



Irish Water & Wicklow County Council
Arklow Wastewater Treatment Plant
Phase 2 Consultation Report Final
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Disclaimer: Please note that this report is based on specific information, instructions and information from our Client and should not be relied upon by third parties.



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1 Introduction

1.1 Project Background

At present, untreated wastewater from homes and businesses in Arklow is discharged into the Avoca River that runs directly through Arklow Town, County Wicklow and is crossed by the Nineteen Arches Bridge.

This practice of discharging untreated wastewater to the river is no longer acceptable and Irish Water intends to resolve this problem in partnership with Wicklow County Council. The Arklow Wastewater Treatment Plant (WwTP) will bring benefits to Arklow in terms of health, integrity of the environment and improved water quality for all.

The proposed WwTP will require approximately two hectares of land and will best meet the current needs of Arklow and allow for any future expansion of the town.

1.2 What does the Project Involve?

Irish Water intends to develop the Arklow Wastewater Treatment Plant Project, which includes:

- A new WwTP estimated to treat 36,000 PE (Population Equivalent) and associated infrastructure such as pumping station(s);
- A pipeline to bring the untreated wastewater to the WwTP and to bring treated wastewater from the plant to the outfall;
- An outfall pipe to safely discharge the treated wastewater to the Irish Sea or the Avoca River.

This report outlines the methodology used and feedback received from the second Non Statutory Public Consultation with the people of Arklow around the proposed Arklow WwTP.

Many of those who engaged with Irish Water as part of this process acknowledged the need for a WwTP in Arklow and welcomed the opportunity to have their say in this consultation.

In accordance with the Aarhus Convention, public participation is an essential element of the development of any infrastructure project and the Arklow WwTP Project Team is committed to facilitating an accessible, meaningful, and accountable consultation process with members of the public. This Consultation Report details the feedback associated with the second phase of public consultation.

This public consultation is the second consultation following reports by Byrne Looby PH McCarthy (BLP) – Irish Water & Wicklow County Council, Arklow Wastewater Treatment Works, Site Assessment Report Phase 1 (October 2014) and Phase 2 (May 2015) which forms the basis for this consultation.

Irish Water is grateful to the people of Arklow and all parties, persons and groups who participated in providing feedback and submissions, via the project information service. The feedback given in this report is based on all of the submissions that were received.



1.3 First Consultation Period

The first consultation period ran for nine weeks (Wednesday 15 October 2014 to Friday 12 December 2014) and 130 submissions were received by:

1. Phone +353 (0) 89 228 5902
2. Post Arklow Submissions
Irish Water
c/o Arklow Municipal District Offices
Avoca River House
Arklow
Co. Wicklow
3. By email arklowtp@water.ie

1.4 Terms of Reference

In the first consultation period Irish Water sought views on the Arklow WwTP on the following;

- What do you think of the process and constraints used in identifying the three potential locations?
- What do you think of the three potential locations chosen?
- What do you think should be considered in choosing the final location?
- How would you like to be communicated with as the project progresses?

The first consultation period challenged two assumptions made by Irish Water at the beginning of this consultation period – these were –

1. The IFI / Shelton Abbey land parcel would be available for a WwTP if required
2. Irish Water should consider discharging treated water into the Avoca River rather than to sea.

These two points were brought back to the Project Team and the team looked in detail at a river discharge and at the potential of the IFI Shelton Abbey site as a possible location for the WwTP.

1.5 Second Consultation Period

The second consultation period ran from 15 May to 10 July and updated stakeholders on the progression of the project, on the challenges that the stakeholders raised about a river discharge and the availability of the IFI / Shelton Abbey land parcel and sought their feedback on specific terms of references. 27 submissions were received and the submissions were sent to the Project Team as before by;

1. Phone +353 (0) 89 228 5902
2. Post Arklow Submissions



Irish Water
c/o Arklow Municipal District Offices
Avoca River House
Arklow
Co. Wicklow
arklowtp@water.ie

3. By email



2 Publicising the Second Consultation

The second consultation was rolled out on the week commencing 11 May 2015. Irish Water briefed Wicklow County Council and Arklow Municipal District officers. Irish Water then met with the Arklow local councillors on Wednesday 13 May 2015 in Arklow Municipal District offices. The following day, Thursday 14 May 2015, Irish Water met with local businesses and business representatives and local media. Irish Water briefed these stakeholders on the consultation, gave each of them the updated newsletter on the consultation and details of how to make submissions and answered any questions they had at that stage.

