



Environmental Licensing Programme Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford

21/04/2022

IW ref: LT0561

Dear Inspector,

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
D01 NP86
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Irish Water
Colvill House
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RE: Whitegate-Aghada Waste Water Discharge Licence (D0423-02)

In response to Regulation 18(3)(b) request for information dated 10th March 2022 please see below relevant information.

REGULATION 16 COMPLIANCE REQUIREMENTS

- 1. Provide an updated Marine Outfall Modelling Study which assesses winter and summer impacts from the worst case scenario of waste water discharges. In order to conclude that the Good Water Framework Directive (WFD) status of Outer Cork Harbour (WFD Code: IE_SW_050_0000) will be maintained and that the seasonal DIN EQSs will not be breached, the worst case winter and summer discharges must be assessed.**

An assessment of impact modelling is currently underway and will be provided within 4 weeks.

- 2. In accordance with Regulation 16(3A), provide confirmation in writing from the planning authority or An Bord Pleanála that an environmental impact assessment is not required by or under the Act of 2000.**

The Planning Authority (Cork County Council) concludes that the project does not require a mandatory EIA under Schedule 5 of the Planning and Development Regulations, 2001 and is further satisfied that the EIA Screening Report demonstrates that the proposal does not require sub threshold EIA. Please see attached Planner's Report – section 7 refers.

- 3. Provide details of existing or proposed measures to prevent unintended discharges and to minimise the impact on the environment of any such discharges.**

In addition to the measures described in Section C: Discharges & Monitoring of the application form the following details in relation to storm water management within the

Whitegate-Aghada Agglomeration are intended to address unintended discharges and their impact on the environment:-

Stormwater storage is provided at each of the 3 No. Pumping Stations (PSs) on the network in accordance with Irish Water standards.

- A total of 379.9m³ (minimum) storm water storage is being provided in the agglomeration.
- The PSs at Lower Aghada, Rostellan and Whitegate will be interlocked via Radio links and PLCs to maximise the storm storage volumes within the agglomeration and PS storm tanks.
- Chambers, V-notch weirs and ultrasonic flowmeters shall be included in each of the PS overflows to measure any spills.
- All 3 PSs and the WWTP will have capability for mobile generator connections in the event of a power failure.
- At the WWTP, a stormwater tank is being provided to capture all flows in excess of full flow to treatment. The tank incorporates return duty / standby pumps.
- Monitoring instrumentation is also being provided at the WWTP to log any storm overflows.
- An emergency procedures plan will be developed as part of the process of the design and construction of the new WWTP to ensure unintended waste water discharges and potential impacts on the environment are kept to a minimum.
- A petrol interceptor will be in place at the WWTP site.

4. Provide an update on the Foreshore Licence application comprising or for the purposes of the waste water discharge to which this application relates. If the Foreshore Licence is granted, provide a copy of the Foreshore Licence issued.

The Foreshore Licence Application is currently at environmental review stage with the Foreshore unit of the Department and a timeline for the completion of same is currently unavailable but will be provided as soon as it becomes available.

Yours sincerely,

Sheelagh Flanagan

Sheelagh Flanagan

Wastewater Strategy

PLANNER'S REPORT
PRIMARY

APPLICATION NO.	20/06463
APPLICANT	Uisce Éireann - Irish Water
DESCRIPTION	<p>The development which consists of the construction of a sewerage scheme, landscaping and associated site works, for the villages of Whitegate and Aghada. The scheme consists of the following components: A) A proposed wastewater treatment plant (WWTP) at Ballytigueen TD, with associated and ancillary development works including an access road, tanks, storage facilities, inlet works, all associated site development works, boundary fencing around the perimeter of the WWTP, a gravity sewer and long sea outfall to convey treated discharge effluent from the WWTP to White Bay through Glanagow TD and Trabolgan TD. B) A proposed underground wastewater pump station and associated infrastructure in Rostellan at the Thomas Kent Memorial Park at Knockanemorney TD, including an underground pump sump, underground stormwater storage tank, valve and flowmeter chambers, manholes, pipework, access road and gate, control kiosks and vent stack. C) A proposed rising main at Knockanemorney TD, Ballynafarsid TD and Aghada TD, to convey flows from the proposed Rostellan pump station to a proposed pump station in Lower Aghada. D) A proposed underground wastewater pump station and associated infrastructure at Lower Aghada located west of the pier at Aghada TD, including an underground pump sump, underground stormwater storage tank, valve and flowmeter chambers, manholes, pipework, access road, gate, control kiosks, a surge vessel, a vent stack and the decommissioning of an existing package wastewater treatment plant. E) A proposed rising main to convey flows from the proposed Lower Aghada pump station to an existing sewer in the Upper Aghada sewerage network at Aghada TD. F) A proposed upgrade to the existing sewerage system by the replacement of an existing 150mm diameter sewer with a proposed 225mm diameter sewer at Aghada TD and Curragh TD. G) A proposed underground wastewater pump station and associated infrastructure at the Square in Whitegate Village including an underground pump sump, underground stormwater storage tank, valve and flowmeter chambers, manholes, pipework, control kiosks and vent stack, and decommissioning of existing pump station, in Mosestown TD and Ballincarroonig TD. H) A proposed rising main to convey flows from the proposed Whitegate pump station to the proposed WWTP at Mosestown TD, Corkbeg TD, Ardnabourkey TD and Ballytigueen TD. I) A</p>

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PLANNER'S REPORT
PRIMARY

	proposed 225mm diameter gravity sewer in Ardnabourkey TD and decommissioning of an existing septic tank. A natura Impact Statement (NIS) will be submitted to the Planning Authority with the application.
LOCATION	Townlands of Knockanemorney TD, Ballynafarsid TD, Aghada TD, Curragh, Mosestown TD, Ballincarroonig Corkbeg, TD, Ardnabourkey TD, Glanagow TD, Trabolgan, Ballytigueen, Co. Cork
DECISION DUE DATE	11/01/2021

1. Site Notice and Date of Inspection

I inspected the site on the 13/12/2020- on inspection the site notices (multiple notices) were in place and legible

