Our Case Number: ABP-312131-21

An Bord Pleanála

Meath County Council
Planning Department
Buvinda House
Dublin Road
Navan
Co. Meath
C15 Y291

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 Edwina McGoldrick

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

PA09

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Aisling Reilly

From: LAPS
Sent: Tuesday 11 June 2024 09:55
To: Aisling Reilly
Subject: FW: PL - DM - MCC Submission - ABP-312131-21 - Greater Dublin Drainage Project
Attachments: MCC Submission - ABP-312131-21 - Greater Dublin Drainage Project.pdf

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From: SIDS <sids@pleanala.ie>
Sent: Monday, June 10, 2024 9:08 AM
To: LAPS <laps@pleanala.ie>
Subject: FW: PL - DM - MCC Submission - ABP-312131-21 - Greater Dublin Drainage Project

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From: John McGearty <John.McGearty@meathcoco.ie>
Sent: Friday, June 7, 2024 3:01 PM
To: SIDS <sids@pleanala.ie>
Cc: Triona Keating <TKeating@meathcoco.ie>; Avril Young <avril.young@meathcoco.ie>; Teresa O'Reilly <TOReilly@meathcoco.ie>
Subject: PL - DM - MCC Submission - ABP-312131-21 - Greater Dublin Drainage Project

Please find attached the response from Meath County Council in relation to the above-mentioned application.

Original to follow in post.

Kind regards,

John

John McGearty | Staff Officer | Planning & Development
Meath County Council, Buvinda House, Dublin Road, Navan, Co. Meath
T: 046 9097500 | E: planning@meathcoco.ie | Web: http://www.meath.ie

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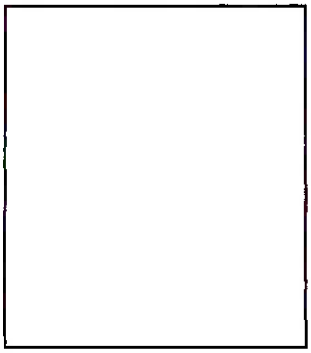

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Meath County Council's new corporate headquarters are:
Buvinda House,
Dublin Road,
Navan,
Co. Meath, C15 Y291

Comhairle Chontae na Mí
Teach Buvinda, Bóthar Átha Cliath, An Uaimh,
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Web: www.meath.ie
Registration No.: 0017277O

07/06/2024

An Bord Pleanála,
64 Marlborough St.,
Dublin 1.
D01 V902.

Re: ABP-312131-21 Remittal Application Greater Dublin Drainage Project, Fingal and Dublin City Councils – Meath Co. Council Submission

A Chara,

The following are the comments of Meath County Council (MCC) in relation to Further Information on a direct Planning Application Remittal to An Bord Pleanála (ABP) for the Greater Dublin Drainage (GDD) Project (Ref. No. ABP-312131-21) located in the administrative areas of Fingal County Council and Dublin City Council.

1.0 Introduction
Uisce Éireann (the applicant) has submitted further information in relation to an application to ABP for the Greater Dublin Drainage Project (Pl. Ref. ABP-312131-21) which is a Remittal Application.

The project consists of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility. A decision by ABP to grant a 2018 planning application for this development (Pl. Ref. ABP-301908-18) was quashed by a High Court Order and the case was remitted by that Court (i.e. sent back) to ABP for a fresh determination. The *Addendum Planning Report* refers to this being the point immediately after the ABP Inspector's Report.

Owing to the passage of time, ABP under Section 37F(1)(a) and (c) of the Planning and Development Act 2000-2022, requested that Uisce Éireann (UÉ) update, where appropriate, the *Environmental Impact Assessment Report* (EIAR) and *Natura Impact Statement* (NIS) and any other information submitted.

The applicant states that the EIAR and NIS have been updated to take account of changes to the baseline environment; the requirement for updated surveys; and changes to the law, policy, and industry standards and guidance in the intervening period. The Remittal Application cover letter states that UÉ has had regard to information presented at the Oral Hearing (associated with the 2018 application) and High Court proceedings including the addition of (UV) treatment and the extension to the River Mayne Culvert. The treatment and culvert extension arose out of details discussed at an Oral Hearing and planning conditions applied by ABP.

The project description has also been updated and it is stated that any changes or updates to the Planning Report/ Addendum Reports and technical reports and drawings, where appropriate is also provided.

In a letter to ABP (26/10/2023) included with the documentation, UÉ also states that Fingal Co. Development Plan (FCDP) 2023-2026 was fully considered, sufficient information has been provided to ABP to comply with its legal obligations under Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended; and the applicant outlines how the 'combined approach' (discharge of wastewater) under Wastewater Discharge (Authorisation) Regulations 2007 as amended has been considered within the application. Reference to the 'combined approach' was in direct response to a request from ABP for such information.

The letter from UÉ also noted that while the 2018 planning application included the Regional Biosolids Storage Facility (RBSF) element, this was subsequently included as part of a Ringsend WWTP upgrade SID Application, granted permission by ABP on 24/04/2019 (Pl. Ref. ABP-301798-18) and due to commence construction in Q.1 2024. Therefore, this aspect of the GDD Remittal Application is no longer required. UÉ submit that the updated *Addendum Planning Report*, *EIAR* and *NIS* consider the direct impact of the RBSF, in combination with other elements of the proposed project, but if planning permission is granted, it should not include this component.

ABP has already prepared a comprehensive Inspector's Report on the 2018 application and CPO which takes account of aspects the proposed project, its supporting documents including EIAR, NIS, etc. and submissions/ observations including the outcomes of an Oral Hearing. MCC has considered the further information details and provides comments in relation to the proposed development for the consideration of ABP (see text highlighted in grey).

As outlined in the submission below, the proposed project is of strategic importance to Co. Meath, given that wastewater from a number of settlements in the south of the county are treated in Ringsend. It is therefore supported by MCC.

2.0 Proposed Development

The proposed development relates to the Greater Dublin Drainage (GDD) Project[1] and comprises:

- A Regional Wastewater Treatment Plant (WWTP) with a 500,000 PE and Sludge Hub Centre (SHC) on a site of 29.8ha in Clonshaugh Td. Fingal (SHC to serve Fingal County);
- Abbotstown Pumping Station (APS) in grounds of National Sports Campus (NSC);
- 13.7km orbital sewer from Blanchardstown to the Clonshaugh WWTP;
- An Odour Control Unit (OCU) at the interface between the rising main and the gravity sewer elements at Dubber;

[1] ABP Inspector's Report[1] (ABP-301908-18)
https://www.pleanala.ie/anbordpleanala/media/abp/cases/reports/301/r301908.pdf?r=212624203263

- A North Fringe Sewer (NFS) diversion to the proposed WWTP - 600 m connecting sewer from NFS to the WWTP at site access road. Access road from existing R139 (left-in) and new egress point (left-out) onto Clonshaugh Road;
- 11.3km outfall sewer including land and marine sections terminating at point 1km north-east of Ireland's Eye (5.4km on land and 5.9km at sea); including a proposed temporary construction compound no. 10 at Portmarnock;
- Provision for future connections to developing areas;
- A Regional Biosolids Storage Facility at an 11.4 ha site at Newtown, Dublin 11 to store biosolids from Clonshaugh WWTP and from Ringsend WWTP;
- A proposal for UV treatment introduced at the oral hearing; and
- Ancillary infrastructure including construction compounds, access roads, landscaping and ancillary work areas.

In addition to planning permission, other consent processes including a Wastewater Discharge Licence for the WWTP (to be made to the EPA), a Foreshore Licence (Maritime Area Regulatory Authority), Certificate of Registration for the Regional Biosolids Storage Facility (RBSF) (Local Authority) and a Fire Safety Certificate under Building Control Legislation.

