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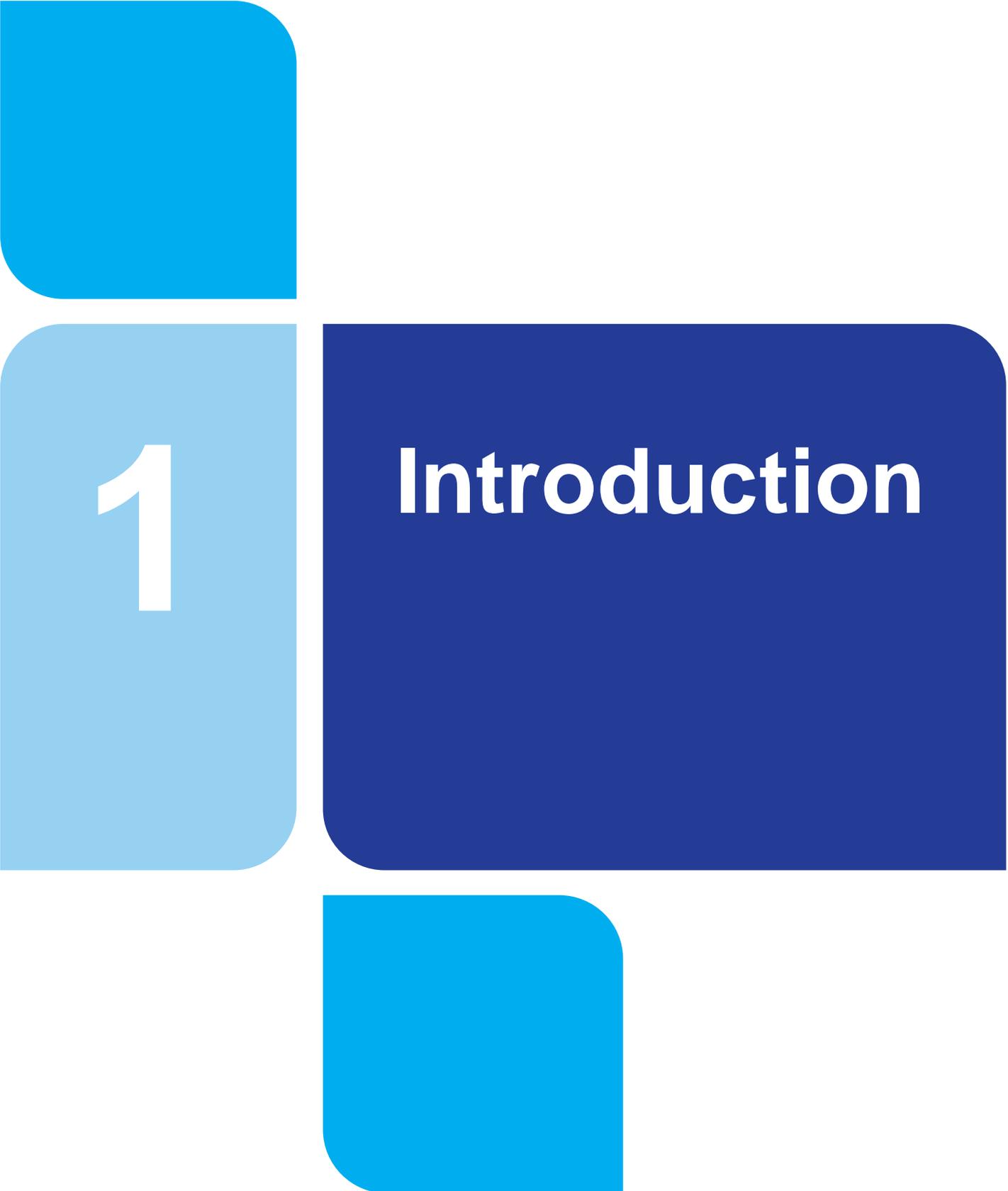
Site Selection Methodology Consultation Report

Sludge Hub Centres – East Midlands Region



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1

Introduction

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 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 East Midlands 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 the below.

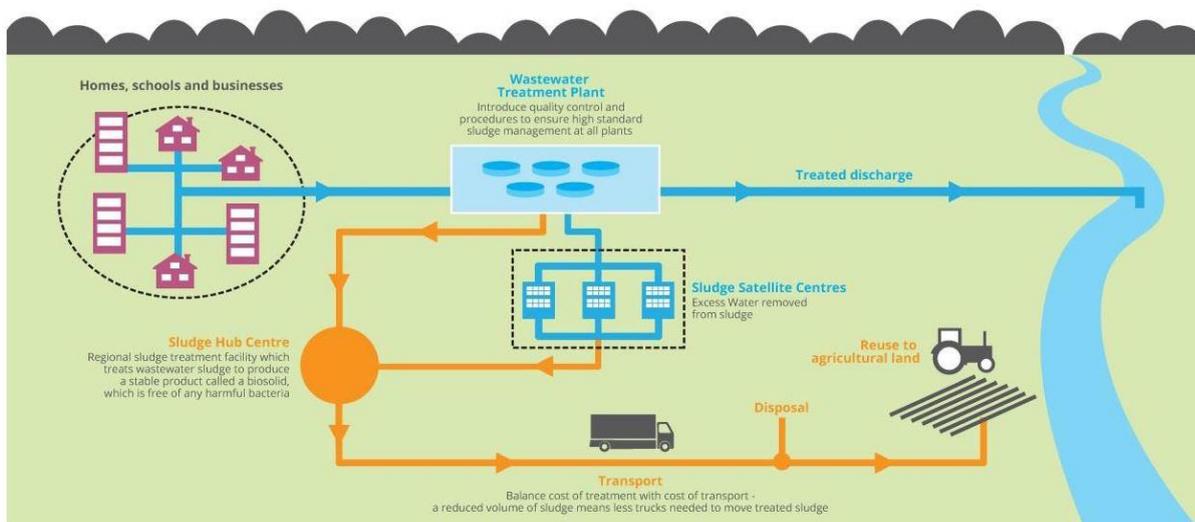


Figure 1 Sludge Hub Centres function in the wastewater treatment process

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 – East Midlands Region

On 24 September 2019, Irish Water published the *Site Selection Methodology Report – East Midlands 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 East Midlands Region. This included details on the project need, the sites being considered for assessment, the site selection criteria and the project roadmap.

The East Midlands Region and the location of the sites being assessed in the site selection process is illustrated in **Figure 1.2**. Irish Water has identified the wastewater treatment plants at Drogheda, Dundalk, Longford, Mullingar, Navan, Portlaoise and Tullamore for assessment for assessment.