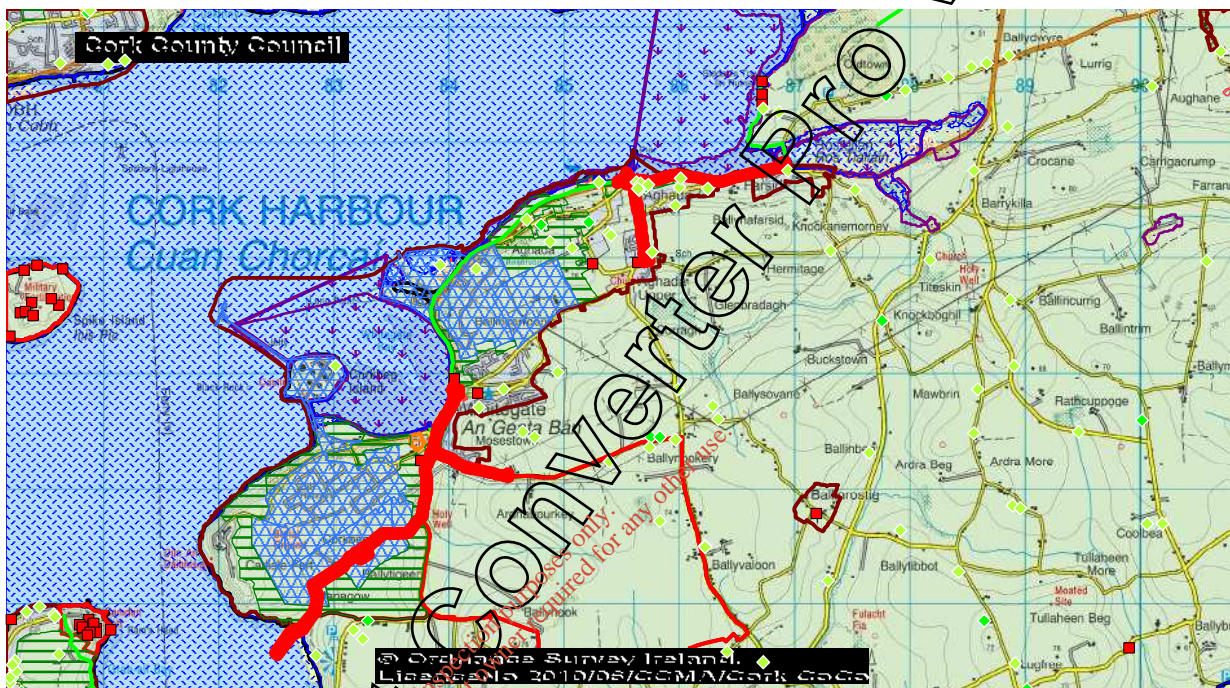


2. Site Description

The subject site relates to the settlement of Aghada/ Whitegate and encompasses an overall area of land which extends for approx 7km. The site extends primarily alongside the R630 between Rostellan and Lower Aghada and whitegate tying into the existing public sewer system at these locations. .

The proposed wastewater treatment plant is located on agricultural land approx 1.5km to the SW of whitegate village to the immediate South of the oil refinery. Treated effluent from the WWTP will discharge via a marine outfall at Whitebay, approx 1km to the SW of the treatment plant

3. History



Application site area (red line identifies)

There are no previous applications along the area of the site. There have been applications in proximity to the site area. These have been detailed in the application documents. Examples include-

PI Ref No. 1374582 (pier area in lower aghada). Permission sought by Jimmy and Mary O'Reilly for Demolition of existing retail shop, canopy, petrol pumps, car mechanic workshops, removal of underground fuel storage tanks and existing 2 no. containers on site and construction of: [1] 1 no. two storey building comprising 2 no. units:- [a] first unit to accommodate on ground floor; new retail shop with delicatessen and seating area, store, office and solid fuel store and first floor to accommodate storage area to serve adjoining workshop, [b] second unit to accommodate on ground floor; new car mechanic workshop, customer reception and waiting area, staff canteen and disabled w.c. and first floor to accommodate 1 no. office, lobby and storage area, [2] new petrol station forecourt and canopy, [3] new car wash, [4] installation of new 3 no. underground fuel storage tanks, [5] erection of new petrol station identification/advertising sign, [6] new front boundary wall, [7] 2 no. new site entrances and alterations to existing 1 no. site entrance to

include new slip lane, and [8] construction of new retaining wall and all associated site works. This application was refused owing to concerns over negative impacts on Cork Harbour Natura site

13/5464- (close to WWTP site) Permission granted to Vodafone Ireland Ltd for 36m multi-user support structure (to replace existing temporary mobile structure), carrying associated telecommunications equipment, associated equipments cabins, all within secure compound, including access track. The development will form part of Vodafone Ireland Ltd's existing GSM and 3G Broadband telecommunications network

4. Proposed Development (including supporting material)

The development which consists of the construction of a sewerage scheme, landscaping and associated site works, for the villages of Whitegate and Aghada. The scheme consists of the following components: A) A proposed wastewater treatment plant (WWTP) at Ballytigueen TD, with associated and ancillary development works including an access road, tanks, storage facilities, inlet works, all associated site development works, boundary fencing around the perimeter of the WWTP, a gravity sewer and long sea outfall to convey treated discharge effluent from the WWTP to White Bay through Glanagow TD and Trabolgan TD. B) A proposed underground wastewater pump station and associated infrastructure in Rostellan at the Thomas Kent Memorial Park at Knockanemorney TD, including an underground pump sump, underground stormwater storage tank, valve and flowmeter chambers, manholes, pipework, access road and gate, control kiosks and vent stack. C) A proposed rising main at Knockanemorney TD, Ballynafarsid TD and Aghada TD, to convey flows from the proposed Rostellan pump station to a proposed pump station in Lower Aghada. D) A proposed underground wastewater pump station and associated infrastructure at Lower Aghada located west of the pier at Aghada TD, including an underground pump sump, underground stormwater storage tank, valve and flowmeter chambers, manholes, pipework, access road, gate, control kiosks, a surge vessel, a vent stack and the decommissioning of an existing package wastewater treatment plant. E) A proposed rising main to convey flows from the proposed Lower Aghada pump station to an existing sewer in the Upper Aghada sewerage network at Aghada TD. F) A proposed upgrade to the existing sewerage system by the replacement of an existing 150mm diameter sewer with a proposed 225mm diameter sewer at Aghada TD and Curragh TD. G) A proposed underground wastewater pump station and associated infrastructure at the Square in Whitegate Village including an underground pump sump, underground stormwater storage tank, valve and flowmeter chambers, manholes, pipework, control kiosks and vent stack, and

