treatment process works, so there will be minimal risk to ammonia overloading in the main treatment process.

Site 1

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.

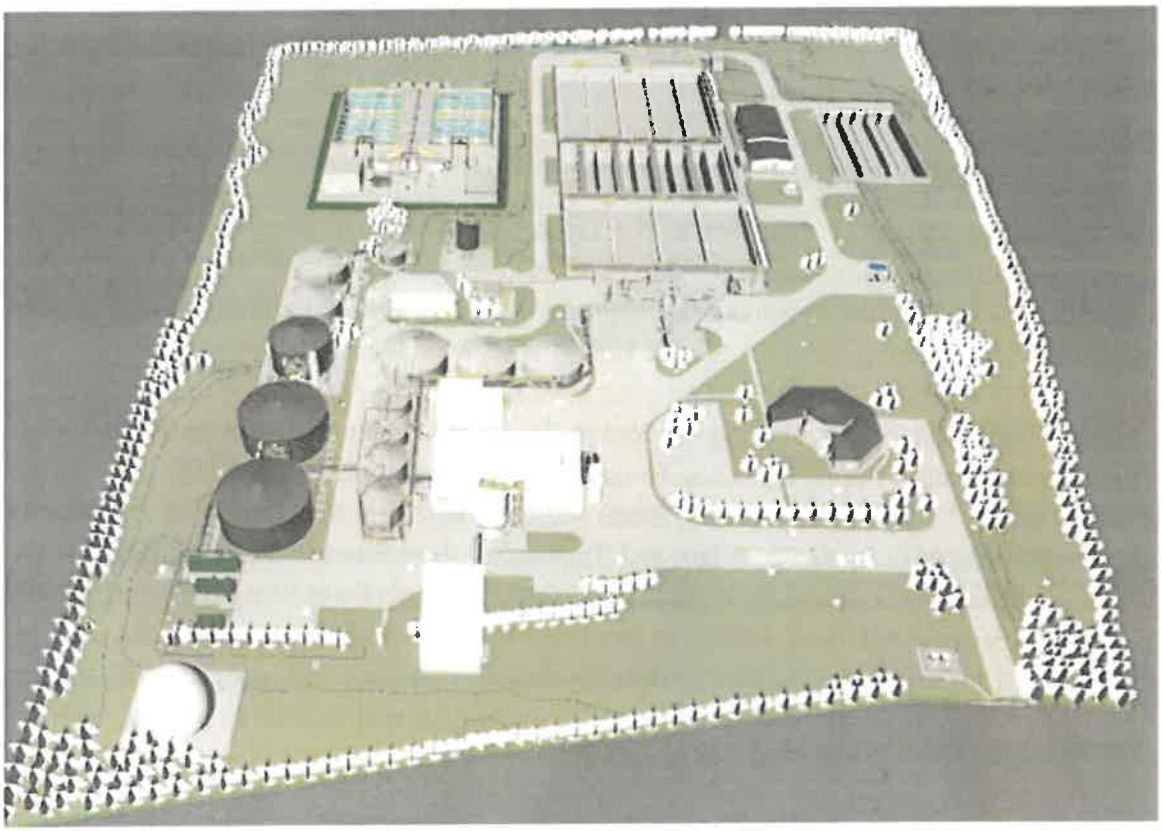


**Figure 1: Site 1, Proposed WWTP**

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

Site 2

The existing stormwater storage tank in Site 1 has limited capacity to manage excess flows from the drainage network during periods of heavy rainfall. As such the proposed upgrades to the Corcanree Pumping Station (site 2) 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 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.

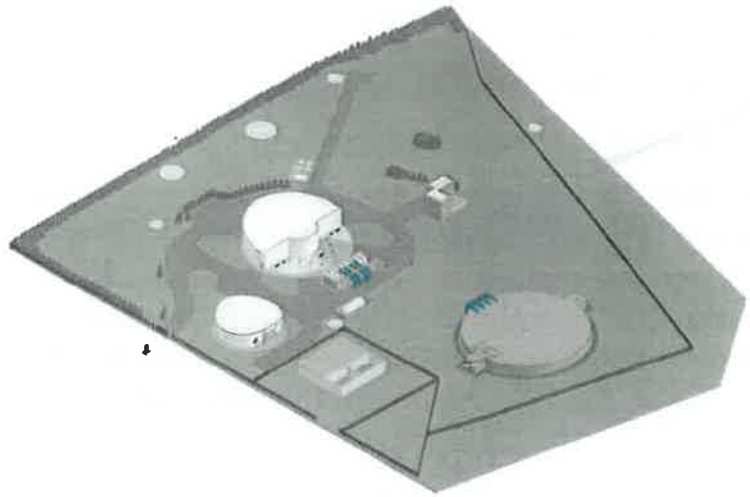


**Figure 2: Site 2, Proposed Site layout of Corcanree Pumping Station and Stormwater tank**

## 3. Project Need

The current plant was designed for 130,000 population equivalent and is reaching its capacity and cannot accommodate the projected population and economic growth. The initial upgrade works will cater for the +10 year growth projections increasing to 285,000 PE. There will be provision made in the civil infrastructural development of the plant (tank sizing and pipework) for the 25+ year growth projections of 325,000 but this will subject to a future planning review.

Without intervention the wastewater treatment plant would become overloaded leading to deteriorating treatment performance and increased risk of non-compliance with national and European union water quality legislation. The works are essential to protect the SAC and to meet the requirements of the Urban Wastewater Treatment Directive.

The upgraded wastewater treatment plant will treat wastewater more effectively and reduce the number of untreated discharges. Although the overall volume of treated water released will increase, its quality will be significant improved. The improved treatment is expected to reduce the amount of organic material entering the estuary.

Currently during heavy rainfall, too much water arrives at Corcanree at the same time. The pumping station cannot send it all to the treatment plant, and the existing storm tank is too small to store it. As a result, excess screened but untreated wastewater can overflow to the Shannon.

The proposed works would provide a new 12,500 $m^3$ stormwater tank, increase pumping capacity and allow stored flows to be returned for treatment after rainfall has reduced. This is intended to significantly reduce the frequency of spills to the Shannon.

With regards to sludge, the National Wastewater Sludge Management Plan notes that there is expected to be 80% increase in national sludge volume by 2040.

## 4. Site Location

The proposed development is located in two sites:

1 – the Bunlicky Wastewater Treatment site which is 9.18ha in size

2 – the Corcanree Pumping Station site which is 2.16ha in size.