The following table and figures expand on some of the key aspects of the development:

Table 1: Key Components of the Proposed Development

Proposed Wastewater Treatment Plant (WwTP)	• Regional WwTP to be located on a 29.8 hectare (ha) site in the townland of Clonshagh (Clonshaugh) in Fingal. • 500,000 Population Equivalent (PE) wastewater treatment capacity. • Maximum building height of 18m. • Sludge Hub Centre (SHC) to be co-located on the same site as the WwTP with a sludge handling and treatment capacity of 18,500 tonnes of dry solids (TDS)/annum. • SHC will provide sustainable treatment of municipal wastewater sludge and domestic septic tank sludges generated in Fingal to produce a biosolid end-product. • Bio-gas produced during the sludge treatment process will be utilised as an energy source. • Access road from the R139 Road, approximately 400m to the southern boundary of the site. • Egress road, approximately 230m from the western boundary of the site to the Clonshaugh Road. • A proposed temporary construction compound to be located within the site boundary. • UV Treatment is to be included in the treatment process at the proposed wastewater treatment plant (WwTP) in the northern section of the WwTP site. • The UV treatment system will be designed for the expected flows at the plant and will be installed on the final effluent line. UV treatment will be in operation 24 hours a day, 365 days a year. • The UV system will consist of a minimum of three and a maximum of four treatment units located below or partially below ground level with an above-ground Motor Control Centre (MCC) (in a kiosk) along with minor maintenance and control equipment (e.g. shut-off button, frame for supporting, retracting and cleaning of UV lamps etc.). • River Mayne Culvert on the proposed access road to the WwTP which will be 25m wide to cater for the full width of the future north south link road.

Proposed Abbotstown Pumping Station	• Abbotstown pumping station to be located on a 0.4ha site in the grounds of the National Sports Campus (NSC) at Abbotstown. • Abbotstown pumping station will consist of a single 2-storey building with a ground level floor area of 305m² and maximum height of 10m and a below ground basement 17m in depth with floor area of 524m2 incorporating the wet/dry wells. • The plan area of the above ground structure will be 305m² and this will have a maximum height of 10m. • A proposed temporary construction compound to be located adjacent to the Abbotstown pumping station site.
Proposed Orbital Sewer Route	• The orbital sewer route will intercept an existing sewer at Blanchardstown and will divert it from this point to the WwTP at Clonshagh. • Constructed within the boundary of a temporarily acquired construction corridor. • 13.7km in length; 5.2km of a 1.4m diameter rising main and 8.5km of a 1.8m diameter gravity sewer. • Manholes / service shafts / vents along the route. • Odour Control Unit (OCU) at the rising main/gravity sewer interface. • Proposed temporary construction compounds at Abbotstown, Cappoge, east of Silloge, Dardistown and west of Collinstown Cross to be located within the proposed construction corridor.
Proposed Diversion of the North Fringe Sewer (NFS)	• The NFS will be intercepted in the vicinity of the junction of the access road to the WwTP with the R139 Road in lands within the administrative area of Dublin City Council (DCC). • NFS diversion sewer will divert flows in the NFS upstream of the point of interception to the WwTP. • 600m in length and 1.5m in diameter. • Operate as a gravity sewer between the point of interception and the WwTP site.
Proposed Outfall Pipeline Route (Land Based Section)	• Outfall pipeline route (land based section) will commence from the northern boundary of the WwTP and will run to the R106 Coast Road. • 5.4km in length and 1.8m in diameter. • Pressurised gravity sewer. • Manholes / service shafts / vents along the route. • Proposed temporary construction compounds (east of Malahide Road and east of St. Doolagh's) located within the proposed construction corridor.
Proposed Outfall Pipeline Route (Marine Section)	• Outfall pipeline route (marine section) will commence at the R106 Coast Road and will terminate at a discharge location approximately 1km north-east of Ireland's Eye. • 5.9km in length and 2m in diameter. • Pressurised gravity tunnel/ subsea (dredged) pipeline. • Multiport marine diffuser to be located on the final section. • Proposed temporary construction compounds (west and east of Baldoyle Bay) to be located within the proposed construction corridor.
Proposed Regional Biosolids Storage Facility (RBSF)	• Located on an 11.4ha site at Newtown, Dublin 11. • Maximum height of 15m. • Further details and full impact assessment are provided in Volume 4 Part A of the EIAR.

(Source: UÉ Revised FRA Report October 2023 – Section 1.2)

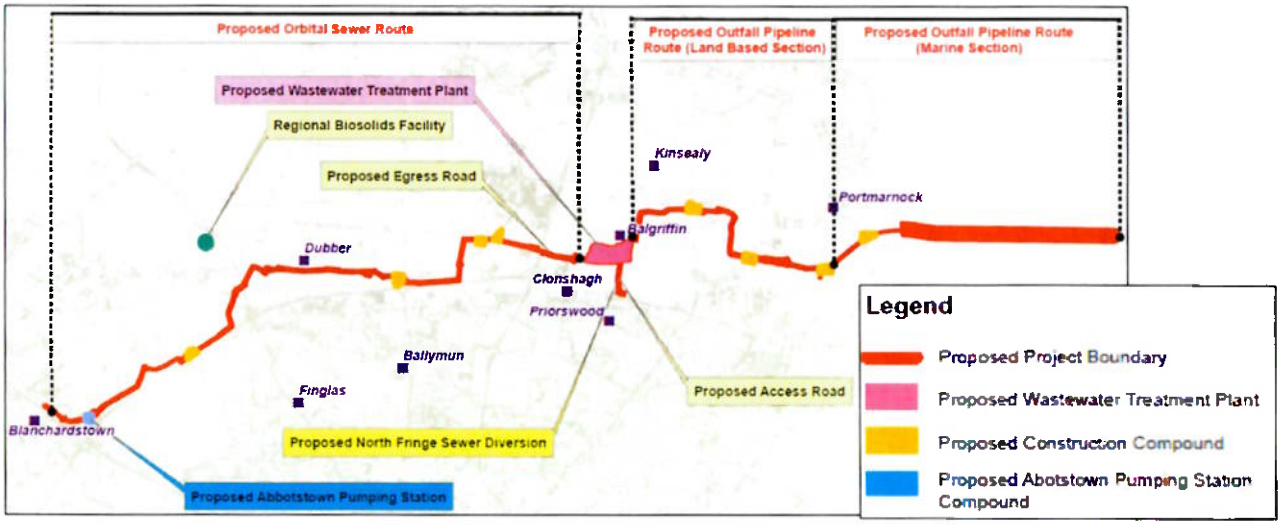

Fig. 1: Location of the Proposed Development (Source: UÉ Revised FRA Report October 2023 – Fig. 1.1)

