

February 2022



# Site Selection Methodology Consultation Report

Sludge Hub Centres – South Region



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1

# Introduction

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# 1. Sludge Hub Centres – Site Selection Methodology

## 1.1 Introduction

In 2016, Irish Water published the National Wastewater Sludge Management Plan (NWSMP). The Plan sets out a nationwide strategy to deliver a sustainable and standardised approach to managing wastewater sludge now and over the next 25 years. This report identified the need for investment in strategic sludge management infrastructure at some of our wastewater treatment plants which included the development of regional Sludge Hub Centres (SHCs).

Irish Water published the Site Selection Methodology Reports (SSMR) for the Sludge Hubs Centres project in September 2019. Following the publication of these reports, Irish Water held a 4-week non-statutory public consultation, inviting feedback from members of the public and stakeholders on the SSMR. This report has been prepared to provide detail on the consultation activities that were carried out and to provide a summary of the feedback that was received following the publication of the SSMR for the South Region.

## 1.2 Project Background

Sludge is generated from the treatment of wastewater and once it is produced it needs to be treated so that it is suitable for either disposal or re-use. Since 2014, Irish Water has been building and upgrading wastewater treatment plants nationwide. The volume of sludge is increasing year on year and is predicted to continue to increase as our population continues to grow.

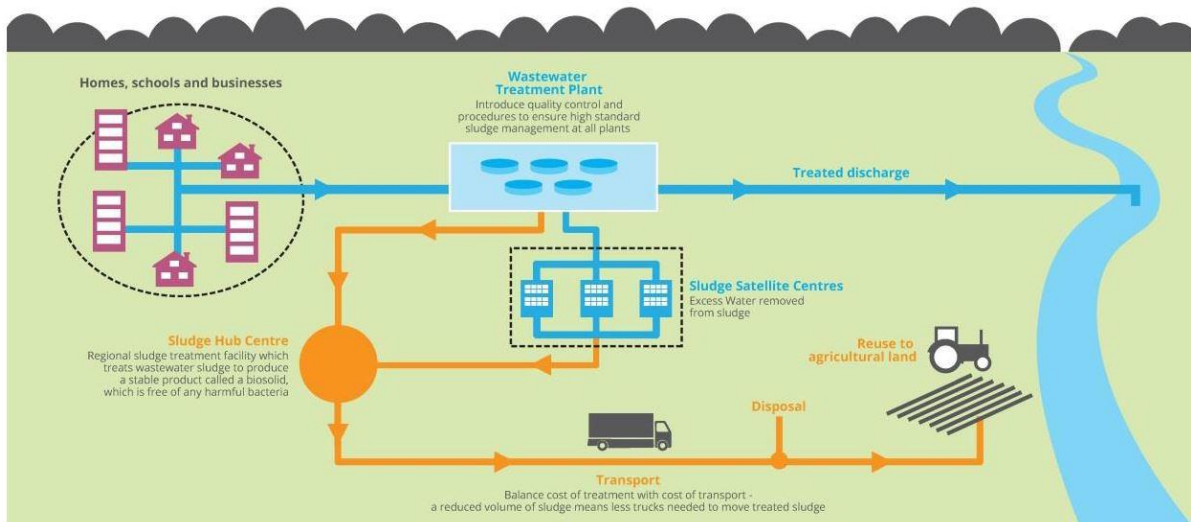
Irish Water has been developing ways of reducing sludge volumes for the most efficient movement of sludge, to achieve the best balance between the cost of transport and the cost of treatment. This means we must invest in strategic sludge management infrastructure at some of our wastewater treatment plants to ensure all regions are served in the most efficient way possible. The NWSMP proposes to develop a Sludge Hub Centre (SHC) and Satellite Dewatering Centre (SDC) network for wastewater sludge treatment, optimised on a regional rather than county basis. The three regions are:

- North West Region
- East Midlands
- South Region

## 1.3 Sludge Hub Centres

The use of a 'hub' and satellite' approach for the management of wastewater sludge provides for wastewater sludge from outlying rural works to be directed via intermediate treatment plants (Satellite Dewatering Centres), where sludge is dewatered prior to transfer to a centralised treatment facility (Sludge Hub Centre).

Sludge hubs are typically located at large wastewater treatment plants and accept sludge from the surrounding region for treatment. The role of Sludge Hub Centres within the wastewater treatment process is presented in **Figure 1.1** below.



**Figure 1.1** Sludge Hub Centres function in the wastewater treatment process

## 1.4 Project Benefits

The provision of new or upgraded sludge treatment facilities with import reception facilities to allow treatment of wastewater sludge on a wider regional basis will improve environmental outcomes, reduce sludge quantities for disposal, improve energy recovery, reduce operating costs and reduce overall energy consumption. Irish Water’s objective is to provide more efficient and effective treatment of sludge.

Existing sludge hubs and a list of potential infrastructure upgrades were identified in the NWSMP. As part of the Sludge Hub Centres project, Irish Water is carrying out an assessment of the capability of existing wastewater treatment plants currently accepting and treating sludge across the country. Through this assessment, the sites most suited to serve as Sludge Hub Centres on a regional basis will be identified. Should a site be selected as a Sludge Hub Centre, the capacity of sludge management facilities at these sites would need to be upgraded and increased.

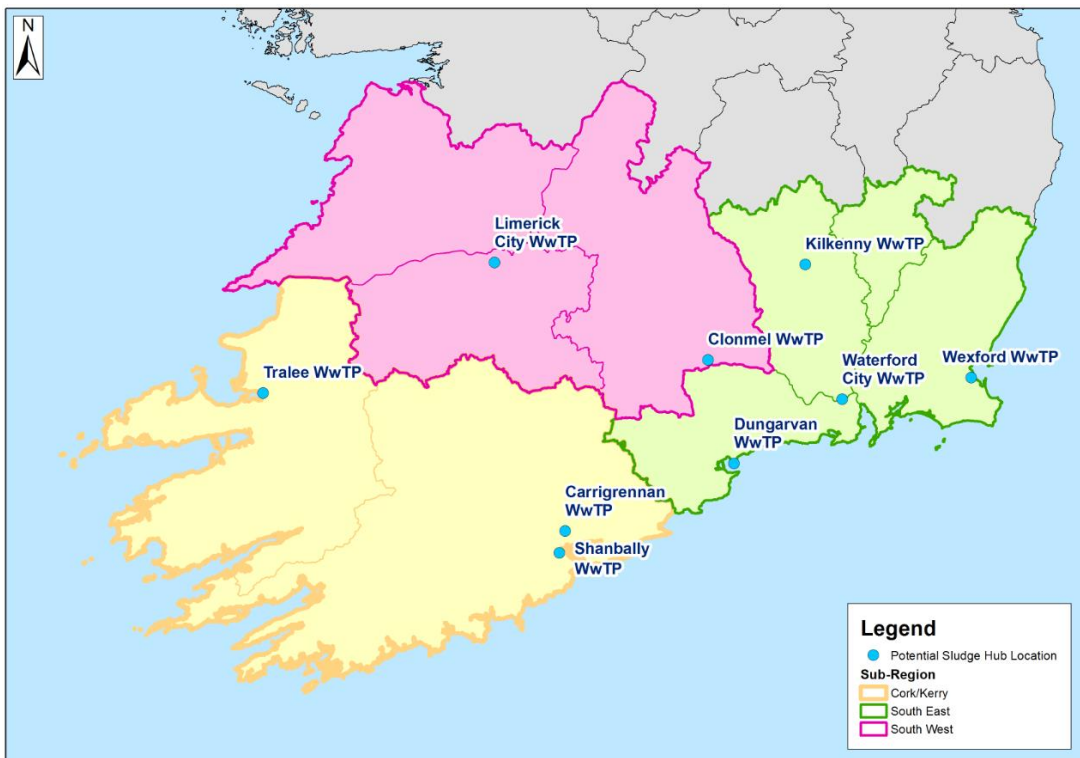
## 1.5 Sludge Hub Centres – South Region

On 24 September 2019, Irish Water published the *Site Selection Methodology Report – South Region* for the Sludge Hub Centre’s project. The Site Selection Methodology Report (SSMR) set out the proposed methodology for assessing and comparing the potential SHC sites in the South Region. This included details on the project need, the sites being considered for assessment, the site

selection criteria and the project roadmap. This report was available for download at [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs).

The South Region and the location of the sites being assessed in the site selection process is illustrated in **Figure 1.2**. The nine WwTPs include:

- Cork/Kerry: Carrigrennan WwTP, Shanbally WwTP and Tralee WwTP
- South-West: Limerick City WwTP and Clonmel WwTP
- South-East: Dungarvan WwTP, Waterford WwTP, Kilkenny WwTP and Wexford WwTP



**Figure 1.2** South Region boundary and sites being assessed as proposed SHC

## 1.6 South Region - Public Consultation

Public consultation is a key element in ensuring stakeholders and members of the public have an opportunity to contribute to the development of this project.

