



Chambers Ireland
c/o Shane Hughes
Policy and Research Executive
11 St Stephens Green
Dublin 2
D02 FY84

Date: 11 June 2024

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility
Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

PP Eilís McGovern

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

PA09

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Aisling Reilly

From: LAPS
Sent: Friday 7 June 2024 15:40
To: Aisling Reilly
Subject: FW: Greater Dublin Drainage Scheme ABP-312131-21
Attachments: Submission by Chambers Ireland regarding the Greater Dublin Drainage Project - June 2024.pdf

From: Shane Hughes <shane.hughes@chambers.ie>
Sent: Friday, June 7, 2024 2:40 PM
To: LAPS <laps@pleanala.ie>
Cc: James Kiernan <james.kiernan@chambers.ie>; Ian Talbot <ian.talbot@chambers.ie>
Subject: Greater Dublin Drainage Scheme ABP-312131-21

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Dear all,

Please find attached a submission by Chambers Ireland in relation to the Greater Dublin Drainage scheme (reference no. ABP-312131-21).

Kind regards,

Shane Hughes

Policy and Research Executive

Chambers Ireland

11 St Stephens Green Dublin 2 D02 FY84

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**Chambers
Ireland**
Advancing business together



**Submission regarding the Greater Dublin
Drainage Project
Reference No. ABP-312131-21**

June 2024

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our Network has pledged to advocate for and support the advancement of the United Nations Sustainable Development Goals (SDGs). As SDG Champions, we use the Goals as a framework to identify policy priorities and communicate our recommendations. We have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), Gender Equality (SDG 5), Industry, Innovation and Infrastructure (SDG 9) and climate action (SDG 13).¹

The Greater Dublin Drainage Scheme (GDD) is particularly relevant in the context of clean water and sanitation (SDG 6), and life below water (SDG 14). As an organisation, we remain steadfast in our support for much-needed investment in critical national infrastructure, including water infrastructure. We are of the view that adequate investment will be critical in helping the State meet its targets under the National Development Plan, improve capacity, and enable efficient wastewater treatment for businesses. For these reasons, the provision of wastewater treatment and the efficiency of water infrastructure are areas of concern for our network. Our main points are indicated under 'Key priorities' concerning how we view the advancement of the scheme, without delay, as a critical project of sustainable development.

¹ The Chambers Ireland SDGs. Available at: <https://chambers.ie/sustainable-development-goals/>

Key priorities

General

A Notice of Further Information in Respect of a Direct Planning Application Remittal to An Bord Pleanála for the Greater Dublin Drainage Project, consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility has been issued. The An Bord Pleanála Reference Number is ABP-312131-21. Chambers Ireland is submitting a response in light of the Notice.

Previously, Chambers Ireland submitted its views on the original scheme in 2018 (reference ABP-301908-18) and also in 2022 (reference ABP-312131-21²). In both submissions, we highlighted the importance of advancing the scheme and ensuring its implementation at the earliest opportunity, for reasons relating to housing, strategic urban growth, and attracting foreign direct investment. Our messaging remains the same in relation to advancing the scheme and ensuring that delays are mitigated.

Chiefly, our core message to An Bord Pleanála is that the project should be fast-tracked as a matter of priority and receive the requisite investment so that sustainable wastewater treatment is in place.

In line with our previous submission regarding the National Water Resources Plan³ and the GDD scheme in 2022, we re-emphasise the importance to our member Chambers and the business

² <https://chambers.ie/wp-content/uploads/2022/09/Chambers-Ireland-Submission-to-An-Bord-Pleanala-regarding-the-Greater-Dublin-Drainage-Scheme.pdf>

³ Chambers Ireland submission to the Irish Water National Water Resources Plan. Available at: <https://www.chambers.ie/wp-content/uploads/2021/03/Chambers-Irelands-Submission-on-the-Irish-Water-National-Water-Resources-Plan.pdf>

community throughout Ireland of the creation of a sustainable and reliable clean water supply, including the safe disposal and treatment of wastewater.

As a vital, once-in-a-generation project, the GDD will help facilitate Uisce Éireann in its role and ensure that the wastewater will be treated safely in compliance with both EU and national wastewater treatment regulations. The project will provide the long-term treatment capacity needed once the wastewater facility at Ringsend reaches its upgraded maximum capacity. It will not only benefit the areas of north Dublin, Kildare and Meath; it will also free up capacity in the Ringsend plant's network, and in turn help facilitate growth and development in the areas it serves.

In the subsequent sections of our submission, we have included further reasons which ought to be considered in advancing the scheme as soon as possible.

Capacity

The lack of capacity in the wastewater services of the Uisce Éireann's Network has been a limiting factor on development across wide tracts of the State. Our view is hence that this constitutes a real constraint upon the efficaciousness of the National Development Plan.

Similarly, the economic problems businesses are experiencing today are increasingly raised as problems of capacity. Many of our water networks are either operating at, or beyond, their projected utility. Indeed, the most recent census results – which indicated a 6% increase since 2016⁴ - underline how important it is that our ambitious plans are delivered promptly. This is

⁴ <https://www.citizensinformation.ie/en/government-in-ireland/how-government-works/government-records-and-statistics/census/#:~:text=access%20the%20information.-,Census%20results,increase%20on%20the%202016%20census>

especially true in regions such as the Greater Dublin Area (GDA), as the GDA will experience even greater strain on utilities as the associated population increases.⁵ Continued population growth and increased commercial activity means the volume of wastewater generated in greater Dublin is projected to increase by more than 50% over the next 30 years. Delays to projects of national importance will ensure the State continuously plays catch-up in these areas while capacity becomes an ever-increasing problem.