The sites are located approximately 3km west of Limerick City Centre in the townlands of Ballykeeffe, Corcanree and Courtbrack. The lands are bounded to the north by the River Shannon which is a Special Area of Conservation and to the south by the Dock Road. Site 1 is directly accessed via a private entrance off the N18 Junction 2 roundabout at the western end of the Dock Road and Site 2 is accessed via the Corcanree Business Park Road which in turn is accessed via the Dock Road. The surrounding area is predominantly commercial and light industrial uses.

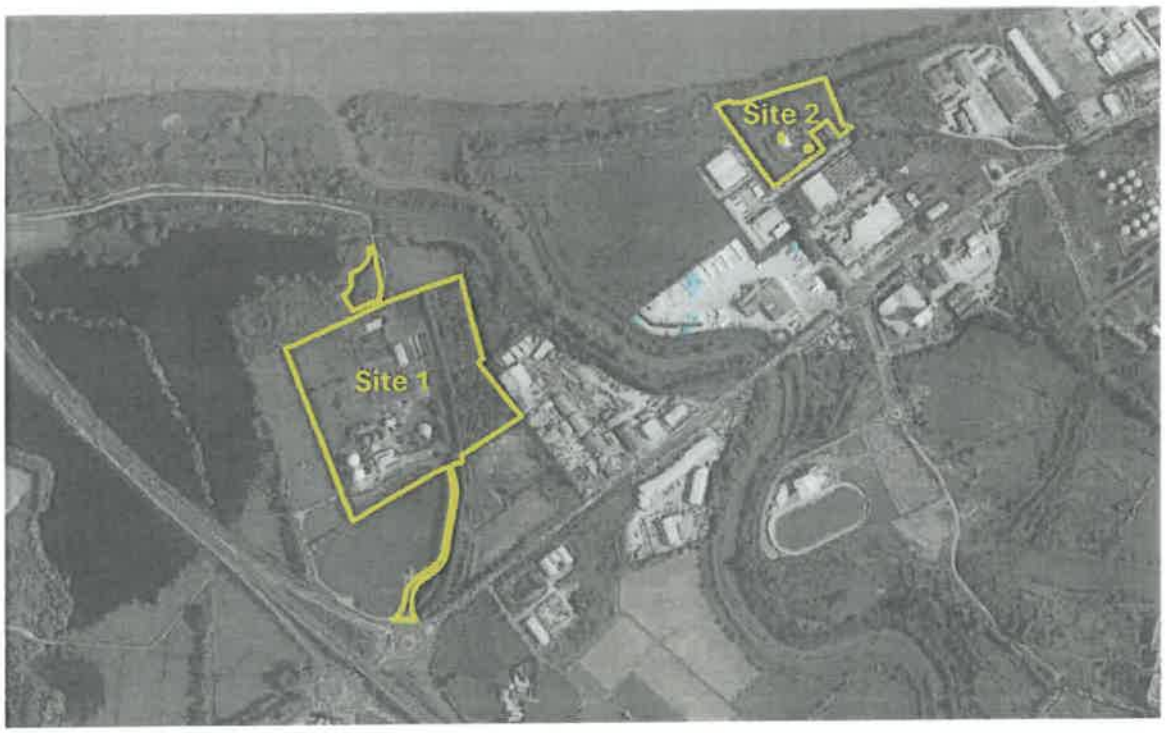



**Figure 3: Site Location**

## 5. Policy

*Limerick Development Plan 2022 – 2028*

The following objectives are relevant to the proposed development:

**Zoning**

Both sites have two zonings associated with them – *Utilities* and *Enterprise and Employment*

**Enterprise and Employment**

**Objective:** To provide for and improve general enterprise, employment, business and commercial activities.

**Purpose:** To provide for enterprise, employment and general business activities and acknowledge existing/permitted retailing uses. To accommodate compatible industry and employment activities that are incapable of being situated in the City Centre, in a high-quality physical environment. Marine related industry shall be allowed on Enterprise and Employment zoned lands on the Dock Road. New enterprise and employment developments shall be provided in high-quality landscaped park style environments, incorporating a range of amenities. These zones may accommodate light industry, low input and emission manufacturing, logistics and warehousing, campus style offices and commercial services with high space and parking requirements. The form and scale of development on these sites shall be appropriate to their location, having regard to surrounding uses and scale. A proliferation of retail uses will not be permitted. The uses in this zone are likely to generate a considerable amount of traffic by both employees and service vehicles. Sites should be highly accessible, well designed and permeable with good pedestrian, cyclist and public transport links. The

implementation of mobility management plans will be required to provide important means of managing accessibility to these sites.

**Utilities**

**Objective:** To provide for the infrastructural needs of transport and other utility providers.

**Purpose:** Park and Ride facilities and commercial development associated with the provision of public transport services are considered appropriate in this zone. This zoning also provides for and preserves land for the provision of services such as electricity and gas networks, telecommunications, the treatment of water and wastewater etc.

**Objective IN 06 Water Services**

It is an objective of the Council to:

a) Support Irish Water 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 Irish Water 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 Irish Water during the lifetime of the Plan to secure investment in the pro-vision, 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.

d) Collaborate with Irish Water to resolve the existing water services infrastructural constraints in Newcastle West – a Key Town designated by the RSES.

e) Ensure that development proposals connecting to the public water and/or wastewater networks, now or in the future comply with Irish Water Standard Details and Codes of Practice. Where relevant, ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.

f) Require future developments to connect to public water services and wastewater if available to the site. Combined water and wastewater systems will not be permitted. Consent to connect to Irish Water assets will be requested as part of the planning application process.

g) Have regard to Section 28 Guidelines – Draft Water Services Guidelines for Planning Authorities, DHPLG, 2018 and any subsequent guidelines when carrying out the forward planning and development management functions of the Planning Authority.

**Section 8.5.3 Public Waste Water Treatment**

According to the 2016 Census, 61% of private households in Limerick City and County are connected directly to the public sewerage network, which is below the State average of 65.9%.

