

SECTION 1: Introduction

This Environmental Impact Assessment Report (EIAR) for the Castletroy Wastewater Treatment Plant (WwTP) Upgrade Project, hereafter referred to as the 'Proposed Development', has been prepared by JB Barry and Partners Ltd. on behalf of the applicant Uisce Éireann (formerly Irish Water). The EIAR accompanies a planning application made directly to An Bord Pleanála (ABP) under Section 37E of the Planning and Development Act 2000 (as amended). An EIAR is an assessment and analysis of potential impacts on the receiving environment caused by a proposed project. This EIAR was preceded by EIA Screening and Scoping Reports, available in **Appendices 1A and 1B**.

1.1 Project Background

Uisce Éireann is the national water utility responsible for providing water and wastewater services throughout Ireland. Uisce Éireann is a public utility formed as a company under the Water Services Act 2013 and incorporated under the Companies Acts. Uisce Éireann took responsibility for almost all functions for the delivery of water and wastewater assets and services that were previously managed by the 31 local authorities in January 2014. Uisce Éireann is now responsible for the operation of all public water and wastewater services in Ireland including:

- Management of national water and wastewater assets;
- Maintenance of the water and wastewater system;
- Investment and planning;
- Managing capital projects; and
- Customer care and billing.

Uisce Éireann is also responsible for the capital investment decisions and implementation of the capital programme delivery across the country. As outlined in its business plan, Uisce Éireann's mission is:

"All of our customers should receive a safe and reliable supply of drinking water and have their wastewater collected and safely returned to the environment. We will protect the environment in all our activities and support Ireland's social and economic growth through appropriate investment in Water Services."

The Castletroy WwTP Upgrade Project was initially an element of Uisce Éireann's 2017-2021 Investment Plan (i.e. Feasibility Study Report and Optioneering) and now forms part of the 2020-2024 Capital Investment Plan. Located west of Limerick City, the main Limerick (Bunlicky) WwTP has also been identified for inclusion in the investment plan. The upgrade projects are progressing independently, but the final combined increase in treatment capacity will promote future development across the Greater Limerick Area.

1.2 Project Need

Castletroy Wastewater Treatment Plant (WwTP) has been providing wastewater treatment since 1992. It serves the East Limerick suburbs of Castletroy, Annacotty, Mountshannon and Castleconnell, as well as the University of Limerick and other local industry. In 2018 Uisce Éireann identified that upgrade works were required at the WwTP to comply with current national and EU legislation, and also to support future growth demands as population grows and industry expands in the area. The geographical configuration of the Castletroy agglomeration catchment area can be seen in Figure 1.1.

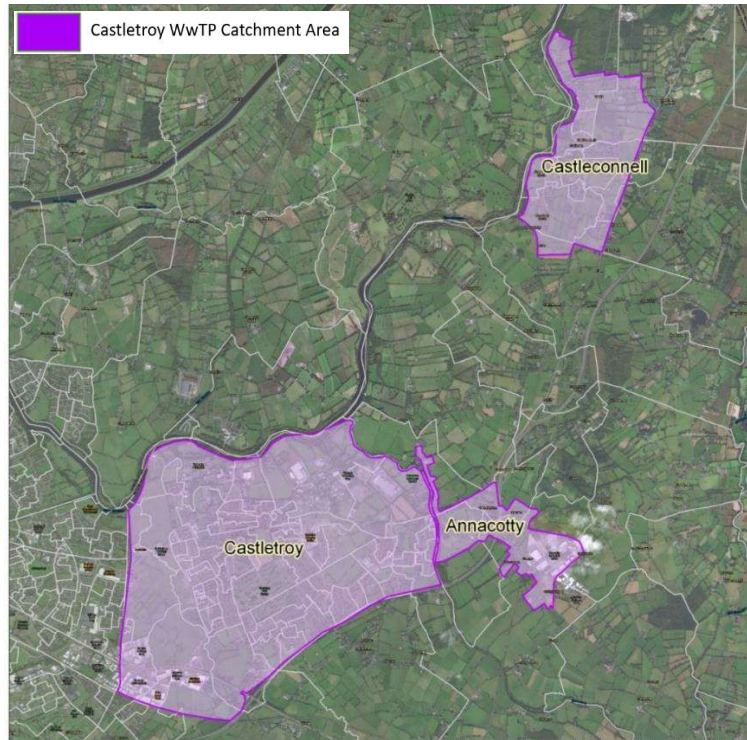


Figure 1.1: Castletroy WwTP Agglomeration Catchment Area

There is currently no capacity for stormwater storage at Castletroy WwTP which is in breach of criteria outlined in the DoEHLG "Procedures and Criteria for Storm Water Overflows, 1995". Excess flows from storms and heavy rainfall events are discharged with minimal treatment to the Lower River Shannon, a special area of conservation (SAC) under the Habitats Directive 92/43/EEC (Commission of the European Communities, 2007). Stormwater storage is required to reduce the annual rate of uncontrolled spills and to ensure compliance with all relevant environmental legislation.