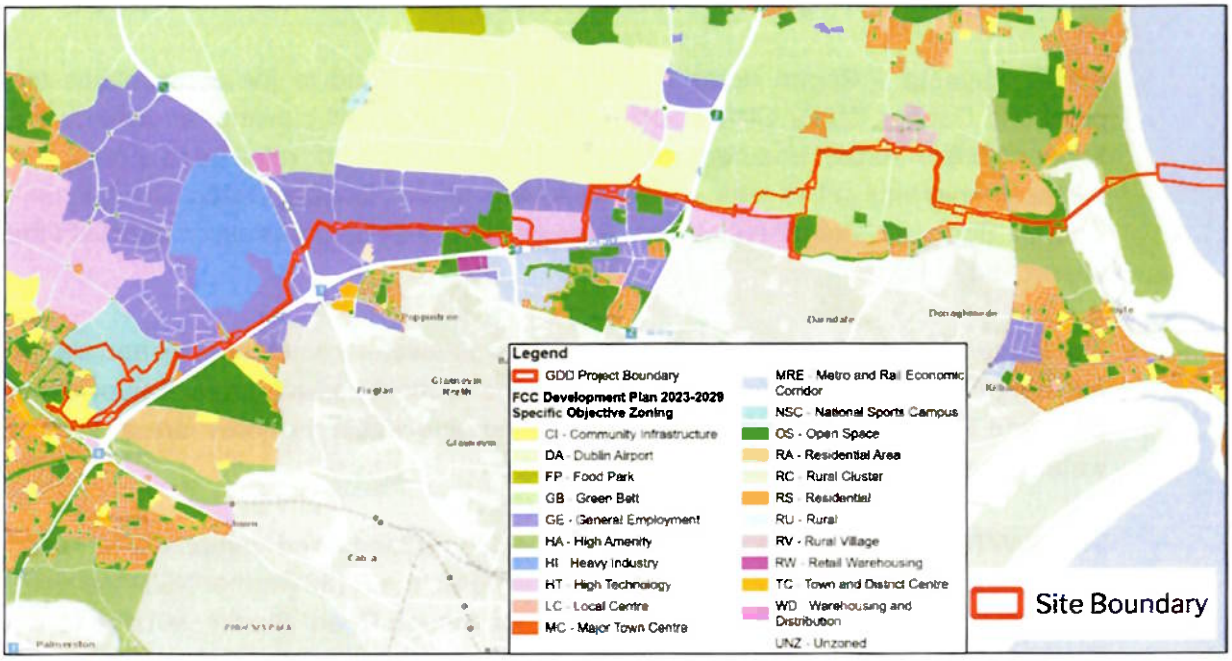

Fig. 2: Proposed Site Location (Source: Planning Report – Site over Fingal CC Zoning)

3.0 Site Location

Most of the proposed development falls under the jurisdiction of Fingal County Council (FCC), however the site access road to the WWTP site and the North Fringe Sewer fall within the area of jurisdiction of Dublin City Council.

Broadly the site area extends over a large area from Connolly Hospital Blanchardstown in the west to 1km north-east of Ireland's Eye (island) in the Irish Sea to the east. The M50 is to the south and the RBSF (Newtown) close to the N2 is located to the north. The GDD orbital sewer connects to the Blanchardstown Regional Drainage Scheme at Waterville Park in FCC.

Section 2.0 of the Inspector's Report with ABP-301908-18 Planning Application/ ABP-302039-18 (CPO) describes the location of the development, noting that a significant length of the outfall pipeline route, Abbotstown pumping station and proposed RBSF is located between Blanchardstown to N2 Finglas Road and north to Newtown area. Some of the existing development in this area includes Connolly Hospital, the National Aquatic Centre, Abbotstown National Sports Centre, Huntstown Power Station, St. Caoimhin's Church and graveyard and Abbotstown House, etc.

The 11.4 ha site of the RBSF is vacant (2018) and close to the N2 with 3 no. housing developments to the south, noting that it is slightly overgrown with some derelict structures and a partly built access road.

The proposed Abbotstown pumping station site is located near the M50/ M3 junction and 150m north of the Tolka River. There will be a proposed orbital sewer route connecting the pumping station to the proposed WWTP (*Addendum FRA Report*).

ABP's Inspector's Report notes that the N2 Finglas Road to the M1 contains the proposed Dubber Odour Control Unit and part of the outfall pipeline, an area to the south of Dublin Airport and north of the M50. ABP's Inspector referred to a reception centre for migrants in this area, residential development, Dubber Castle, Sillogue Golf Course, Sillogue Nature Development Area and long stay carparks associated with the airport, etc.

The M1 to Ireland's Eye contains the proposed wastewater treatment plant and sludge hub centre (SHC) with the outfall pipeline (marine section) passing under Baldoyle Bay SAC and Portmarnock Golf Course and re-emerging within the foreshore at the low water tide point and continuing along the seabed.

The WWTP/SHC site is in the middle of agricultural lands and comprises farmland (2018) in a block defined by Baskin Lane to the north, the R139 (former N32) Malahide Rd. to the south, the R107 to the east and Clonshaugh Road/ Stockhole Lane to the west (*ABP Inspector's Report*). It is 2.5km to the east/ southeast of Dublin Airport and 1.5km to the east of the M1/ M50 junction (*Addendum FRA Report*).

The Mayne River is traversed by the route of a north-south access road into the main WWTP site from the R139. To the south and east of this area are residential areas and high-density urban development and commercial development. This includes Cara Park Traveller community, Belcamp House and nearby Clare Hall Shopping Centre. The Clayton Hotel Dublin Airport is located close to the west of this area. Springhill House (a protected structure) is located to the north of the WWTP site (*ABP Inspector's Report*).

ABP's Inspector's Report noted that the Sluice and Mayne Rivers flow into the inner Baldoyle Bay Estuary (Baldoyle Bay SPA, SAC and pNHA site) and areas of salt marsh and intertidal flats. The outfall pipe would pass through an area of international importance for birds, important fisheries for razor clams and high intensity codling nursery. This area is used for recreational purposes; and as are areas on Velvet Strand/ Portmarnock Strand. There are golf courses in the hinterland and extensive dunes near Baldoyle Bay.

Ireland's Eye, an island off the coast comprises and area of 24ha and is of international importance for birds and habitats and is a tourist attraction. There are sand banks off the east coast.

39 no. land holdings would be affected by construction activities associated with this project (26 of these are in agricultural use) and 10 national and regional roads will be traversed. It is also proposed to cross electricity lines, the Belfast railway line, Connolly Hospital, a no. of watercourses, Sillogue Golf Club, a fuel pipeline, a subsea fibre-optic cable and routes of the proposed Metrolink and Metro West.

The RBSF site is isolated from the remainder of the project area and is 1.6 km to the north of the M50/ N2 (Finglas) junction and to the west of the N2 itself off the R135. The purpose of the facility is to store treated biosolids[2] from the GDD and Ringsend WWTPs to cater for the period up to 2040 and to gradually replace the use of a facility in Carlow.

4.0 Relevant Planning History

ABP's Inspector's Report prepared on Pl. Ref. **ABP-301908-18** (the previous file reference for this Remittal Application and associated Compulsory Purchase Order application **ABP-302039-18**), contains the planning history relevant to the application, though this will need to be revisited to account for more recent developments permitted in the vicinity of the project.

The 2018 planning and CPO applications were subject to numerous submissions and observations and an Oral Hearing was held between March and April 2019. ABP's Planning Inspector summarised the comments from MCC's Chief Executive's Report in relation to this development noting that it was MCC's assertion that the infrastructure is critical to facilitate future sustainable economic, social and residential growth of South Meath's settlements with reference to MCDP policy (previous Development Plan) and the Economic Development Strategy 2014-2022 which required wastewater infrastructure in Co. Meath to be resilient, secure and reliable.

Pl. Ref. **ABP-301798-18** is relevant as this is a permitted SID application for upgrading Ringsend WWTP and was granted permission by ABP on 24/04/2019. This included the Regional Biosolids Storage Facility component of the current Remittal Application; thus, this element no longer requires planning permission.

MCC Comment:

EirGrid East Meath-North Dublin Grid Upgrade SID Application (Pl. Ref. ABP-319422-24) which will follow a similar corridor/ overlap with this development (i.e. align with part of the site of the Greater Dublin Drainage Study Project). This is a proposal for a 400kV electrical cable from Woodland Substation in Co. Meath to Belcamp Substation in Dublin City Council area. While it is noted that this application has been included in the Cumulative Assessment associated with the EIAR Addendum (Appendix A23.1), it does not appear to be included in the NIS Addendum Report (Note: CP1213 is referenced in the NIS Addendum – F23A/0040 FCC application).

