



Health Service Executive
c/ Niall Roche Environmental Health Officer
National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas
Co. Kildare

Date: 07 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,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

PA09

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Lálthreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Aisling Reilly

From: LAPS
Sent: Thursday 6 June 2024 21:43
To: Aisling Reilly
Subject: FW: HSE Submission on ABP Case Reference ABP-312131-21 Greater Dublin Drainage Project EHIS 3804
Attachments: HSE Submission June 6th Greater Dublin Drainage EHIS 3804.pdf

From: SIDS <sids@pleanala.ie>
Sent: Thursday, June 6, 2024 4:37 PM
To: LAPS <laps@pleanala.ie>
Subject: FW: HSE Submission on ABP Case Reference ABP-312131-21 Greater Dublin Drainage Project EHIS 3804

From: Bord <bord@pleanala.ie>
Sent: Thursday, June 6, 2024 1:10 PM
To: SIDS <sids@pleanala.ie>; LAPS <laps@pleanala.ie>
Subject: FW: HSE Submission on ABP Case Reference ABP-312131-21 Greater Dublin Drainage Project EHIS 3804

From: Niall Roche <niall.roche@hse.ie>
Sent: Thursday, June 6, 2024 12:41 PM
To: Bord <bord@pleanala.ie>
Subject: HSE Submission on ABP Case Reference ABP-312131-21 Greater Dublin Drainage Project EHIS 3804

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam,

Please find attached the HSE submission with respect to the above proposed development

We'd appreciate an acknowledgement of receipt at your earliest convenience,

Kind regards,

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)

Rannóg Sláinte um Phort Baile Átha Cliath, Seirbhís Sláinte Comhshaoil
Post Rialaithe Teorann - Clós 4, Bóthar an Phromanáid, Baile Átha Cliath 3, D03R9X3.

Dublin Port Health Section, Environmental Health Service
Border Control Post - Yard 4, Promenade Road, Dublin 3, D03R9X3.

T: +353 87 4336621 (office hours only) | E: niall.roche@hse.ie

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"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seans gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2
T: 045 880 442
ehnationaloffice@hse.ie

Seirbhís Sláinte Chomhshaoil Náisiúnta FSS | National Environmental Health Service HSE

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902 – bord@pleanala.ie

Date: 6th June 2024
Name: An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902
Re: EIAR updated via an Addendum EIAR ABP-312131-21
Proposed development: Greater Dublin Drainage Project
Applicant: Uisce Éireann
EHIS Reference: EHIS 3804

Dear Sir/Madam,

Please find enclosed the HSE Consultation Report in relation to the above proposal.

If you have any queries regarding this report please contact Niall Roche, Environmental Health Officer, in the first instance at niall.roche@hse.ie

Yours sincerely

A handwritten signature in blue ink that reads 'Niall Roche'.

Niall Roche
Environmental Health Officer

HSE Submission Report

National Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000) and Regulations made thereunder)

Date: 6th June 2024

Our reference: 3804

Report to: An Bord Pleanala at bord@pleanala.ie

Type of consultation: EIAR

Applicant: Uisce Eireann

Address of proposed development: Townlands of Clonshaugh, Dubber and Newtown, County Fingal and Dublin City.

ABP Case Number: ABP-312131-21

Proposed development: Uisce Eireann is seeking planning permission from An Bord Pleanala (ABP) to construct a number of elements in order to increase the wastewater drainage and treatment capacity of the Greater Dublin Area (GDA), protecting health, safeguarding the environment and facilitating social and economic growth to 2050 and beyond. The elements of the proposed project in brief comprise:

- A new proposed Wastewater Treatment Plant (WwTP) and Sludge Hub Centre on a 29.8 hectare site at Clonshaugh.
- A proposed underground orbital sewer from Blanchardstown to Clonshaugh, including a new proposed pumping station at Abbotstown
- A proposed outfall pipe from the new WwTP to discharge the treated wastewater to the Irish Sea and
- A Regional Biosolids Storage Facility (RBSF) building where solids created as a result of wastewater treatment which can be reused are stored, to be located on an 11 hectare site at Newtown, Dublin 11.