Irish Water'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. waste water treatment plants (WWTPs). These include Bunlicky and Castletroy WWTPs, which serve the Limerick City Metropolitan Municipal District. These WWTPs require some upgrading and it is envisaged by Irish Water that with the completion of these upgrades, there will be sufficient spare capacity to accommodate the projected growth in Limerick City and Suburbs (in Limerick), Mungret and Annacotty, as set out in the RSES and the Core Strategy, over the lifetime of the Plan, subject to planning and other approvals. It is noted that currently there is no spare WWTP capacity available in the Key Town of Newcastle West. However, the upgrade of the plant to provide capacity is included in Irish Water's 2020- 2024 Investment Plan.

WWTP upgrades are also planned for Abbeyfeale, Adare and Dromcollogher. Other capital investment projects by Irish Water are ongoing to provide WWTPs in the previously untreated agglomerations of Foynes and Glin. Minor WWTP upgrades and improvements are also continually carried out on a nationally prioritised basis through Irish Water's programmes. Further upgrade(s) may also be progressed under the Small Towns and Villages Growth Programme, intended to provide capacity in Irish Water's treatment plants in smaller settlements, which would not otherwise be provided for in the current Investment Plan.

Irish Water is preparing a Drainage Area Plan (DAP) to be completed in 2024 for the Limerick City and Castletroy agglomerations. Limerick City and County Council will collaborate with Irish Water to ensure planned growth in the strategic growth areas and elsewhere in the city is taken account of in this study.

Wastewater Network Development Plans are currently being prepared by IW for the Limerick Shannon Metropolitan Area (in Limerick) and Newcastle West. As part of the Mungret Local Infrastructure Housing Activation Fund project (LIHAF), Irish Water is working with the Council to provide wastewater network infrastructure in the Mungret area.

**Objective IN O9 Public Waste Water**

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 Irish Water, to avoid any deterioration in the quality of receiving waters and to ensure that discharge meets the requirements of the Water Framework Directive.

b) Require all new developments to connect to public wastewater infrastructure, where available and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water and evidence of this agreement will be required as part of any planning application.

c) Require all new development to provide separate foul and surface water drainage systems, to maximise the capacity of existing collection systems for foul water.

d) Apply a presumption against any development that requires the provision of private wastewater treatment facilities (i.e. Developer Provided Infrastructure) other than single house systems and in very exceptional circumstances.

### 8.7.3 Sludge Management

Wastewater sludge is semi-solid remains in a wastewater treatment plant, after the treated water is discharged to either ground or surface waters. It comprises mainly of energy rich organic matter removed during treatment and is a valuable by-product of the wastewater treatment process. Further treatment is required to ensure the safe and efficient re-use or disposal of the sludge. The proliferation of single rural dwellings with on-site treatment units and septic tanks requires de-sludging services on a regular basis. Similarly, public treatment plants also require de-sludging.

In the National Waste Water Sludge Management Plan, Irish Water proposes to expand on the provision of 'sludge centres' and satellite facilities in Limerick. These proposals include upgrading the existing sludge centre at Bunlicky and the construction of dewatering satellite facilities in Newcastle West, Rathkeale, Foynes-Shanagolden and Cappamore. In the case of sludge management facilities, these facilities are best suited to sites of existing public wastewater treatment facilities, due to the nature and characteristics of existing operations on these sites and the need to strictly control the treatment of sludge.

Sludge from wastewater treatment plants and septic tanks can only be used in agriculture in accordance with the Waste Management (Use of Sewage Sludge in Agriculture) Regulations, 1998 and 2001 and the Department of Housing, Planning and Local Government Codes of Good Practice for the Use of Bio-solids in Agriculture.

**Objective IN O19 Sludge Management**

It is an objective of the Council to:

a) Support the provision of sludge management infrastructure at suitable locations in accordance with Irish Water's National Waste Water Sludge Management Plan, whilst not compromising environmental obligations.

b) Restrict the provision of sludge management facilities to the sites of existing public wastewater treatment facilities due to the nature and characteristics of existing operations on these sites and the need to strictly control the treatment of sludge.

c) Require that the treatment and management of sludge waste is carried out in a safe, efficient and sustainable manner, having regard to the protection of the environment and public health and in compliance with the Waste Framework Directive, the Nitrates Directive, the Waste Management Act and all relevant statutory instruments.

Other relevant policies are noted below:

- Objective EH O50, Work to Protected Structures
- Objective EH O36, Preservation of the Archaeological Heritage

- Objective EH O37, Preservation of unrecorded/newly discovered Archaeological Heritage
- Objective EH O40, Proper procedures during the planning process
- Objective TR O37, Land Uses and Access Standards
- Objective TR O38, Improvements to Regional and Local Roads
- Policy TR P12, Safeguard the Capacity of National Road
- Objective TR O39, National Roads
- Objective TR O40, National Road Network Drainage Regime
- Policy TR P13, Strategic Regional Road Network
- Objective TR O41, Strategic Regional Roads
- Objective HO O3, Protection of Existing Residential Amenity
- Policy EH P1, Protection of Natural Heritage and Biodiversity
- Policy CAF P5, Managing Flood Risk
- Objective EH O31, Views and Prospects

## 6. Environmental Impact Assessment / Appropriate Assessment

The proposed development is strategic in nature, and the application has been made directly to An Coimisiún Pleanála. Therefore, An Coimisiún Pleanála is the Competent Authority in respect to appropriate assessment of the project. A Natura Impact Statement and an assessment against the Water Framework Directive (included in the EIAR) have been submitted in relation to the project and accompany the application.

An Environmental Impact Assessment has been submitted with the application. Relevant items of the EIAR are considered below.

## 7. Planning and Environmental Issues

*Principle of Development*

As per the requirements of S37E (4) of the Act, this report deals specifically with the requirements set out in S34(2) of the Act. In relation to the works associated with the WWTP all works are on lands within the area zoned *Utilities* which has an objective in the LDP to provide for the infrastructural needs of transport and other utility providers. Therefore, the principle of the development is considered acceptable in principle.

In relation to site 2 the existing pumping station is on lands zoned *utilities,* while the new proposed pumping station is on lands zoned *enterprise and employment.* As set out in the zoning matrix waste disposal and recovery facilities are generally permitted on lands zoned *enterprise and employment.* As such, taking this into consideration and given the existing use on site and the proposal is associated with same, the proposed development at site 2 is considered acceptable in principle.

*Traffic, Access and Road Safety*

Both sites have the benefit of existing access points. The WWTP is accessed via Junction 2 roundabout off the N18 while site 2 is accessed via the Corcanree Business Park Road. The

application is accompanied by a traffic and transport assessment within the EIA which is also appended with traffic count data and trip generation details with regards to HGVs and Staff.