5.0 EU, National, Regional & Local Planning Legislation and Policy

Section 7 of ABP's Inspector's Report (Pl. Ref. **ABP-301908-18**) sets out relevant policy documents and Section 3.0 and 4.0 of the applicant's *Addendum Planning*

[2] Biosolids are biologically stable with pathogens reduced so that it is safe for use in agriculture and suitable for transport and storage without further health protection measures. The main forms of biosolids are biocake and biofert (which differ in terms of moisture content). Storage amount of 34,600m^3 per annum. Also provides for storage of 6,000 tonnes per annum of struvite, a biosolid by-product of the Ringsend plant. Ultimately struvite will be delivered directly to the fertiliser industry.

Report covers a range of updated policy documents, sectoral policies and objectives. Where relevant, updates or relevant information which are applicable in the assessment of this planning application, are provided below, categorised by hierarchical level, though the list is not exhaustive. In particular, the policies and objectives of MCDP are set out below.

International/ European Level

- Water Framework Directive 2000/60/EC (WFD)
- Urban Wastewater Treatment Directive 91/271/EEC amended by Directive 98/15/EC (UWWTD) **and provisions agreed on a recast Directive in January 2024**
- European Union Bathing Water Directive 2006/7/EC (BWD)
- Marine Strategy Framework Directive 2008/56/EC
- Marine Spatial Planning Framework Directive 2014/89/EU
- UNESCO Dublin Bay Biosphere Reserve
- Other European Directives which are relevant in the consideration of the environmental effects of this case relate to air quality and habitats and birds.
    - Habitats Directive
    - Birds Directive

Associated Regulations transposing EU legislation into Irish Law

- S.I. No. 722/2003 – European Communities (Water Policy) Regulations 2003 have been amended by S.I. No. 166/2022 - European Union (Water Policy) (Amendment) Regulations 2022;
- Urban Wastewater Treatment Regulations (UWWT) (S.I. 254/2001)
- Waste Water Discharge (Authorisation) Regulations 2007 (S.I. 684/2007)
- European Communities Environmental Objectives (Surface Water) Regulations 2009 (SI 272/2009) as amended by The European Communities Environmental Objectives (Surface Water) (Amendment) Regulations 2015 (S.I. 386/2015) and S.I. No. 288/2022 - European Communities Environmental Objectives (Surface Waters) (Amendment) Regulations 2022
- European Communities (Quality of Shellfish Waters) Regulations 2006 (SI 268/2006)
- The Bathing Water Regulations (S.I. 79/2008)
- S.I. No. 249/2011 - European Communities (Marine Strategy Framework) Regulations 2011 have been amended by S.I. No. 648/2018 - European Communities (Marine Strategy Framework) (Amendment) Regulations 2018; and

National Level

- River Basin Management Plan for Ireland 2018-2021
- Project Ireland 2040 – long term strategy for public capital projects.
    - National Planning Framework – which specifically refers to the project – National Strategic Outcome 9: To implement the GDSDS through enlarging capacity at Ringsend and providing a new treatment plant in North County Dublin – known as the Greater Dublin Drainage Project - to provide for effective waste management including additional sewage sludge treatment capacity and a standardised approach to managing wastewater sludge and including options for extraction of energy and other resources.
    - National Development Plan 2021-2030 – includes reference to the project.
- National Marine Planning Framework 2021 and National Maritime Area Planning Act (2021)
- Water Services Policy Statement 2024-2030
- Uisce Éireann - National Water Resources Plan
    - Uisce Éireann - Regional Water Resources Plan – East & Midlands Region

- National Climate Action Plan (NCAP) 2023 and 2024 Draft Plan - The NCAP 2023 was prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, the first of the Climate Action Plans (since 2019) to be prepared following the introduction of economy-wide carbon budgets and sectoral emissions ceilings. The 2023 plan implements the carbon budgets and sectoral emissions ceilings and sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050, as committed to in the Programme for Government. It sets out how Ireland can accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development.

  Public consultation on the 2024 NCAP has concluded (04/2024) and it refines and updates the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. It includes a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.
- National Biodiversity Action Plan 2023 -2030

- Uisce Éireann Sectoral Plans
  - Water Services Strategic Plan 2050
  - Strategic Funding Plan
  - Capital Investment Plan 2020-2024 – This plan identifies the project as strategic and significant wastewater asset.
  - National Wastewater Sludge Management Plan (NWSMP)
  - Biodiversity Action Plan 2021

- The Management of Invasive Alien Plant Species on National Roads – Technical Guidance. (Transport Infrastructure Ireland 2020).
- Draft River Basin Management Plan for Ireland 2022-2027
- Waste Action Plan for a Circular Economy – Ireland's National Waste Policy 2020-2025
- EPA Best Practice Guidelines for the Preparation of Resource Management Plans for Construction and Demolition Projects (EPA 2021)

Regional

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy (RSES), 2019 to 2031 - RPO 4.2, RPO 10.12, RPO 10.13, Section 5.9, etc.
- Dublin Metropolitan Area Strategic Plan
- Greater Dublin Strategic Drainage Study (GDSDS), 2005 & SEA 2008
- Eastern – Midlands Region Waste Management Plan (EMRWMP) 2015 – 2021 and Draft Plan 2023-2029

Local

- **Meath County Development Plan 2021-2027**[3] - The Meath County Development Plan 2021-2027 has taken effect since the last consideration of this application took place.

  The CDP acknowledges the strategic importance of this project to County Meath as that wastewater from the settlements of Ashbourne, Ratoath, Kilbride, Dunboyne and Clonee are discharged to Co. Dublin and treated in Ringsend.

[3] https://consult.meath.ie/en/consultation/meath-adopted-county-development-plan

Several sections of the Meath County Development Plan 2021-2027 are relevant to the project. These are set out below.

Key aspects of the Meath CDP include Chapter 6 Infrastructure Strategy which refers to Policy Context (Section 6.6) including that of the Greater Dublin Drainage Project, noting that the site selection process concluded in 2014.

Section 6.9 'Wastewater' refers to the Greater Dublin Strategic Drainage Study and its in-depth assessment of the drainage system. This includes a key recommendation to expand Ringsend Wastewater Treatment Plan to its ultimate capacity, develop a new Regional WWRP, orbital drainage network and marine outfall in the northern part of the GDA, known as the Greater Dublin Drainage Project. **Wastewater from Ashbourne, Ratoath, Kilbride, Dunboyne and Clonee is discharged into Dublin where it is treated in Ringsend.** The MCDP states that "*The Council will continue to work with Irish Water to advance and realise capital expansions and upgrades of wastewater infrastructure for the continued sustainable growth of the County*".

Section 6.6 notes that this plant is expected to serve **Dunboyne, Ashbourne, Ratoath, Clonee and Kilbride.**

Relevant objective is **INF OBJ 1**:

- To liaise and work in conjunction with Irish Water to promote the sustainable development of water supply and drainage infrastructure in the county and the region, in accordance with the objectives and recommendations set out in the Greater Dublin Drainage Study and Irish Water's Water Services Strategic Plan.

Relevant policy is **INF POL 11**:

- To liaise and work in conjunction with Irish Water during the lifetime of the Plan in the provision, upgrading or extension of wastewater collection and treatment systems in the County to serve existing and planned future populations and enterprise in accordance with the requirements of the Core and Settlement Strategies.

- **Meath Climate Action Plan 2024-2029**[4] **-** Adopted in January 2024, this Plan seeks to create a low carbon and climate resilient County, by delivering and promoting best practice in climate action, at the local level.

- **Other Relevant Guidelines/ Guidance -** Section 28 Ministerial Guidelines on Environmental Impact Assessment, Flood Risk Management and other guidance documents on Appropriate Assessment are relevant in the context of this application. There is also a County Meath Biodiversity Action Plan 2015 – 2020.

