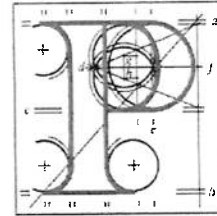


Our Case Number: ABP-312131-21



**An
Bord
Pleanála**

Ibec
c/o Keenan Stack
Transport & Infrastructure Policy Executive
Lobbying & Influence Division
84-86 Baggot Street Lower
Dublin 2
D02 H720

Date: 12 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 recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the 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,

Edwina McGoldrick
Administrative Assistant
Direct Line:

PA04

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Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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D01 V902	D01 V902



The Greater Dublin Drainage Project

**Ibec Submission to the An
Bord Pleanála Statutory
Consultation**

June 7th, 2024



Contents

The Dublin & Eastern Regional Executive Committee	3
Introduction	3
Enabling Infrastructure - Unlocking Capacity	4
Business Expansion - Supporting Non-Domestic Users	4
Population Growth - Dublin's Demography	5
Housing Delivery - The First Step	5
Economic Footprint - The Ripple Effect	6
Public Health - Safe-guarding Dublin Bay	6

The Dublin & Eastern Regional Executive Committee

Ibec is a national organisation with a strong regional structure. The Dublin & Eastern Regional Executive Committee (REC) consists of nominees from Ibec member companies operating within Dublin, Kildare, Louth, Meath, and Wicklow. It includes both multinational and indigenous companies and reflects the diversity of business in terms of sectors and company size. The committee works to shape, guide and influence business policy priorities for the region that contribute to sustainable economic growth and employment. The REC has contributed to the development of the National Planning Framework, the Eastern & Midland Regional Spatial and Economic Strategy, as well as the National Development Plan, the GDA Transport Strategy and various local development plans across the region. The Dublin & Eastern REC is committed to shaping policy that supports quality of life and a resilient and sustainable recovery across our region.

Introduction

Ibec welcomes the opportunity to respond to the An Bord Pleanála statutory consultation on the Greater Dublin Drainage Project (GDD) proposed by Uisce Éireann. We represent the views of a wide variety of businesses across the country, including those in the Greater Dublin Area (GDA). Our members see a clear need for a resilient and future-proofed wastewater treatment system. The infrastructure managed by Uisce Éireann is the backbone of the region's economic and social development. The commencement of strategic infrastructure projects such as the GDD will serve as a key determinant of the region's future economic prosperity. In the context of the recently published National Adaptation Framework (NAF), it will also serve to boost our climate resilience from the potential implications of climate change. Ibec has facilitated a series of briefings for members of our Ibec Transport & Infrastructure Council (T&IC) allowing for Uisce Éireann to outline the role of their underpinning infrastructure in achieving key national objectives. Alongside the equally important Water Supply Project (WSP), the GDD stands out as being of critical importance to support a growing population in the GDA, bolster our environmental protections of coastal areas and afford business the security of adequate wastewater provisions in the region. The

following response echoes our submissions to the Eastern and Midlands Regional Water Resource Plan and Dublin City Development Plan.

Enabling Infrastructure – Unlocking Capacity

The GDD serves to provide long term sustainable wastewater drainage and treatment for the GDA through a new regional wastewater treatment facility and associated infrastructure. With projected wastewater increases of 50%+ over the coming 30 years, adequate wastewater treatment must be in place to ensure sustainable development of the GDA and to ensure the safe return of wastewater to the natural environment.

The GDD will encompass parts of Meath, Kildare and Fingal alongside Dublin – serving to unlock capacity across the region out to 2050 and beyond. The GDD will operate in lockstep with the €5.26 billion Uisce Éireann is allocating in water services assets across the country as part of their strategic plans for 2020-2024. Wastewater infrastructure is a key enabling infrastructure which has the ability to deliver on housing, economic and regional growth commitments. The project is fully in line with the stated aims of Project Ireland 2040 which outlines our National Strategic Objectives (NSO).

While pre-existing development plans in the GDA have not been conducive to the planning, provision and upgrading of strategic wastewater infrastructure, the region's growth potential must not be held back by inadequate commitment to providing essential wastewater infrastructure. The existing 19th century infrastructure in much of Dublin city and growth projections for the region necessitates intervention by Uisce Éireann. Ireland's planning and consents system should not once more contribute to the delay of this vital piece of infrastructure given its wide-reaching impact for citizens and businesses alike.