The TTA indicates that all assessed junctions will operate within the normal design threshold, except for Junction 3 (Dock Road / Ballykeeffe), which is approaching capacity on the Dock Road West arm during the morning peak in the 2031 Final Year of Construction. However, the assessment demonstrates that this is primarily attributable to background traffic growth rather than the proposed development, with the development generating only a negligible increase in traffic demand.

Appropriate mitigation and monitoring measures have been proposed and are considered acceptable. As such it is considered that the overall need for and benefits of the proposed development outweigh the minor increase in traffic impacts anticipated during the construction phase.

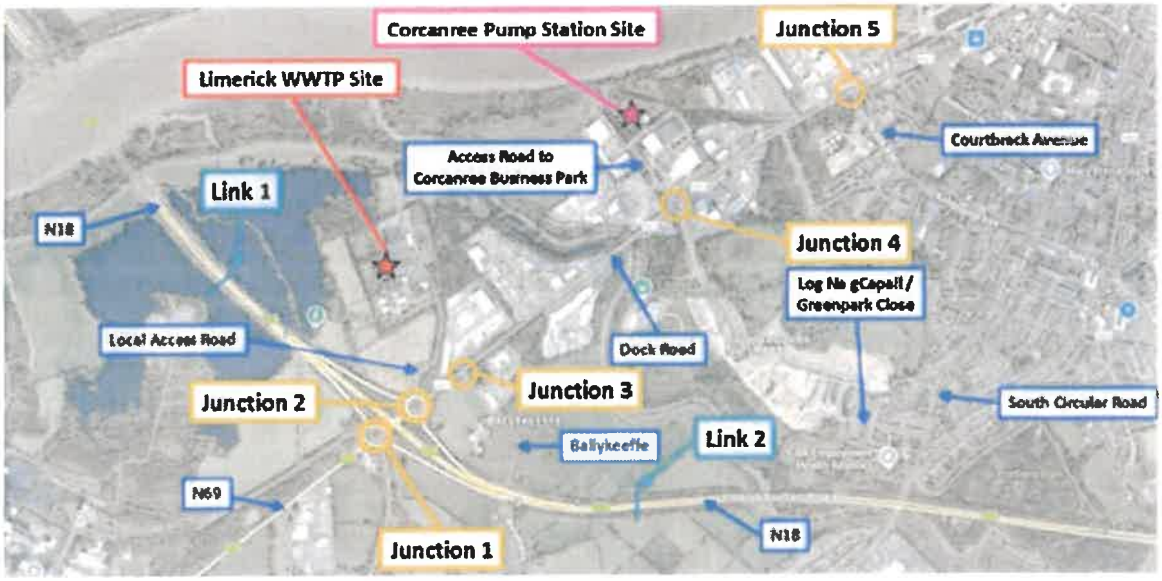



**Figure 4: Existing Junctions layout**

*Visual Impact*

In relation to visual impact, While I note that no contiguous elevations have been provided for either site, the existing WWTP is set back from the Dock Road and N18 and is well screened by mature trees. There are no sensitive residential receptors which would be visually impacted. The site is in close proximity to commercial and industrial uses therefore it is considered that visual impact is negated. In relation to the Corcanree Pumping Station, again this site is located within a heavily industrialised area. Furthermore, the proposed pumping station has a height which is much lower than the ridge height of the existing pump station.

*Archaeology*

There are no recorded archaeological monuments within the site. The Archaeology, Architectural and Cultural Heritage Chapter within the EIAR notes that there is a potential for uncovering of subsurface archaeological features during groundworks associated with the

construction period and notes that mitigation measures to be carried out subject to the approval of the National Monuments Service. A condition should be attached noting that all mitigation measures outlined in the EIAR should be carried out in full.

*Conservation*

There are no protected structures or architectural conservation areas within the site or its immediate surroundings. The proposed works will be within the existing footprint of the Wastewater Treatment Plant and Pumping Station facility. There are therefore no architectural heritage concerns relation to the application.

*Flooding*

Both sites are within Flood Zone A and it is noted that a flood risk assessment accompanies the application which can be found in the EIAR. The SSFRA has been and it is noted that the development as proposed is regarded as highly vulnerable as per table 3.1 as per the Planning System and Flood Risk Management Guidelines with justification test completed and satisfied for both locations.

The Applicant has allowed for a design flood level of 5.64 mOD at Limerick WWTP and 5 .61 mOD at Corcanree PS accommodating 0.5% AEP MRFS flood level plus the recommended freeboard to determine the design flood level for the developments. This approach ensures the development remains safe under a climate-adjusted 0.5% AEP MRFS event including overtopping.

Access to both sites will remain as existing. There is therefore no change to the emergency evacuation route in the case of a flood.

The applicant has also allowed for mitigation measures including wet-proofing buildings to be considered to protect assets where applicable along with measures to be implemented during construction to manage potential flood risk such as stockpile management, portable bunds, sandbags, or silt fencing will be installed if weather forecasts or river level monitoring indicate potential flooding amongst others

Design coastal flood levels have been adopted for the assessment, using the 0.5% AEP MRFS flood level and allowance for freeboard (300mm).

All sensitive infrastructure such as electrical equipment and open channel and tank walls are to be at or above the design flood level to mitigate flood risk.

It is therefore considered that subject to the above, that no flood risk objection is raised to the proposed development.

*Environmental, Ecology and Natural Heritage*

The report assesses the potential for the proposed development to impact European (Natura 2000) sites under Article 6 of the Habitats Directive.

A Stage 1 Screening concluded that likely significant effects could not be excluded on the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, necessitating a full Natura Impact Statement (Stage 2 AA).

The principle risk to both the SAC and SPA is deterioration in water quality particularly during construction associated with excavation, dewatering, earthworks, piling and construction traffic. There are also potential pathways from the wastewater treatment plant to Bunlicky Lake and from Corcanree Pump Station through the nearby drainage network to the Shannon Estuary.

There is a risk that pollutants and sediment laden surface water run-off could discharge into the crossing sites along the proposed grid connection route. In terms of mitigation, and specifically with regard to watercourse crossing, the report states that specific crossing techniques are proposed. There is also the risk to disturbance of SPA Birds such as the cormorant colony at Bunlicky Lake, disturbance to otters, operational discharge or treatment failure.