6.0 Internal Referrals

The application was referred to the following departments within MCC for comment and a summary is provided below:

[4] https://www.meath.ie/system/files/media/file-uploads/2024-02/Climate%20Action%20Plan%202024%20-%202029_0.pdf

MCC Dept.	Report Status/ Date of Receipt	Comment**
Transportation Dept.	Report Received 29/05/2024	No objection. The proposed development is in Fingal Co. Council area so should not affect the road network in Co. Meath.
Archaeology	Report Received 22/05/2024	Numerous records of monuments and places in the vicinity, no ACAs, unclassified built heritage in the vicinity. Appendix 16 Cultural Heritage Report absent from documentation. 2018 application was granted by ABP with an archaeological condition. Archaeological works carried out as part of the 2018 project application are noted (geophysical survey and trial trenching) and the mitigation proposed. These related to test trenching the project as far as possible in advance of construction, determine any sites requiring preservation in situ or preservation by record. It also included a townland boundary survey and monitoring of risings from dredging works for archaeological objects. No additional mitigation is proposed in the remittal application. Recommended planning condition provided. Quantity of trial trench testing in greenfield areas should be stated, etc.
Environment (General) Dept.	Nil Return	
Environment (Flooding/ Surface Water) Dept.	Nil Return	

*** Please see Appendices below for further details.*

MCC Comment: ABP is invited to consider the comments set out above/ in the reports of internal department of MCC.

7.0 Key Aspects of the Proposed Development

Some of the key points from the *Addendum Planning Report* in relation to the project, are as follows:

Project context

- The project is outlined as an investment priority within capital investment plans and seeks to implement the recommendations of the Greater Dublin Strategic Drainage Study Final Strategy and its SEA.
- It will provide for much needed headroom in wastewater infrastructure and is in an area which will ensure maximum benefit to existing zoned lands.
- It will ensure that the GDA region is adequately served as it continues to develop in line with population and economic growth projections and support plan-led spatial and economic growth and development.

- It will limit the environmental risk associated with a lack of existing capacity within existing WWTPs and associated infrastructure; and it will address capacity deficits and remove constraints to future development.
- The project represents an integrated wastewater management approach, subject to rigorous assessment and stakeholder engagement, which will augment Ringsend WWTP.
- The project will ensure the protection, enhancement and maintenance of water quality and the natural environment and will provide for improved environmental and infrastructural benefits for a significant proportion of the existing and future GDA communities and population.
- The proposal will assist the future growth and development of Dublin Airport and associated Local Area Plan lands.

Landscape

- As the bulk of the project will be underground and it is proposed to reinstate ground to its prior condition, thus landscape impacts will be limited to the above-ground elements (i.e. the proposed WWTP and Sludge Hub Centre, the proposed Abbotstown pumping station, Odour Control Unit and the RBSF. A Landscaping Plan/ Masterplan forms part of the EIAR, Green Infrastructure Plan (in the 2018 planning application) and Biodiversity Assessment forms part of the Addendum Planning Report.
- Abbotstown pumping station is considered to comprise a relatively small, single storey pumping station that has been specifically designed to reflect the architectural character of the adjacent St. Francis's Hospice. The applicant states that its scale and design is such that it will have no significant impact on the sports campus lands at this location, nor the adjoining High Amenity (HA) zoned lands of the Tolka Valley.
- EIAR Landscape and Visual Assessment has been updated with no significant changes to the conclusion since the 2018 application was lodged.

Biodiversity

- The project will protect and enhance existing assets, seeking to deliver net gain both quantitatively and qualitatively with respect to green infrastructure and biodiversity.
- Existing treelines and hedgerows will be protected and enhanced where relevant and it includes measures for the enhancement and protection of biodiversity within the 'site', including the use of native species and hedgerows which would improve and protect biodiversity habitat.
- It is stated that tree/ hedgerow removal may be required in areas not previously identified so liaison with an ecologist will be required.
- The applicant refers to UÉ's Biodiversity Action Plan (UÉ 2021), which seeks to achieve a net biodiversity gain. A Biodiversity Assessment (Appendix 2) considers relevant policy and a quantitative and qualitative assessment of the project with respect to green infrastructure and biodiversity and will deliver a positive biodiversity outcome with respect to both area and linear habitats.
- Consideration has been given to badgers and smooth newts (protected species). Affected badger territories are enclosed on the south-east by the M50 and a fraction of their territory will be affected by construction of the project. In relation to smooth newts, the core breeding water bodies at the Coldwinters site (including the largest water body seen to retain water year-round) will be avoided. No significant impact is predicated upon the local population of this protected species due to the project.
- A new access road is required to the proposed WWTP which will involve crossing the River Mayne, which will replace an existing culvert with a new culvert. It is submitted that the ecological importance of this river is low and no signs of otter or other small mammals were recorded in the update surveys at this location. It is stated that the movement of any small

mammals or amphibians, should they occur, will be protected given that an existing culvert is present, and a similar arrangement is to be provided in its place.

- Refer also to the *EIAR and NIS Addendum Reports*.

Other Authorisations

- The project is subject to a no. of consent processes, including (inter alia) a Foreshore Licence and a Benthic Foreshore Licence. Foreshore Licence applications are assessed in relation to their compliance with the policies and objectives of the National Marine Planning Framework (2021), as it relates to the area between the mean high-water mark and the near shore.
- The WWTP will require a wastewater discharge licence from the EPA under S.I. No. 684/ 2007 - Waste Water Discharge (Authorisation) Regulations, 2007 (as amended) prior to commissioning of the proposed WWTP. This would place conditions on the operation of such discharges to ensure that potential effects on the receiving water bodies are limited and controlled with the aim of achieving good surface water status and good groundwater status.

Climate Change

- The applicant indicates that the proposal has been located and designed to ensure resilience and adaptation to climate change risks, climate-proofing of future wastewater provision and meeting legislated water quality thresholds.
- The sea outfall pipeline has accounted for sea level rise in its design.

Surface Water Drainage/ Flood Risk Management

- No surface water will be discharged to this network from future developments.
- The original application was supported by a Surface Water Management Plan.
- SuDS have been incorporated at the proposed Abbotstown pumping station and WWTP site, comprising a mix of rainwater harvesting, swales, infiltration trenches and permeable pavement, underground storm attenuation tanks (StormTec or equivalent) and oil interceptors such that runoff is controlled to greenfield rates.
    - Final surface water discharge from the proposed WWTP site will be to the Cuckoo Stream.
    - Final surface water discharge from the access road to the proposed WWTP will be to the River Mayne.
    - Final surface water discharge from the proposed Abbotstown pumping station site will be to a tributary of the River Tolka.
    - The applicant submits that all discharges must comply with EPA standards and licensing requirements and conditions.
- Flood Risk Assessment has been updated, but the conclusion remains unchanged.

Energy Performance

- Plant, equipment, buildings and systems will be designed, equipped, operated and maintained in such a manner as to ensure a high level of energy performance and that energy is used efficiently.
- Revised Energy Performance of Buildings Directive 2023/1791 came into effect on 10 October 2023 so zero-emission building targets will form part of the updated design.
- Renewable energy technologies have been considered, though wind turbines were not compatible with DAA requirements and excessive distance to WWTP would mean negligible energy would be generated.
- It is proposed to maximise energy recovery from the WWTP and sludge treatment processes using thermal hydrolysis and anaerobic digestion in the treatment of the sludge

and using the biogas produced from this process to fuel on-site Combined Heat and Power (CHP) generators to produce electrical and thermal energy. The electricity generated through CHP will reduce overall energy consumption and reduce GHG emissions and CHP systems can achieve up to 80% efficiency.

