



### Submission

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|---------------------------|--------------------|
| Submitter:                | Miss eve smith     |
| Organisation Name:        | HSE                |
| Submission Title:         | HSE Submission EHS |
| Submission Reference No.: | S011261            |
| Submission Received:      | 04 August 2023     |

### Application

|            |               |
|------------|---------------|
| Applicant: | Uisce Éireann |
| Reg. No.:  | D0056-02      |

See below for Submission details.

Attachments are displayed on the following page(s).



**National Office for Environmental Health Services  
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**Re:** Waste Water Discharge Application, Midleton and Carrigtwohill, Co.Cork

**Dear Sir/Madam,**

Please find enclosed the HSE consultation report in relation to the above proposal.

Yours Sincerely

A handwritten signature in black ink that reads 'Eve Smith'.

**Eve Smith  
Environmental Health Officer  
Environment/Climate Change, Network Support Unit (NSU)**



## **Environmental Health Service Consultation Report**

*(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)*

**Report to:** Environmental Protection Agency, PO Box 3000, Johnstown Castle Estate, Co. Wexford

**Date:** 02/08/2023

**Type of consultation:** Waste Water Discharge Application

**Planning Authority:** Cork County Council

**Current EPA Authorisation Register Number:** D0056-02

**EHIS Reference number:** 3288.

**Applicant:** Uisce Éireann, Colville House, 24-26 Talbot Street, Dublin 1

**Location of development:**  
Midleton and Carrigtwohill.

### **General Comments**

Details of the application were circulated to HSE stakeholders on the 4<sup>th</sup> of July 2023.

- HSE South Emergency Management – David O’Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O’ Moore
- CHO – Michael Fitzgerald

### **Proposed Development**

To accommodate the proposed diversion of wastewater loads from the Midleton agglomeration to the existing Carrigtwohill WwTP, it is proposed that two new Pumping Stations, and approximately 7km of rising main will be delivered, as discussed in Section 1 of the EIAR. Refer to Attachment B.8. for full details on these projects. Under this WWDL review, the scope includes for the diversion of waste water loads from the Midleton agglomeration to the existing Carrigtwohill and Environs WwTP (Design Capacity: 30,000 p.e.) and the amalgamation of the Carrigtwohill and Environs agglomeration into the Midleton licence (D0056), thereby leading to the surrender of the Carrigtwohill licence (D0044-01). The total design p.e. of 48,750 is a combination of the design p.e for Carrigtwohill and



Midleton WwTP and Industrial Emission (IE) discharges downstream of the Midleton WwTP. There are no construction works associated with the existing primary, secondary, or overflows in the Midleton or Carrigtwohill functional areas. However, as outlined in Section 2, additional overflows from the Carrigtwohill and Midleton WwTWS will be regularised as part of the D0056-01 WWDL review. The treated effluent from the primary (SW009) and secondary discharge (SW001) locations will remain as per D0044-01 and D0056-01 i.e., they will continue to discharge the locations as described in Table A.1.3. of the EIAR.

To cater for the above, two new Pumping Stations, at Midleton North and Water Rock are required to be constructed along with approximately 7km of rising main. The Midleton North Pumping Station which will be sized for future growth will draw an existing wastewater load (ca. 4,177 p.e.) off the existing sewerage network system in Midleton and will divert this load to the Water Rock Pumping Station and onto Carrigtwohill WwTP for treatment. This will provide immediate relief at the Midleton WwTP. From the new Water Rock Pumping Station, a new network will be constructed to Carrigtwohill to divert future loads from the UEA Housing site (ca. 7,000 p.e) in North Midleton. There will be no SWO or EO at this new Pumping Station. In the absence of The Project, there would continue to be inadequate capacity at Midleton WwTP to effectively treat waste water from the area served, therefore this Project is essential to the future social and economic growth of residents and businesses in the Midleton and Carrigtwohill area.

This report only comments on Environmental Health impacts of the proposed development and the adequacy of the submitted documentation from the viewpoint of the Environmental Health Service (EHS).

**The Environmental Health Service has made observations and submissions on the following specific Environmental Health areas:**

### **Assessment of principle and description of the Project**

**Principle:** The principle of the project is considered satisfactory, particularly as it will improve the quality of wastewater.