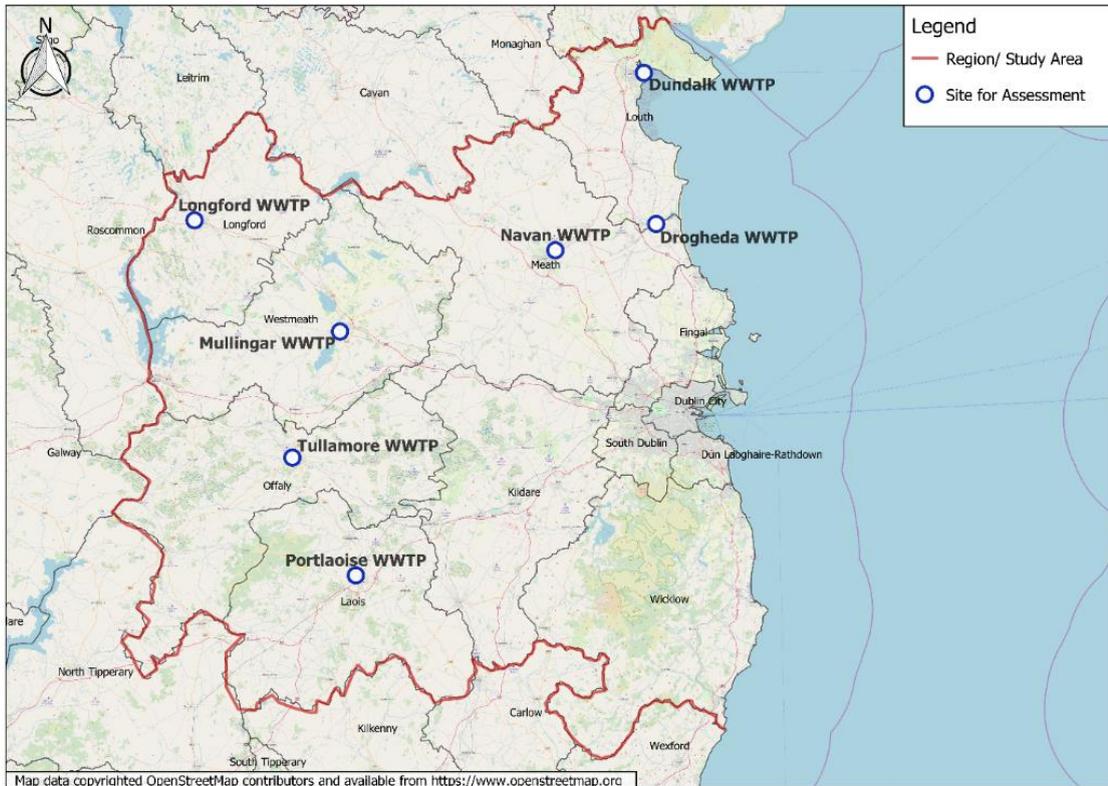


Figure 1.2 East Midlands Region boundary and sites being assessed as proposed SHC

1.6 East Midlands 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. The consultation period was extended until 5 November 2019, due to a technical issue with the project email address being identified at the start of October.

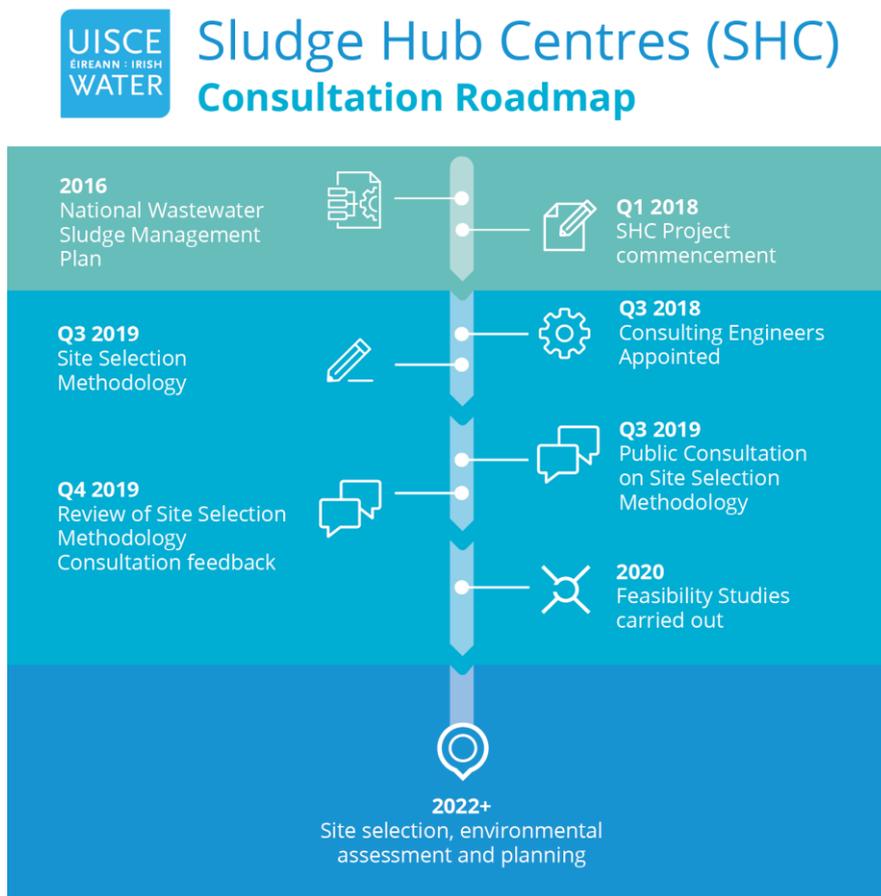


Figure 1.3 Roadmap



2

Consultation Process

2. Consultation Process

2.1 Introduction

A variety of communications methods were used throughout and prior to the consultation period to promote and invite stakeholders to participate in the non-statutory consultation for the East Midlands 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 East Midlands Region;
- The consultation Site Selection Methodology Report and newsletters which were put on public display at local authority planning counters and libraries in the East Midlands 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 sludgehubseastmidlands@water.ie email address.

2.2 Consultation Promotion

2.2.1 Site Selection Methodology Report

The Site Selection Methodology Report for the East Midlands Region was published for the consultation period. This was made available to view or download from the webpage (www.water.ie/sludgehubs) and was also issued for display at local authority planning counters and county libraries in the East Midlands Region.