Irish Water published three regional site selection methodology reports for the SHCs in the North West, East Midlands and South regions simultaneously and sought feedback from members of the public and interested stakeholders.

Irish Water invited feedback on the following questions:

1. Is there any additional information on the potential sites identified that we should be aware of?
2. In addition to the criteria set out to select a preferred site, are there any other factors you think should be considered in choosing the preferred site?

3. How would you like Irish Water to communicate with you as the project progresses?

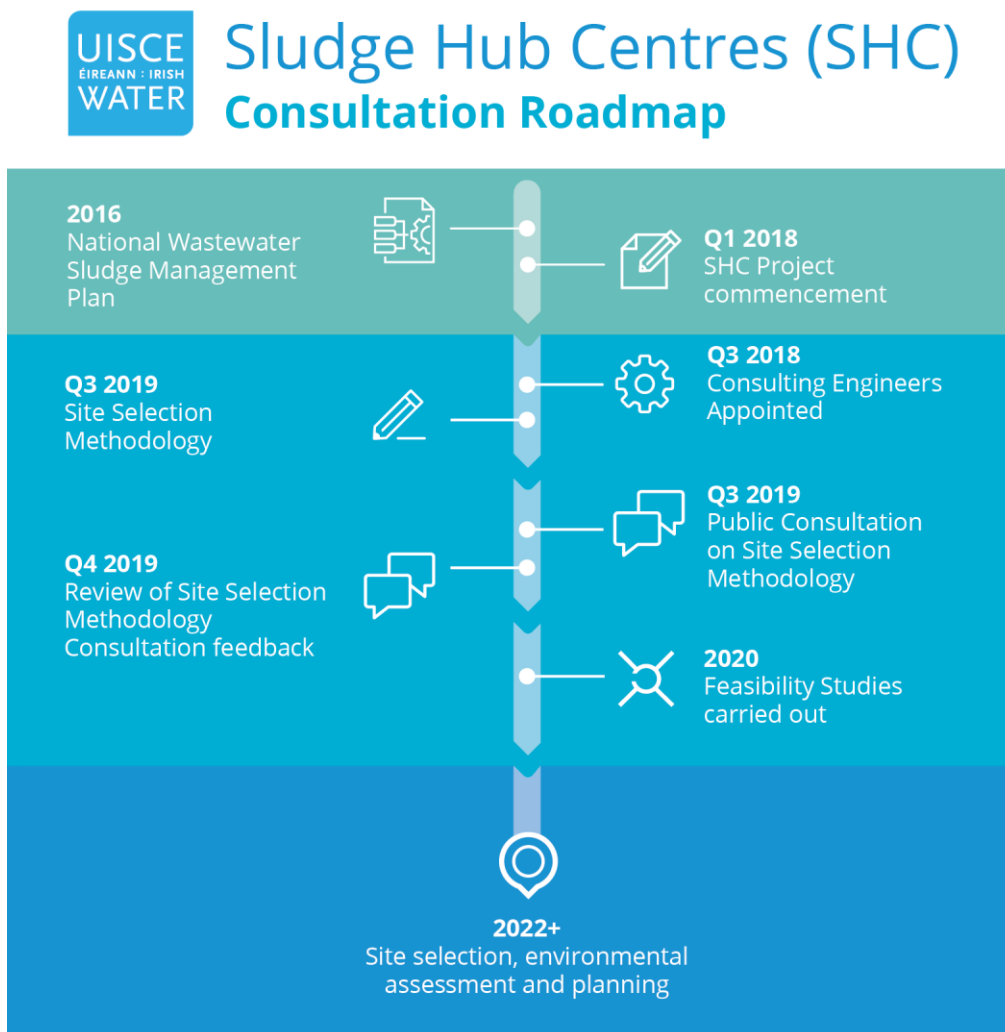
Irish Water sought feedback from the public, businesses, local authorities, elected representatives, public bodies and stakeholder groups on the SSMR. Each submission was reviewed and subsequently incorporated into this consultation report.

The SHC project consultation roadmap, sets out the steps planned to facilitate engagement by the public and relevant stakeholders as the project progresses. It illustrates the expected timelines of the SHC project, and the various stages involved in bringing it from the NWSMP through to planning and construction.

The project roadmap is presented in in **Figure 1.3** below.

In order to generate awareness of and participation in the consultation, a range of communications tools were used to promote the consultation. These communications tools are summarised in Section 2 of this report.

Irish Water commenced a period of non-statutory public consultation to run for four weeks from 24 September 2019 until 22 October 2019.



**Figure 1.3** Project Roadmap



2

# Consultation Process



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## 2. Consultation Process

### 2.1 Introduction

A variety of communications methods were used throughout and prior to the four-week consultation period to promote and invite stakeholders to participate in the non-statutory consultation for the South Region. Stakeholders that were targeted included the public, elected representatives, statutory bodies, and interested bodies / groups.

Public participation is a valuable asset in the development of any infrastructure project and our aim was to promote and encourage participation in the consultation process and welcome feedback on the SHC Site Selection Methodology.

The following communication tools were used:

- The SHCs dedicated project webpage on the Irish Water website contained details relevant to the South Region;
- The consultation Site Selection Methodology Report and newsletters which were put on public display at local authority planning counters and libraries in the South Region and available to download on the project webpage;
- Press release to local print and online media;
- Newspaper adverts placed in local newspapers;
- Correspondence via email and post;
- Social media postings on Irish Water's Twitter and LinkedIn accounts, with information on the public consultation and links to the SHC website; and
- Correspondence via the [sludgehubssouth@water.ie](mailto:sludgehubssouth@water.ie) email address.

### 2.2 Consultation Promotion

#### 2.2.1 Site Selection Methodology Report

The Site Selection Methodology Report for the South Region was published for the consultation period. This was made available to view or download from the webpage ([www.water.ie/sludgehubs](http://www.water.ie/sludgehubs)) and was also available to view at local authority planning counters and county libraries. This is presented in Appendix A.

The SSMR included relevant project information regarding sites being considered for selection, the selection criteria, details on how to submit feedback, further information and next steps following the consultation period.

Details on how to participate in the consultation were included on the SHC webpage. Submissions were invited through the following channels:

**By email:** [sludgehubssouth@water.ie](mailto:sludgehubssouth@water.ie)

**Or by Post:** Sludge Hub Centres – South Region Public Consultation, C/O Jacobs Engineering Ireland Ltd, Merrion House, Merrion Road, Dublin 4, D04 R2C5.

### 2.2.2 Project and Consultation webpage

A dedicated SHC project webpage was hosted on the water.ie website and went live in September 2019 at [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs). The webpage provided details of the public consultation. Details for the South Region were provided in a sub-section of the webpage.

The SSMR for the South Region was also made available to view or download, as well as other relevant information including the terms of reference, details on how to make a submission in the public consultation and the SHC project consultation roadmap.

The information was published on 17 September 2019 and has been available on the website since that date.

During the period of the consultation, there were 1,392 page views of the website [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs).

The SHC website content can be found in Appendix B.

### 2.2.3 Consultation newsletter

An information newsletter for the South Region was produced and distributed to local authority planning counters and libraries within the South Region prior to the consultation. The newsletter included details of the consultation including the consultation roadmap, a brief overview of the project need, details of consultation questions and means of which stakeholders could provide feedback on the SSMR. Libraries and planning counters were subsequently contacted and encouraged to share and promote the material with local stakeholders.

A copy of this newsletter can be found in Appendix C.

### 2.2.4 Press release

A press release announcing the commencement of the consultation was issued to regional and local news outlets, including both the traditional print media and online media outlets. This press release was issued to raise awareness of the consultation amongst the general public, thus increasing public participation and feedback on the Site Selection Methodology Report for the South Region.

The press release is presented in Appendix D.

### 2.2.5 Newspaper Advertisements

To promote the consultation to a wider audience, newspaper adverts were placed in the following regional newspapers:

Regional Newspaper	Date
Wexford People	17 September 2019
Munster Express	17 September 2019
Evening Echo	17 September 2019
Carrigdhoun	18 September 2019
Clonmel Nationalist	18 September 2019
Kilkenny People	18 September 2019
Kerry's Eye	19 September 2019
Limerick Post	19 September 2019

**Table 2.1** List of newspapers adverts placed in during consultation.

The advertisements were placed in local newspapers to announce the commencement of the consultation period, raise awareness and to encourage participation in the public consultation for the South Region. The advertisement included a brief overview of the SHC process and the nine WwTPs being considered in the Site Selection Methodology, along with an invitation to submit feedback by email and by post. This advertisement included details on how the public could review and obtain further information on the consultation both online and at planning counters / county libraries and details on how stakeholders could make a submission.

A copy of this advertisement can be found in Appendix E.

### 2.2.6 Social Media

The launch of the SHC consultation was promoted on social media using the Irish Water LinkedIn and Twitter pages, as displayed in Figure 4 below. The Irish Water LinkedIn page currently had approximately 19,300 followers and the Irish Water Twitter page approximately 27,000 followers at the time of the consultation.