- By-products of the project will be reused to reduce dependency on fossil fuels. It is stated that there is considerable scope for the site to accommodate solar energy technologies, further supporting a circular economy (though not part of this application). Onsite generated biogas will be used as an energy source for the treatment process. Treated wastewater sludge and domestic septage biosolid will be land spread.

Affect on Natura 2000 Network

- It is stated that the NIS conclusion remains unchanged from the 2018 planning application, with both reports concluding 'beyond reasonable scientific doubt, that the proposed project with the implementation of the prescribed mitigation measures will not give rise to significant impacts, either individually or in combination with other plans and projects, in a manner which adversely affects the integrity of any designated site within the Natura 2000 network.

Traffic & Transport

- TTA has been updated and there are no significant changes to the conclusions.

Construction Environmental Management

- Original application was supported by a Construction Environmental Management Plan (CEMP).

As per the **Engineering Design Report Addendum** (October 2023), it is proposed to provide UV treatment in the overall process at the proposed WWTP (northern section), which would be installed on a final effluent line to treat expected flows at the plant and which will operate on a continuous basis. The system will be part subsurface and partially below ground level and above ground level and will be managed by a control centre kiosk.

The other addition to the project which is proposed is the 4m extension to the River Mayne culvert under a proposed access road (off the R-139) to the WWTP to cater for the full width of the future north-south link road. This is consistent with a condition applied by ABP to the 2018 planning application.

No changes are proposed to the site/ pumping station, orbital sewer route, North Fringe sewer diversion, WWTP, SHD, outfall pipeline, RBSF, site topography, earth works, water supply, foul sewage, utility connections, materials re-use, energy recovery and reuse, construction quality assurance, SuDS and surface water management from the details in the 2018 application.

The addition of the UV treatment arises from the Oral Hearing in 2019, where it was agreed that additional UV treatment, a well-established technology, would be provided at the Clonshaugh WWTP. Its role is to reduce *E. coli* at the point of discharge, appropriate to the designation of water (e.g. bathing/ shellfish), distance of discharge from the designated receiving waters, the local current and tidal system, total volume

and flow rate that effluent is discharged from the WWTP (Section 2.4 Engineering Design Report Addendum).

While the original application predicted no impact on shellfish water quality, as an additional precaution, additional treatment is to be applied to treat effluent with 99.9% *E.coli* reduction across the entire WWTP process (i.e. primary, secondary and tertiary treatment). An energy management system will manage dosing depending on the characteristics of the effluent and there will be ongoing maintenance of the system. The treatment system will have no impact on the operational capacity of the WWTP. Additional surface water drainage pipes may be required to service the UV treatment process building within the WWTP, but no change to runoff will results from the UV treatment process building as this was an area of hardstanding in the 2018 application (Section 2.4 Engineering Design Report Addendum).

Amendments to the Energy Performance of Buildings Directive 2023/1791 came into effect in October 2023, which relate to zero-emission building requirements so this will inform the next phase of design of the project.

In a letter to ABP (26/10/2023) included with the documentation, Uisce Éireann provided a response to a request from ABP in relation to the combined approach (discharge of wastewater) under Wastewater Discharge (Authorisation) Regulations 2007 as amended. ABP queried whether the discharge of wastewater from the proposed development, in conjunction with existing discharge to the receiving waters, would cause or exacerbate breaches of the 'combined approach'.

UÉ stated that it would not cause breaches and the EIAR has taken full account of the Waste Water Discharge (Authorisation) Regulations 2007 (as amended), the Urban Waste Water Treatment (UWWT) Regulations 2001 as amended, the Water Framework Directive, European Union Environmental Quality Objectives (EQO) (Surface Water) Regulations 2009 as amended and the Bathing Water Quality Regulations 2008. It is stated that the proposed discharge complies with limits in the UWWT Directive and the water quality modelling will ensure that limits proposed for discharge are sufficient to meet the EU EQO (Surface Water) Regulations. Thus, receiving waters will meet good status criteria and environmental quality objectives for coastal water nutrients levels, areas associated with the Bathing Water Regulations and Shellfish Water Regulations.

As per the (oCEMP) **Surface Water Management Plan Addendum** (October 2023), UÉ has outlined the changes to WFD status of some water bodies since the 2018 application, namely:

- The River Sluice which now has a 'poor' water quality status though its risk of achieving 'good' status is 'under review'. It was previously unassigned.
- Mayne Estuary (Baldoyle Estuary) was previously 'under review', but this has now been assigned a 'moderate' status.
- Tolka Estuary previously had a 'moderate' status but is now assigned a 'poor' status.

- The transitional water body into which the River Santry discharges (North Bull Island transitional water body) is now classified as 'moderate' status.

It is submitted that no material change to the 2018 application have occurred due to the changes in WFD status and no change in details/ measures regarding surface water management are proposed, including mitigation, pollution prevention, surface water drainage, outfall pipeline route – micro tunnelling of the marine section or construction phase measures. It is proposed to extend the River Mayne Culvert by 4m; however, it is stated that it will be constructed using the construction methodologies already outlined in the 2018 application.

An **outline Construction Environmental Management Plan** Addendum (October 2023), states that it has been updated to take account of updated infrastructural requirements of the proposed project, updates to the EIAR, NIS and changes to relevant law, policy, industry standards and guidance. It notes that the EPA (2021) *Best Practice Guidelines for the Preparation of Resource Management Plans for C&D Projects* has been followed. The construction programming and sequencing has been updated (i.e. construction over 48 months with 12 months for commissioning (estimated to take place from Q.4 2025 to the end of Q.4 2028). The WWTP is expected to take 3 years to construct with orbital sewer route including NFS diversion sewer is expected to take 1.5 years. A similar amount of time is required for the outfall pipeline route (on land) (refer to Diagram 3.1 in the report for an overview of the programme).

The **Regional Biosolids Storage Facility Engineering Design Report Addendum** states (Section 2.1) that projected loadings have been reviewed and updated since the 2018 planning application, including the current loading at Ringsend Wastewater Treatment Plant (WWTP) and Census 2022 population, population growth rates, and projected industrial and commercial/ institutional loading. Over the period of the design horizon to 2040, there is a reduction of approximately 100,000 P.E. since the 2018 planning application, however it is stated that this is not a material change to the design. The completion of the various buildings, namely the storage building sizing – with the milestone dates of 2021 (first storage building complete), 2024 (second storage building complete), and 2040 (design horizon) have changed to 2025, 2029, and 2040, respectively, since the 2018 application. Though the agglomeration loading (P.E.) has reduced, it is stated that these changes do not materially change the storage requirements/ building size requirements.

The report refers to the 2018 Glint and Glare Study conclusion which determined that a solar panel installation on the roof of the storage building would not have adverse impacts on a planned air traffic control tower at Dublin Airport which has already been constructed. No other changes to the proposed facility since 2018 are proposed.

Traffic levels including total trip generation for biosolids delivery vehicles were considered and predicted daily trip figures have not materially changed. New traffic surveys and future year traffic flows do not materially alter the design and there are no changes to access and egress arrangements.

Some limited earthwork investigation was carried out on the RBSF site in 2020 but there are no changes to demolition works, surface water and wastewater drainage and external lighting design proposals since 2018.

A **Revised Flood Risk Assessment (FRA) Report** has been submitted and it investigates the flood risk to the main infrastructure proposed, namely the proposed WWTP and the proposed Abbotstown pumping station as these could be adversely affected or damaged by flooding.

Although reference is made to the proposed orbital sewer route and the outfall pipeline route (land-based section), pipelines are water compatible/ less vulnerable to flood risk as these are located below ground level and therefore will not be susceptible to flooding. However, flood risk associated with the construction of the pipelines is addressed in the report.