The list of local authority and library locations issued to is included 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: sludgehubseastmidlands@water.ie

Or by Post: Sludge Hub Centres – East Midlands Region Public Consultation, C/O J. B. Barry and Partners Ltd, Classon House, Dundrum Business Park, Dundrum Road, Dublin 14, D14 T9T0

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. The webpage provided details of the public consultation. Details for the East Midlands Region were provided in a sub-section of the webpage.

The SSMR for the East Midlands 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.

Sample website content can be found in Appendix B.

2.2.3 Consultation newsletter

An information newsletter for the East Midlands Region was produced and distributed to local authority planning counters and libraries within the East Midlands 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.

An image 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 East Midlands 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
Longford Leader	20/09/2019
The Drogheda Independent	17/09/2019
The Dundalk Democrat	17/09/2019
The Meath Chronicle	17/09/2019
Westmeath Examiner	17/09/2019
The Offaly Independent	19/09/2019
Leinster Express	17/09/2019

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 East Midlands Region. The advertisement included a brief overview of the SHC process and the seven 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 2.1 below. The Irish Water LinkedIn page 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 all elected representatives in the East Midlands 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 – East Midlands Region and providing details of the consultation to the Chief Executives and various relevant Directors of Services of the local authorities within the East Midlands Region. All local authorities in the East Midlands Regions were contacted prior to the consultation period and offered copies of the Site Selection Methodology Report

for the East Midlands Region and an information newsletter on the upcoming consultation.

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 East Midlands 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.

2.2.7.4 Direct Engagement

Representatives of the project team were made available to brief elected representatives during the consultation period.



3

Consultation Feedback

3. Consultation Feedback

3.1 Overview

In the East Midlands Region 678 submissions were received for this period of consultation. A total of 188 emails, 488 letters and 2 telephone calls were received. Respondents are categorised as shown in Table 1.1.

Category	Number Received
Individuals, members of the public	644
Community groups	11
Businesses and business groups	2
Public bodies	8
Elected representatives	13
Total Participation	678

Table 1.1 Consultation Participation

The public bodies that made submissions are listed in 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
Environmental Protection Agency (EPA)
Geological Survey of Ireland (GSI)
Inland Fisheries Ireland (IFI)
Transport Infrastructure Ireland (TII)
National Parks and Wildlife Service (NPWS)
Meath County Council
Longford County Council
Westmeath County Council
Transport Infrastructure Ireland (TII)

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 the following common themes: Technical; Environmental; Planning; and Other.

3.2.1 Technical

There were a number of submissions in relation to the capacity of the Drogheda WwTP. Submissions by a stakeholder group in Drogheda and an elected representative raised concerns regarding the available capacity of the Drogheda treatment plant. It was requested that consideration be given to both the increased sludge load and future residential and industrial developments in the area when selecting the sludge hub site. Submissions from residents and an elected representative from Louth also stated that, "the Drogheda plant is already working close to its capacity so the proposed additional 10,000 lorry loads of sludge would be completely unacceptable."

There were multiple submissions by residents in Drogheda who also highlighted their concerns that the Drogheda WwTP is already operating close to its capacity.

A stakeholder group in Drogheda suggested that the technical information provided was limited or insufficient and stated that it does not, “sufficiently outline the level of dewatering or other pre-processing to be carried out at the initial receiving treatment plant in advance of transportation for regional processing nor does it outline the proposed methodology at the regional plant in order that an assessment of the additional hydraulic loading on the existing plant can be determined.”

Feedback received from residents highlighted the poor working condition of the existing infrastructure such as the sewer network, storm pumps and sludge holding tanks at the Drogheda WwTP site. They also highlighted issues of spillages and leakages from the plant. Concerns were raised that as a sludge hub centre, the conditions would worsen.

There were also submissions received in relation to the capacity of the Mullingar WwTP. A submission by an elected representative from Longford Westmeath stated that the site is not suitable and should not be considered as “This site has the lowest capacity of all the facilities currently being assessed.” Feedback received from a resident in Mullingar stated that the “wastewater management and storm drain systems are already volatile, and there have been several pollution incidents in recent years, especially during heavy rain.” Submissions by residents also highlighted issues of spillages and leakages from the plant. Concerns were raised that as a sludge hub centre, the conditions would worsen.

Meath County Council provided clarification regarding the current capacity of Navan WwTP in its submission and stated that the “Methodology Report states that the current WwTP at Navan is designed for a treatment capacity of 90,000 PE. However, the Council note that the Navan WwTP only has a capacity of 40,000 PE (The Sludge digesters etc. were apparently designed for 80,000 PE to facilitate imports from other WwTP’s around Meath).” The submission further highlighted that “lime stabilisation is undertaken by the sludge disposal contractor at his own facilities and removed from Navan WwTP and the sludge digesters at the Navan WwTP were decommissioned many years ago and have not operated since.” Meath County Council sought further clarification as to the number of sludge hub centres to be chosen and the extent of the geographical area they would serve. It was also noted that there is a planned capital investment project for the plant that will increase its capacity.

3.2.2 Environment

Biodiversity

The potential impact on Natura 2000 sites and other areas of conservation and biodiversity due to the development of sludge hubs was noted in submissions from National Parks and Wildlife Service (NPWS), the IFI, residents and elected representatives in Mullingar and Drogheda and stakeholder group in Drogheda and Co. Westmeath.

Inland Fisheries Ireland (IFI) provided a comprehensive submission, providing details of the freshwater ecology and current biological status of the watercourses near the potential sites. IFI stressed the potential impact on fisheries and noted that “this additional effluent has the potential to create significant impacts on water quality, fish health, fisheries habitat and aquatic species”. They also highlighted issues like fish spawning and nursery areas, ecosystem structure and functioning, sport, commercial fishing and angling, amenity and recreational areas from a fisheries perspective.

IFI raised concerns in respect of the assimilative capacity of the waters where the sludge hubs are proposed. The Brosna River at Mullingar and the Triogue River at Portlaoise are given as particular examples. IFI state “Currently, to greater or lesser degrees, all waters are under pressure from diffuse agricultural and urban run-off and some assimilative capacity is already taken up by these factors.” IFI also noted the current effects on roach in the River Brosna should be considered and with particular reference to the species retention time in Lough Ennell.

IFI also stated that the Castletown Estuary in Dundalk and the River Boyne Estuary in Drogheda are important estuaries for species such as salmon, sea trout, eel and other species that migrate either upstream or downstream. These estuaries and the River Camlin and Lough Ennell should be classified as very important water bodies and “the potential impacts on all fish especially the highly valuable trout stock needs to be avoided and the precautionary principal should apply.”