The Proposed Development is also required to support growth demands in the agglomeration. Castletroy WwTP has a maximum design capacity of 45,000 population equivalent (PE). The plant is currently operating at the limitations of its design capacity and growth projections indicate that, without intervention, it will become overloaded in the coming years. This would cause severe deterioration in the quality of the final effluent discharge, and there would be subsequent negative effects on receiving water quality in the Lower River Shannon and SAC habitats. The Proposed Development addresses this eventuality by increasing the capacity of the WwTP to cater for +10-year population growth projections of up to 77,500 PE.

The population estimates for Castletroy have considered the information from the Central Statistics Office census data, Castletroy Local Area Development Plan 2009 to 2015 and information from the Geo-directory (2017). Population growth projections have been based on recommendations from Uisce Éireann Wastewater Asset Planning detailed in the Growth and Headroom Technical Guidance Note (TGN) - December 2017. Further details on population growth projections are available in **Section 3.3**.

Additional key drivers identified for the expansion of the Castletroy WwTP are as follows;

- Castletroy WwTP is an aging plant – Several items of equipment, key to the process, need refurbishment or replacement;

- There is an existing commitment to industrial licensees to provide capacity of 35,987PE which is not being fully utilised (Wastewater Discharge Licence Reg. No. D0019-01). Full use of this allowance will cause the WwTP to exceed current treatment capacity;
- There is an additional future allocation to the IDA of 5,500PE, if required;
- There is a requirement to meet a forecasted growth for domestic, commercial and institutional uses @ 3.28% growth over +10 years;
- There is a requirement to provide 20% headroom on domestic, non-domestic and institutional loading in accordance with Uisce Éireann policy; and
- The need to deliver on strategic national objectives, as discussed further in **Section 5**.

1.3 Site Description

1.3.1 Site Location

Castletroy is a Limerick suburb situated approximately 3km east of the City Centre. Castletroy WwTP is surrounded by the University of Limerick (UL) campus, between the university boat club and Dromroe student village. There is a walkway at the northern perimeter of the site along the banks of the Lower River Shannon. The site is predominantly enclosed as it is surrounded by heavy vegetation, high trees and hedge rows. The WwTP discharge point is in the main river channel, where Co. Limerick borders with Co. Clare. Figure 1.2 displays the site location with regard to the surrounding entities.