A number of mitigation measures have been included for and which include controlled dewatering and runoff treatment, sediment and erosion controls; fuel, chemical and concrete controls; piling, vibration and groundwater protection; piling to be avoided during sensitive cormorant breeding period; maintaining ecological supervision and inspection; flood risk controls and operational safeguards. All construction phase mitigation measures are to be implemented through the CEMP. This should be updated in the event of a grant of permission.

The NIS concludes that no adverse effects on European Sites will occur, subject to full and strict implementation of mitigation measures.

An assessment against the Water Framework Directive is also included within the appendices of the EIAR.

The Heritage Officer has reviewed the NIS and the EIAR who while is satisfied in principle, they do note that the wildfowl and estuary surveys carried out as part of the NIS date from 2024 and therefore more than 2 years old. Furthermore, the subtidal and intertidal reports within the EIAR are more than 2 years old and may require updating. They welcome the avoidance of the wet woodland as the construction compound. In summary, it is considered that potentially outdated survey information may need to be updated and that the identified mitigation, habitat avoidance and ecological enhancement measures should be secured by condition.

**8. Conclusion**

Having regard to the established wastewater treatment and pumping station uses on the subject lands, the applicable Utilities and Enterprise and Employment zoning objectives, the strategic need to provide additional treatment and stormwater storage capacity to support the planned population and economic growth of Limerick, and the objectives of the Limerick Development Plan 2022–2028 relating to wastewater and sludge management, the proposed development is considered acceptable in principle and consistent with the proper planning and sustainable development of the area. The works would improve treatment performance, reduce the frequency of untreated discharges to the River Shannon and provide a more sustainable

regional approach to sludge treatment and resource recovery. Subject to An Coimisiún Pleanála being satisfied in respect of Environmental Impact Assessment and Appropriate Assessment, including the adequacy and currency of the ecological survey information, and subject to the full implementation of the mitigation measures contained in the EIAR, NIS and CEMP together with the conditions recommended in this report, the Planning Authority supports the proposed development.

It is noted that this is a multi-jurisdictional proposal. In the event of a grant of permission, ACP should consider conditions (see appendix 1) that would be location focused to allow the Planning Authority to accurately monitor same and ensure compliance is focused.

**Dr. Pat Daly**
**Director General**
**Limerick City & County Council.**
**2nd October 2026**

## Appendix 1: Recommended Conditions

Construction Management

***Condition 1***

*A Construction Management and Delivery Plan (CMDP) is also required in the event of a grant of permission as follows:*

*Prior to the commencement of development, the developer shall submit for the written agreement of the Planning Authority a detailed Construction Management and Delivery Plan (CMDP). The CMDP shall include, but not be limited to, the following:*

*A site-specific Temporary Traffic Management Plan (TTMP), provided in both report and drawing format, detailing all proposed traffic management measures associated with the construction phase, including provisions for vehicular traffic, pedestrians, and vulnerable road users;*

*Details of construction access routes, delivery routes (including concrete deliveries where applicable), and measures to minimise disruption to the public road network;*

*A pre-condition survey of all roads and associated infrastructure along the proposed construction routes, to be carried out prior to the commencement of development, for the purpose of recording the existing condition of the road network.*

*The agreed Construction Management and Delivery Plan shall be fully implemented for the duration of the construction phase.*

***Condition 2***

*During construction of the proposed development, the following shall apply-*

a. *No work shall take place on site outside the hours of 7.00 a.m. to 7.00 p.m. Monday to Friday and 8.00 a.m. to 2.00 p.m. Saturday, or on Sundays or public holidays, unless otherwise agreed in writing by the Planning Authority.*
b. *No surface water run-off shall be discharged onto public roads, foul sewers or adjacent property.*
c. *Adequate car parking facilities shall be provided on site for all workers and visitors.*

*Reason – To protect the residential amenities of the area in the interest of proper planning and sustainable development.*

Archaeology

The developer shall preserve, protect or otherwise record archaeological materials or features that may exist within the site by ensuring that all greenfield ground disturbance associated with the site development is archaeologically monitored under licence from the National Monuments Service.

***Condition 1:***

a) *Notify the Planning Authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development.*

b) *Employ a suitably qualified archaeologist who shall apply for a licence to monitor all site investigations, excavation works and all ground disturbance associated with the development.*

c) *Submit the name of the suitably qualified archaeologist to the Planning Authority four weeks in advance of the commencement of any site works (including site investigations) accompanied by a site specific letter from the archaeologist certifying that they have applied for a licence.*

***Condition 2***

*The requirement for archaeological monitoring shall be included in the CEMP and the archaeologist shall be kept fully informed of the schedule of works.*

***Condition 3:***

a) *Submit on completion of the ground works a report detailing the results of the licensed archaeological monitoring works to the Department of Housing, Local Government & Heritage and the Planning Authority. The report shall contain a drawing showing the exact extent of the area that was archaeologically monitored certified by the archaeologist. Excavators should include a catalogue of excavated features with 12 figure ITM coordinates for the centre point of each feature. In the event that the development is phased, interim reports shall be submitted at each stage showing the area monitored and giving preliminary results.*

b) *Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The Development Applications Unit, National Monuments Service, Department of Housing, Local Government & Heritage and the Planning Authority Archaeologist shall be informed immediately. The developer shall be prepared to be advised by the National Monuments Service, Department of Housing, Local Government & Heritage and the Planning Authority with regard to any necessary mitigating action.*

c) *Should an archaeological excavation be required then the following shall apply: the developer shall provide satisfactory arrangements for the recording and excavation of any archaeological material that may be considered appropriate to excavate and shall undertake to complete all post excavation analysis up to and including final report stage. Excavators should include a catalogue of excavated features with 12 figure ITM coordinates for the centre point of each feature. Within twelve months of the completion of the excavation a final report (in the format recommended in the Guidelines for Authors of Reports on Archaeological Excavations 2006 National Monuments Service) shall be submitted to the Planning Authority*

Reason - In order to conserve the archaeological heritage of the site and to secure the preservation of any remains which may exist within the site.