decommissioning of existing pump station, in Mosestown TD and Ballincarroonig TD. H) A proposed rising main to convey flows from the proposed Whitegate pump station to the proposed WWTP at Mosestown TD, Corkbeg TD, Ardnabourkey TD and Ballytigueen TD. I) A proposed 225mm diameter gravity sewer in Ardnabourkey TD and decommissioning of an existing septic tank. A natura Impact St

5. Pre-Planning

Yes- the project was outlined as a part of a pre-planning meeting on the 26/11/2019

6. AA Checklist Option

The development site is situated next to Cork Harbour SPA. A NIS has been submitted. The file has been referred to Heritage section for further comment

7. EIAR

Schedule 5 of the Planning and Development Regulations, 2001 outlines projects for which an EIA is mandatory

Under Schedule 5 Part 1, Class 13 of the Planning and Development Regulations 2001-2018 *waste water treatment plants with a capacity of 150,000 populations* would automatically trigger an EIAR but in this case the scheme falls well short of that population figure (P/E c. 3000)

Under Part 2, Class 11 (other projects) Wastewater treatment plants with a capacity greater than 10,000 P/E as defined in article 2 point 6 of Directive 91/271 EEC not included in Part 1 of the schedule. Again the proposal does not exceed this threshold

Pipelines

Part 1, Class 16

Pipelines with a Diameter of more than 800mm and a length of more than 40km

The proposal does not exceed either of these thresholds

Urban Development

Part 2, Class 10

Infrastructure Projects

(iv) Urban development which would involve an area greater than 2hectares in the case of a business district, 10 hectares in the case of other parts of a built up area and 20ha elsewhere

The subject proposal comprises approx 9ha of land and is not deemed to be within a "business district". The 10ha threshold that is applicable has not been breached

Part 2, Class 13 deals with extensions to existing projects. Having considered same, the proposal does not breach the thresholds outlined in the section

While the project does not trigger a mandatory EIAR as per the categories outlined above, the proposal also needs to be considered in the context of "sub threshold" EIAR. To this end, an EIAR screening document has been submitted. The EIA screening document assesses the project in the context of sub-threshold development utilising the criteria listed under schedule 7. Having considered the nature of the proposal and the criteria listed under this schedule, I would be satisfied that the proposal does not trigger requirement for sub threshold EIA

8. Policy Context

The County Development Plan 2014

WS 3-1 (b) Ensure that development in all main settlements connect to public waste water treatment facilities subject to sufficient capacity being available which does not interfere with the councils ability to meet the requirements of the Water Framework Directive and the Habitats Directive. In settlements where no public waste water system is either available or proposed or where design capacity and licensing issues have been identified in existing plants, new developments will be unable to proceed until adequate waste water infrastructure is provided

GI10-3 Preserve and protect ground water.

GI 6-1 Protect the visual and scenic amenities of the area and that and new development meets a high standard of design, discourage the removal of hedgerows, trees and historic walls.

GI 7-1 General views and prospects of sea views, rives and lakes, unspoilt mountains, upland or coastal landscape, historical and cultural significance and views of natural beauty to be preserved.

GI 7-2: Scenic Routes. Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects.

GI 7-3: Development on Scenic Routes. Demonstrate that there will be no adverse obstruction or degradation of the views towards and from vulnerable landscape features including mitigation measures to prevent significant alterations to the appearance or character of the area and encourage appropriate landscaping and screen planting. .

GI 10-2 Protect and improve the status and quality of surface water.

GI10-3 Preserve and protect ground water.

GI 10-5 Ensure that the discharge from septic tank and waste water treatment systems comply with relevant approved standards including installation and maintenance. Consider the cumulative impact.

HE 2-1 Protect all Natural Heritage sites including Special Area of Conservation, Special Protection Area, Natural Heritage Areas, Statutory Nature reserves, Refuges for Fauna and Ramsar

HE 3-1: Protection of Archaeological Sites

a) Safeguard sites and settings, features and objects of archaeological interest generally. b) Secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments including the Sites and Monuments Record (SMR) (see www.archeology.ie) and the Record or Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, as amended and of sites, features and objects of archaeological and historical interest generally. In securing such preservation, the planning authority will have regard to the advice and recommendations of the Department of Arts, Heritage and Gaeltacht as outlined in the Frameworks and Principles for the Protection of the Archaeological Heritage.

HE 3-2: Underwater Archaeology

Protect and preserve the archaeological value of underwater archaeological sites and associated features. In assessing proposals for development, the Council will take account of the potential underwater archaeology of rivers, lakes, intertidal and subtidal environments.

HE 3-3: Zones of Archaeological Potential

Protect the Zones of Archaeological Potential (ZAPs) located within historic towns and other urban areas and around archaeological monuments generally. Any development within the ZAPs will need to take cognisance of the potential for subsurface archaeology and if archaeology is demonstrated to be present appropriate mitigation (such as preservation in situ/buffer zones) will be required.