Promoting the consultation on this platform enhanced the potential to inform a higher volume of people across a broad demographic. The post resulted in over 14,000 impressions over the two social media platforms.

**Figure 2.1 Screenshot of Twitter post on public consultation**



## 2.2.7 Direct Engagement and Correspondence

A number of governmental and non-governmental stakeholders were invited to participate in the public consultation through targeted correspondence. The list of stakeholders is identified in Appendix F.

### 2.2.7.1 Elected Representatives

On the 17 September 2019, a letter and email were issued to the Department of the Taoiseach and the Minister for Housing, Planning and Local Government. A copy of the letter issued is presented in Appendix G.

Additionally, an email was issued to elected representatives in the South Region including MEPs TDs, Senators and councillors informing them of the consultation.

Information was provided regarding the SSMR and elected representatives and their constituents were encouraged to submit feedback on the report.

### 2.2.7.2 Local Authorities

Local authorities are an extremely important stakeholder group given their past responsibility for sludge management. An email was issued on 24 September 2019 introducing the SHC SSMR Report – South Region and providing details of the consultation to the Chief Executives and various relevant Directors of Services of the local authorities within the South Region. Local authorities were

contacted prior to the four-week consultation period and offered copies of the Site Selection Methodology Report for the South Region and an information newsletter on the upcoming consultation.

The following city and county councils were contacted:

- Carlow County Council
- Clare County Council
- Cork City Council
- Cork County Council
- Kerry County Council
- Kilkenny County Council
- Limerick City and County Council
- Tipperary County Council
- Waterford City and County Council
- Wexford County Council

### **2.2.7.3 Public, Environmental and Interested Bodies**

Public, environmental and interested bodies were contacted by Irish Water by email with information about the consultation and invited to give their feedback on the Site Selection Methodology in the South Region.

Any requests for briefings from the interested bodies was considered by the project team and facilitated where appropriate.

A list of the environmental, public and interested bodies who received a correspondence is presented in Appendix F, while a sample of the letter issued can be viewed in Appendix H.



3

# Consultation Feedback

## 3. Consultation Feedback

### 3.1 Overview

In the South Region 96 submissions were received for this period of consultation. Respondents are categorised as shown in Table 3.1.

Category	Number Received
Individuals, members of the public	70
Businesses and business groups	11
Public bodies	8
Elected representatives	4
<b>Total Participation</b>	<b>96</b>

**Table 3.1** Consultation Participation

The public bodies that made submissions are listed in Table 3.2. Some bodies made more than one submission.

Public Bodies
Department of Rural and Community Development
Department of Communications, Climate Action and Environment
Department of Culture, Heritage and Gaeltacht (DCHG)
Environmental Protection Agency (EPA)
Geological Survey of Ireland (GSI)
Inland Fisheries Ireland (IFI)
Transport Infrastructure Ireland (TII)
Kerry County Council
Tipperary County Council
Kilkenny County Council

**Table 3.2** Public Bodies Responding to the Consultation

The issues raised and feedback provided during the public consultation period are summarised in the following sections of the report. Feedback is compiled from stakeholders' submissions with repeated themes summarised and specific issues reported directly. Feedback provided by individuals, businesses and

elected representatives is reported anonymously. Feedback from public bodies has been attributed as appropriate.

Feedback is summarised under headings that correspond to the questions asked in terms of reference of the consultation. In cases where submissions made did not fall under the specific consultation questions, these were grouped into relevant subsections following the criteria outlined in the SSMR.

Feedback has been reviewed by the project team and, where relevant, will be considered by the project team in the development of the Preferred Site Selection Report. Responses to queries raised in submissions are not provided in this report.

The views contained in this section do not reflect the views of Irish Water but represent the views of the stakeholders who made submissions as part of the public consultation. Accordingly, Irish Water does not attest to the accuracy of the information provided below.

## 3.2 Consultation Question 1

***Is there any additional information on the potential sites identified that we should be aware of?***

In answer to this consultation question several respondents provided specific information relating to the potential SHC locations. Feedback was further summarised under common themes including environmental, concerns with existing wastewater treatment plants, policy and plans, planning, traffic and the local economy.

### 3.2.1 Environmental Biodiversity and Ecology

The potential impact on Natura 2000 sites and other areas of conservation and sensitive habitats due to the development of sludge hubs was noted in a number of submissions in the south region.

The water services division of Tipperary County Council noted that the proposed south west SHC in Clonmel is immediately adjacent to the Lower River Suir Special Area of Conservation (SAC). They stated that “any development proposal will need to assess potential impacts on the Natura 2000 and will also need to consider wider biodiversity impacts i.e. impacts outside of the conservation objectives of the Natura 2000 site.” The Council continued that the mitigation of impacts on the wider catchment area of the proposed SHC hub in Clonmel would be very important at both design and planning application stages of this project.



Inland Fisheries Ireland (IFI) stated that the proposed Limerick SHC, in the south west sub region, is adjacent to the Shannon Estuary and in the Lower Shannon SAC and Shannon and Fergus Estuaries SPAs. It raised concerns at the sludge hubs' capability to accept increased organic and chemical / pharmaceutical loads. IFI continued that insufficient data has been provided for the proposed Limerick sludge hubs capacity to treat the range of harmful chemicals, "especially the pharmaceuticals that are currently finding their way into domestic sewage," in relation to important species such as salmon, lamprey, and eels present in the estuaries mentioned.

In relation to the potential SHCs in the Cork Kerry sub region, it was stated that the existing WwTP in Carrigrennan is in close proximity to the Cork Harbour SPA and the Great Island Channel SAC. An elected representative highlighted that "Little Island is right beside the Belvelly Channel SAC and the Lough Mahon SPA is already showing signs of stress caused by excess nutrient input from the Carrigrennan treated discharge."

Ecology was a key theme in many submissions from the south east sub region. A number of submissions detailed what they felt were current issues. One stakeholder stated that danger signs are appearing in Irish waters affecting "salmon, eels, shellfish and humans." One stakeholder from the south east mentioned that "since Dungarvan has expanded its sludge and wastewater output, a significant fall in oyster and other marine wildlife production has been reported." It was stated there are "already problems in the Bricky Estuary [Dungarvan] with algae due to nitrate pollution."

Respondents went on to outline the sensitive ecological areas in the environs of the potential SHC in Dungarvan. The Harbour in Dungarvan was stated as being an EU Natura Zone and "environmentally sensitive." An elected representative explained that Dungarvan WwTP is unsuitable for use as a regional SHC because it is adjacent to Dungarvan Harbour, "which is a SPA under the EU Birds Directive." It was also noted that Dungarvan WwTP is unsuitable for use as a regional SHC "because it is across the harbour from Helvick Head, which is a Special Area of Conservation." Another stakeholder noted that the proposed SHC in Dungarvan is also very near to Clonea Beach, which is home annually to a number of migrating birds.

It was highlighted that Ballinacourty, Dungarvan is a designated Green Belt area by Waterford City & County Council to protect and enhance the area. The animals, sea life and plant life were mentioned frequently in submissions. It was highlighted by stakeholders that Dungarvan Harbour has been identified as a Priority Area for Action in the River Basin Management Plan for Ireland 2018-2021. A stakeholder explained that a forum is currently being established "to work on these collaborative efforts locally in conjunction with the Local Authorities Water Program and EPA Catchments. It would be counterproductive to put further pressure on an area that has been highlighted for priority action."

They further voiced concerns that the SHC would have a “detrimental impact on the environment and impact other industries.” It was stated that a SHC located in Dungarvan “would cause disruption to our local ecosystem and would hinder the conservation objectives under Directive 2009/147/EC on the conservation of wild birds.” One stakeholder stated that they “assume that the water removed from the sludge will contain bacteria, viruses and nutrients and possibly other contaminants that are not routinely tested for” which could impact marine life. One business owner requested that the SSM for the South Region provide evidence that the discharge is of suitable quality to release into a natural waterway. One stakeholder referenced the Local Authorities Water Programme, which states that storm drains are connected to the sewage system, which discharges on the Blue Flag beach of Clonea.

Submissions from Wexford in the south east sub region emphasised the potential impacts on ecology also. A stakeholder stated that Wexford Harbour is located within a SAC and SPA and is also a designated shellfish growing area. It was highlighted that Wexford Harbour is a shellfish designated area and thus, protected under the Shellfish Directive, which is included under the Water Framework Directive. Several stakeholders queried the impact potential bacteria from sludge would have on shellfish growing.

It was noted that according to “the River Basin Management Plan 2018-2021 published by the Department of Housing and Local Government, Wexford harbour is identified as an area where, because of poor water quality, action is required.” The stakeholder further noted that “all these points considered, it is hardly fitting that sludge which is generated over a wider area should be transferred to Wexford and after treatment the effluent discharged into Wexford Harbour, adding to the pressures on the ecosystem.”