Ecology

Matters to be taken into account in conditions have been provided by the Council Ecologist in relation to the proposed grid connection route and this are noted below for incorporation to any grant of planning permission:

***Condition 1***
*The developer shall provide a bat house as part of the development. The bat house should be suitable for multiple species and for both summer and winter use. Their construction location and screening should be subject to ecological advice.*
*Reason; to increase the network of planning provided roosting features for bats in the city and environs.*

***Condition 2***
*All lighting should be designed so that the site is as dark as possible when vacant. The possibility of the installation of swift bricks and bat bricks or boxes should be considered an integral part of the design.*
*Reason; to add to the ecological value of the site.*

***Condition 3***
*The developer shall provide for the construction of an artificial holt as part of the development.*
*Reason: to add to the ecological value of the development.*

***Condition 4***
*All environmental mitigation measures set out in the Environmental Impact Statement, the Natura Impact Statement, and associated documentation submitted with the planning application shall be implemented in full, except as may otherwise be required in order to comply with the following conditions.*
*Reason: In the interest of protection of the environment.*

Surface Water

Matters to be taken into account in conditions have been provided by the Roads Department in relation to the proposed development and are noted below for incorporation to any grant of planning permission:

***Condition 1***
*(a) All surface water run-off from the development shall be disposed of appropriately. No such surface water shall be allowed discharge onto adjoining properties or onto the public road.*

*(b) All surface water run-off from the public road which flows into the site shall continue to be accommodated within the site unless alternative arrangements acceptable to Limerick City & County Council are carried out. Full details of any such alternative arrangements shall be submitted to the Planning Authority and agreed prior to commencement of development.*

*Reason- In the interest of public health and to prevent flooding in the interest of traffic safety and amenity.*

Flooding

Matters to be taken into account in conditions have been provided by the Flooding Department in relation to the proposed development and are noted below for incorporation to any grant of planning permission:

***Condition 1***

*All sensitive infrastructure such as electrical equipment and open channel and tank walls are to be at or above the design flood level to mitigate flood risk.*

*Reason – in the interest of public health*

Waste Management

Matters to be taken into account in conditions have been provided by the Environment Department in relation to the proposed development and are noted below for incorporation to any grant of planning permission:

***Condition 1***

*Prior to commencement of development the developer, shall submit the following for the written agreement of the Planning Authority:*

*A site specific Resource Waste Management Plan (RWMP) as set out in the "Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)" which shall include:*

a. *A list of proposed authorised waste collection permit holders to be employed.*
b. *A list of the proposed waste facility permitted sites at which the wastes may be recovered or disposed of.*
c. *Estimates of the proposed tonnages of construction and demolition (C&D) wastes by type e.g. soil and stone, rubble, wood, metal and plastic.*
d. *Details of how the RWMP will be measured for and monitored for effectiveness.*

*All records relating to the agreed RWMP should be made available for inspection at the site offices at all times.*

*Reason - In the interest of sustainable waste management.*

***Condition 2***

*Where there is a requirement to import soil and stone onto this site for a particular phase of this development appropriate authorisation must be in place. Two options are available, provided appropriate planning is in place.*

A. *Local Authority Waste Facility Permit or Certificate of Registration*

*A waste facility permit (WFP) or Certificate of Registration (COR) obtained from the Local Authority under the Waste Management (Facility Permit and Registration) Regulations 2007 (as amended). The Waste authorisation i.e. WFP/COR must be issued by the Council prior to commencement of importation of any suitable waste*

*material (soil and stone) to the property. A Waste Facility Permit is limited to 200,000 tonnes for soil and stone and a Certificate of Registration is limited to 25,000 tonnes.*

B. *By-Product Article 27 Declaration to the EPA*

*Importation of soil and stone can also be carried out under a By-Product Declaration under Article 27 to the EPA. Please note that Source Location and Use Location must be planning compliant.*
*Reason - In the interest of sustainable waste management.*

***Condition 3***

*Where there is a requirement to remove soil and stone from a development site, two options are available.*

1. *Removal of soil and stone off site in accordance with the Waste Management Act 1996 (as amended). This process requires the use of authorised waste collectors to transport soil and stone (which is classified as waste) to licensed waste sites such as Local Authority Certificate of Registration or Waste Facility Permit sites.*

2. *Removal of soil and stone can also be carried out under a By-Product Declaration under Article 27 to the EPA. In this instance the producer is declaring the soil and stone is a by- product and not a waste. Where the site is greenfield a By Product Registration application is made to the EPA. A Single Case By Product Notification is made to the EPA where the site is brownfield.*

*Reason - In the interest of sustainable waste management.*

## Appendix 2: Comments from Internal Departments

### 1.0 Roads

Comhairle Cathrach & Contae Luimnigh
Limerick City & County Council

**Planning Application Internal Report**

**Planning Ref:** 26324584

**Applicant:** SID - Limerick Wastewater Treatment Plant Upgrade & Regional Bioresource Centre

**Development Address:** Dock Road, Ballykeeffe, Corcanree & Courtbrack, Limerick

**Development Description:** 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

**Report Prepared By:** Tony Carmody

**Date:** 01.10.2026

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**Comments:**

**Roads – Requirements**

(a) The Road Section has examined the Traffic and Transportation Assessment for both the Operational Phase and Construction Phase for the proposed development and have found the following:

The TTA indicates that all assessed junctions will operate within the normal design threshold, except for **Junction 3 (Dock Road / Ballykeeffe)**, which is approaching capacity on the Dock Road West arm during the morning peak in the 2031 Final Year of Construction. However, the assessment demonstrates that this is primarily attributable to background traffic growth rather than the proposed development, with the development generating only a negligible increase in traffic demand.
Appropriate mitigation and monitoring measures have been proposed and are considered acceptable. Having regard to the findings of the TTA, the Roads Section is satisfied that the overall need for and benefits of the proposed development outweigh the minor increase in traffic impacts anticipated during the construction phase.

(b) Any damage to the existing roads and footpaths shall be repaired at the Applicants/Developers cost in agreement with Limerick City and County Councils Road Section.

**Surface Water & SuDs Management Plan – Requirements**

(c) All surface water run-off from the development shall be disposed of appropriately. No such surface water shall be allowed discharge onto adjoining properties or onto the public road.

(d) All surface water run-off from the public road which flows into the site shall continue to be accommodated within the site unless alternative arrangements acceptable to Limerick City & County Council are carried out. Full details of any such alternative arrangements shall be submitted to the Planning Authority and agreed prior to commencement of development.

Reason- In the interest of public health and to prevent flooding in the interest of traffic safety and amenity.

**Construction Management and Delivery Plan**

(a) During construction of the proposed development, the following shall apply-

- No work shall take place on site outside the hours of 8.00 a.m. to 8.00 p.m. Monday to Friday and 8.00 a.m. to 4.00 p.m. Saturday, or on Sundays or public holidays, unless otherwise agreed in writing by the Planning Authority.