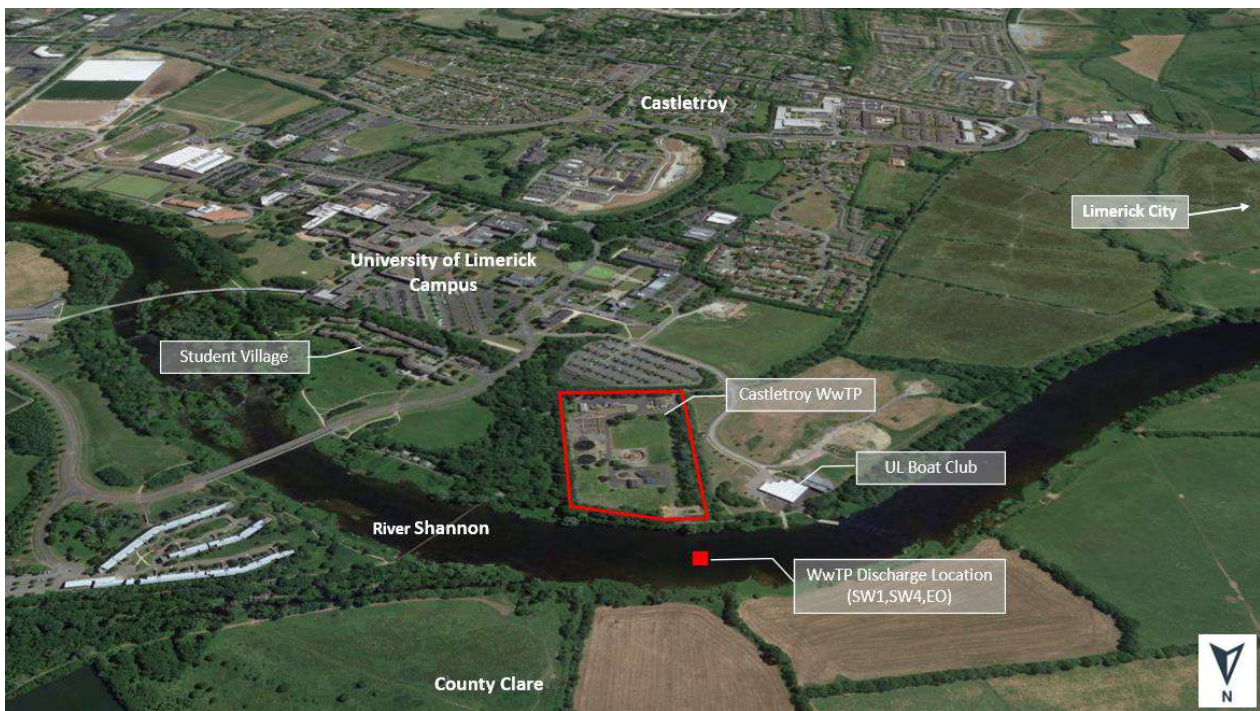


Figure 1.2: Castletroy WwTP Site Location

1.3.2 Existing WwTP Processes

The existing Castletroy WwTP operates as a conventional secondary treatment activated sludge plant and consists of the following elements with the main elements labelled in Figure 1.3:

- Inlet works incorporating wet well and 3 duty/assist/standby pumps and stormwater dry well with duty/assist pumps;

- Emergency gravity overflow in main lift pump station to outfall in the Lower River Shannon;
- Rake step screens complete with screenings removal, washing and compaction;
- Grit trap complete with blower, grit conveyor and classifier;
- Inlet flow measurement (DWF and storm electromagnetic flowmeters);
- 1 no. mechanical filtration unit and forward feed pumping arrangement;
- Twin stream conventional activated sludge with FBDA system installed in 2016/2017;
- Three final settlement clarifiers (two at 20m dia and one with 25m dia.);
- Final effluent inspection chamber;
- Outfall to the Lower River Shannon (combined storm and treated effluent outfall);
- 2 No. Picket Fence Thickeners (PFTs);
- Sludge dewatering consisting of 1 no. belt press and 1 no. centrifuge which is currently out of service; and
- Administration/control building & sludge dewatering building.