East Cork Municipal District LAP 2017

DB boundary objective 01- Promote the development of up to 190 houses within the plan period

"The existing sewerage scheme is a combined sewerage scheme that discharges without treatment to the lower harbour at a number of locations though primarily at long point. Provision of a new foul sewer system and a new wastewater treatment plant is required prior to further development taking place in Aghada/Whitegate "

9. Recreation & Amenity Compliance
N/A
10. Internal Consultants
Water services engineer has indicated no objection to the proposal
Environment section has indicated no overall objection to the proposal
Co. archaeologist has reported- has recommended F.I
Area engineer has reported- has indicated no overall objection subject to relevant conditions
11. External Consultants
Inland Fisheries Ireland- no overall objection to the proposal
Gas Networks Ireland- no overall objection however it is noted that some gas pipelines are in proximity to the subject development. GNI would ask to be consulted in relation to development in proximity to said pipelines
HSA Does not advise against the granting of permission in the context of the "Serveso" directive
12. Public Submissions
8 no. public submissions have been received. While many of the submissions broadly support the proposal works, some specific elements of concern are highlighted

1. Brian and Anne Martin

- Concerns regarding the proximity of the WWTP to their dwelling
- Impact of the outfall pipe on whitebay
- Roads in area are inadequate

2. Shane Russell

- Possible flood risk concern re; whitegate
- Ensure construction impacts are managed
- Impact of the proposal on the proposed village enhancement plan (whitegate)

3. Whitegate residents committee

- Possible flood risk concern re; whitegate
- Ensure construction impacts are managed
- Impact of the proposal on the proposed village enhancement plan (whitegate)

4. Thomas Kent Committee

- Ensure construction impacts are managed in the village of Rostellan
- Ensure works to the Thomas Kent park and coastal area are carefully carried out
- Ensure archaeological monitoring
- Some wall has to be knocked to facilitate the pump station- the re-instatement of same, aesthetic consideration important

5. Jim Reaney

- Has queried the possibility to re-routing the sewer line from under the Ardnabourkey estate

6. Local residents near Whitebay

- Concerns over the outfall pipe location and the possible impact of same on a local eddy. Concerns that the submitted detail is insufficient in this regard

7. Chriselle Holdings

- It is noted that the proposed works subdivide a section of the Chriselle landholding (part of the overall Industrially zoned lands) and thus limit future developability.

8. Conrad Howard

- Wishes to ensure none of the infrastructure will be visible on whitebay beach

The items raised will be discussed under **assessment** below

13. Public Representative Submissions
None received
14. Assessment and Conclusion

Proposal/ Principle

The proposed development consists of a new WWTU and marine outfall, 3 new pumping stations with interconnecting network of pipes and a proposed upgrade to part of the existing sewer network

At present, the majority of the whitegate- aghada agglomeration is served by a collection network which discharges untreated sewage into Cork Harbour, a protected Natura 2000 site. In order to ensure compliance with the *Urban Wastewater Treatment Directive (91/271/EEC)* and the higher standard *Waste Water Discharge (Authorisation) Regulations 2007* it is imperative that this situation be addressed. The current proposal will help meet this legislative requirement as well as improving water quality in Cork Harbour with associated public health and environmental benefits. In addition to same, the proposed development will allow the Planning Authority to meet its objectives in terms of housing delivery in this settlement (there is a target to deliver 190 dwellings to the settlement over the plan period however this housing target is contingent on adequate infrastructure being in place). Therefore and having regard to the foregoing, the proposed development is fully compliant with the aims objectives of the CDP 2014 and the East Cork Municipal District LAP 2017.

Strategic Reach

The proposed WWTP is intended to cater for a PE of 2479. Documents submitted indicated that certain components of the scheme are intended to cater for 10 year Pop projection while other elements can be upgraded to cater for a 30 year population.

Please note the East Cork MD LAP outlines that in 2015, the settlement had 893 dwellings (translating to a population of 2321 based on a 2.6 household size). The projected growth target of 190 dwellings would add a further 494 persons to the settlement (an overall total of 2815. While it would have been preferable to see the proposed WWTU sized to this level at this juncture, it is acknowledged that it may be many years before a target of 190 additional dwellings is reached. The application outlines that the scheme can be optimised at future date to account for increased loadings. In total, the scheme would appear potentially cater to a P/E of 3700

Design/ Layout/ Scheme particulars

The following section gives an overview of the main design layout components to the proposed scheme