### **Noise and Odour**

A stakeholder in the south east sub region articulated that due to the potential location being on an exposed headland this “would allow noise and odours to be received by receptors all across Dungarvan Harbour from the patrons of the adjacent golf club and beaches to local residents and visitors to Dungarvan town.”

A stakeholder stated that noise, odour and vibrations for the proposed Tralee SHC needed to be mitigated in the design stage to cater to residents’ needs.

### **Hydrology and Flood Risk**

A submission from Tipperary County Council noted concerns regarding flooding and zoning, stating that the most up to date Suir Catchment Flood Risk and Management “shows the extremities of the existing site as being at risk of flooding.” One stakeholder based in the Cork-Kerry sub region stated that

climate change will affect the sea levels and a flood risk assessment needs to be considered.

A commercial business located in the south east sub region, highlighted that no Environmental Impact Assessment has been undertaken yet to assess the impacts such a development would have on a coastal town such as Dungarvan and the surrounding areas. Referencing the NWSMP, this business questioned why sludge would increase to 96,442 tonnes of dry solids over the next 25 years.

### Archaeological and cultural heritage

It was stated by the water services division of Tipperary County Council, in the south west sub region, that the site of the existing WwTP “does not include any zone of archaeological potential, recorded monuments or protected structures.”

In the Southeast Region a number of stakeholders noted that the Ballinacourty lighthouse is a protected structure and within the area of one of the potential SHCs.

### Other Environmental concerns

An elected representative from Waterford stated that the Dungarvan area should not be disturbed as it was shown in the Ordnance Survey Ireland (OSI) and Environmental Protection Agency’s (EPA) Radiological Data Map as being located in an area with high radon readings.

#### 3.2.2 Existing Wastewater Treatment Plants (WwTP)

A number of respondents in the Cork and Kerry and the south east sub regions expressed their concerns about the operations of existing WwTPs.

It was noted by a stakeholder from Co. Cork that the Carrigrennan WwTP is in breach of its EPA approved licence. It was stated that this breach consisted of nitrate emissions and ongoing odour issues have been reported to Irish Water. Another stakeholder and a local representative stated that there are huge odour issues in the area at present. It was noted that the existing Carrigrennan plant in Co. Cork, has no nutrient removal process at present and adding to its capacity should be an urgent priority. It was noted by another stakeholder that “any capacity that the plant has at present will be used by the increase in population living and travelling to Cork in the near future.” A respondent stated that although the Carrigrennan treatment plant is one of the biggest of its kind in the country, its location at the very south of the region, makes it more difficult to cater for the region in its entirety.

Regarding the WwTP in Dungarvan, it was stated by a stakeholder that there had been a number of instances due to poor management and practices, where beaches had to be closed for prolonged periods due to uncontrolled discharges.

It was noted by one stakeholder that there had been “dumping of raw sewage when there are heavy rains and high tides.” A stakeholder stated that the confidence in the management of the existing facilities and their maintenance was already a concern.

Several respondents in Dungarvan complained about odour issues relating to the WwTP. One stakeholder said they were told that “there would be no foul odour from the local Wastewater Treatment Plant” but they have often had to make complaints of the contrary. One stakeholder stated that the smells were strong in the area [Dungarvan] “especially when the sludge lorries come in.” A local business stated that there were odour problems at present and that a SHC would exacerbate these problems. One stakeholder stated that the sewage smell was also inside her home. It was noted that complaints regarding odour have already been issued to Waterford City Council.

A stakeholder in the south east sub region discussed the effectiveness of the treatment of effluent at present, which ends up affecting the quality of the seawater in the bay in Dungarvan. One stakeholder explained that bacteria such as E. coli have increased in the harbour since wastewater output was expanded in the area. A stakeholder proposed to connect the public sewer where possible. One stakeholder raised concerns over the quality of the treated wastewater and sought assurance that the wastewater being discharged from the outfall pipe in Dungarvan bay would be considered clean to the highest standards. Another stakeholder also in the Dungarvan area queried the significant variations in volume between the sludge entering the plant and dewatered sludge leaving the plant from year to year and why this had not been addressed in the Annual Environmental Reports for the current plant.

### **3.2.3 Sludge Policy and Plans**

There were a number of submissions in relation to sludge management policy and plans from across the southern region.

The planning division of Kilkenny County Council stated that they “concur with Irish Water’s view that the provision of upgraded sludge treatment facilities with import reception facilities to allow treatment of wastewater sludge on a wider regional basis will improve environmental outcomes, reduce sludge quantities for disposal, improve energy recovery, reduce operating costs and reduce overall energy consumption.”

The water services division of Tipperary County Council noted that the existing Clonmel WwTP already had a Sludge Hub, and therefore cited that they had “no objection in principle to the location of a Sludge Hub that would serve the wider catchment.”

A stakeholder noted that although both the current and projected population of Clonmel is within the capacity of the plant, in the event of a large-scale

development being proposed, the plant should be upgraded to cater for a potential increase in usage.

It was stated by an elected representative that “the carbon footprint of centralising all sludge processing in a Sludge Hub Centre for the Cork and Kerry sub region would be highly significant.” It was then stated that the carbon footprint evaluation needs to be presented and the single hub approach justified from a climate impact perspective. This elected representative continued that both cost and sustainability dictate that “it is best to minimise the volume of any sludge destined for destruction rather than reuse.”

An elected representative in Cork noted that although centralisation is efficient, that does not always mean it is the best option. It was mentioned that the distance sludge would need to travel to get from Shanbally to Kerry, for example, would be very great, noting the knock-on effects of Heavy Goods Vehicle (HGV) movements of this scale would be large due to emissions and the potential for increased road accidents would need to be considered.

An elected representative in Cork stated that the precautionary principal be used in the location of a proposed sludge hub in Shanbally, “the reality is that although the Code of Good Practice was produced with the best possible knowledge of the time, it is now 20 years old and is based on legislation that is 30 years old. As it remains, the only mandatory quality control is over the use of biosolids in agriculture, to locate Cork’s Sludge Hub at Shanbally would be diametrically opposed to the use of the Precautionary Principle.”

An elected representative from Cork noted that “either Shanbally or Carrigrennan will likely be chosen as the preferred regional Sludge Hub” according to the matrix of evaluation criteria. This elected representative further noted that Carrigrennan does not have planning permission to accept sludge imports and will likely continue to treat its own sludge to biosolids standard, therefore, making Shanbally an easier choice for a sub-regional hub due to the greater availability of adjacent land and superior serving road network.

A stakeholder located in the south east sub region suggested that alternative sludge management options should be explored due to the “associated uncertainties and the cost of reuse.” Another stakeholder in the south east sub region questioned why Dungarvan had been selected as a potential SHC as it had been considered previously and found to be at capacity for the foreseeable future. It was queried why the NWSMP stated that no additional sludge satellites are required for Waterford.

### **3.2.4 Planning**

#### **Planning context**

The water services division of Tipperary County Council noted that if the existing Clonmel WwTP were to be extended then it should be in accordance with the “objectives of the CEDP [Clonmel and Environs Development Plan

2013] subject to all other technical requirements being satisfied.” The Council also noted that sufficient capacity should be maintained in the plant to provide for growth of the town as envisaged under the Draft Regional Spatial and Economic Strategy (RSES) and the Clonmel and Environs Development Plan 2013.

An elected representative from Waterford noted that the Waterford County Development Plan was out of date as the Regional Spatial and Economic Strategy for the southern region was yet to be completed and noted that when this is complete “it is highly likely that objectives in relation to the conservation of the area of Ballinacourty where the Dungarvan WwTP is located would have been included.”

An elected representative in Cork queried the proposed SHC locations outlining that the NWSMP states “the Cork County Sludge Management Plan as proposing development of Sludge Hub Centres at Skibbereen, Castletownbere, Ringaskiddy, Ballincollig, Middleton, Mallow and Mitchelstown. The three locations now proposed in the SSMR did not feature at all in the NWSMP and differ from the Sludge Hub locations identified in the preceding Cork County Sludge Management Plan.”

## Land use

A stakeholder in the Cork and Kerry sub region cited that a potential SHC would mean that there would be a reduced availability of land in Carrigrennan. A local representative stated that if Irish Water intended on producing biosolids at the new Carrigrennan SHC, the optimal location could not be assessed without looking at local availability of agricultural land for spreading.

The Kerry County Council water and environment division, noted that they are a major landowner in the area of the potential Tralee Sludge Hub and had “plans in the area to develop both social and private housing along with ancillary community and residential facility on these lands in the future.” They requested that planning and development of the SHCs be cognisant of the present and future residential development plans close to the Tralee WwTP.

The water services division of Tipperary County Council also noted in reference to the potential sludge hub in Clonmel, that “the only adjacent lands which are available to cater to any expansion outside of the site boundary are located immediately to the east and are zoned for immediate use, the land use zoning objective is to preserve and enhance recreation and amenity areas.” They further noted that the development of a SHC would not comply with the land use zoning objective.