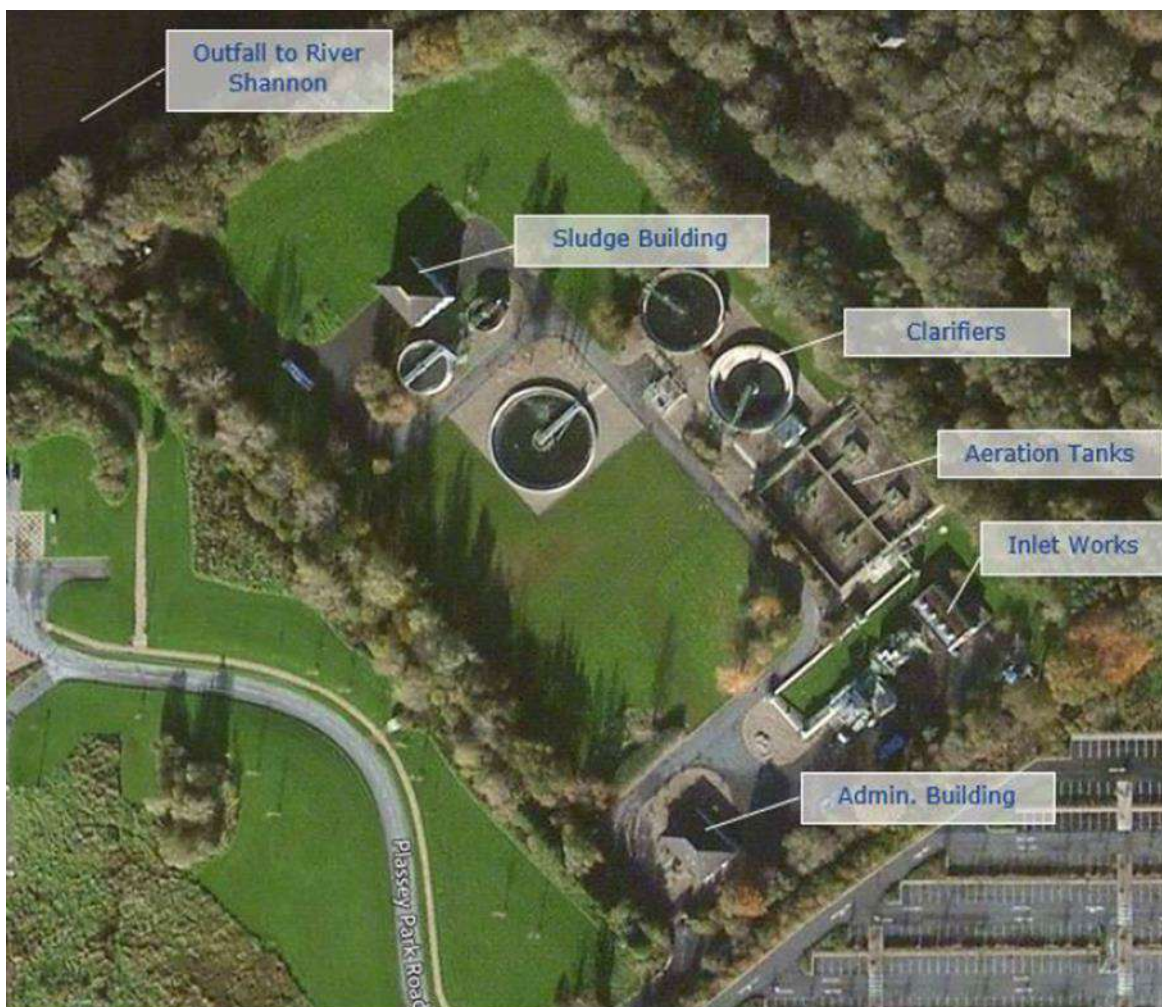


Figure 1.3: Castletroy WwTP Existing Layout

1.4 Overview of the Proposed Development

The Proposed Development will cater for future population growth and industrial development in the area, in line with population projections for Limerick as set out in the National Planning Framework (NPF)

Implementation Roadmap and the Southern Region Regional Economic Spatial Strategy (RSES). It will provide 20% Headroom allowance, in line with Uisce Éireann guidelines for large urban settlements. It will also ensure the WwTP continues to comply with requirements of the EPA Wastewater Discharge License (WWDL), Urban Wastewater Treatment Regulations (UWWTR) and other relevant Uisce Éireann Guidelines.

The initial upgrade works will cater for the +10-year growth projections up to 77,500 PE including a future IDA load of 5,500 PE. There will be provision made in the civil infrastructural development of the plant (tank sizing and pipework) for the +25-year growth projections of 81,100PE. However, a planning review will be required before any uplift above 77,500PE can be instated.

The Proposed Development also includes the installation of a new stormwater storage tank that will significantly reduce the annual rate of spills to the Lower River Shannon and make the WwTP compliant with the criteria outlined in the DoEHLG “Procedures and Criteria for Storm Water Overflows, 1995”.

The WwTP will remain operational during the construction phase. All new structures will be constructed offline and connected during temporary shutdowns. The shutdowns will be planned in a manner that will not affect WwTP performance. The main elements of the Proposed Development are listed below, further information on the construction strategy and proposed works is included in **Sections 4 and 5**:

- Upgrade to the inlet works (screens and pumps);
- Installation of a new (additional) grit channel;
- Construction of a new stormwater storage tank;
- Upgrade to primary treatment process;
- Construction of a new primary sludge holding tank with odour abatement;
- Upgrade to secondary treatment aeration system;
- Upgrade to secondary clarifiers to improve hydraulic capacity;
- Construction of a new flood event pumping station;
- Construction of a new surface water attenuation tank;
- Installation of a new chemical dosing tank; and
- Upgrade and repurposing of the plant’s sludge treatment facilities.

1.5 Overview of the Planning Process

Pre-application consultation with An Bord Pleanála (ABP) was undertaken, with regard to Section 37B of the Planning and Development Act 2000 (as amended), to determine whether the Proposed Development for Castletroy will be classified as Strategic Infrastructure Development (SID).

The Planning and Development Act 2000 (as amended) provides the statutory framework in Ireland for planning consents and the control of development. The Act (including the Strategic Infrastructure Act 2006) categorises development which is of strategic economic or social importance (‘Strategic Infrastructure Development’) under its 7th Schedule. The 7th Schedule of the Act defines ‘Environmental Infrastructure’ as follows:

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

Following consultations outlined in Section 37(B) of the Act, ABP has determined that the Proposed Development meets the criteria for Strategic Infrastructure Development (SID). Subsequently, as per under

Section 37E of the Act, the consent application for the Proposed Development will be made directly to An Bord Pleanála, accompanied by this Environmental Impact Assessment Report.

“An application for permission for development in respect of which a notice has been served under section 37B(4)(a) will be made to the Bord and will be accompanied by an environmental impact statement in respect of the Proposed Development.”