Figure 1: Proposed Whitegate-Aghada Sewerage Scheme Layout

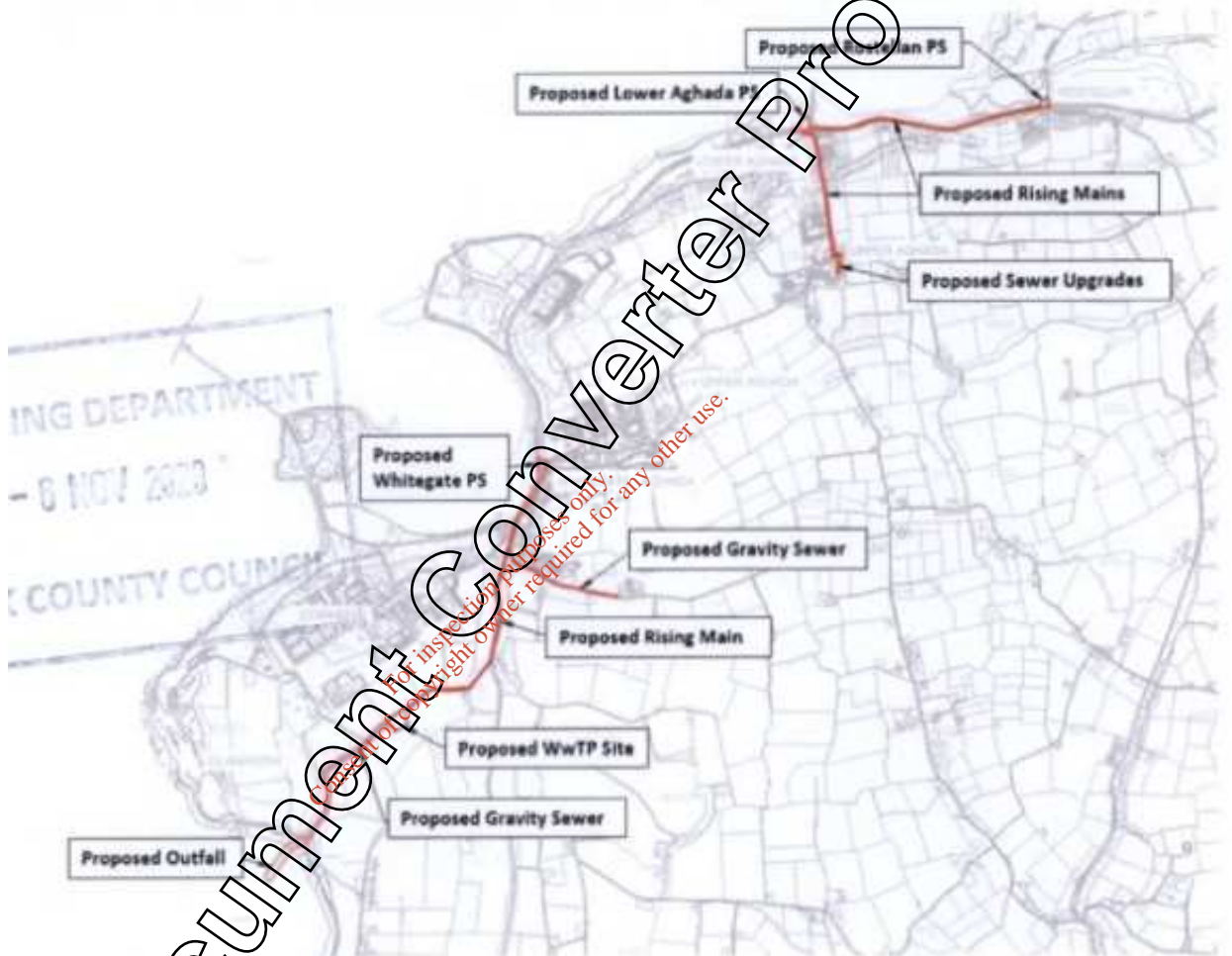
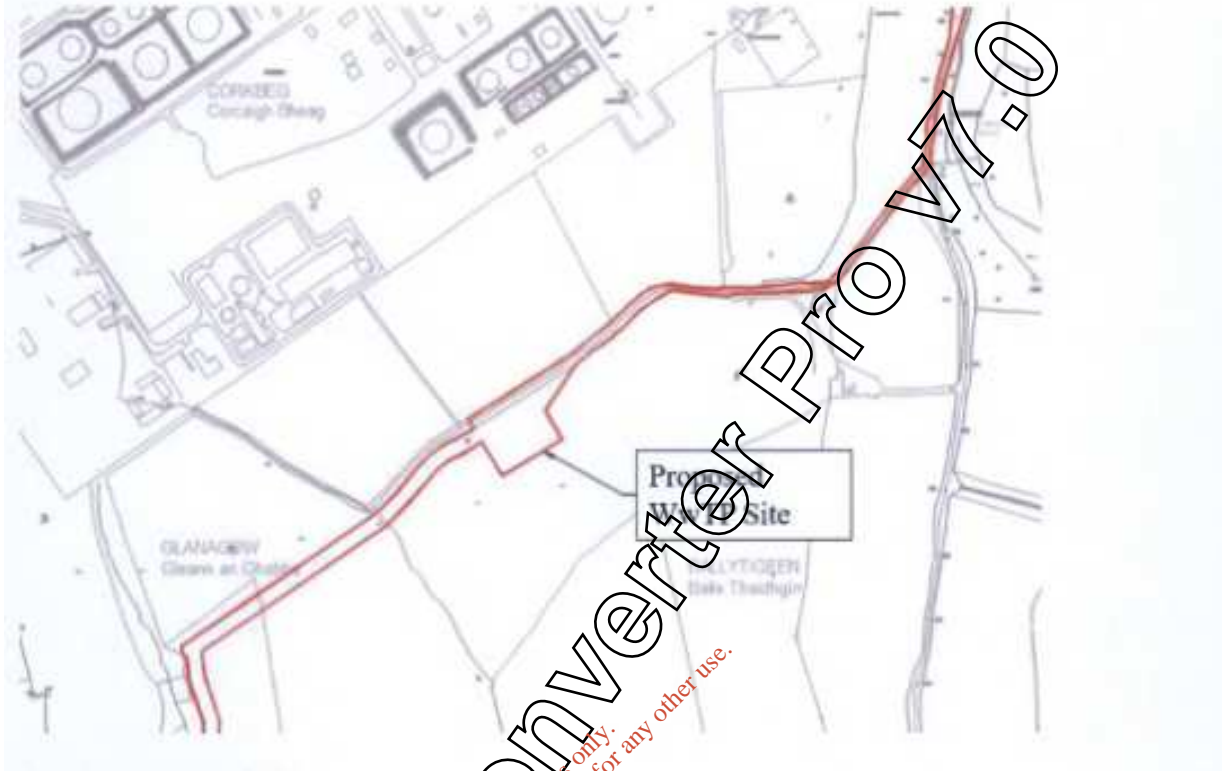


Figure 2: Location of Proposed WWTP Serving the Whitegate-Aghada Agglomeration



Please note that the detail provided in respect of the various elements (PS's and WWTU) may be subject to minor change as part of the final design/ build process

As per the images above 3 new pumping stations are envisaged at Rostellan, Lower Aghada and Whitegate. Each of these PS's is in a coastal/ scenic location however it is intended that the infrastructure will be undergrounded in each of these locations.

The proposed WWTP will be located off the R630 on land currently used for agricultural purposes albeit on lands zoned for Industrial purposes (the oil refinery is approx 200m to the North of the subject site area). The site is accessed via private track which serves an existing telecommunications compound located to the East of the subject site area. The closest dwelling is indicated as being 517m from the WWTP site.