A number of submissions received discussed the land use in the Ballinacourty and Ballinard areas, which are near Dungarvan, County Waterford. A stakeholder noted that there were a significant number of residential homes within a short distance of one another in the area that is proposed as a SHC. It

was also noted that development of the potential site in Dungarvan could necessitate approaching the boundaries of a local business, thus incurring negative impacts. A stakeholder referred to the fact that the current development plan “stipulates that the treatment plant is in an area of zoned land” and would necessitate going right up to the boundaries of a highly regarded local, commercial amenity in the area resulting in “unwarranted interference.”

## Traffic impacts

There were a number of submissions from the Cork-Kerry sub region and the southeast sub region in relation to potential traffic impacts of the SHC projects.

With reference to the Cork Kerry sub region, it was noted by an elected representative from Cork that there is a traffic blackspot on the N25 between Little Island and the Dunkettle interchange and increased HGV movements would be dangerous. It was stated that this road infrastructure was already at capacity.

An elected representative in Cork noted that the distance sludge would need to travel to get from Shanbally to Kerry, for example, would be very great, noting the knock-on effects of Heavy Goods Vehicle (HGV) movements of this scale would be large due to emissions and would need to be considered.

Many submissions relating to the Dungarvan WwTP in the south east sub region stated that the roads infrastructure would not be able to facilitate any increase in the type or volume of traffic. It was noted that the current treatment plant is poorly located in terms of accessibility due to its location on narrow rural roads. One respondent stated that the road leading to the Dungarvan plant services residential properties only and was not equipped to deal with an influx of HGVs. A stakeholder stated that the road network near the plant is only suitable for cars, cyclists and pedestrians. The roads were noted as being busy due to the area being a popular tourist destination. It was stated that the road infrastructure “from the N25 for the last km to the treatment plant is unsuitable for the transportation of sludge on a daily basis, particularly in the summer with the width of the road and campervans and caravans accessing the local caravan parks and amenities.”

### 3.2.5 Local impacts

#### Tourism

The potential impact of a sludge hub on tourism was frequently mentioned by respondents from the south east sub region. A local business stated that they are “not opposed to the existing Dungarvan WwTP and its operations but would be concerned about the impact a SHC would have on the local community, businesses and tourist accommodation in the area.”

A number of stakeholders mentioned Dungarvan and Ballinacourty as being quiet, residential areas with a strong presence in the tourism industry. It was noted that these tourists “pour their money” into the local economy. It was stated that the potential Dungarvan SHC is “located near Kilgrovan, an early Christian site where Ogham stones were also located.” One stakeholder stated that the entire area had been an inspiration to their poetry, which had been widely published. A stakeholder referenced the hard work and effort put in by both the Waterford City & County Council and the local community to the local economy and tourism industry in recent years. A local elected representative stated that a “Sludge Hub Centre would certainly have a massive detrimental impact on the Council’s plans going forward.”

It was noted that a local popular tourist business very close to the Dungarvan plant “will suffer even more noise and smell from the plant” if upgraded to a SHC. It was expressed that potential poor management of the SHC would deter tourists from visiting the area as well as frequenting the local holiday homes and caravan sites “occupied all year round by visitors.” Another Dungarvan stakeholder stated that “while I accept these plants as a necessary evil, surely putting one such treatment plant alongside a fledging tourist and health success of the greenway is poorly judged.” It was suggested that a non-tourism dependent area would be a preferable location for a SHC.

The proximity of the proposed Dungarvan SHC to the Waterford Greenway and local beaches was cited by a number of stakeholders, with reference to the many locals including cyclists, walkers and families that frequent them and the adjoining roads. It was outlined that the region had experienced a huge boost to the local economy since the Greenway had been opened and several stakeholders expressed fears regarding loss of jobs and income.

Concerns were expressed by south east sub region respondents regarding the blue flag status of the local beaches and Clonea Strand as well as the impact the loss of this would have on tourism. It was noted that many of the local clubs and businesses depend on having clear and clean seawater. A stakeholder noted that “the present outfall pipe off Ballinacourty [Dungarvan] lighthouse is used by kayakers, sailors and recreational fishermen.”

### **Impact on local amenities**

The potential impacts to local amenities were also raised by a number of respondents. One stakeholder from Dungarvan, Co. Waterford, raised concerns regarding the impacts to sea swimmers and they did not want to lose that natural amenity to a SHC. One stakeholder noted that the local waters were used for both leisure and commercial reasons. Several concerns were raised regarding an increase of bacteria in the water and the impact a change in water quality would have on human health from food consumption or bathing. Local



swimmers expressed concerns that the water would no longer be safe to swim in.

The Waterford Greenway was cited as being a hugely successful local amenity. One stakeholder explained that the Greenway has attracted many to use Ballinard in Dungarvan as a picnic area. Inland Fisheries Ireland (IFI) stated that the “the impact of any proposal on the recreational value of the River Suir and associated Greenway will need to be considered.”

Concerns were raised that a SHC in Dungarvan would have a large impact on the local community. Another submission noted that a potential SHC in the area would be “unfair on residents.” It was also noted that residents’ quality of life would be “directly and negatively impacted” by such a development. Asthma was mentioned as being a concerning factor and “trucks constantly moving sludge into the area would affect this.” One stakeholder expressed concern that there would be a “degradation of recreational opportunities and hypoxia.”

### Local economy

There were also a number of respondents from the southeast sub region in relation to the potential impacts to the local economy.

Several respondents from Wexford and Waterford expressed concerns about the potential impacts a SHC would have on the fishing industry in the south east region. A stakeholder noted that the NWSMP does not refer to the environmental or commercial impact a SHC would have on the local fishing and seafood economy. Several stakeholders in Dungarvan mentioned oysters and their sensitivity to change. A stakeholder in the aquaculture industry noted that a SHC would not be in line with the Water Framework Directive and could impact the shellfish and business as a result. A local business commented that any “increased organic matter and phosphorus levels being released into the water may lead to eutrophication and to increased bacteria and virus levels in the waters.” They stated that this would have a very serious effect on the stock of shellfish growing in that area.

A local business in Dungarvan stated that “our shellfish growing areas leased from the Department of Marine and licenced by aquaculture licences are completely dependent on the clean and safe growing waters designated under the Shellfish Water Directive 2006/113/EC. The oyster industry is helping to keep transitional and coastal waterbodies in good health and the wider ecosystem. Anything that threatens the local shellfish producers will ultimately threaten the ecosystem health of the bay.” It was further stated by a stakeholder in the South East sub region that Dungarvan Bay is already considered a Grade B bay for part of the year and further pollution would incur great losses for the shellfish industry.

Concerns were expressed regarding the impact a potential SHC in Wexford would have on the water quality in the harbour and subsequently, the local

shellfish producing industry. A number of stakeholders expressed concerns about the impact a SHC would have on agriculture, fisheries and aquaculture practices in the area. It was stated that the area is extremely dependent on this industry. Several other shellfish producing companies echoed this sentiment, stating that potential viruses and bacteria could impact sensitive shellfish and thus, negatively affect the local economy. A local business raised concerns “that discharges from the proposed development may have a detrimental effect on the water quality in Wexford harbour” and therefore a harmful effect on the shellfish they produce.

A stakeholder in the south east sub region noted that the oyster industry provides significant employment in the area, stating that the industry had already been struggling with water quality issues. Another commercial shellfish company stated that they feared the impact a SHC would have on their business due to exporting markets being extremely strict with food safety controls. This stakeholder suggested that Kilkenny WwTP would be the only location that would not impact shellfish and local businesses selling them.

### 3.3 Consultation Question 2

***In addition to the criteria set out to select a preferred site, are there any other factors you think should be considered in choosing the preferred site?***

In answer to this consultation question respondents provided feedback on the criteria that should be considered by the project team in selecting a preferred site. This feedback is summarised under common themes, namely environmental, transportation, local economy and other criteria and is not specific to any sub region.

#### 3.3.1 Environmental Criteria

##### Ecology, Biodiversity and Landspreading

DCGH stated that nitrogen emissions may also be a resulting factor from land-spreading of the final sludge product. It was noted that this matter should be a criterion in the site selection process, with attention to potential impacts “on nitrogen-sensitive Natura 2000 sites or other sensitive receptors.” An elected representative in the Cork Kerry sub region also suggested that the “local availability of land spreading outlets” be an additional criterion.

DCGH noted that the future impacts of any nitrogen emissions from combined heat and power engines on nitrogen-sensitive Natura 2000 sites or Annex 1 habitats should be taken into account at site selection stage. They stated that the impacts of nitrogen deposition included acidification and eutrophication.

DCGH also stated that the site selection criteria should “include whether the site overlaps, is immediately adjacent to or in the vicinity of any European sites, Natural Heritage Areas, statutory nature reserves, refuges for fauna, Proposed Natural Heritage Areas, Annex 1 habitats occurring outside European designated sites and sites of local biodiversity importance including wetlands and green infrastructure as outlined in County Development plans, local area plans and biodiversity plans.”