**Description:** The description of the project is considered to be satisfactory.

### **History**

The primary basis for this Midleton Waste Water Discharge Authorisation (WWDA) review is to account for the current Industrial connection P1103-01 to the UÉ network downstream of the Midleton WwTP. This review also includes for the amalgamation of the Carrigtwohill and Midleton licences, the population equivalent (p.e.) to which the application relates is 48,750. This p.e. is a combination of the design p.e. for Carrigtwohill WwTP (30,000 p.e.), Midleton WwTP (15,000 p.e.) and Industrial Emission (IE) discharges (3,750 p.e.) downstream of the Midleton



WwTP. The amalgamated agglomeration will cover the previous Midleton and Carrigtwohill agglomerations over a combined 72 no. townlands.

#### **Assessment of Later Consents Required**

None. The application for Waste Water Discharge Authorisation is a “Later Consent” to planning permission that has already been granted.

#### **Assessment of Public Consultation & Non-Technical Summary**

Consultation would have been undertaken for each planning application. A Planning and Environmental Considerations Report is being prepared in support of the planning application for these developments, and the scope of same has been agreed with Cork County Council.

#### **Assessment of Consideration of Alternatives**

The alternative would be to change nothing and keep using the existing infrastructure without upgrading, this would have a significant impact for the water quality in the receiving water body; Each of these waterbodies are part of the Lee, Cork Harbour, and Youghal Bay Catchment area.

The assessment of whether a likely impact will have significant effects on a European site is based European Commission guidance (2001) which recommends the use of key indicators which can include the site’s conservation objectives. Where it is determined that a likely impact will have a significant impact on a European site, an Appropriate Assessment must be progressed. The precautionary principle must also be applied in determining significance of an impact. Where the significance of an impact cannot definitively be ascertained based on the information available it is required to progress to Appropriate Assessment i.e. the project cannot be screened out unless there is certainty that no significant effects are will occur.

#### **Assessment of Description of Physical Environment**

The WwTP site is located approximately 1.9km south west of Midleton Town Centre just off the N25- E-Cork Parkway road. Entrance to the site is located on a Cul De Sac with one other residential dwelling approximately 650m from the subject site entrance. The area is surrounded by agricultural land.

The subject site is located 600m south of Sherwood Walk which has an existing walkway used by the public. Ballyannan Woods –Midleton Forest is located south east approximately 900m from the subject site.

#### **Climate**

Cork County Council’s Climate Adaptation Strategy 2019-2024 seeks to enhance resilience to climate hazards. The Strategy presents actions to address challenges and develop innovative and sustainable solutions that address adaptation and enhance resilience to climate change. Chapter 16 of the EIAR assesses potential risks, including from extreme events, and specifically from heavy rainfall and



details mitigation measures which should be monitored in cases of heavy rainfall/flash flooding.

## Conclusions

- An opportunity to provide enhanced wastewater treatment (i.e. wastewater treated to at least tertiary standard and disinfected using UV or equivalent before discharge) exists which must be considered given the quality of the receiving waters' status.
- The Environmental Health Service recommends that a complaints procedure is implemented and that a member of staff is designated as a point of contact to deal with any complaints or queries received from members of the public in relation to the WWTP facility.
- The operator should develop a system for recording and responding to complaints from the public regarding fugitive noise and or odour emissions from the WWTP or from any component. It is recommended that records of complaints received are included in annual monitoring results reported to the EPA.
- It is recommended that an Odour Management Plan is implemented and that regular unannounced odour audits of the plant are undertaken.
- Emission Limit Values and monitoring frequencies specified in the EPA licence shall be strictly adhered to ensure the maintenance of groundwater quality and the protection of public health.
- It is recommended that the routine monitoring, maintenance and repair of all plant, equipment and pipework is included as a condition of the license. This should include the discharge pipe and the non- return flap valve.

Yours Sincerely

A handwritten signature in black ink that reads 'Eve Smith'.

**Eve Smith**  
**Environmental Health Officer**  
**Environment/Climate Change, Network Support Unit (NSU)**

**\* All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to : Eve Smith, Environmental Health Officer, Environment/Climate Change, Network Support Unit (NSU) Environmental Health Service, Dungloe Community Hospital, Letterkenny Co. Donegal. F94 Y326, Eve.smith@hse.ie**