The report presents a flood risk assessment methodology, existing hydrological environment, flood risk assessment for the proposed WWTP and Abbotstown pumping station. The FEM FRAMS project categorises the area of the WWTP and Odour Control Unit in a Flood Zone C (fluvial/ tidal flooding) and based on the River Tolka Flooding Study (2001), hydraulic modelling was not considered necessary for the Abbotstown pumping station site. The Orbital Sewer Route is located in a FZC. Therefore, the probability of flood risk is low.

Trenchless construction techniques will be used for the installation of the proposed orbital sewer route at any significant watercourse crossing; and for the installation of the Marine Outfall under Baldoyle Estuary and out to the Irish Sea.

A **Water Framework Directive (WFD) Assessment** (October 2023) was carried out and forms part of the Further Information details. Taking into consideration the impacts of the proposed project on the biological, physico-chemical, hydromorphological and groundwater quality elements, the report concludes that following the implementation of design and mitigation measures, it will not compromise progress towards achieving GES or GEP or cause a deterioration of the overall status of the water bodies within the scope of the development. It will also not compromise the qualifying features of protected areas and is compliant with other relevant Directives. Therefore, an assessment under Article 4.7 of the WFD is not required.

A **Revised Natura Impact Statement NIS** (2023) was submitted. It considers any relevant changes to the baseline environment and any changes in law, policy or industry standards and guidance in the intervening period, information presented at an Oral Hearing of the application (ABP-301908-18), High Court proceedings and the addition of the UV treatment process. It includes updated estuarine, coastal and marine ornithology Baseline Report 2023, a Marine Habitat Assessment Survey and Ireland's Eye Sublittoral Biotope Survey 2023 and a revised Vessel Management Plan. These are in addition to previous surveying.

There is now an additional SPA designated which is relevant to the project – namely the North-West Irish Sea candidate SPA (cSPA) (004236). The length of the marine-

based outfall pipeline which is proposed to be located beyond Velvet Strand to the terminal marine diffuser (4,800m) is located within the North-West Irish Sea cSPA within 108.5 ha of the red line boundary. The report has been updated to take account of new guidance, namely the EC (2021) *Assessment of plans and projects in relation to Natura 2000 sites* and EC (2019) *Managing Natura 2000 sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*.

The description of the proposed project has been updated to take account of the UV treatment process and proposed extension to the culvert at the access road crossing of the River Mayne, the construction phase programme, consideration of the aforementioned guidance and other guidance such as the Institute of Air Quality Management (2020) *A guide to the assessment of air quality impacts on designated nature conservation sites*, OPR (2021) *Practice Note (PN01) Appropriate Assessment Screening for Development Management* and EC (2021) *Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC*.

The applicant refers to case law which required project mitigation to be considered at NIS stage only; and more recent case law which determined that inherent aspects of the design could be considered at AA Screening stage. The applicant clarifies that the outline Surface Water Management Plan associated with the 2018 application has not been taken into consideration in the AA Screening within this Remittal Application.

The 2021 guidance defines a likely significant effect, and this has been included in the report. The updated NIS refers to additional advice provided in EC guidance and the project elements that can give rise to LSEs are included.

Since the 2018 application was lodged, some of the Site-specific Conservation Objectives (SSCOs) for the European Sites were prepared and published by the NPWS (i.e. Ireland's Eye SAC, Howth Head Coast SPA, Lambay Island SPA, Dalkey Island SPA, Skerries Islands SPA, Glenasmole Valley SAC, Rye Water Valley/ Carton SAC and the North-West Irish Sea candidate SPA).

The report references the reasons for the High Court challenge to ABP's 2019 decision on the 2018 application, with included grounds that Ireland's Eye SAC or Howth Head SAC should not have been screened out but highlights that the judgment concluded that substantial ground for challenging ABP's Screening had not been substantiated.

Conclusions of the AA Screening remain the same and an AA NIS was prepared. Section 5 provides updates on the additional surveying carried out (species, habitats and water quality standards/ pollutant loads).

Section 6 includes a range of new projects which have informed the assessment of in-combination effects with other plans or projects – for example it references EirGrid CP1213 for the development of new electricity transmission infrastructure at the existing ESB Belcamp 220kV substation with an application submitted in Feb. 2023.

The report states that "*it is therefore concluded, beyond reasonable scientific doubt, that the proposed project with the implementation of the prescribed mitigation measures will not give rise to significant impacts, either individually or in combination*

with other plans and projects, in a manner which adversely affects the integrity of any designated site within the Natura 2000 network".

An **Environmental Impact Assessment Report (EIAR) Addendum** (October 2023) was prepared. As per the NIS, the document has been updated to account for changes to the baseline environment; the requirement for updated surveys; and changes to the law, policy, and industry standards and guidance in the intervening period, the information presented at the Oral Hearing, the High Court proceedings, addition of UV treatment process and extension to the River Mayne Culvert on the proposed access road to the WWTP.

The construction phase including RBSF construction has been updated due to the passage of time. Some of the development will be constructed under ABP permission (PA29S.301798) for the Ringsend Upgrade. A new Operations Management Centre (2022) will monitor, control and manage the WWTP including the UV treatment system.

The environmental baseline has been updated under each environmental receptor to account for any changes that have taken place since the original planning application in 2018 (desk-based reviews, updated modelling, detailed interpretation of specialist field surveys, as required).

8.0 MCC Comments in relation to Documents Submitted

EIAR Archaeology

ABP are invited to consider the comments of MCC's Archaeologist in relation cultural heritage associated with the application.

Future Expansion

It is noted that the WWTP includes areas for expansion of the facility, which is important to have available as part of the application documentation and assist with the EIAR and AA processes, but also critical to cater to future capacity within the GDA.

Cumulative Effect

Through its EIAR and AA, ABP may need to consider the cumulative effects of a no. of ongoing Strategic Infrastructure Development applications which intersect in/ around this development including the subsurface congestion in the road corridor (e.g. specific separation distances required for subsurface electrical infrastructure).

Implementation of Mitigation

An Bord Pleanála is requested, in the event of a grant of planning permission, to apply a condition which seeks the implementation of all environmental mitigation proposed in the reports accompanying the application; and where relevant, additional mitigation proposed in this submission by MCC. An Ecological Clerk of Works should be appointed during the pre-construction, construction stage and post construction phases to advise on, oversee and monitor mitigation measures. All mitigation measures outlined in the EIAR/ NIS/ FRA/ CEMP/ SWMP, etc. should be fully implemented and post-construction monitoring should be in place for a minimum of 7 years post construction.

ABP is respectively requested to consider the comments outlined above in its assessment of the proposed project/ Remittal Application. It is essential to accommodate the plan led growth of South Meath settlements that sufficient wastewater treatment capacity is made available. Therefore, this project is of significant strategic importance to Co. Meath in the context of the wider GDA and wastewater treatment infrastructure for the region.

Should you have any queries, please don't hesitate to contact me.

Mise le meas,

Padraig Maguire,
Senior Planner.