GSI commented that they would “like to see reference to research of impacts of biosludge impact on plant growth and soil microbial and faunal communities.” They stated that in order to avoid ecotoxicological impacts and to understand the effects of biosludge, it needs to be thoroughly evaluated. GSI questioned how biosludge would persist in the field conditions and the long-term impacts.

IFI requested that the increasing impact of pharmaceuticals on the aquatic environment be addressed in greater detail for all sites.

The water services division of Tipperary County Council stated that a “robust screening exercise with the benefit of specialist ecological input will need to be carried out to determine an Appropriate Assessment is required.”

### Hydrology and Flood Risk Criteria

The Department of Culture, Heritage and the Gaeltacht (DCHG) stated that reference should be made to *Planning System and Flood Risk Management Guidance for Planning Authorities* and that flood risk mapping and any relevant Flood Risk Management Plans should be consulted. It also recommended that the selection criteria should factor in increase future flood risk due to climate change.

Geological Survey Ireland (GSI) recommended using the GSI National Aquifer and Recharge maps to assess Flood Risk Management.

It was recommended from a stakeholder that a risk assessment to analyse the possibility of leaks or bacterial outbreaks in Dungarvan Bay should be a criterion considered.

### Health criteria

DCHG expressed that an assessment of the effects of any increases in the discharge of endocrine disruptors should also be included in any assessments, where relevant.

### Geology and Hydrology criteria

It was requested that bioavailability parameters be assessed for soil and subsoil at each site first. GSI stated that soil conditions may inhibit uptake of phosphorous and other nutrients. GSI said that “the latest sand and gravel aquifers need to be consulted too. White layers are continually checked, renewed and published on

GSI webviewer. Direct contact to GSI would ensure the most up to date sand and gravel aquifers, karst features and ZOC details. This would hone the site selection.”

### **3.3.2 Transportation Criteria**

Transport Infrastructure Ireland (TII) gave feedback advising that the national road network should continue to serve their intended strategic purpose as outlined in the Spatial Planning and National Roads Guidelines. In addition, they suggest that “Consultations should be had with the relevant local authority/ national road design office with regard to locations of existing and future national road schemes.”

The Environmental Protection Agency (EPA) stated that adequate dewatering satellite facilities “capable of accepting all Wastewater Treatment Plant and domestic wastewater treatment sludges need to be provided in each region and considered as part of this methodology” and that hubs should be within a sustainable transport distance from these or additional hubs provided.

An elected representative stated that additional criteria should include assessing the carbon footprint of transportation of raw sludge, including the carbon footprint and cost implications of necessary thickening and dewatering centres.

Kerry County Council stated that a traffic study should be conducted as a part of the selection criteria.

### **3.3.3 Local economy criteria**

A stakeholder from the Dungarvan area requested that the impact on the oyster industry be one of the criteria in the Site Selection Methodology.

The Project Team was urged to consider shellfish production areas as a main criterion for site selection. IFI stated that the impact on fisheries and the fisheries habitat must be fully taken into consideration as a criterion for selection.

It was cited that any threat to locals’ income and livelihood should be given significant consideration in the decision-making context.

A commercial stakeholder in Wexford referred to the SSMR and the statement regarding sludge management, that when treated appropriately it does not pose a risk to human health. The stakeholder sought clarification on why shellfish health and the waters in which they grow were not included in this statement.

### **3.3.4 Other**

It was suggested in submission from a minister that Irish Water should engage with Bord na Móna for alternative solutions for sludge treatment.

A stakeholder stated that “alternative management options should be explored and proposed” due to public concern relating to food chain safety and availability of land.

Regarding the potential Shanbally SHC in County Cork, it was stated that an additional criterion in the evaluation should be the quality of sludge that could be produced.

### 3.4 Consultation Question 3

#### ***How would you like Irish Water to communicate with you as the project progresses?***

Respondents were invited to provide their preferred method of contact to receive updates on the project as it progresses.

It was highlighted by a stakeholder in Clonmel that the SSMR for the South Region does not “set out the extent and nature of the infrastructure or the associated quantum of land take which would be required for Clonmel to function as a Sludge Hub Centre.” And continued that “the considerations set out in the report are general only and further advice should be sought from the planning section at the next stage of the process.”

The GSI and TII indicated that they would like to be communicated on the project via email as the project progresses.

A number of stakeholders including a business owner, elected representative and a community group requested that Irish Water meet with them directly as part of the ongoing public consultation process prior to any decision being made on a regional sludge hub centre.



4



# Next Steps



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## 4. Next stages of the project

The feedback received as part of this period of public consultation has been reviewed by the project team and the feedback and issues raised will inform the Site Selection Report for the Preferred Site(s) in the Southern Region.

Irish Water would like to thank all those who submitted feedback during this period of public consultation on the Site Selection Methodology Report.



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# Appendices



## Appendix A – Local Authority Libraries and Planning Counters

Local Authority	Library	Planning Counter
Louth County Council	Library Headquarters, Dundalk Roden Place, Dundalk	Planning Department, Louth County Council, Town Hall, Crowe Street, Dundalk, County Louth
Meath County Council	Meath County Council, Library Headquarters, Railway Street, Navan, Co. Meath	Planning Department, Buvinda House, Dublin Road, Navan, County Meath
Westmeath County Council	Library Headquarters, County Buildings, Áras an Chontae, Mount Street Mullingar, County Westmeath	Planning Department, Westmeath County Council, Mount Street, Mullingar, County Westmeath
		Planning Department, Westmeath County Council, Civic Offices, Church Street, Athlone, County Westmeath
Longford County Council	Library Headquarters, Town Centre, Longford.	Planning Department, Longford County Council Offices, Áras An Chontae, Great Water Street, Longford.
Offaly County Council	Library Headquarters, O'Connor Square, Tullamore Co. Offaly	Planning Department, Offaly County Council, Áras an Contae, Charleville Road, Tullamore, Co. Offaly
Laois County Council	Laois County Library Headquarters, The Old Mill, Church Street, Portlaoise	Planning Department, Laois County Council, County Hall, JFL Avenue, Portlaoise

Local Authority	Library	Planning Counter
Kildare County Council	Kildare Library Headquarters, Main Street, Newbridge, County Kildare.	Planning Department, Aras Chill Dara, Devoy Park, County Kildare.
Wicklow County Council	Wicklow Library Service Headquarters, Boghall Road, Bray, Co. Wicklow	Planning Department, Wicklow County Council, Whitegates, Station Road, Wicklow Town.
South Dublin County Council	South Dublin Library Headquarters, Unit 1, The Square Industrial Complex, Tallaght, Dublin 24	Planning Department, South Dublin County Council, County Hall, Tallaght, Dublin 24.
Dublin City Council	City Librarians office, Administrative Headquarters, Dublin City Library & Archive, 138-144 Pearse Street, Dublin 2	Planning Department, Block 4, Ground floor, Civic Offices, Wood Quay, Dublin 8.
Fingal County Council	Library Headquarters, County Hall, Main Street, Swords, Co. Dublin	Planning Department, County Hall, Fingal County Council, Main Street Swords, County Dublin.
		Planning Department, Fingal County Council, Grove Road, Blanchardstown Dublin15
Dún Laoghaire Rathdown County Council	Library Headquarters, DLR Lexicon, Haigh Terrace, Moran Park, Dún Laoghaire, County Dublin	Planning Section, Dún Laoghaire Rathdown County Council, Marine Road, Dun Laoghaire

# Appendix B – Website Content

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## Regional Sludge Hub Centres

Irish Water is assessing wastewater treatment plants as potential sludge hub centres so that sludge can be treated more effectively and efficiently

Home / Projects & Plans / National Projects / Regional Sludge Hub Centres

## Site Selection Methodology Public Consultation

Irish Water has published the site selection methodology reports for the sludge hub centres and is inviting feedback from members of the public and interested stakeholders on these reports.

### Sludge hub centres - North West region

#### What is happening now?

Irish Water has published the Site Selection Methodology Report for the sludge hub centres – North West region. As part of the next phase of this project, we are now inviting feedback from members of the public and interested stakeholders as part of a four-week non-statutory public consultation.

Public consultation for the North West Region has been extended until Tuesday 05 November, 2019. This is due to an IT issue, as submissions emailed [sludgehubsnorthwest@water.ie](mailto:sludgehubsnorthwest@water.ie) prior to this have not been received. View the [Site Selection Methodology Report](#).

Irish Water is inviting feedback on the following:

- 01 Is there any additional information on the potential sites identified that we should be aware of?
- 02 In addition to the criteria set out to select a preferred site, are there any other factors you think should be considered in choosing the preferred site?
- 03 How would you like Irish Water to communicate with you as the project progresses?