The newsletter, Arklow Wastewater Treatment Plant, Update Newsletter Public Consultations Phase 2 May 2015, was delivered to every home and business in Arklow via a mail drop with the Wicklow Times on the week of the 18 May 2015

Irish Water also directly informed, by post or e-mail, those who had made submissions as part of the previous consultation period and encouraged them to take part again in the process.

Irish Water asked for people's views on the following:

- What are your views on the Emerging Preferred Site at Ferrybank, (Old Wallboard Site) route pipeline and outfall location?
- What are your views on the process for selecting the Emerging Preferred Site, route pipeline and outfall location?
- Do you have any comments on the alternative sites, route pipeline and outfall locations?
- Is there any other information you believe is relevant to the selection of the Emerging Preferred Site Selection, route pipeline and outfall location?
- How would you like to be communicated with as the project progresses?

Irish Water then invited submissions on these points via phone or to be sent by email or post by Friday 10 July 2015.

2.1 Media Outreach

Irish Water engaged with local media including the Wicklow People, Wicklow Times and East Coast FM via an initial press release setting out the consultation process. Follow up face to face meetings were had with the Wicklow People on a number of occasions resulting in regular media coverage. A second release was issued to local media reminding people to make their submission by the due date and an interview was sought and given on East Coast FM. Media coverage included:

Radio Coverage:

- East Coast FM 8 broadcasts

Press Coverage



- Wicklow People (Arklow Edition) 7 articles
- Wicklow Times 2 articles

Online coverage:

- Wicklownews.net 1 article
- Wicklowpeople.ie 1 article
- Wicklowvoice.ie 1 article
- Irishbuildingmagazine.ie 1 article

2.2 Information Service

A dedicated phone line and e-mail address, which were set up for the first consultation period, remained in place to enable anyone with queries to get in touch with the Project Team or indeed to make submissions via phone or email.

2.3 Website

The Arklow WwTP website was redeveloped for the second phase of the proposed Arklow WwTP and was available on www.water.ie/arklowtp. This website was updated throughout the consultation period.

The Byrne Looby PH McCarthy (BLP) – Irish Water & Wicklow County Council, Arklow Wastewater Treatment Works, Site Assessment Report Phase 2 was available on the website as was a copy of the newsletter text in English and in Irish.

2.4 Elected Members Engagement

A meeting was held with local elected members on Wednesday 13 May 2015 where all six local Arklow representatives were briefed on the project, their questions answered and any concerns were recorded by Irish Water. Engagement with these Councillors continued throughout the consultation period.

Irish Water also engaged with all other Wicklow politicians / TDs and kept them informed throughout the consultation period.

2.5 Emails to Stakeholders

A specific email address was set up and used for the project – arklowtp@water.ie and any queries received were responded to from this e-mail address.



2.6 Project Brochure

An eight page newsletter (Arklow Wastewater Treatment Plant, Update Newsletter Public Consultation Phase 2 May 2015) was delivered using the Wicklow Times delivery service for the area. It was inserted into the Wicklow Times, a free newspaper which is sent to every home and business in Wicklow. Over 3,500 copies were delivered in the week commencing 18 May 2015.

Copies of the newsletter were also available at the Arklow Municipal District offices, the libraries in Arklow and Wicklow and in the offices of Wicklow County Council.

English and Irish versions of the newsletter were available for download from the Arklow WwTP website.

2.7 Meetings with Stakeholders

Irish Water met with the Arklow and District Chamber of Commerce on a number of occasions including a site visit to the Malahide WwTP with a presentation followed by a question & answer session with their members.

Irish Water also engaged with representatives of other local groups and any person or group that requested a meeting was accommodated.

2.8 Site Visit to Malahide WwTP

In order to give interested stakeholders a better understanding of what a WwTP in Arklow might look like and the impact on its surroundings Irish Water facilitated visits to the Malahide WwTP. The Malahide plant is in a marine location, close to apartment blocks and close to the marina – in a similar location to the proposed Arklow WwTP Emerging Preferred Option. The Malahide WwTP is also of a similar scale to that proposed for Arklow.

Two visits during the consultation were organised for two of the interested project stakeholder groups. The visits informed the stakeholders how a WwTP could operate successfully within a short distance of residential and commercial property.



3 Feedback

At the end of the consultation process, IW received a total of 27 submissions through a combination of letters/email/phone conversations and reports. Some reports received, were extremely detailed. Each and every submission received by the Project Team was reviewed, summarised and logged. As part of the compilation of this report, the Project Team reviewed each submission in order to elicit the key issues raised. This section of the report will review the feedback received, in terms of issues raised by stakeholders as part of their submissions.