The outfall pipe conveying the final treated effluent will be constructed through agricultural land alongside hedgerows towards whitebay beach. The pipe will be constructed under the beach and under the sea bed reaching a diffuser port approx 295m below HWM. Whitebay is not a designated bathing beach. It is stated the construction would require the closure of the beach for one summer season. A foreshore licence will be required for this aspect of the development and an application for same is currently in train

A 2.4m high fence would be required to secure the facility

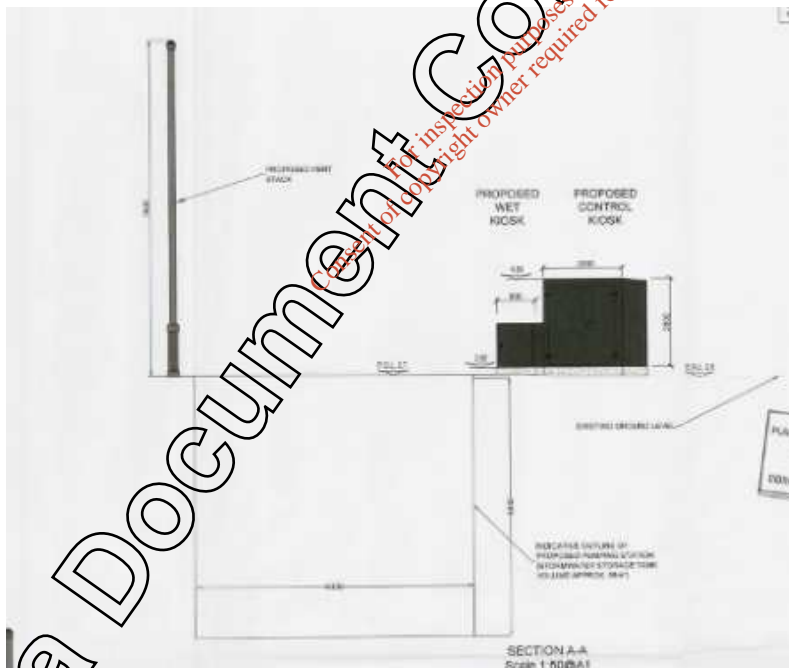
The pumping station elements are outlined below

Rostellan PS

This will be constructed in an area of OS known as Thomas Kent park- a flat grassed area. There are existing picnic tables, sculpture, commemorative plaque and flag pole located in this area. It is proposed to remove and store these elements during construction and replace same once the works are complete

The pump station (56m³) will be an underground structure however there will be some over ground elements (control kiosks and a 7.6m high vent pipe which will resemble a street light). An access gate and hard standing area will also be required

A 1.4km rising main will be constructed to link the Rostellan PS with the lower aghada PS. This will run under the public road along the verge



Rostellan PS cross section- typical for all elements

Lower Aghada PS

This is to be constructed on an irregular section of land close to the existing service station on lower Aghada pier. The shore also bounds the NW section of the site. This site is currently used as the location for an existing package treatment plant which would be decommissioned as part of the proposed

development. Control kiosks will be located on the eastern boundary of the site adjacent the public road.

The pump station (85m³) will be an underground structure however there will also be some over ground elements (2 no. control kiosks and a 7.6m high vent pipe which will resemble a street light), a surge vessel, access road and 1.2m high post and rail fencing

C700m of rising main will connect the new PS to the existing Upper Aghada/whitegate sewer network. . These works will also see the replacement of an existing 150mm diameter pipe with a new 225 diameter pipe located below ground.

Whitegate PS

The PS proposed for whitegate is to be constructed on an open space area within the centre of the village. This is a small landscaped area with seating and is surrounded by public roads and perpendicular parking. The PS has a volume of 111m³

A new gravity sewer is to be constructed along a local road which will pick up flows from the existing Ardabourkey housing estate. This will allow an existing ST to be decommissioned. This gravity line will flow to a new PS

The pump station will be an underground structure however there will also be some over ground elements (2 no. control kiosks and a 7.6m high vent pipe which will resemble a street light), One of the control kiosks will be located to the North of the OS area adjacent the regional road. The second will be located on the OS area within the village. It is stated that final landscaping of this area will tie in with sanctioned CCC part 8 proposal for "village improvement works"

A rising main is required to connect the PS to the WWTP which is to be located approx 1.5km to the SW.

Environment Impact

Currently the Whitegate-Aghada agglomeration is non compliant with the Urban Wastewater Treatment Directive, and non compliant with the Wastewater Authorization issued by the EPA (D0423). The agglomeration is currently served by three untreated outfalls, and a septic tank. The scheme will see reduced loadings of nutrients from three untreated outfalls along the

eastern side of outer Cork Harbour, discharged via one primary treatment outfall, the removal of two untreated discharges into an SPA, and the removal of untreated discharges away from shellfish producing areas. In overall terms therefore, the proposal will lead to improved water quality in Cork Harbour with associated public health and environmental benefits.

The environment officer has commented on the application and has noted that the final discharge quality will not meet the licence. The environment officer goes on to note "However, under the Protection of the Environment Act 2003, a Planning Authority may not impose conditions relating to the control of emissions from a site/activity subject to a licence from the EPA. The EPA prescribe limits and/or standards of treatment under the Waste Water Discharge (Authorisation) Regulations 2007 -2020. Cork County Council is thus restricted to assessing whether or not the proposed development would have an adverse effect on WFD status. It is the EPA, as the environmental regulator who will decide whether the proposed treatment standard is appropriate.

In other words, It is the responsibility of the Environment Protection Agency to consent or otherwise grant a licence with conditions for a discharge and the type of treatment that is appropriate having regard to the status of the receiving waters. This is outside the jurisdiction of the Planning Authority

Finally it is noted the environment officer raised some concerns over the impact of the neap tides vis a vis the data presented (an issue raised in one of the submissions)-

"While I have slight concerns the localised neap tide eddies/current direction noted in the hydrodynamic modelling and drogue deployment in the vicinity of the outfall may be prejudicial to any future Council amenity (bathing water) objectives for White Bay; mitigated by an extension to the outfall into deeper channel, dispersion modelling for E.coli (Section 6.5.1) estimates <50 cfu/100mls or "excellent" water quality 50m from the outfall. It should be noted that White Bay is not designated bathing water under Directive (Bathing Water) 2006/7EC.