Business Expansion – Supporting Non-Domestic Users

The Greater Dublin Drainage Project is a critical infrastructural undertaking which will deliver vital wastewater infrastructure to the country's economic engine – the Greater Dublin Area. The high level of risk to the schedule of the project through

challenge and delay actively undermines business confidence in further expanding their presence in the GDA. This perceived inadequacy of our underpinning infrastructure and inability to deliver it damages the country's perception as an attractive destination for FDI. The provision and capacity of utilities plays a critical role in residential and commercial development. As the needs of nondomestic users change, connections to not-yet developed land and the increased capacity provided by the GDD will be key to preventing upgrade issues.

Population Growth – Dublin's Demography

The demographic context of the GDD is the projected 450,000 additional residents living in the GDA by 2040. Ireland's population has grown 30 percent over the last two decades - the third-fastest rate in the EU – while EU average population growth in the period was just 4 percent. There is a potential for this economic and developmental opportunity to be squandered if our infrastructural ambition falls short. The GDD alone will provide wastewater treatment for the equivalent of half a million people living and working in this area. There are existing acute pressures on ensuring continuity of water services to meet demand from the current population and enterprise base. Therefore, forward-thinking and future-oriented projects such as the GDD serve as strong templates to inform expansion of our other critical utilities.

Housing Delivery – The First Step

The GDA urgently requires the delivery of key supporting infrastructure, such as the GDD and WSP to allow for housing and other key projects in Dublin and other urban centres to progress without delay. This can only be expected to get worse if progress on critical infrastructure projects such as the GDD are hindered further.

As outlined in our response to the Dublin City Development Plan, the deficit in existing wastewater services is having a dampening effect on new house construction in some areas of the GDA. Inadequate water infrastructure is already being used as grounds for objection to planning applications. Housing for All

contains specific actions to expand the water network to support housing delivery and the GDD will be integral to this.

Economic Footprint – The Ripple Effect

The GDD stands to be an impactful value-add for the GDA in economic terms with Uisce Éireann working with over 2,000 Irish and international businesses and suppliers to deliver their work programmes, generating economic opportunities nationwide. It is projected that the GDD will support the creation of 360,000 extra jobs in the GDA by 2040. As the competitiveness agenda returns to the fore of businesses minds, it must be considered that the greatest single domestic driver of competitiveness pressures is the lack of housing supply. Continued shortages of affordable housing in the Dublin & Eastern region threatens to undermine the achievement of many of our economic policy goals – including the attraction of overseas investment into Ireland, the promotion of third-level education, the reduction of emissions and the improvement of household incomes and wellbeing. While being an economic boon in its own right, the expansionary nature of the GDD will be felt across the region for years to come.

Public Health – Safe-guarding Dublin Bay

The GDD is a direct investment in the future of our public health. Ireland faces EU sanctions for continuing to discharge inadequately treated municipal sewage at multiple locations, including Dublin Bay. Poor water quality in our estuarine regions can be a serious problem not just for marine life, but also for leisure and tourism activity. Having been identified by Uisce Éireann in the National Water Resources Plan, they have included numerous provisions as part of the GDD to ensure it delivers the most environmentally, technically and economically beneficial solutions to meeting the populations long-term water service needs. The GDD project is necessary to meet the Water Framework Directive (WFD) requirements and other relevant EU Directives - alongside national regulations related to water quality and marine outfall.



About Ibec

Ibec is Ireland's largest lobby group and business representative. We campaign for real changes to the policies that matter most to business. Policy is shaped by our diverse membership, who are home grown, multinational, big and small and employ 70% of the private sector workforce in Ireland. With 36 trade associations covering a range of industry sectors, 6 offices around Ireland as well as an office in Brussels. With over 250 employees, Ibec communicates the Irish business voice to key stakeholders at home and abroad. Ibec also provides a wide range of professional services and management training to members on all aspects of human resource management, occupational health and safety, employee relations and employment law.

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