This consultation report compiles all of the issues raised. Some of the issues are quoted directly from submissions but others are an amalgamation of issues raised by a number of submissions. Everything included in the ensuing sections is taken directly from stakeholder feedback. No bias is implied by the order in which they are presented.

3.1 Consultation Questions

There were 5 questions asked directly as part of this consultation process and these are listed below numbered 1 to 5 and the specific submissions to each are summarised.

3.1.1 Question 1 - What are your views on the Emerging Preferred Site at Ferrybank (Old Wallboard Site) route pipeline and Outfall location?

General Positive Comments on the Emerging Preferred Site

- Gets rid of an eyesore
- The right place to site a plant – logical place – involves no pumping water uphill
- The provision of the plant could enhance the area if tastefully done, Demolition of the derelict factory must include the removal of the unsightly steel chimney
- Could an emergency river discharge be considered?
- Site is closest to the load centre, the river and the coast and due to its elevation has the lowest pumping costs
- Keep the chimney and let it become a piece of art for Arklow
- Demolition of the derelict buildings gets rid of a safety hazard to trespassers
- Cheapest from an energy cost point of view
- A “no brainer” from a carbon footprint point of view
- Wastewater more or less gravity fed with associated lower operating costs
- Significant environmental benefits and compelling economic advantages of the Wallboard site
- Former industrial site



- As far east as possible so prevailing winds will minimise any odour and noise problems

General Negative comments about the Emerging Preferred site

- Site has the potential to be “gentrified” and re developed to build a riverfront and seafront area
- Potential further marina development
- Arklow needs this kind of prime land to redevelop, reinvigorate and stimulate the local economy
- Valuable piece of land for tourism – site was mentioned as potential site for an hotel
- Prime location for significant development – misuse of the little remaining development land areas in the town
- Could have potential legal challenges – why not build away from the town to ensure no delays?
- Existing planning permission on an adjacent site

3.1.2 Question 2 - What are your views on the process for selecting the Emerging Preferred Site, route pipeline and outfall location?

Many submissions received in relation to the process were positive, with comments including:

- “worthwhile”
- “detailed and transparent”
- “much care gone into letting people know”
- “process very well conducted”
- “liked that there is a formal process”
- “I wish all planning was as thorough as this”

One submission however felt that the

- “Iterative process on the environmental and technical / economic criteria using matrices seems a bit complicated”.

3.1.3 Question 3 - Do you have any comments on the alternative sites, route pipeline and outfall locations?

- Can’t understand why Seabank site was ever chosen
- Wallboard site is 50% of the carbon footprint of the two alternates sites



- Possible study of options for the disposal of discharges from a treatment plant at the Shelton Abbey / IFI site could reveal significant environmental and economic advantages
- IFI should have been in the initial three sites chosen in the first consultation phase
- Position the WwTP on a site that is much further away from the town. There may be additional costs but we are talking about people's health and safety
- I would choose Shelton Abbey / IFI site as my second choice

3.1.4 Question 4 - Is there any other information you believe is relevant to the selection of the Emerging Preferred Site selection, route pipeline and outfall location?

- Existing planning permission of residential and commercial units close to the Emerging Preferred Site
- Possible backwash of sewage from a sea outfall back into the river in Arklow

3.1.5 Question 5 - How would you like to be communicated with as the project progresses?

- Irish Water are committed to communicating with the people of Arklow throughout this consultation process and the submission responses acknowledged that the methods by which the Project Team communicated with the people of Arklow, namely by post, mail, newsletter and e-mail contact were the best ways to communicate around this consultation.

3.2 Relevant Comments and Concerns

A summary of additional relevant comments and issues raised is provided below;

3.2.1 New Information

One detailed submission was received which brought new information to the Project Team's attention. The submission gave a history of the waterfront area which included details of an existing planning permission that is still in date. When the Project Team initially reviewed planning permissions in the Arklow area this was overlooked as it was assumed that the permission had expired. However, it is a 10 year permission and is valid until July 2016.

This recent submission, as part of this second consultation process, corrected this oversight and gave the Project Team details of an existing, in date planning permission for the demolition of an existing structure and the construction of residential and retail units in the North Quay area. In the initial screening of land parcels in Phase 1, the Project Team used a buffer zone for existing residential and commercial receptors. As this buffer was applied to the existing business on the location of this permission this new information does not alter the outcome of the Phase 1 or Phase 2 analysis. The necessary buffers can be



accommodated to the permitted development in the locating of the proposed WwTP within the Emerging Preferred Option site.