Residents in their submission in relation to Mullingar reported that the River Brosna, located downstream of the Mullingar WwTP, has a poor assimilative capacity. There were multiple submissions, in which the importance of Lough Ennell to fish, biodiversity, tourism and amenity was highlighted. It was reported that the lake has been previously affected by pollution caused by discharges from the Mullingar WwTP which required remediation efforts by local clubs.

A stakeholder group in Co. Westmeath raised concerns that, “Mullingar treatment plant is located beside the river Brosna which is Lough Ennell's main tributary. The EPA has identified the Brosna as poor, the loading of Mullingar treatment plant with sludge from six other plants would have devastating consequences for Lough Ennell.” They stated that “The lake is one of only 11 wild brown trout fisheries left in Europe”. Further concerns were raised that Lough Ennell has recently begun to recover from the past pollution after the recent upgrade works at the WwTP and that significant amount of funding has been spent on stream development and improvements and had concerns that the SHC would destroy these improvements. The stakeholder group also noted that, “The area around Lough Ennell is a SAC and SPA Natura 2000 site, also protected by EU directives and EU water quality framework Directive.”

Three elected representatives from Co. Westmeath raised concerns in relation to the proposed sludge hub in Mullingar in that the WwTP has been a source of

pollution to Lough Ennell and was also responsible for the polluted status of the lake for years. It was stated in one of these submissions that the plant is “beside the River Brosna which flows directly into Lough Ennell, a renowned fishing lake and one of the main tourist attractions in Mullingar. There is a history of Lough Ennell being polluted by the River Brosna and if a major regional sludge hub were to be established here, it would exacerbate the situation further”.

A resident in their submission in relation to Mullingar WwTP stated that “The Snipe is a protected and critically endangered species and the field that is adjacent the Sewage plant is their natural habitat and therefore any expansion to facilitate a Sludge Hub would be illegal to disturb their natural habitat”.

Referring to the Drogheda WwTP, there were submissions in relation to the presence of biodiversity and wildlife in close proximity to the plant. A stakeholder group in Drogheda also stated that “The current wastewater plant is adjacent to and discharges into a European designated SAC & SPA (The Boyne Estuary). Malfunctions or incidents at this plant or with vehicles in transit to or from the plant creates a significant risk to the Estuary and the designated site.”

A submission from Environmental Section of Longford County Council relating to Longford WwTP explained that there are assimilative capacity issues with the River Camlin and that the river from Longford to the Shannon is a LAWPRO priority area. It is also explained that Longford County Council staff will require access to discharge points from the site for monitoring purposes.

Geology and Hydrogeology

The Geological Survey of Ireland (GSI) made a submission in relation to the County Geological Sites (CGS), as adopted under the National Heritage Plan. This submission highlighted Dundalk Bay (GR 309115 302227), Boyne Valley (GR 298078 272904) and the Ridge of Portlaoise (GR 247232 199302), however, noted that “with the current plans, there are no envisaged impacts on the integrity of these CGSs” The GSI recommends that if the proposed plans are altered then they should be contacted for further information.

Hydrology and Flood Risk

Submissions from residents and elected representatives reported the issues of flooding in various areas of Drogheda and Mullingar.

Submission by an elected representative from Westmeath-Longford in relation to Mullingar WwTP highlighted that “the plant is built on a flood plain and there is an abundance of flora and fauna living in the vicinity which would be wiped out should this development go ahead.”

An elected representative from Westmeath-Longford, highlighted that “the filter beds were built on a flood plain.” in their submission in relation to Mullingar. A

number of similar submissions were also made by residents in relation to the Mullingar WwTP being built on a flood plain.

A submission made by a resident in Drogheda noted that the area always floods after heavy rain and flooding of the SHC could impact the river.

Submissions by residents in Drogheda included observations regarding the quality of drinking water in the region.

Air Quality and Emissions

There were a number of submissions from stakeholders in Drogheda concerning air emissions and air quality issues relating to the proposed sludge hub centre.

Feedback from a number of residents suggested that the existing industry in the town causes a lot of pollution and a sludge hub at Drogheda WwTP would aggravate the issue. One of the submissions noted there was already an industrial site in close proximity which “emits many gases that contribute to poor air quality and odorous gases are released on a daily basis and these already affect our town in a negative way.”

A resident also raised concerns regarding air pollution and an increase in particulate matter and acid rains due to increased NOx emissions by tanker movements in the vicinity of the proposed hub.

There were also a number of other submissions in relation to the Drogheda WwTP noting concerns that it was environmentally unsustainable to transport sludge over large distances and that this would increase the carbon footprint

Odour

There were multiple submissions received from residents and stakeholders regarding potential odour issues from the proposed sludge hub and existing wastewater treatment plants in Drogheda. Submissions from several elected representatives from Louth raised concerns over on-going odour nuisance near Drogheda WwTP in areas such as Wheaton Hall, Marsh Road and Dublin Road.

Submissions from an elected representative in Louth and a number of residents in Drogheda noted that “The malodour the plant current emits is noxious and unwelcome, therefore any additional sludge material is entirely unwelcome due to its proximity to the urban town centre, homes and proposed adjoining Greenway”. Feedback from residents suggested that odour nuisance at Drogheda was due to issues at the plant, the sewer network and the movement of tankers and the odour was more prevalent in the summer months.

A further submission from an elected representative from Louth in relation to the Drogheda WwTP stated that “Increasing the amount of sludge to be treated in this area would increase the frequency of foul odours emitting from the plant.”

Odour related issues were also reported by residents, businesses and elected representatives in relation to the Mullingar WwTP. A number of submissions also noted that odour from the WwTP is carried by winds to the local housing estates and to the town centre. Concerns were raised from stakeholders in relation to the effect of odour on human health and that the sludge hub would increase odour which would detract foreign investment to the local area.

One of the submissions reported that the odour from Tullamore WwTP was perceptible only occasionally.

3.2.3 Planning

There were a number of submissions received from stakeholders in Drogheda and Mullingar in relation to planning concerns regarding the proposed location of the sludge hub centres.

Submissions from a stakeholder group in Drogheda and residents raised concerns that Drogheda WwTP is too close to businesses, an urban centre, hospitals, care facilities for the elderly; childcare, residential areas and the proposed greenway and that there would be impact due to traffic, odour and air pollution-related issues.

A number of submissions from residents and a stakeholder group in Drogheda were made concerning current and proposed planning applications for residential developments in close proximity to the Drogheda WwTP.

An elected representative in Louth stated that, "Housing developments (current and proposed) surround the current treatment plant and this additional sludge would be intolerable considering the plant's proximity to people's homes." Another elected representative in Louth noted that the "plant is surrounded by residential areas and there are several hundred more houses planned in the immediate area."