#### Have your say

If you would like to make a submission, please send it by email or post by Tuesday 05 November 2019 via the following:

- **Email:** [sludgehubsnorthwest@water.ie](mailto:sludgehubsnorthwest@water.ie)
- **Post:** Sludge Hub Centres – North West Region, C/O J. B. Barry & Partners Ltd., Classon House, Dundrum Business Park, Dundrum Road, Dublin 14, D14 T9T0

#### Site selection

As part of the sludge hub centres project, Irish Water will identify and assess the capability of existing wastewater treatment plants across the North West region. Irish Water has initially identified the following two wastewater treatment plants (WWTP) in the North West region for assessment in the site selection process.

- Tuam Wastewater Treatment Plant
- Sligo Wastewater Treatment Plant

Both of these wastewater treatment plants currently accept and treat sludge. Should a site be progressed as a regional sludge hub centre the capacity of sludge management facilities at these sites would need to be upgraded and increased. The assessment of the potential treatment facilities and selection of preferred sites will be based on environmental, planning, economic, and technical factors.

View the [Site Selection Methodology Report](#) for the North-West region.

#### Next Steps

All submissions will be reviewed and relevant feedback considered as part of the Sludge Hub Centre Preferred Site Selection Report.

Submissions from individuals will be reported anonymously and feedback from organisations will be attributed to them. Submissions will not be individually responded to but will be summarised in a consultation report which will be published on this page.

For information on how we store your data, view our [Privacy Notice](#).

Following this non-statutory public consultation, the Sludge Hub Centres Preferred Site Selection Report will be published.

As the Sludge Hub Centres Project develops, there will be further opportunities for stakeholders and the public to contribute to the project.

## Sludge Hub Centres Site Selection Methodology

Public Consultation | South Region

Irish Water has published the **Site Selection Methodology Report for the Sludge Hubs Centres** and is inviting feedback from members of the public and interested stakeholders for the South region.

### In this newsletter we explain:

- Project Background
- What is happening now?
- Why are Sludge Hub Centres needed?
- What sites are being considered?
- What is the methodology for selecting the preferred site?
- Next steps

### Project Background

In 2016, Irish Water published the National Wastewater Sludge Management Plan (NWSMP). The Plan sets out a nationwide strategy to deliver a sustainable and standardised approach to managing wastewater sludge now and over the next 25 years.

Sludge is generated from the treatment of wastewater, however once it is produced it needs to be treated so that it is safe for disposal or re-use. Irish Water has been building and upgrading wastewater treatment plants nationwide. The volume of wastewater sludge is increasing every year and is predicted to continue to increase.

The NWSMP estimates that by 2040 around 50,000 truck-loads of sludge will be generated each year. Irish Water has been developing ways of reducing sludge volumes for the most efficient movement of sludge, to achieve the best balance between the cost of transport and of treatment. This means that Irish Water must invest in strategic sludge management infrastructure at a number of wastewater treatment plants to ensure all regions are served in the most efficient way possible.



NWSMP published 2016

### What is happening now?

Sludge Hub Centres form part of Irish Water's National Wastewater Sludge Management Plan to ensure the safe and sustainable management of sludge. A Sludge Hub Centre is a centralised treatment facility for the effective treatment of wastewater sludge prior to reuse or disposal. Irish Water will now identify and assess the capability of a number of existing wastewater treatment plants across the region to become Sludge Hub Centres.

The selected wastewater treatment plant(s) will require investment to increase the capacity of the existing infrastructure. The Site Selection Methodology Report identifies nine wastewater treatment plants in the South region and sets out the rationale for selecting a preferred site(s).



### Why are Sludge Hub Centres needed?

Sludge is generated in wastewater treatment plants around the country. Between now and 2040, Irish Water estimates that the volume of wastewater sludge produced will increase by 80%. Irish Water needs to plan and invest in the future so that sludge can be treated and disposed of safely, and in a way that does not pose a risk to public health, the environment or agricultural lands. Developing Sludge Hub Centres will help Irish Water achieve this goal.

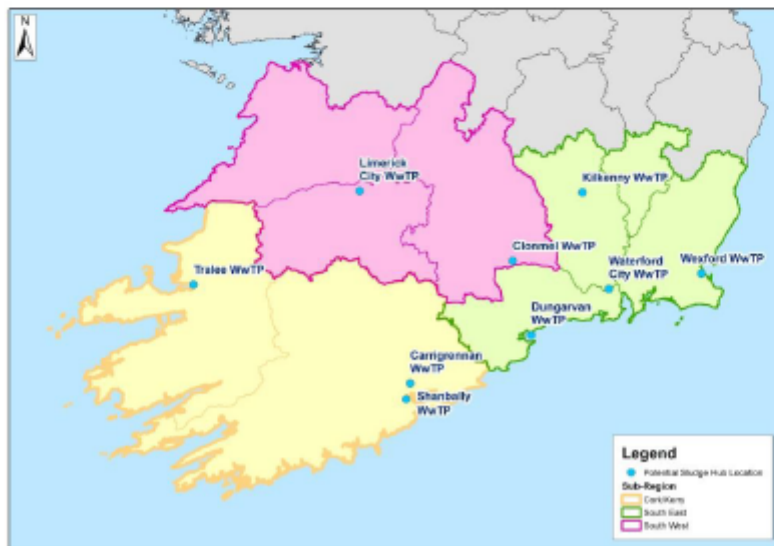
### What are the benefits of the Sludge Hub Centres?

Optimising the number of Sludge Hub Centres is a critical part of a more efficient national sludge management system. Irish Water is assessing the number of Sludge Hub Centres so that sludge can be treated in a more effective and efficient way. Investing in sludge treatment facilities will:

- Lower traffic movements and reduce transport emissions by reducing the amount of sludge that needs to be transported and the distance it needs to travel.
- Reduce operating costs per kg of sludge treated.
- Promote energy recovery.

### What sites are being considered?

The study area for the Southern region includes the counties of Cork, Kerry, Limerick, Clare, Tipperary, Waterford, Wexford, Carlow and Kilkenny. Irish Water has identified nine wastewater treatment plants in Carrigrennan, Shanbally, Tralee, Limerick, Clonmel, Dungarvan, Waterford, Wexford and Kilkenny as potential Sludge Hub Centres for assessment in the site selection process.



3 Irish Water | Sludge Hub Centres –South Region

Project Study Area

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### What is the methodology for selecting the preferred sites?

The assessment of these wastewater treatment plants as a Sludge Hub Centre will be based on environmental, planning, economic, and technical factors. If a site is identified as a Sludge Hub Centre for the South region, then the capacity of sludge management infrastructure at these sites would need to be upgraded and increased. The Site Selection Methodology Report can be viewed and downloaded at [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs).

### Next Steps - Have your Say

Irish Water has published the Site Selection Methodology Report for the Sludge Hubs Centres and is inviting feedback on the site selection methodology from members of the public and interested stakeholders for the South region. A four week period of non-statutory public consultation process will run from **Tuesday 24 September 2019** until **Tuesday 22 October 2019**.

Irish Water is inviting feedback on the following:

1. Is there any additional information on the potential sites identified that we should be aware of?
2. In addition to the criteria set out to select a preferred site, are there any other factors you think should be considered in choosing the preferred site?
3. How would you like Irish Water to communicate with you as the project progresses?

Submissions can be made to Irish Water in the following ways:

**By email:** [sludgehubssouth@water.ie](mailto:sludgehubssouth@water.ie)

**By post:** Sludge Hubs Centres – South Region,  
c/o Jacobs Engineering Ireland Ltd, Merrion House, Merrion  
Road, Dublin 4, D04 R2C5.

## Appendix D – Press Release

### Irish Water seeking public input on site selection for Regional Sludge Hub Centres

**17 September 2019** - Irish Water is launching a public consultation on the Site Selection Methodology Report for Regional Sludge Hub Centres. The consultation is seeking the public and interested stakeholder views on the site selection methodology. The consultation opens on 24 September 2019 and closes on 22 October 2019.

The Site Selection Methodology Report follows on from the National Wastewater Sludge Management Plan 2016, which sets out a nationwide strategy for managing wastewater sludge now and over the next 25 years. One of the recommendations of the report was to develop a number of existing sludge treatment facilities into regional Sludge Hubs Centres.

Paul Fallon says: “Through the consultation we are inviting feedback from members of the public and interested stakeholders on the site selection methodology. In particular we are eager to understand if there is any additional information on the potential sites identified that we should be aware of; whether there are any additional factors we should be considered in choosing the preferred sites and how the public would like to be communicated with as the project progresses.”

The Site Selection Methodology Report identifies wastewater treatment plants in Kilkenny, Wexford, Cork, Kerry, Waterford, Limerick and Tipperary as potential Sludge Hub Centres in the South Region. The assessment of these wastewater treatment plants as Sludge Hub Centres will be based on environmental, planning, economic, and technical factors.