Water Quality standards are established for Coastal Waterbodies in European Communities Environmental Objectives (Surface Waters) Regulations 2009-2019. A Dissolved Inorganic Nitrogen (DIN) standard for coastal water bodies is prescribed as:

High Status: ≤ 0.17 mg/N/l

Good Status: ≤ 0.25 mg/N/l

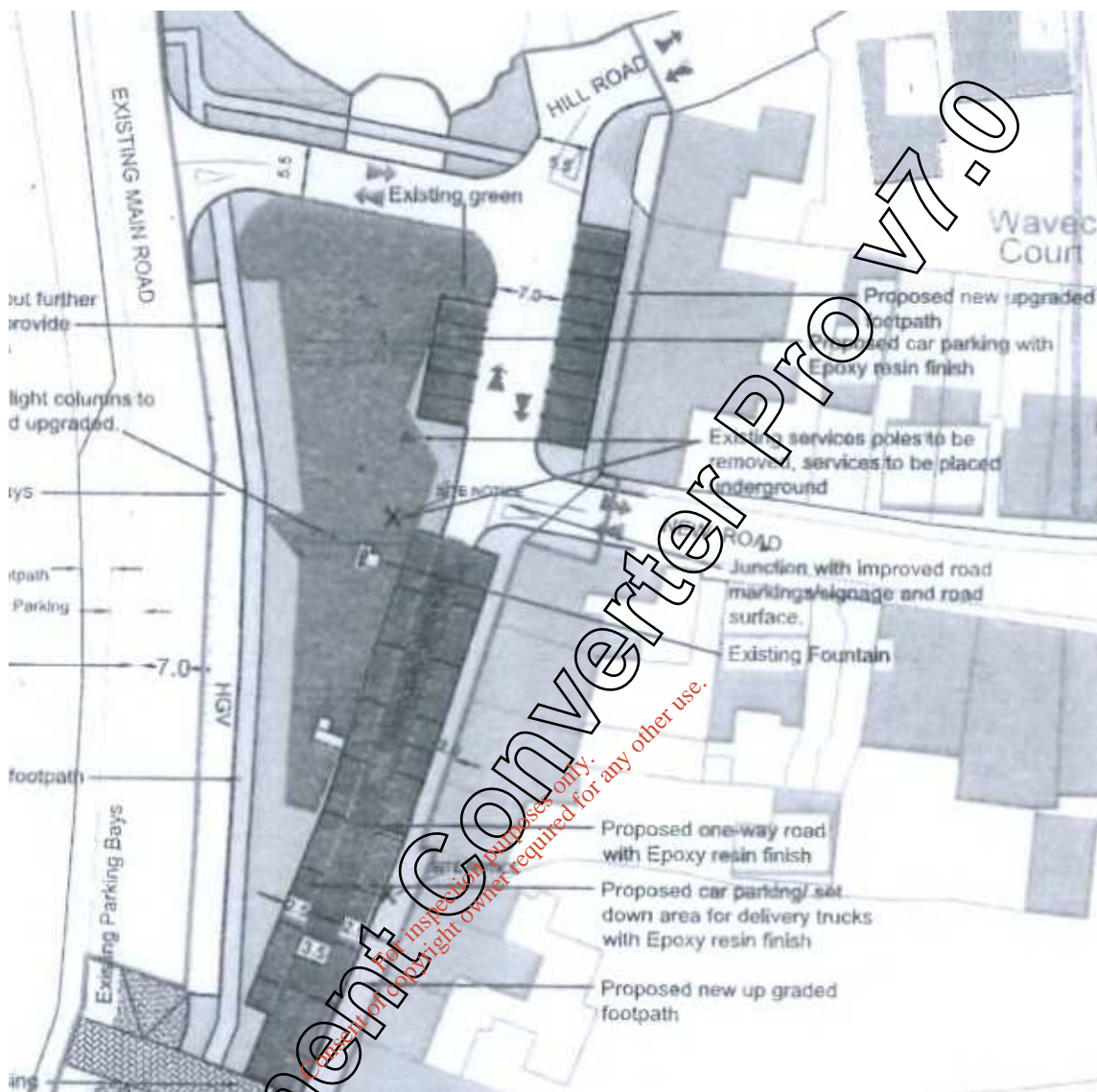
Dispersion modelling (Section 6.5.3) estimates reduced DIN throughout the outer harbour, except in very localised areas around the outfall, but at values less than the environment quality standard. For orthophosphate and total ammonia the situation is repeated, there will be a net reduction in the concentration of pollutants discharged to Cork Harbour. In that sense, the development is to be welcomed in principle"

Visual Impact

The overall site area is located in a scenic/ coastal location thus the visual impact of the proposal is a key consideration. In the main, I would be satisfied that the visual impacts associated with the proposal are likely to be of minor consequence. The three main pumping stations will be buried underground thus will generate no appreciable visual impact. It is acknowledged that each PS requires supporting apparatuses (i.e vent stacks, control kiosks). The vent stacks are the most pronounced of these items (typical height of 7.6m) however they are narrow cylindrical structures that resemble typical lighting columns found in urban areas. In total, only three of these stacks are required thus their overall impacts are not considered problematic

The control kiosks are box like structures with typical heights of 2m and an average size of 4sqm. While these are not the most aesthetically pleasing of elements they are essential to the functioning of the infrastructure. They have been placed along the boundaries to each of the PS sites which helps soften their overall impact

The Whitegate PS is located in the main square/ green area in the centre of the settlement. Submissions have been received outlining concerns that the proposal tie in with the approved village enhancement scheme. Please note Cork County Council sought and attained part 8 planning permission in 2013 for the construction of a village enhancement scheme in Whiteite village from the green area of the proposed Whitegate pump station as far as Barrack St. Whitegate. The scheme was put on hold pending the Whitegate sewage scheme. The applicant refers to the scheme in the planning document, stating the finishes to the area of Whitegate pump station will comply with the part 8 planning granted. The area engineer has also commented on this aspect. Should permission be granted, this issue can be addressed by condition ensuring the final design detail adheres to the requirements of the permitted part 8 scheme