Submission from residents in Drogheda raised concerns that the value of land and housing market would be impacted by the development of a sludge hub in their area.

A submission from a resident in Drogheda noted that the land use described around the Drogheda WwTP in the Site Selection Methodology Report is inaccurate. Details of the different land use in the area, which is described predominantly residential use, were provided in this submission.

There were also a number of submissions received from residents in relation to the proximity of the Mullingar WwTP to residential area, schools and other amenities. This also included concerns in relation to a school with special needs located on the access route to the plant.

A business in Mullingar stated that the "site is located in a highly populated residential area with hundreds of residents adjacent to several local and international employers with over a thousand employees in the area." They

sought further clarification if additional land will be purchased from adjoining stakeholders.

Submission by several elected representatives from Mullingar-Kinnegad Municipal District and elected representatives from Longford-Westmeath noted that the proposed sludge hub in Mullingar is located close to residential areas, proposed residential developments, schools, local businesses and the River Brosna. One elected representative also raised concerns in relation to two new primary schools currently being constructed in close proximity to the proposed site.

A submission by Westmeath County Council stated that the proposed sludge hub at Mullingar WwTP is located in close proximity to housing estates, schools and the River Brosna.

An elected representative from Mullingar-Kinnegad Municipal District also raised concerns that the value of land will be impacted in the area.

It was suggested in three submissions from residents in Mullingar that the roads and other infrastructure are not suitable for the development of a sludge hub in Mullingar. It was suggested that the development of a sludge hub should be located in a larger town where more sludge is generated and where it would be in a better position to deal with it closer to the source.

A resident raised concerns about the requirement for additional land around the Tullamore WwTP for the new development of the sludge hub.

Landscape and visual impacts

Meath County Council noted in relation to Navan WwTP, that “there is already a concentration of physical infrastructure on the site associated with the existing WwTP and the sludge management facilities and therefore it is not considered that additional sludge management infrastructure would exacerbate the any landscape or visual impacts”.

Tourism and Amenity

A resident in their submission raised concerns regarding the potential impact of additional haulage vehicles on the heritage and tourism of the town near the Drogheda WwTP. It was highlighted in other submission by residents relating to Drogheda WwTP that the greenway from Drogheda to Mornington, which is expected to increase tourism and economic development, could be negatively impacted by sludge hub development. In relation to Mullingar WwTP, elected representatives from Co Westmeath raised concern on the ongoing environmental issues with the River Brosna and Lough Ennell in terms of water quality and stated that there have been many negative impacts with respect to “tourism, health, marine life, sports and the economic situation in Westmeath.”

IFI highlighted issues like fish spawning and nursery areas, ecosystem structure and functioning, sport, commercial fishing and angling, amenity and recreational areas from a fisheries perspective.

Access and Traffic

Submissions were received from numerous residents and elected representatives in relation to access, traffic issues, congestion and poor road infrastructure and associated issue of human health and safety in relation to the Drogheda WwTP.

Submissions from many residents, a stakeholder group, a local school and elected representatives in Drogheda, raised concerns that the existing road infrastructure is not suitable to cater for increased tanker movements and would pose threat to health and safety. The submissions stated that Marsh Road, Mill Road, South Quays and Dublin Road are routes of concern.

An elected representative in Louth stated, “Drogheda’s roads infrastructure is currently woefully inadequate, especially when it comes to HGVs.” Another elected representative noted that “Possible routes include the Mill Rd which would see excessive numbers of lorries passing by several schools which would pose serious pedestrian and motorist safety risks,” while another elected representative noted that the increased traffic to the Drogheda WwTP will also impact areas coming into the town from the M1 including Mill Road, Colpe and Julianstown.

Submission by residents in Drogheda highlighted that new school and residential developments are planned for the area which would increase the traffic congestion together with the increased truck movements which would pose health and safety risk to residents.

A submission by a local school outlined concerns in relation to the safety of their students given potential increased traffic along the Marsh Road which is already busy with commercial lorries, port traffic and general traffic.

Feedback received by Meath County Council stated that “The entrance to Navan WwTP has poor sight/ stopping distances and as a result health and safety and traffic safety purposes the Council have sought to minimise vehicular movements in and out of the site.”

There were also submissions from residents in Mullingar raised concerning increased traffic congestion due to additional trucks movements and the associated human health and safety.

A submission by an elected representative from Mullingar-Kinnegad MD in relation to Mullingar raised concerns that “The road conditions would be negatively impacted and due to the populous part of the county being affected, the noise and additional traffic caused by the sludge hub being in Westmeath would be extremely undesirable.”

3.2.4 Other

A joint submission from elected representatives in Louth raised concerns that parts of Drogheda are located in both County Louth and County Meath. The submission noted “We are further concerned that any large project in this part of Drogheda would require Louth County Council and Meath County Council to properly and efficiently cooperate”

There were also a number of submissions stating their opposition to sludge hub centres being located in Drogheda and Mullingar however they did not provide a reason for their opposition.

In a submission from an elected representative in Drogheda and a few submissions from residents in Drogheda, there were concerns over the local authority and Irish Water’s capability to manage the sludge centres due to past failures.

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 additional factors that should be considered by the project team in selecting a preferred site. This feedback is summarised under the following common themes: Technical, Environmental, Planning and Other.

3.3.1 Technical Criteria

In a submission from the EPA, it was suggested that “adequate dewatering satellite facilities, capable of accepting all wastewater treatment plant and domestic wastewater treatment sludges, needs to be provided in each region and should be considered as part of this methodology.” The EPA further suggested that “the sludge hub should be located within a sustainable transport distance from these dewatering facilities. Where the distance between dewatering facilities and the preferred sludge hub is considered excessive Irish Water should provide for additional sludge hubs centres within a region.”

A submission from a stakeholder group in Drogheda suggested that satellite digesters should be considered in place of a centralised digester.

A stakeholder group in Co. Westmeath suggested that “an anaerobic digester be used to take this waste and make clean electricity” or as another option, silos “be built in our thousands of acres of cutaway bogs and dried and stored there.”

3.3.2 Environmental Criteria

Biodiversity

The Department of Culture, Heritage and Gaeltacht (DCHG) suggested taking into account the proximity of European sites, Natural Heritage Areas, Statutory Nature Reserves or areas of local biodiversity importance to the proposed sludge hub sites. It was also suggested that the objectives of River Basin Management Plan 2018-2021, sub-basin plans for sites designated for the protection of Freshwater Pearl Mussel, The European Union Environmental Objectives (Freshwater Pearl Mussel) (Amendment) Regulations 2009 to 2018 and rivers designated under Salmonid Regulations (SI 293/1988) be considered. It is also recommended that the future impacts of any nitrogen (NO_x) emissions from combined heat and power engines on nitrogen-sensitive Natura 2000 sites or Annex 1 habitats outside European sites should be taken into account at site selection stage as impacts of nitrogen deposition include acidification and eutrophication.