- No surface water run-off shall be discharged onto public roads, foul sewers or adjacent property.
- Adequate car parking facilities shall be provided on site for all workers and visitors.
- Deliveries shall be off peak.
- The wheels and underside of all construction traffic leaving the site shall be cleaned, as required, to prevent soiling of public roads. A wheel washing facility, including water jets or other approved cleansing method shall be provided close to the site exit. If any public roads become soiled by construction traffic from the site, these roads shall be cleaned immediately.

  Reason - In the interest of the proper planning and sustainable development of the area, road safety and to protect the amenity of the area.

(b) Prior to commencement of development, a revised Construction Management and Delivery Plan for the construction of the development shall be submitted and agreed in writing with Planning Authority, which shall include a Site-Specific Temporary Traffic Management Plans TTMP (plans shall also be in drawing format). This is to give advance warning to road users on the public road being made aware that there is a construction site ahead.

Reason- In the interests of public safety and residential amenity.

**Recommendation:**
*Approval subject to conditions.*

**Signed** Tony Carmody **Date:** 01.10.2026

Tony Carmody

**2. Ecology**

Comhairle Cathrach & Contae Luimnigh
Limerick City & County Council

**Planning Application Internal Report**

**Planning Ref:** 26 324584 SID

**Applicant**: UE SID
**Development Description**: 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)
**Report Prepared By:** T O Neill Heritage Officer/Ecologist.

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**Comments** noted that UÉ has identified that the Limerick Wastewater Treatment Plant is currently reaching capacity and an upgrade is required to ensure continued environmental compliance, and to support both the existing and future development. The plant is to be used for development of a Regional Bioresource Centre, accepting sludge imports from smaller plants in Counties Limerick, Clare and Tipperary. This forms part of the National Wastewater Sludge Management Plan which aims to deliver a sustainable and standardised approach for wastewater sludge management. Noted that Anaerobic Digestion will be art of the process. The process is designed to meet the required Code of Good Practice standard for reuse of Biosolids in Agriculture, in compliance with the National Wastewater Sludge Management Plan (NWSMP). This raises the question of the eventual destination and usage of the sludge.

The Corcanree pumping station is a separate site and is located 700m to the east. See site location drawing 20702-EEI-00-XX-DR-Z-1190.

The new development will occur to the north of the existing WWTP. There is wet grassland and scrub on the western portion of the site and riparian woodland on the north-eastern portion. Mammal trails were found in the grassland to the west and an otter was found hunting in Bunlicky Lake.

All lighting should be designed so that the site is as dark as possible when vacant. The possibility of the installation of swift bricks and bat bricks or boxes should be considered an integral part of the design.

Given the presence of woodland and scrub there is need to ensure minimal disruption to these features., This is dealt with in the EIAR which is referred to below.

There are a range of habitats and species that might be affected including those in the inter tidal area. It is noted that wildfowl surveys have taken place over a number of years from 2020 until 2025 (NIS, p.p. 4-5) and the estuarine survey also took place. These date back to January 2024 and as such as more than two years old.

**EIAR:** the sub tidal and inter tidal reports are over to two years old and may require updating. Noted that they indicate a stable environment. The mitigation measures mention in S12.5 of the Marine Chapter are to be implemented in full. (pp. 16-20).

Bat surveys were carried out in July 2025 and were preceded by static detectors being put in place in 2023. This was for a 9-day period. Detectors were in place for a three-week period in 2025. Noted that one or two Lesser horseshoe passes were recorded at both Corcanree and Bunlickey in the 2023 survey. Six bats were identified to species level with Myotis species also present. Given the range of species and the presence of Lesser Horseshoe Bat, I would recommend the construction of bat house as part of the development. This would supplement other bat houses which have been included as planning conditions in the metropolitan area and help provide a network of suitable roosting features for bats in the city, and particularly along the river. The bat house should be suitable for multiple species, including Lesser Horseshoe and for both summer and winter use.

For birds it is noted that the development footprint will lead to the loss of wet grassland habitat. Noted that while it was initially proposed to use Uisce Éireann lands to the east of the Limerick WWTP boundary, with its woodland habitats to the east of the boundary, including the Annex I wet woodland area to the northeast, it was considered these habitats should be retained and avoided, and therefore it is proposed to use the existing hardstanding area to the north of the WWTP, or to use agricultural lands to the south of Limerick WWTP for the temporary construction compound. This is welcomed and should be implemented.

In relation to otters, they were recorded foraging in Bunlicky Lake and suitable habitat for them exists in the wider areas around Limerick WWTP and Corcanree Pumping Station. Potential for disturbance to otter was identified, both from construction noise and due to the potential for establishment of a holt in the interim between baseline otter surveys and commencement of construction. While the possibility of holt establishment (Chp. 13 p.62) is mentioned , consideration should be given to construction of an artificial holt in the area as part of the development, which would represent a net gain in terms of on-site habitats, which when added to the bat house would result in new ecological features being provided on the UE properties. This would be particularly useful as the otter is a QI species of the Lower River Shannon SAC site. The mitigation measures in S. 13.5 should be implemented in full, which include preconstruction surveys.

Noted no FPO species found on site. No badges or setts found on site.

**Recommendation:**
Development to proceed, with the following suggested conditions:

**I** I recommend the construction of bat house as part of the development. This would supplement other bat houses which have been included as planning conditions in the metropolitan area and help provide a network of suitable roosting features for bats in the city, and particularly along the river. The bat house should be suitable for multiple species and for both summer and winter use. Their construction location and screening should be subject to ecological advice.
**Reason;** to increase the network of planning provided roosting features for bats in the city and environs.

**2** All lighting should be designed so that the site is as dark as possible when vacant. The possibility of the installation of swift bricks and bat bricks or boxes should be considered an integral part of the design.
**Reason**; to add to the ecological value of the site.

**3** Noted that while it was initially proposed to use Uisce Éireann lands to the east of the Limerick WWTP boundary, with its woodland habitats to the east of the boundary, including the Annex I wet woodland area to the northeast, it was considered these habitats should be retained and avoided, and therefore it is proposed to use the existing hardstanding area to the north of the WWTP, or to use agricultural lands to the south of Limerick WWTP for the temporary construction compound. This is welcomed and should be implemented.
**Reason**: to minimise ecological disruption.