In addition, as a major pillar of the National Planning Framework is the concentration of growth in areas that can support denser populations, the substantial population increase that the GDD area will experience is a further reason why the scheme should be implemented at the earliest opportunity. Failure to do so for this reason alone will create significant capacity constraints on an already under-resourced system.

Finally, from the perspective of businesses, *all* are dependent on the continuous supply and treatment of water to keep their operations open. Where this is limited, their operations are severely negatively impacted and in many cases this threatens the viability of their business. Hence while every business in the country is aware of the importance of efficiency, essential services like water treatment also require sufficient capacity to provide for all scenarios. This is highly relevant to our point elsewhere in our submission regarding climate change; businesses need to have a water network that is resilient to all possible shocks.

⁵ <https://www.cso.ie/en/csolatestnews/pressreleases/2023pressreleases/pressstatementcensusofpopulation2022-summaryresultsdublin/>

The importance of the GDD for housing, economic growth and development in the Greater Dublin Area

The GDD scheme is a key part of Uisce Éireann's investment in new wastewater infrastructure in greater Dublin and will protect public health, safeguard our environment and facilitate sustainable growth up to 2050 and beyond. One of the core reasons underpinning our support of the project is that the GDD is an environmentally, technically and economically beneficial solution that can meet the GDA's long-term wastewater treatment needs.

In its current state, our water infrastructure limits the growth of numerous regions in the State and this is particularly the case in the areas affected by the GDD scheme. As referenced elsewhere in our submission, delays in advancing the project and the development of wastewater treatment capacity will result in a severe shortfall in wastewater treatment capacity in the GDA.

The associated wastewater infrastructure requires urgent upgrades and improvement, while in many cases such water infrastructure needs to be entirely overhauled. Failure to advance the scheme will ensure the status quo continues and raises serious concerns about the capability of the network to cope with future population growth (mentioned elsewhere in our submission under 'capacity'). In particular, delays will have serious consequences for the delivery of housing, economic growth and development in the GDA. This also includes meeting the needs of businesses wishing to trade in the area; as stated elsewhere in our submission, if the GDD scheme is not advanced, then this will limit not only the growth of businesses, the region itself, but also the operation of businesses in the area.

Facilitating investment in water infrastructure

The legacy of significant historical underinvestment and the lack of advancement in water projects nationwide have impacted the national water network and caused the problems it faces

today. Linked to under-investment are the litany of successive planning appeals and a congested planning system which has frequently stalled projects of national importance. This is true for other important projects listed in the National Development Plan, and is especially true in the context of the GDD scheme which will serve a large population.

We have consistently raised the point that adequate infrastructure requires proper investment, and water infrastructure is no exception. In our opinion, significant capital investment is required to ensure that adequate water services are available in every community if the national network is to become robust. As the commencement of the project becomes prolonged, so too does the appropriate necessary investment required to deliver it. We recognise the importance of investment in our utility networks, not just for ensuring that businesses may operate, but also for aiding foreign direct investment and the wider economy. In the context of water infrastructure, Covid, Brexit, and inflation have all delayed the closing of a gap which is the result of the post-crash decade of under-investment. It is therefore critical that investment is facilitated to close that gap.

Achieving national and regional targets

At a high level, the Chamber Network values long-term planning and investment as a means of futureproofing the economy. For this reason, we believe the State must ensure it meets the targets set out in the National Planning Framework (Project Ireland 2040) and National Development Plan.

Ensuring strategic infrastructure is prioritised is pivotal to Ireland becoming a sustainable and environmentally sound economy. We were therefore pleased that the delivery of the GDD was included as a key strategic investment priority under the National Planning Framework and the National Development Plan 2021-2030. In addition, we supported its inclusion as a strategic policy objective of the Regional Planning Guidelines for the GDA 2010-2022, the Fingal

Development Plan 2017-2023 and the Dublin City Development Plan 2016-2022. However, absent implementation, those objectives will unfortunately not be met. This has the effect of stalling both national and regional policy which is pivotal for the sustainable growth of our urban areas.

Safeguarding against climate-related challenges and ensuring compliance with international standards

In combination with the projected growth in demand, changes to our climate are likely to have a significant impact on our water supplies, with increased flooding risking groundwater contamination, and deeper winters damaging our pipe network and increasing demand through leakage. This is compounded by data from the Environmental Protection Agency,⁶ which shows that the number of areas in the State failing to meet EU treatment standards rose from 2021 to 2022, while there are numerous areas (36) where wastewater is a significant pressure on inland and coastal waters at risk of pollution. Climate inaction, a lack of investment in infrastructure and the slow progress of the GDD scheme will make improving such figures and ensuring compliance with our obligations more difficult.

⁶ <https://www.epa.ie/our-services/compliance--enforcement/waste-water/urban-waste-water/urban-waste-water-priority-areas/>