The proposed development was previously granted planning permission in November 2019 but was quashed by order of the High Court and the case was remitted by that Court to ABP for a fresh determination. As a result the EIAR has been updated through an Addendum Report. The key changes referred to in the preface of the addendum Non-Technical Summary are (a) the addition of ultraviolet (UV) treatment at the proposed WwTP and (b) the extension to the River Mayne Culvert on the proposed access road to the WwTP.

Introduction

The Environmental Health Consultation Report only comments on Environmental Health impacts of the proposed development as outlined in the EIAR and the adequacy of the EIAR from the Environmental Health viewpoint.

The submission below is in addition to the submission made under the original application in 2018 under the ABP reference number LDG-007913-18.

The National Environmental Health Service has made observations and submissions on the following specific environmental health areas:

- **Climate Action**

Chapter 14A Air Quality, Odour and Climate under Volume 3A Part A of 6 of the Greater Dublin Drainage Project Addendum addresses climate action. More specifically the topic of climate is assessed under Appendix A14.1 Climate (Green House Assessment).

Much of the focus under this chapter is on reducing green-house gas emissions during the construction and operational phases of the proposed development. Some additional means to reduce emissions could be employed in both construction and development phases.

The National Environmental Health Service (NEHS) recommends that consideration be given to the use of zero emission or low emission vehicles and machinery during the course of the 48 month construction period. In addition to supporting workers get on site via shuttle buses, active travel to enable workers walk, cycle or take public transport could be included to further reduce emissions. In addition the generation of renewable energy beyond the recovery of heat during the sludge treatment process could be explored namely solar, wind and geothermal energy.

Reference is made in the above documentation to the “need to provide sectoral resilience to the impacts of climate change” but detail on how the proposed project intends to provide that resilience or in other words adapt to climate change could not be found. Reference, for instance, could not be found to the National Adaptation Framework of 2018.

The National Environmental Health Services recommends that the proposed development is assessed in terms of how it will adapt to the changing climate over its lifetime. The first step in this process should be a risk assessment that is not just confined to severe weather events. Risks assessed should include sudden onset events like floods, windstorms and wildfires but also slower onset effects. Following this risk assessment a response plan should be put in place across the entire Emergency Management Framework to prevent, mitigate, prepare, respond and recover in a manner that builds back better, safer and stronger.

The climate crisis is a health crisis but action to address climate change also present opportunities to protect population health.

The NEHS recommends the applicant look for ways to enhance or protect population health in line with a Health in All Policies approach and to meet the vision of Healthy Ireland where “everyone can enjoy physical and mental health and well-being to their full potential, where well-being is valued and supported at every level of society and is everyone’s responsibility.

Conclusions

Should permission be granted for the proposed development, the National Environmental Health Service makes the following recommendations:

- That consideration be given to the use of zero emission or low emission vehicles and machinery during the course of the 48 month construction period. In addition to supporting workers get on site via shuttle buses, active travel to enable workers walk, cycle or take public transport could be included to further reduce emissions. In addition the generation of renewable energy beyond the recovery of heat during the sludge treatment process could be explored namely solar, wind and geothermal energy.
- That the proposed development is assessed in terms of how it will adapt to the changing climate over its lifetime. The first step in this process should be a risk assessment that is not just confined to severe weather events. Risks assessed should include sudden onset events like floods, windstorms and wildfires but also slower onset effects. Following this risk assessment a response plan should be put in place across the entire Emergency Management Framework to prevent, mitigate, prepare, respond and recover in a manner that builds back better, safer and stronger.
- That the applicant look for ways to enhance or protect population health in line with a Health in All Policies approach and to meet the vision of Healthy Ireland where “everyone can enjoy physical and mental health and well-being to their full potential, where well-being is valued and supported at every level of society and is everyone’s responsibility.

Kind regards,

Niall Roche

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)