Extract from permitted part 8 (whitegate village improvement works)

The WWTU itself is located in a less sensitive location accessed via a private track. It involves 3 no. primary settlement tanks (which are mostly buried as well as associated infrastructure and small welfare facility approx 30sqm and 3.3m in height). The treatment facility is in proximity to the substantial oil refinery site thus any visual impacts are easily absorbed in the context of the surrounding industrial development. In addition, the WWTU site is on land zoned for industrial purposes

In conclusion therefore I would be satisfied that the proposal will not generate any adverse visual impact

Flood Risk

A Stage 1 and Stage 2 Flood Risk Assessment have been undertaken. Of the 4 main areas of development (3 pumping stations sites and the site of the WWTU), 3 of the areas are found to be within (or partially within) a flood risk area (zone B). The 3 affected areas are the sites containing the proposed pumping stations (these are all located close to the coast). A justification test in respect of each of these elements. The proposal relates to essential infrastructure (as per the flood risk guidelines). Given that each of the PS will be buried, no tangible impact to existing flow paths will arise as a result of the proposal. It is noted that each of the PS sites contains some minor overground elements (the control kiosks for examples). It is stated that these will be on plinths to mitigate any potential flood risk. The PS's themselves should be encased in watertight material. On this basis the FRA assessment submitted concludes that the 3 elements pass the justification test and will not generate/ contribute to flood risk in the area. The area engineer has not raised any specific concerns in relation to this detail

Roads and Transportation

The area engineer has reviewed this element and is generally satisfied with the proposal. Each of the PS sites and the WWTU require an individual access. It is noted that the applicant has not shown SD triangles in respect of these entrances but in any event traffic volumes are expected to be very light. The area engineer has addressed same by condition

Construction Environmental Management Plan

A CEMP has been submitted. As the project is intended a "design and build" operation, the CEMP submitted is indicative and will likely be subject to variances as per the final appointed contractor. An updated CEMP should be required at such time. This would be important as many of the submissions received relate to the correct re-instatement of the public areas impacted by this proposal

In general it is noted that an approximate 16month build schedule is intended. Hours of operation are to be 7am-7pm Mon to Friday and 8am to 2pm Sat.

Appropriate Assessment

Given the nature of the works and the location of the site within Cork Harbour (a natura 2000 site), the applicants have submitted a NIS. This has been reviewed by the co. ecologist however I do not have this report at time of adjudication. Having spoken to the reporting ecologist, I understand she is generally satisfied with the applicant's submission however some additional element of detail required. **Case planner to review**

Heritage

The co. archaeologist has reviewed the proposal and noted the following

The Archaeological Impact Assessment states the site of the treatment plant and the route of the proposed upgrade at Whitegate / Area 1 contains NO Recorded Monuments although notes there are lot in the surrounding landscape.

I am not satisfied with this assessment. Firstly, the Sites and Monuments Record (SMR) is not referred to as a source. This data base is updated with new sites identified since the issuing of the RMP in 1998. Secondly, the AIA does not provided details on the location and proximity of CO088-032 Holy well in regards to the development and that the development is within it's Zone of Archaeological Potential. More significantly the Recorded archaeological monument CO088-101 Mound is within the development and on the line of the upgraded route and will be directly impacted by development. In addition Recorded Monument CO088-031 Ringfort is clearly shown within the development site - Area 1 as shown in Fig 2 of the AIA but not referred to as such. Consequently the report does not provide an assessment of the impact of the proposed development on the above three monument's which makes the assessment inadequate and unacceptable. Finally it does not provide an underwater assessment of the new marine treatment effluent outfall pipe or provide and assessment of Post Medieval archaeology/cultural heritage along the route. Both these may not be an issue but given the coastal location and the maritime heritage of the area it should have been considered/addressed in the AIA assessment.

Further Information has been requested

Other Issues

One of the submissions on file (Chriselle Holdings) notes that the location of the WWTU is not optimum vis a vis the functioning of the wider Industrial zoning applicable to the land. It has been suggested that the WWU be moved 200m to the South in order that it be located in a more peripheral location which would be less impactful on the wider zoning

It is noted that this issue was also raised as part of the CPO process for these lands and was given due consideration by the ABP inspector (the inspectors report has been provided as part of the application). Ultimately it was concluded that that subject plot represents only 1% of the total Industrial zoned lands in this area and the site of the plant would not impede the potential delivery of development across the wider Industrial lands. In fact it was determined that the delivery of this essential infrastructure may be net beneficial for the wider industrial zoning. The location of the plant is also essential in terms of generating an optimum gravity feed flow for the marine outfall. Moving the plant South would generate additional capital cost where there would not appear to be any overriding reason for imposing such a burden. On the basis of the foregoing, I would not see any need to re-visit this issue

The submission from Jim Reaney queried the possibility of re-routing the existing sewer line serving the Ardnabourkey estate as same runs under his property. The current scheme intends picking up the discharge from this estate. At present, re routing within the estate is outside the scope of the current applicant but it could be an issue given further consideration by IW separate to this process

Conclusion

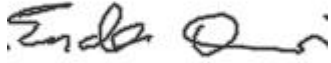
Further Information is required

The applicant is required to engage the services of a suitably qualified archaeologist to carry out an (a) underwater archaeological assessment of the new marine treatment effluent outfall and (b) assessment of post medieval archaeology /cultural heritage features (identify features, assess impact of the development on same and propose mitigation measures) within the proposed development site. The underwater assessment shall be undertaken to the specifications advised by the National Monument Service of the Department of Housing Local Government and Heritage. The appointed archaeologist shall liaise with the County Archaeologist Mary Sleeman during the preparation of both Assessments.

It is noted that the applicant has not shown Sight distance triangles in respect of the proposed entrances for each of the site. Please submit an appropriate sight distance triangle at the proposed access points

It is noted that there are a number of direct discharges not being picked up by the proposed scheme in particular between Lower Aghada and Rostellan. Please clarify this matter accordingly

Defer Application



Enda Quinn
Executive Planner
08/01/2021

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