IFI noted concerns about water bodies and fisheries near all seven potential sludge hubs and raised concerns over “the increased hydraulic loads that will be placed on all of the hubs identified.” They further stated that “insufficient data has been provided to indicate that the sludge hubs at the proposed locations currently have the capacity to treat the range of harmful chemicals.”

In its submission, IFI brought to attention the document by OECD on “Pharmaceutical Residues in Freshwater, Hazards and Policy Responses” and raised concerns over the effects caused by pharmaceuticals in wastewater discharges. Both the IFI and DCHG requested that the potential increase in the discharge of endocrine disruptors into the waterways be assessed.

IFI also raised concerns over the compliance of the discharges with the requirements of Water Framework Directive (WFD) and advised that “It is important that negative or deleterious effects on biodiversity are removed or at least mitigated to such an extent that they can be sustainably managed and monitored.”

In a submission by a resident relating to Mullingar WwTP, it is noted that the catchment into which the treatment plant discharges is linked to the River Shannon, which is planned to be a source of drinking water for Dublin.

Hydrology and Flood Risk

The Department of Culture, Heritage and the Gaeltacht (DCHG) recommended that reference should be made to the *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 was also recommended that site selection should factor in increased future flood risk due to climate change.

With regard to flood risk management, GSI recommends using their “National Aquifer and Recharge maps” which includes data from turloughs and their flooding potential. GSI suggested that their Coastal Vulnerability Index should be adopted at site selection stage with regards to flood risk for coastal sites along with the GSI/OPW Groundwater Flood Project.

Geology and Hydrogeology

GSI, in its submission, brings attention to data that may be of use in the ongoing planning and decision making process. It makes the following recommendations and identifies relevant sources of information.

- Sand and gravel aquifers should be considered and are published on GSI's webviewer. GSI should be contacted directly for the most up to date aquifer data, karst features and zones of contribution to aid in site selection process.
- Groundwater dependent ecosystems (e.g. turloughs) and karst features are taken into account and that groundwater users are considered in terms of subsoil permeability and groundwater recharge at/around the hub centre.
- The importance of groundwater as a source of drinking water should be considered. The Groundwater Programme provides advice and maps to members of public, consultancies and public bodies about groundwater quality, quantity and distribution.
- Other online resources are available from GSI databases such as topographic data, ground investigation information and water supply schemes.
- Important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas) should be considered. This is provided through the Irish Geoheritage Programme (IGH) and County Geological Sites (CGS) as adopted under the National Heritage Plan.
- Geohazards such as landslides should be taken into consideration, especially when developing areas where these risks are prevalent.

Concerns raised by members of public in Drogheda regarding potential groundwater contamination should the tanker spill on route to the sludge hub were also received.

Land Spreading

There were several submissions from public bodies, stakeholder groups and residents in relation the land spreading of wastewater sludge. In its submission, the GSI requested further information regarding wastewater sludge composition

in order to better understand the impacts of land spreading of wastewater sludge. The submission suggested assessing ground conditions before land spreading, noting issues around the uptake of phosphorous and nutrients in plants, while they also suggested assessing bioavailability of soil and subsoils at each land spreading site.

DCHG recommended that “Nitrogen emissions may also result from the impacts of land-spreading of the final product which may arise as a result of the operation of the sludge hub centres. This matter should be considered as part of the site selection process taking into account the potential impacts on nitrogen-sensitive Natura 2000 sites or other sensitive receptors.”

A submission from a stakeholder group in Drogheda raised concern in relation to contaminants from sludge to enter the food chain.

A stakeholder group in Drogheda raised concerns on the ill effects of land spreading on human health and environment due to presence of commercial waste products in the sludge mix.

3.3.3 Planning Criteria

Transport and Traffic

The sustainability of transportation of sludge over longer distances and its environmental impact, was questioned in multiple submissions. A number of submissions also suggested that each wastewater treatment plant should process its own sludge.

Residents in their submission in relation to Drogheda raised concerns that the transport of sludge over large distances is environmentally unsustainable and would increase the carbon footprint. One of the submissions stated, “The additional cost of transporting such large volumes of waste over unnecessarily great distances as proposed is environmental unsustainable.”

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.”

3.3.4 Other

It was suggested in a submission from an elected representative from Galway East that Irish Water should engage with Bord na Móna for alternative solutions for sludge treatment.

A number of submissions questioned the rationale of a regional hub approach to the management of wastewater sludge. It was recommended in one such

submission, that sludge should be treated locally in accordance with the principle of “dealing with waste at its source”.

A submission by a stakeholder in Mullingar suggested having weighting for different criteria listed out to reflect the relative importance of criteria.

3.4 Consultation Question 3

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

It was suggested in one submission by a resident in Drogheda that media such as TV, radio, the local newspaper, letter drop, social media or a specific newsletter for the Drogheda Borough Area be used for future communications.

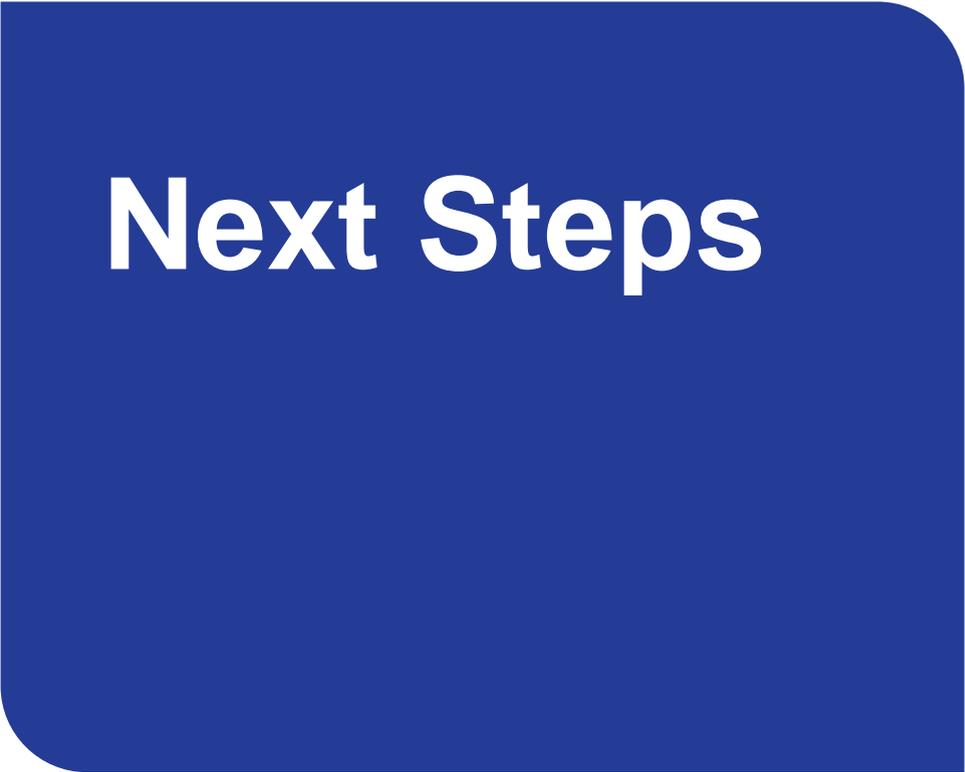
Multiple submissions requested further information on the technical details of the project such as the number of tankers to the WwTP, sludge quantities, odour control measures, details of techniques and technologies to be used at the future sludge hub centre, the number of regional sites to be developed as sludge hub and the geographical area they would serve. It was requested that these details be included in future reports for the project.