Since 2014, Irish Water has been building and upgrading wastewater treatment plants nationwide and developing ways of reducing sludge volumes to achieve the best balance between the cost of transport and the cost of treatment. The volume of sludge is increasing year on year and is predicted to continue to increase. The National Wastewater Sludge Management Plan estimated that by 2040 around 50,000 truck-loads of sludge will be generated each year, which represents an 80% increase.

Paul Fallon says: “Irish Water is planning for now and the future so that sludge can be treated and disposed of safely and in a way that does not pose a risk to public health, the environment or agricultural lands by increasing the capacity of sludge management facilities. The development of regional Sludge Hubs Centres is key to ensure that, as a country, we can manage the increasing volumes of sludge we produce.”

Submissions can be made to Irish Water in the following ways:

**By email:** [sludgehubsnorthwest@water.ie](mailto:sludgehubsnorthwest@water.ie)

**By post:** Sludge Hubs Centres South Region, c/o J.B. Barry & Partners Ltd, Classon House, Dundrum Business Park, Dundrum Road, Dublin 14, D14 T9T0

To view the Site Selection Methodology Report or for further information, visit [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs).

The Report and project newsletter are also available at planning counters in the relevant local authority offices and public libraries across the country.



## Appendix E – Advertisement



### Irish Water Public Consultation:

#### Sludge Hub Centres Site Selection Methodology – South Region

Irish Water has published the Site Selection Methodology Report for the Sludge Hubs Centres and is inviting feedback on the site selection methodology from members of the public and interested stakeholders for the South region.

Sludge Hub Centres form part of Irish Water's National Wastewater Sludge Management Plan to ensure the safe and sustainable management of sludge. A Sludge Hub Centre is a centralised treatment facility for the effective treatment of wastewater sludge prior to reuse or disposal.

The Site Selection Methodology Report identifies wastewater treatment plants in: Carrigrennan, Shanbally, Tralee, Limerick City, Clonmel, Dungarvan, Waterford, Kilkenny and Wexford as potential Sludge Hub Centres in the South Region. The assessment of these wastewater treatment plants as a Sludge Hub Centre will be based on environmental, planning, economic, and technical factors.

We would like to hear your views on the site selection methodology. A four week period of non-statutory public consultation process will run from **Tuesday 24 September 2019** until **Tuesday 22 October 2019**.

Submissions can be made to Irish Water in the following ways:

**Email:** [sludgehubssouth@water.ie](mailto:sludgehubssouth@water.ie)

**Post:** Sludge Hub Centres – South Region, c/o Jacobs Engineering Ireland Ltd, Merrion House, Merrion Road, Dublin 4, D04 R2C5

To view the Site Selection Methodology Report or for further information, visit [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs).

The Site Selection Methodology Report and project newsletter is also available at the relevant planning counters in local authority offices and public libraries across the country.

***Safeguarding our water for our future***

## Appendix F – Groups and Organisations Contacted Directly

**Table F-1 List of Public bodies**

List of Public Bodies		
Department of Communications Climate Action and Environment	Transport Infrastructure Ireland (TII)	Fáilte Ireland
Department of Housing, Planning and Local Government	Geological Survey Ireland	Inland Waterways Ireland
Department of Culture, Heritage and the Gaeltacht	National Federation of Group Water Schemes	Inland Fisheries Ireland (IFI)
Environmental Protection Agency	An Taisce	Department of Agriculture, Food and the Marine (DAFM)
		National Parks and Wildlife Service

**Table F-2 List of interested bodies and stakeholders**

Interested Stakeholders and Bodies		
Bird Watch Ireland	Bord Bia	Bord na Móna
CCMA	CEWEP	Chambers Ireland
Construction Industry Federation	Coillte Teoranta	CRÉ
Dairy Industry Ireland	Engineers Ireland	Environmental Law Implementation Group
Irish Environmental Network	Food Safety Authority of Ireland	IDA
Water Policy Advisory Committee	Southern Regional Assembly	Zero Waste Action Ireland
IBEC	ICOS	Irish Bioenergy Association
Irish Creamery Milk Supply Association	Irish Farmers Association	Irish Technology Centre for Biorefining and Bioenergy
Irish Water National Stakeholder Forum	National Federation of Group Water Schemes	Voice of Irish Concern for the Environment
National River Basin District Office	SWAN	Friends of the Irish Environment

## Appendix G – Letter to An Taoiseach



17<sup>th</sup> September 2019

An Taoiseach  
Mr. Leo Varadkar T.D.,  
Department of the Taoiseach,  
Government Buildings,  
Upper Merrion Street,  
Dublin 2, D02 R583

Uisce Éireann  
Teach Coill  
24-26 Sráid Thalbóid,  
Baile Átha Cliath 1,  
D01 NP86  
Éire

Irish Water  
Coill House  
24-26 Talbot Street  
Dublin 1  
D01 NP86  
Ireland

T: +353 1 89 25000  
F: +353 1 89 25001  
[www.water.ie](http://www.water.ie)

### Re: Sludge Hub Site Selection Methodology Consultation

Dear Taoiseach,

I am writing to you to inform you that Irish Water has published the Site Selection Methodology Reports for the Sludge Hubs Centres in North West, East Midlands and Southern Region. Irish Water is inviting feedback on the site selection methodology from members of the public and interested stakeholders for the East Midlands region.

Sludge Hub Centres form part of Irish Water's National Wastewater Sludge Management Plan to ensure the safe and sustainable management of sludge. A Sludge Hub Centre is a centralised treatment facility for the effective treatment of wastewater sludge prior to reuse or disposal.

The Site Selection Methodology Reports identify wastewater treatment plants in Longford, Dundalk, Drogheda, Navan, Portlaoise, Mullingar, Tullamore, Carrigrennan, Shanbally, Tralee, Limerick City, Clonmel, Dungarvan, Waterford, Kilkenny, Wexford, Tuam and Sligo as potential Sludge Hub Centres. The assessment of these wastewater treatment plants as a Sludge Hub Centre will be based on environmental, planning, economic, and technical factors.

A four week period of non-statutory public consultation process will run from **Tuesday 24 September 2019** until **Tuesday 22 October 2019**.

The Site Selection Methodology Report or for further information, visit [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs). The Report and project newsletter is also available at planning counters in the relevant local authority offices and public libraries across the country.

I have also issued this update to Minister Eoghan Murphy and would be delighted to provide you or your officials with a briefing on the National Wastewater Sludge Management Plan should it be required

Yours sincerely

Niall Gleeson  
Managing Director

Séirbhíocht / Directors: Cathal Marley (Chairman), Niall Gleeson, Eamon Gallen, Brendan Murphy, Michael G. O'Sullivan  
Oifig Chláraithe / Registered Office: Teach Coill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Coill House, 24-26 Talbot Street, Dublin 1, D01 NP86  
Is cuideachta ghléimhalachta ainmnithe atá faoi theoirinn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.  
Uimhir Chláraithe in Éirinn / Registered in Ireland No.: 530363

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## Appendix H – Direct Engagement Letters



### Re: Sludge Hub Site Selection Methodology Consultation

Dear **XXXX**,

I am writing to you to inform you that Irish Water has published the Site Selection Methodology Reports for the Sludge Hubs Centres in North West, East Midlands and Southern Region. Irish Water is inviting feedback on the site selection methodology from members of the public and interested stakeholders.

Sludge Hub Centres form part of Irish Water's National Wastewater Sludge Management Plan to ensure the safe and sustainable management of sludge. A Sludge Hub Centre is a centralised treatment facility for the effective treatment of wastewater sludge prior to reuse or disposal.

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A four week period of non-statutory public consultation process will run from **Tuesday 24 September 2019** until **Tuesday 22 October 2019**. The Site Selection Reports and Project Newsletter are also available at planning counters in the relevant local authority offices and public libraries across the country.

The Site Selection Methodology Report or for further information and how to make a submission, please visit [www.water.ie/sludgehubs](http://www.water.ie/sludgehubs)

Kind Regards,

**Paul Fallon**  
Infrastructure Programme Manager

Uisce Éireann  
Teach Colvill  
24-26 Sráid Thalbóid  
Baile Átha Cliath 1  
D01 NP86  
Éire

Irish Water  
Colvill House  
24-26 Talbot Street  
Dublin 1  
D01 NP86  
Ireland

T: +353 1 89 25000  
T: +353 1 89 25001  
[www.water.ie](http://www.water.ie)

**Stiúrthóirí / Directors:** Cathal Marley (Chairman), Niall Gleeson, Eamon Gallen, Brendan Murphy, Michael G. O'Sullivan

**Oifig Chláraithe / Registered Office:** Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86

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## Appendix I – Glossary of acronyms

Term	Acronym
Sludge Hub Centre	SHC
National Wastewater Sludge Management Plan	NWSMP
Site Selection Methodology Report	SSMR
Geological Survey Ireland	GSI
Department of Culture, Heritage and the Gaeltacht	DCHG
Environmental Protection Agency	EPA
Inland Fisheries Ireland	IFI
Wastewater Treatment Plant	WwTP