3.2.2 General Comments

The following represents a list of general comments submitted by the public during the consultation period:

- Urgent need for a WwTP in the town
- Comprehensive comparison of the 3 land parcels
- Good to see that effluent discharge to the Avoca River was considered
- Original site chosen for a WwTP was this site on the North Quay as per Arklow Town Plan 1988
- Water consumption as per water meters seems to show lower water use meaning that the hydraulic loading on the proposed WwTP may be lower than expected
- Rather taken aback at the proposed timeframe – Irish Water MUST fast track this process
- Hope that tertiary treatment will be installed
- Can a second bridge across the river be incorporated into the plans?

3.2.3 General Concerns

The following represents a list of general concerns or issues that the public commented on in their submissions

- Close to residents and commercial businesses
- Proper screening would be required
- Care must be taken in the design so that the treatment plant does not make noise
- Property values / land values in the local community may be affected negatively having a WwTP in the vicinity
- Negative impact of site works during the construction phase of the development
- Daily impacts of the actual operating site
 - Air and Odour
 - Noise and vibration
- Potential impact of a major incident at such a plant close to a residential area
- Impact of the quality of life of residents
- Landscape and visual impacts of a WwTP in the town
- Health and safety with regards to airborne pollutants and contaminants



- Potential risk of rising sea levels on a WwTP at Ferrybank
- Potential risk of flooding

3.2.4 Consultation with An Bord Pleanála, Wicklow County Council and Environmental Protection Agency

Prior to finalising the site selection report Irish Water met with An Bord Pleanála (ABP) as part of the pre-application consultation on the Strategic Infrastructure Development process. On foot of the meeting Irish Water was asked to further consult with Wicklow County Council Planning Department (WCC) and the Environmental Protection Agency (EPA) regarding the project.

One of the key topics discussed with ABP and WCC was section 4.11 of the Site Selection Report which deals with Planning Policy. It was considered that the scope of the chapter was not broad enough as it did not assess the impact of the development of the proposed WwTP on the potential for the delivery of the Core Strategy targets on the 3 sites or the potential to realise some of the specific objectives contained in the Arklow Town and Environs Plan 2011-2017.

On foot of these discussions section 4.11 of the report was updated along with the assessment matrix. The changes in the assessment matrix were transferred into the overall project matrices and the iterative analysis was repeated. The changes to the planning policy did not impact on the outcome i.e. the Old Wallboard Factory Site, North Quay, Ferrybank remains to be Irish Water's preferred site.

Specifically in relation to the Ferrybank site, following consultation with WCC, Irish Water is of the opinion that the development of a WwTP within a 2 hectare site on lands zoned WZ 'Water-front Zone: To promote and provide for mix-use development' would not be inconsistent with the objective to realise housing targets set out in the Wicklow County Development Plan 2010-2016 and the Arklow Town and Environs Plan 2011-2017 and would not impede the delivery of the Core Strategy. In addition Irish Water recognises that there is a requirement to meet the specific objectives for the Water-front Zone. The development of a Wastewater Treatment Plant at the Ferrybank site, which has significant frontage onto both the river and the coast, will need to be designed to a high architectural standard and quality, such that it becomes an 'anchor' for the area, contributes to the public realm surrounding the site by providing improved access to the shore, adjacent to the plant and potentially links to adjacent the sports ground and ensures that the potential to redevelop adjoining lands is not undermined by the siting of a WwTP at this location.

4 Next Steps

The feedback received during this public consultation phase and scheduled in this report has been reviewed by the Project Team. Based on the site analysis and the public consultation phases it is the team's recommendation that the project be advanced on the basis that the preferred site for the Arklow Wastewater Treatment Plant is at the Old Wallboard Factory Site, North Quay, Ferrybank.



The next stage in the project is the undertaking of an Environmental Impact Assessment (EIA) which will form the basis of a planning application. This EIA will examine in detail the issues of concern raised during the consultation periods including, but not limited to, odour, noise & vibration, visual impact, traffic disruption, flooding and Development Plan policies and objectives.

Irish Water is currently in consultation with An Bord Pleanála on whether the planning application will be made as a Strategic Infrastructure Development. Once this application is made, along with any Compulsory Purchase Order or Foreshore Licence applications, there will be a Statutory Public Consultation period where any person or body may make formal submissions for consideration by the Board. The Board has the discretion to hold an oral hearing if deemed necessary. A revised Wastewater Discharge Licence application will also be made to the EPA at the same time.

As it will take at least 12 months to carry out the Environmental Impact Assessment, Irish Water will keep people updated during the period by means of regular updates on the project website and through updates given to local media. Irish Water will continue to liaise and consult with all relevant project stakeholders throughout this period. In particular Irish Water will consult with the Wicklow County Council planning department regarding the WwTP site layout and will also and seek public input on the design of WwTP.