1.6 Approach to the EIA

1.6.1 Definition of EIA

EIA supports the decision-making process as it is integrated into consenting processes for new development projects. This helps to ensure that consent decisions are made in the knowledge of the environmental consequences of the project. Article 1(2)(g) of the 2014 EIA Directive states that:

“Environmental impact assessment” means a process consisting of:

- (i) the preparation of an environmental impact assessment report by the developer, as referred to in Article 5(1) and (2);*
- (ii) the carrying out of consultations as referred to in Article 6 and, where relevant, Article 7;*
- (iii) the examination by the competent authority of the information presented in the environmental impact assessment report and any supplementary information provided, where necessary, by the developer in accordance with Article 5(3), and any relevant information received through the consultations under Articles 6 and 7;*
- (iv) the reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point (iii) and, where appropriate, its own supplementary examination; and*
- (v) the integration of the competent authority’s reasoned conclusion into any of the decisions referred to in Article 8a.”*

For the purpose of this EIAR, Uisce Éireann is the ‘developer’ of the Proposed Development and An Bord Pleanála is the ‘competent authority’ responsible for undertaking the EIA and integrating its reasoned conclusion in this regard into the consent decision for the Proposed Development.

1.6.2 Legislative Context

Statutory Requirement for EIA

A European Directive for EIA has been in force since 1985 since the adoption of Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment.

The EIA Directive of 1985 has been amended three times by Council Directives 97/11/EC, 2003/35/EC and 2009/31/EC. It was ultimately codified and repealed by Council Directive 2011/92/EU on 13 December 2011. This Directive was further amended in 2014 by Council Directive 2014/52/EU which sets out the current requirements for member states on the assessment of the effects of certain public and private projects on the environment.

The EIA Directive Requires the competent authority to consider and take account of the EIAR for certain public and private projects that are likely to have significant effects on the environment as part of the consent decision making process. In Ireland, the requirements for EIA in relation to planning consents are specified in the Planning and Development Act, 2000, as amended, in Part 10 (Part X) of the Planning and Development Regulations, 2001, as amended.

As outlined previously, the Proposed Development requires an EIA, under the provisions of the Planning and Development Act, 2000, as amended and this EIA will be undertaken by the competent authority for the planning consent (An Bord Pleanála).

This EIAR adheres to the requirements of the EIA Directive and transposing European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (SI No. 296 of 2018) which came into force on 1 September 2018, and all associated guidance documents outlined in **Section 1.6.4**.

The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 transpose the requirements of Directive 2014/52/EU, amending previous Directive 2011/52/EU, on the assessment of the effects of certain public and private projects on the environment (the EIA Directive) into planning law with effect from 1st September 2018. Where reference is made to the EIA Directive throughout this EIAR, it should be understood that the transposing European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 also apply.

Notwithstanding, regard has also been had to the provisions of the Planning and Development Act 2000 (as amended), and the Planning and Development Regulations 2001 (as amended) as they apply now. This EIAR therefore fully complies with all European law and EIA Directive requirements in respect of EIARs and also all Irish law and requirements under the Planning Act and Planning Regulations in respect of Environmental Impact Assessments.

1.6.3 Other Relevant Legislation

Water Framework Directive

In response to the increasing threat of pollution and the increasing demand from the public for cleaner rivers, lakes and beaches, the EU adopted the Water Framework Directive (WFD), 2000/60/EC. This Directive is unique in that it establishes a framework for the protection of all waters including rivers, lakes, estuaries, coastal waters and groundwater, and their dependent wildlife/habitats under one piece of environmental legislation. The WFD aims to:

- *Protect/enhance all waters (surface, ground and coastal waters);*
- *Achieve “good status” for all waters by December 2015 or, at the latest, by 2027;*
- *Manage water bodies based on river basins or catchments; and*
- *Involve the public in this process.*

The WFD is linked to, and cross-references, a number of other EU directives. These include Directives relating to the protection of biodiversity (Birds and Habitats Directives), directives related to specific uses of waters (drinking water, bathing waters and urban Wastewater directives) and to directives concerned with the regulation of activities undertaken in the environment (Industrial Emissions and Environmental Impact Assessment directives). More recent directives on topics such as Floods and the Marine Strategy Framework have significant linkages with the WFD which is also supplemented by the Priority Substances Directive and the Groundwater Directive. The Nitrates Directive forms an integral part of the Water Framework Directive and is one of the key instruments in the protection of waters against agricultural pressures. The Sustainable Use of Pesticides and the Sewage Sludge Directives also provide for the control of materials applied to land. The European Communities Environmental Objectives (Surface Waters) Regulations 2009, (S.I. No. 272 of 2009) are of particular interest as they implement further aspects of the WFD, in particular Directive 2008/105/EC on environmental quality standards in the field of water policy and Directive 2006/11/EC on pollution caused by certain dangerous substances discharged into the aquatic environment. The Regulations apply to all surface waters and provide, inter alia, for:

- The establishment of legally binding quality objectives for all surface waters and environmental quality standards for pollutants;
- The examination and, where appropriate, review of existing discharge authorisations by Public Authorities to ensure that the emission limits laid down in authorisations support compliance with the new water quality objectives/standards;
- The classification of surface water bodies by the EPA for the purposes of the Water Framework Directive;
- The establishment of inventories of priority substances by the EPA; and
- The drawing up of pollution reduction plans to reduce pollution by priority substances and to cease and/or phase out discharges, emissions or losses of priority hazardous substances.