The GSI and TII indicated that they would like to be communicated on the project via email. A business in Mullingar suggested they would like to be communicated on the project via email or telephone.

Meath County Council requested that, should the Navan WwTP be selected as a sludge hub centre, the project team in Irish Water consult closely with them during the site selection stage.



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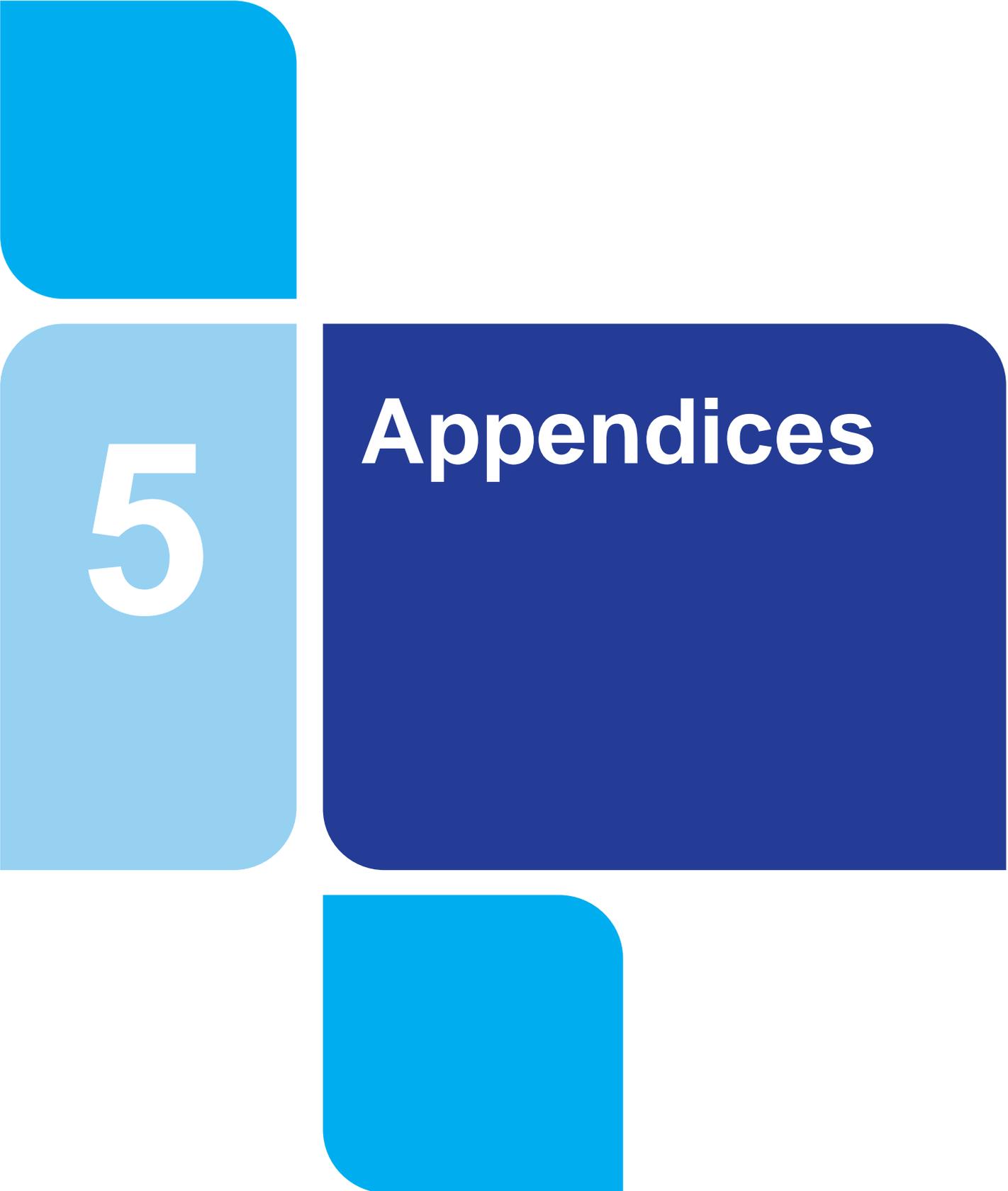


Next Steps

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 East Midland Region.

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



5

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

CONTACT US SIGN IN | PAY NOW



Projects & Plans Water Supply Wastewater For Home For Business Conservation Connections Support About Us



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 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
- **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 | North West 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 North West region.

In this newsletter we explain:

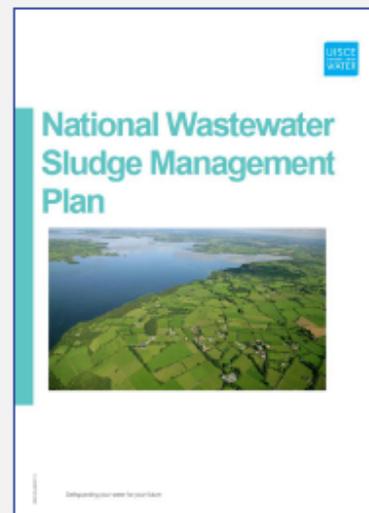
- Project Background
- What is happening now?
- Why are Sludge Hub Centres needed?
- What sites are being considered?
- What is the methodology for selecting the preferred site?
- Next steps

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 two wastewater treatment plants (WWTP) in the North West 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.