**4** The construction of an artificial holt in the area as part of the development, would represent a net gain in terms of on-site habitats, which when added to the bat house would result in new ecological features being provided on the UE properties.
**Reason:** to add to the ecological value of the development.

**Signed** T O Neill **Date:** 24/9/2026

**3. Conservation Officer**

Comhairle Cathrach & Contae Luimnigh
Limerick City & County Council

**Planning Application Referral Report**
**Architectural Conservation**

**Planning Ref:** 26/324584

**Applicant:** SID - Limerick Wastewater Treatment Plant Upgrade & Regional Bioresource Centre

**Development Description:** Planning Permission for:
*"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."*

**Location:** Dock Road, Ballykeeffe, Corcanree & Courtbrack, Limerick.

**R.P.S. Reg. No.:** N/A

**A.C.A.:** N/A

**N.I.A.H. Reg. Ref.:** N/A

**N.I.A.H. Garden Survey Ref.:** N/A

**Report Prepared By:** Shóna O'Keeffe, Executive Architectural Conservation Officer

**Date:** 22nd September 2026

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**Comments:** There are no Protected Structures, NIAH Structures or Architectural Conservation Areas in the immediate vicinity of the subject site.

**Assessment**

I have examined the documentation submitted in support of the application.

There are no Protected Structures or Architectural Conservation Areas within the site or its immediate surroundings. The proposed works will be within the existing footprint of the Wastewater Treatment Plant and Pumping Station facility.

The development is not considered to have any likely impacts on architectural heritage.

**Recommendation:**

I have no architectural heritage concerns relating to this application.

**Signed:** _____ **Date:** 22nd September 2026

Shóna O'Keeffe
Executive Architectural Conservation Officer

**4. Environment and Climate Action Department**

**From:** McDonagh, Michael <michael.mcdonagh@limerick.ie>

**Sent on:** Thursday, September 17, 2026 2:56:53 PM

**To:** plandev <planning@limerick.ie>

**CC:** DL - C and D Waste <CandDwaste@limerick.ie>; Mellett, Arlene <arlene.mellett@limerick.ie>; Leland, Aine <aine.leland@limerick.ie>; O'Grady, Paul <paul.ogrady@limerick.ie>

**Subject:** 26 324584- Michael McDonagh

**Planning Application Internal Report**

**Applicant Name:** SID - Limerick Wastewater Treatment Plant Upgrade & Regional Bioresource Centre

**Planning Ref: 26 324584**

**Proposed Development Description:**

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.

**Development Location:** Dock Road, Ballykeeffe, Corcanree & Courtbrack, Limerick.

**Recommendation:**

**At the planning stage the following may be Conditioned into the Planning Decision..**

**Item 1: Resource and Waste Management Plan.**

Prior to **initiating any works** at this development, the site developer or appointed contractor shall submit to Planning Department and the Environment, Climate Action and Fire Department for agreement in writing a site specific Resource Waste Management Plan (RWMP) as set out in the "*Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)*". The RWMP shall include:

e. A list of proposed authorised waste collection permit holders to be employed.

f. A list of the proposed waste facility permitted sites at which the wastes may be recovered or disposed of.

g. Estimates of the proposed tonnages of construction and demolition (C&D) wastes by type e.g. soil and stone, rubble, wood, metal and plastic.

h. Details of how the RWMP will be measured for and monitored for effectiveness.

All records relating to the agreed RWMP should be made available for inspection at the site offices at all times.

**A template Resource Waste Management Plan can be found on our website at:** https://www.limerick.ie/council/services/environment-and-climate-action/circular-economy/resource-and-waste-management

**Item 2: Importation of Soil and Stone to Site**

Where there is a requirement to import soil and stone onto this site for a particular phase of this development appropriate authorisation must be in place. Two options are available, provided appropriate planning is in place.

B. Local Authority Waste Facility Permit or Certificate of Registration

A waste facility permit (WFP) or Certificate of Registration (COR) obtained from the Local Authority under the Waste Management (Facility Permit and Registration) Regulations 2007 (as amended). The Waste authorisation i.e. WFP/COR must be issued by the Council prior to commencement of importation of any suitable waste material (soil and stone) to the property. A Waste Facility Permit is limited to 200,000 tonnes for soil and stone and a Certificate of Registration is limited to 25,000 tonnes.

Link to information on Limerick City and County Council website is shown below

https://www.limerick.ie/council/waste-facility-permits-and-registrations-enforcement

C. By-Product Article 27 Declaration to the EPA

Importation of soil and stone can also be carried out under a By-Product Declaration under Article 27 to the EPA. Please note that Source Location and Use Location must be planning compliant. Link to website is found below.

https://www.epa.ie/our-services/licensing/waste/by-products-regulation-27/#

**Item 3: Removal of Soil and Stone from Development Sites**

Where there is a requirement to remove soil and stone from a development site, two options are available.

3. Removal of soil and stone off site in accordance with the Waste Management Act 1996 (as amended). This process requires the use of authorised waste collectors to transport soil and stone (which is classified as waste) to licensed waste sites such as Local Authority Certificate of Registration or Waste Facility Permit sites. Link to information on Limerick City and County Council website is shown below

https://www.limerick.ie/council/waste-facility-permits-and-registrations-enforcement

2. Removal of soil and stone can also be carried out under a By-Product Declaration under Article 27 to the EPA. In this instance the producer is declaring the soil and stone is a by- product and not a waste. Where the site is greenfield a By Product Registration application is made to the EPA. A Single Case By Product Notification is made to the EPA where the site is brownfield. Please note that Source Location and Use Location must be planning compliant. Link to website is found below.

https://www.epa.ie/our-services/licensing/waste/by-products-regulation-27/#

**Signed** _____ **Date: 17/09/2026**

**Michael McDonagh, E.S**

**5. Fire Department**

**From:** Kiely, Antoin <antoin.kiely@limerick.ie>

**Sent on:** Monday, September 14, 2026 2:58:42 PM

**To:** Leland, Aine <aine.leland@limerick.ie>

**CC:** fireservice <fireservice@limerick.ie>

**Subject:** FW: 26/324584 - SID

The Fire Service has on objection to the grant of planning for this development.

Antóin Kiely | Assistant Chief Fire Officer |Fire & Emergency Services

Limerick City and County Council

Lissanalta House, Dooradoyle Road, Limerick