The WFD aims at improving the water environment in the EU and requires all Member States to protect and improve water quality in all waters so that they achieve good ecological status by 2015 or, at the latest, by 2027. It has been transposed in Ireland by the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003). The WFD applies to rivers, lakes, groundwater, and transitional coastal waters and requires that management plans are prepared on a river basin basis through the specified structured method.

River Basin Management Plans (RBMPs) have been prepared to protect and improve Ireland's water environment. They are reviewed and updated every six years. The first RBMPs covered the period 2009 to 2014 and identified the waterbodies that may not meet the environmental objectives of the WFD by 2015. The latest RBMPs (for 2018 to 2021) were published in April 2018 and these set out the actions to improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, estuaries and coastal waters) by 2027.

Urban Wastewater Treatment Directive

Council Directive 91/271/EEC (UWWT Directive) concerning urban wastewater treatment was adopted in May 1997 by all member states. The UWWT Directive is the legislative framework to protect the water environment from the adverse effects of discharges of urban wastewater and from certain industries in urban agglomerations.

Article 3(1) of the UWWT Directive identifies the need for urban agglomerations to be provided with collecting systems for wastewater that satisfy those requirements outlined in Annex 1(A). Further, Article 4(1) provides that:

"Member States will ensure that urban wastewater entering collecting systems will before discharge be subject to secondary treatment or an equivalent treatment."

Commission Decision 2014/413/EU (which replaces Decision 93/481/EEC) defines the information that member states should provide (to the European Commission) when reporting on the state of implementation of the UWWT Directive. Article 17 of the UWWT Directive aims at collecting information on planning processes for the implementation of the UWWT Directive, beyond the information on the status of compliance for agglomerations and treatment plants.

Habitats and Birds Directives

EU member states are required to establish a network of Natura 2000 sites under the obligations of Council Directive 92/43/EEC (Habitats Directive) and Council Directive 79/409/EEC (Birds Directive), as amended and codified in Council Directive 2009/147/EC. The Natura 2000 network comprises designated sites selected to protect important biodiversity including rare and threatened habitats and species including:

- Special Areas of Conservation (SACs, including candidate SACs) protected under the provisions of the Habitats Directive; and
- Special Protection Areas (SPAs, including proposed SPAs) protected under the provisions of the Birds Directive.

The Habitat and Birds Directives require that the likely significant effects of any plan or project, alone, or in combination with, other plans or projects, on the Natura 2000 site network (i.e. European designated sites), should be assessed before any decision is made to allow that plan or project to proceed. This process is known as Appropriate Assessment (AA), which starts with Stage 1 AA Screening and if likely significant effects cannot be ruled out, must progress to Stage 2 AA (i.e. preparation of a Natura Impact Statement).

There are a number of steps and tests in place that should be undertaken sequentially and documented by competent authorities in order to make decisions on the approval or refusal of a plan or project that may impact on European designated sites). Part XAB of the Planning Acts, which transposes the Birds and Habitats Directive requires the following to be undertaken:

- Stage 1 – Screening for Appropriate Assessment: To assess, in view of best scientific knowledge, if a development, individually or in combination with another plan or project is likely to have a significant effect on any European designated site.
- Stage 2 – Appropriate Assessment: This is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, is likely to have a significant effect on a European designated site. The appropriate assessment must include a final determination by the competent authority as to whether or not a Proposed Development would adversely affect the integrity of a European designated site. In order to reach a final determination, the consenting authority must undertake examination, analysis and evaluation, followed by findings, conclusions and a final determination. The appropriate assessment must contain complete, precise and definitive findings and conclusions, and may not have lacunae or gaps.
- Stage 3 – Assessment of alternative solutions: The process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European designated sites.
- Stage 4 – Assessment where no alternative solutions exist and where adverse impacts remain: An assessment where no alternative solutions exist and where adverse impacts remain – an assessment of compensatory measures where, in light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

Surface Water (Amendment) Regulations, 2009

The European Union Environmental Objectives (Surface Water) Regulations 2009, as amended, provide a more complete and stringent set of surface water quality regulations which address the requirements of the WFD and Council Directive 2006/11/EC on pollution caused by certain dangerous substances discharged into the aquatic environment of the Community. These regulations specify the conditions and physio-chemical concentrations that should be considered in the assessment of surface water quality. These regulations also give effect to Council Directive 2008/105/EC on environmental quality standards in the field of water policy.