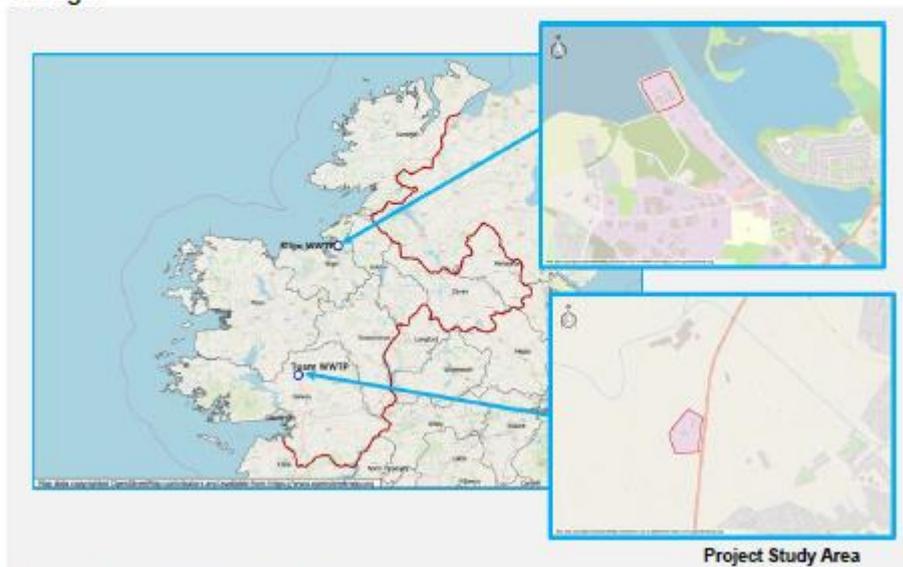
What are the benefits of the Sludge Hub Centres?

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 North West region includes the counties of Galway and Sligo. Irish Water has identified the wastewater treatment plants in Tuam and Sligo as a potential Sludge Hub Centre for assessment in the site selection process. Both of these wastewater treatment plants currently accept and treat sludge.



3 Irish Water | Sludge Hub Centres – North West Region

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 North West 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.

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 North West 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: sludgehubsnorthwest@water.ie

By post: Sludge Hubs Centres – North West region,
c/o J.B. Barry & Partners Ltd, Classon House, Dundrum Business
Park, Dundrum Road, Dublin 14, D14 T9T0

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; Sligo Town and Tuam in Galway as potential Sludge Hub Centres in the North West 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

By post: Sludge Hubs Centres East Midlands 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.

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



Irish Water Public Consultation: Sludge Hub Centres Site Selection Methodology – East Midlands 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 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 Report identifies wastewater treatment plants in: Longford, Dundalk, Drogheda, Navan, Portlaoise, Mullingar and Tullamore as potential Sludge Hub Centres in the East Midlands 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:

By email: sludgehubseastmidlands@water.ie

By post: Sludge Hubs Centres East Midlands 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.

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

Safeguarding our water for our future

Appendix F – Groups and Organisations Contacted Directly

Public Representatives in the Sludge Hub Centres Project Study Area
Minister for Agriculture, Food and the Marine
Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs
Minister for Communications, Climate Action and the Environment
Minister for Housing, Planning, Community and Local Government
Minister of State for Housing and Urban Renewal at the Department of Housing, Planning, Community and Local Government
MEPs/TDs/Senators and Councillors in the North West
Opposition Spokespersons on the Environment and Housing/Planning

Stakeholders
An Taisce
Bord Bia
Bord na Móna
Coillte
CRÉ (Composting and AD Association of Ireland)
Department of Agriculture, Environment and Rural Affairs, Northern Ireland
Department of Agriculture, Food and the Marine (DAFM)
Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs (DAHRRGA)
Department of Communications, Climate Action and Environment (DCCAIE)
Department of Housing, Planning, Community and Local Government (DHPCLG)
Environmental Protection Agency (EPA)
Failte Ireland
Food Drink Ireland (FDI)
Food Safety Authority of Ireland
Geological Survey of Ireland (GSI)
IBEC
ICOS (Irish Co-operative Organisation Society)
ICSMA (Irish Creamery Milk Supplies)
IDIA (Irish Dairies Industries) Dairy Industry Ireland
Irish Farmers Association (IFA)
Inland Fisheries Ireland (IFI)
Irish Bioenergy Association
Irish Technology Centre for Biorefining and Bioenergy (TCBB)
Sludge Haulage Framework Contractors

Sustainable Water Network Ireland (SWAN)

The Health and Safety Authority (HAS)

The Health Service Executive (HSE)

Transport Infrastructure Ireland (TII)

Waterways Ireland

Zero Waste Action Ireland (ZWA)

Appendix G – Letter to An Taoiseach

17th September 2019

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

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. 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

Síorghní / Directors: Cathal Marley (Chairman), Niall Gleeson, Eamon Gallen, Brendan Murphy, Michael G. O'Sullivan
Offic 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 ghníomhaloidta ainmnithe atá faoi theocrann scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.
Umhir Chláraithe in Éirinn / Registered in Ireland No.: 530363



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Éire

Irish Water
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F: +353 1 89 25001
www.water.ie

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Appendix H – Direct Engagement Letters



Re: Sludge Hub Site Selection Methodology Consultation

Dear Sir/Madam,

I am writing to you to inform you that Irish Water has published the Site Selection Methodology Reports for the Sludge Hubs Centres Project 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.

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 and Project Newsletter are also available at planning counters in the relevant local authority offices and public libraries across the country.

For the Site Selection Methodology Report or for further information and how to make a submission, please visit www.water.ie/sludgehubs.

Kind regards,

Paul Fallon
Infrastructure Programme Manager

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Re: Sludge Hub Site Selection Methodology Consultation

Dear Sir/Madam,

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 North West 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 Tuam and Sligo Wastewater Treatment Plants as potential Sludge Hub Centres in the North West Region. The assessment of these wastewater treatment plants as a Sludge Hub Centre will be based on environmental, planning, economic, and technical factors.

Due to an IT issue, submissions emailed sludgehubsnorthwest@water.ie prior to this have not been received, Irish Water are asking for any submissions to resubmitted. Irish Water have extended the period of non-statutory public consultation until **Tuesday 05 November, 2019.**

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

By email: sludgehubsnorthwest@water.ie

By post: Sludge Hubs Centres North West Region
c/o J.B. Barry & Partners Ltd, Clason 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.

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

Kind Regards,

Paul Fallon
Infrastructure Programme Manager

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