The Planning System and Flood Risk Management Guidelines for Planning Authorities

In November 2009, the (then) Department of Environment, Heritage and Local Government and the Office of Public Works jointly published their guidance. The aim of the Guidelines is to ensure that flood risk is neither created nor increased by inappropriate development.

The Guidelines are issued under Section 28 of the Planning and Development Act 2000, as amended and planning authorities and An Bord Pleanála are therefore required to implement these guidelines in carrying out their functions under the Planning Acts. The Guidelines require the planning system to avoid development in areas at risk of flooding, unless the development can be justified on wider sustainability grounds and the risk can be reduced or managed to an acceptable level.

The Guidelines specifically require the adoption of a Sequential Approach (to Flood Risk Management) of Avoidance, Reduction, Justification and Mitigation and they require the incorporation of Flood Risk Assessment into the process of making decisions on Planning Applications and Planning Appeals. Fundamental to the Guidelines is the introduction of flood risk zoning and the classifications of different types of development having regard to their vulnerability.

The management of flood risk is therefore a key element of any development proposal in an area of potential flood risk and should therefore be addressed as early as possible in the site master planning stage.

1.6.4 EIAR Guidance

This EIAR has been prepared with due regard to the following overarching guidance on EIA:

- European Commission (2022) Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (EIAR);
- Department of the Environment, Community and Local Government (2013) Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (EIA);
- Government of Ireland (2018) Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018);
- Department of the Environment, Heritage and Local Government (DoEHLG) (2003) Environmental Effect Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development;
- Department of Housing, Planning, Community and Local Government (2017) Key Issues Consultation Paper on the Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use Planning and EPA Licencing Systems;
- Department of Housing, Planning, Community and Local Government (2017) Circular PL 1/2017 – Implementation of Directive 2014/52/EU on the effects of certain public and private projects on the environment (EIA Directive); and
- Department of Housing, Planning and Local Government (2018) Circular PL 05/2018 - Transposition into Planning Law of Directive 2014/52/EU amending Directive 2011/92/EU on the effects of certain public and private projects on the environment (the EIA Directive) And Revised Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.

Additional topic-specific guidelines are identified in the individual impact assessments in **Sections 6-19**, as appropriate.

1.6.5 Structure of the EIAR

This EIAR has been prepared in four volumes as follows:

- Volume 1 provides the non-technical summary. This summarises the findings of the EIAR in a clear, accessible format that uses non-technical language and supporting graphics. The non-technical summary describes the Proposed Development, existing environment, effects

and mitigation measures and relevant aspects of the EIAR in a manner that can be easily understood by the general public;

- Volume 2, Part A encompasses the EIAR introductory Sections in addition to ‘assessment’ Sections for each environmental aspect in accordance with Article IV of the EIA Directive. The front-end Sections (Sections 1 – 6) provide the relevant project context;
- Volume 2, Part B includes the assessment Sections (Sections 6 – 20) provide a description of the relevant environmental aspects and likely significant effects with summary Sections provided thereafter (Sections 20 and 21);
- Volume 3 provides the technical appendices and figures that support and are cross referenced with Volumes 2 and 3. This may include other relevant drawings, modelling outputs, background reports and/or supporting documents; and
- Volume 4 provides project drawings in A3 format that illustrate the information detailed in Volume 2 of the EIAR.

1.6.6 EIAR Team

This EIAR has been prepared on behalf of Uisce Éireann by a multi-disciplinary consultancy team of competent experts led by J.B. Barry and Partners Ltd. with input from specialist sub-consultants.

All technical leads are deemed to be qualified and competent experts in their fields in accordance with Article 5(3) of the EIA Directive, given their academic qualifications, professional affiliations and professional experience on other EIAs for major infrastructure projects. Refer to **Appendix 1C** for further details on the competent experts that have prepared this EIAR.

1.7 Consultation Undertaken

1.7.1 Introduction

Early stakeholder engagement (including dialogue, consultation and the disclosure of information) is a key element of project planning, development and implementation. Effective stakeholder engagement assists good design, builds relationships with local community, and reduces the potential for delays through the early identification of risks and issues.

Consultation has been undertaken with stakeholders during the development of the EIAR and statutory consent application in order to:

- Provide information on the proposed development;
- Ascertain and understand the views of stakeholders; and
- Seek input from stakeholders on the design, construction and assessment aspects of the proposed development.

1.7.2 Statutory Pre-Application Consultation with An Bord Pleanála

Consultation has been undertaken with An Bord Pleanála (the consenting authority) as part of the formal pre-application consultation process for the proposed development.

Irish Water submitted a letter to An Bord Pleanála on 29th October 2021 requesting to enter into pre-application consultation to determine if the proposed development is ‘Strategic Infrastructure Development’ in accordance with the Seventh Schedule of the Planning and Development Act, 2000, as amended. An Bord Pleanála was also required, as part of the pre-application consultation process, to give advice on

procedural matters involved in making an application and to advise on matters relating to proper planning and sustainable development or the environment, which may have a bearing on its determination.

Pre-application consultation meetings were subsequently held with An Bord Pleanála on the 28th June 2021 and 30th August 2022. Following these meetings Uisce Éireann submitted a request to close the pre-consultation process, and on the 24th January 2023 An Bord Pleanála confirmed that the proposed development is ‘Strategic Infrastructure Development’ in accordance with the Seventh Schedule of the Planning and Development Act, 2000, as amended. An Bord Pleanála also provided a list of Statutory Consultees to which Uisce Éireann are obliged to engage with directly in the application process as listed in Table 1.1.

Table 1.1: Prescribed Bodies List Provided by An Board Pleanála

Prescribed Bodies to be Notified of Application
Minister for Housing, Local Government and Heritage
Minister for Environment, Climate and Communications
Limerick City and County Council
Clare County Council
South-western Regional Assembly
Commission for Regulation of Utilities, Water and Energy
HSE
EPA
Inland Fisheries Ireland
Transport Infrastructure Ireland
The Heritage Council
An Taisce
An Chomhairle Ealaíon
Failte Ireland
Health & Safety Authority
GSI

1.7.3 Non-Statutory Consultation

Uisce Éireann held a period of non-statutory consultation to engage with relevant stakeholders in relation to the proposed development, which commenced on 13th June 2022 for a duration of 6 weeks. Non-statutory consultees included the public, elected representatives, and other interested parties (i.e. local industry).

The following strategies were used to communicate with non-statutory consultees:

- Social media and poster campaigns promoting the project publications;
- Information webinars;
- Information web page; and
- Contact email address for submissions.

At the outset of the consultation period, the project team held a webinar/online information event. They presented on the proposed design and associated environmental considerations, with an open questions forum at the end. The webinar information and environmental reports were also published on the project

webpage, and submissions were welcomed for the duration of the consultation period via the project email address. Further details of the activities carried out during the non-statutory consultation period are outlined in the following sections.

Social media and poster campaigns

The following measures were taken to promote engagement on the Proposed Development and Webinar event:

- Poster Campaign – posters were erected in public places like post offices and libraries in East Limerick;
- Social Media Campaign – social media posts were created and shared on Twitter, Facebook which contained a link to the project webpage with access to details of the consultation process; and
- Press Release – a newspaper advertisement was published in the Limerick Leader on 11th June 2022 with details of the upcoming public webinar, the project web page and contact email address.

Webinars for elected representatives and the public

Uisce Éireann held an information evening in the form of a webinar event to present the Proposed Development. Local Elected Representatives from Clare and Limerick were invited to meet on the 9th of June 2022. An open webinar for the public, business, industrial and all other interested parties was held on the 13th of June 2022. A copy of the advertisement for the open webinar is attached in **Appendix 1D**.

Information web page

Uisce Éireann oversaw the publication of the project on their website. The landing page provided an overview of the project, with details the project background, description, benefits and FAQ's. The web page will remain live for the duration of the project and will be continually updated as progress is made at: <https://www.water.ie/projects/local-projects/castletroy-wastewater-tre/>.

1.7.4 Feedback from Non- statutory Consultation

The issues raised and feedback provided during the public consultation period were summarised in the Consultation Report which has been submitted with this planning application. During the entire process of consultation three responses were received, as listed in Table 1.2.

Table 1.2: Responses Received During the Consultation Process

Stakeholder Name	Response
Shannon Group	Letter of Support
Johnson and Johnson	Query on Funding
TII	Recommendation affecting the National Road Network

1.8 Difficulties Encountered During the Assessment

The primary difficulty encountered was due to the location of site which necessitated communications with University of Limerick, which affected the preparation of Traffic and Transportation and Cumulative Impacts

sections of the EIAR. However, communications with the university have been established and their feedback is accounted for in the assessment.

In assessing the impacts of proposed odour sources, an inherent difficulty is associated with the selection of accurate odour emission rates used to represent the sources. The monitoring of odour emissions from tank sources on WwTP sites is also prone to a wide range of results and subsequently derived odour emission rates due to variations in throughput, meteorological conditions, operational scenarios, etc. This assessment is based on realistic worst-case odour emission rates to predict odour emission from the site based on the existing Castletroy WwTP and the Proposed Development.

No other difficulties were encountered during the preparation of this EIAR. The difficulties which arose are not considered to have a material impact on the baseline data collection for this EIAR.