Appendix 1 – Referral Reports

Comhairle Chontae na Mí
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Co. Meath, C15 Y291
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Registration No.: 00172770

Our Ref: TRA 15 10 04 **Transportation Department**

Report on Planning Application

Date: **29th May 2024**

To: Planning Department

Planning Ref: **SID ABP 312131**

Applicant Name:	Uisce Éireann
Development address:	Co. Fingal
Adjoining public road No.:	
Strategic Corridor:	
Description:	Greater Dublin Drainage Project (Proposed Regional Wastewater Treatment Plant, Orbital Sewer, Outfall Pipeline, Sludge Hub Storage Centre and Regional Biosolids Storage Facility)

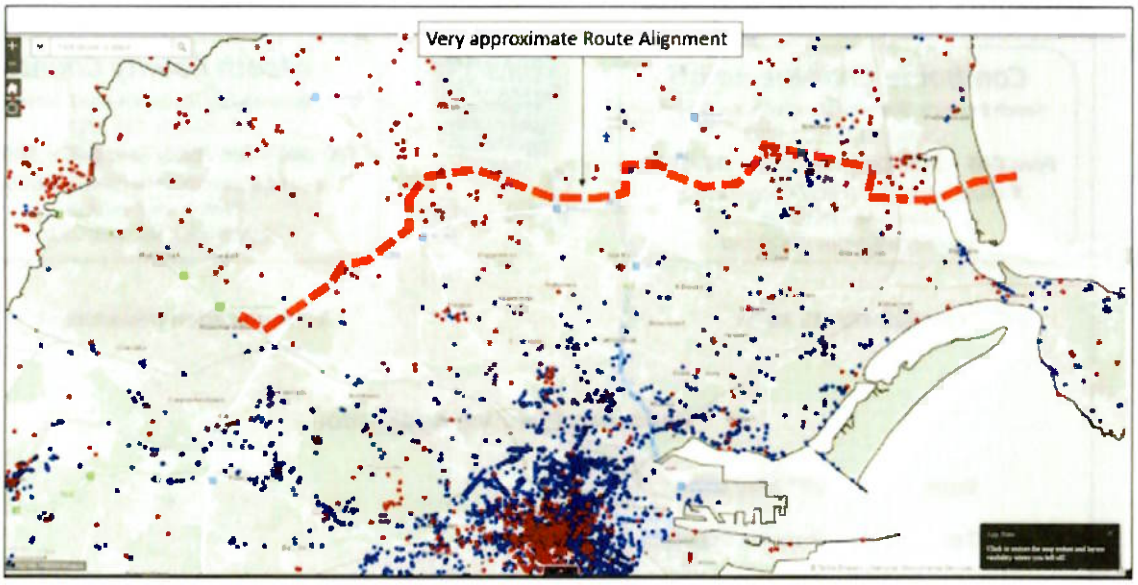
Comments: The proposed development will be within the boundary of Fingal. The development should not have any affect of the road network in County Meath.

Recommendation:

No objection to the proposed development.

Report prepared by:

Adrian Santry,
Executive Engineer,
Transportation.



Proposed Uisce Eireann Greater Dublin Drainage Project, Co Fingal & Dublin City

Waste water development

Archaeology Heritage Desk Based Review and Assessment

Blanchardstown to Portmarnock townlands with main treatment works area at Clonshagh

Site Area: Approx. 19 km of pipeline and compounds with Clonshagh = 29 hectares

ITM: main treatment works area at Clonshagh ITM 71939, 742012

Record of Monuments and Places: Numerous

Record of Protected Structures: None but unclassified built heritage dotted about

Architectural Conservation Area: None

Niall Roycroft

22nd May 2024

1

Non-Technical Summary

NOTE: THE APPLICANT DOCS submitted for review as part of this updated application did not include the APPENDIX 16 CULTURAL HERITAGE REPORT. As such, there was only the information in the Non-technical summary too review and also a review of the 2018 application – which was recommended in any case.

In 2018 the Uisce Eireann Greater Dublin Drainage Project in Co Fingal & Dublin received Planning permission with an archaeological condition. Archaeological works as part of this application included:

1. Archaeological geophysical survey of selected points along the pipeline routeway (Earthsound Ltd) in 2013
2. Archaeological geophysical survey at the three proposed waste water treatment sites including AAP12 (Clonshagh) (Target Geophysics) in 2014
3. Follow-up trial trench testing of geophysical anomalies at AAP12 13E0355 (Fintan Walsh for IAC Ltd) in 2014-2015. This works found no archaeological material, but recommended that should the development proceed that the trial trench testing potential be added to comprise 12% of the green field area for this site.

2018 App (IAC Ltd) has general ARCHAEOLOGICAL mitigation of:

1 Testing known Archaeological Heritage (AH) 11, AH 31, AH 33, AH 34, AH 38, AH 39, AH 41, AH 42, AH 44 and AH 45. This will enable the compilation of a programme of works to ensure the sites are fully preserved by record.

2 Testing Areas of Archaeological Potential (AAP) 2, AAP 3, AAP 5, AAP 6, ?AAP7 AAP 8, AAP 10, AAP 12, AAP 16, AAP 17 and AAP 19. This will enable the compilation of a programme of works to ensure the sites are fully preserved by record.

3 Testing along the remaining green field areas of the proposed orbital sewer route.

4 All dredging will be monitored by a specialist underwater archaeologist under licence to the NMS of the DoCHG / DHLGH. Should any archaeological remains be identified, further mitigation, such as preservation by record, will be required.

5 No direct impacts on recorded Built Heritage sites are predicted.

6 An underwater/wade survey will be carried out in these areas prior to construction on AAP 7, AAP 8, AAP 9 and AAP 21.

7 No mitigation is deemed to be necessary in association with Designed Landscapes

8 A written and photographic Townland Boundary (TB) survey will be carried out at the following locations: TB 4, TB 5, TB 9, TB 11, TB 16 and TB 20

9 A written and photographic Townland Boundary survey, to include archaeological testing, will be carried out at the following locations: TB 3,

TB 6, TB 10, TB 12, TB 13, TB 14, TB 18, TB 19, TB 21, TB 22, TB 23 and TB 24.

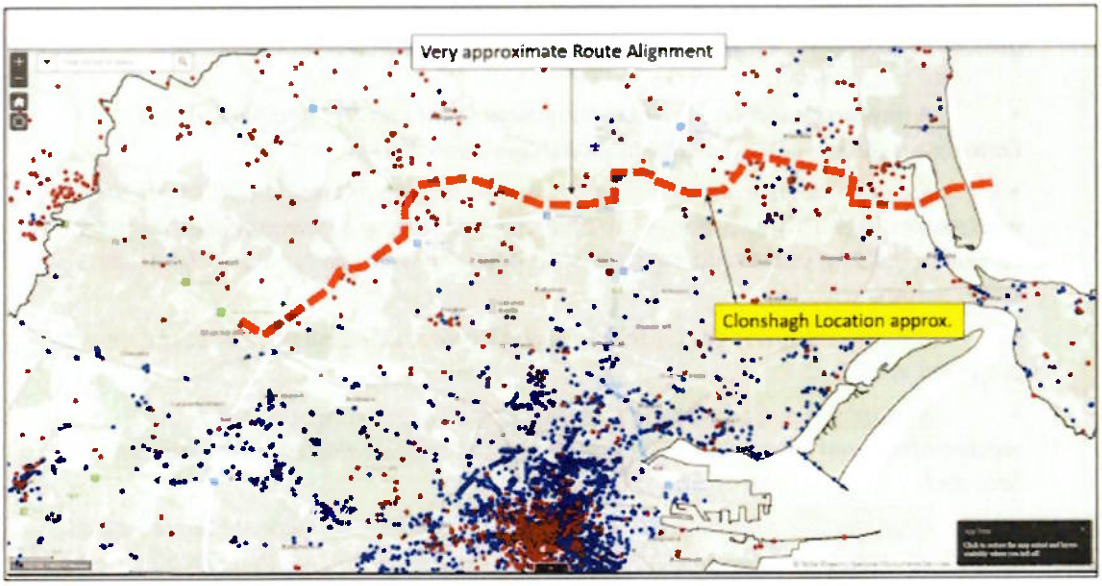
The overall result of the above recommendations was to archaeologically test trench the whole project as far as possible in advance of construction and then to determine whether any sites required preservation in situ or preservation by record. Also to complete townland boundary surveys crossed by the scheme. Risings from dredging works were due to be monitored for archaeological objects.

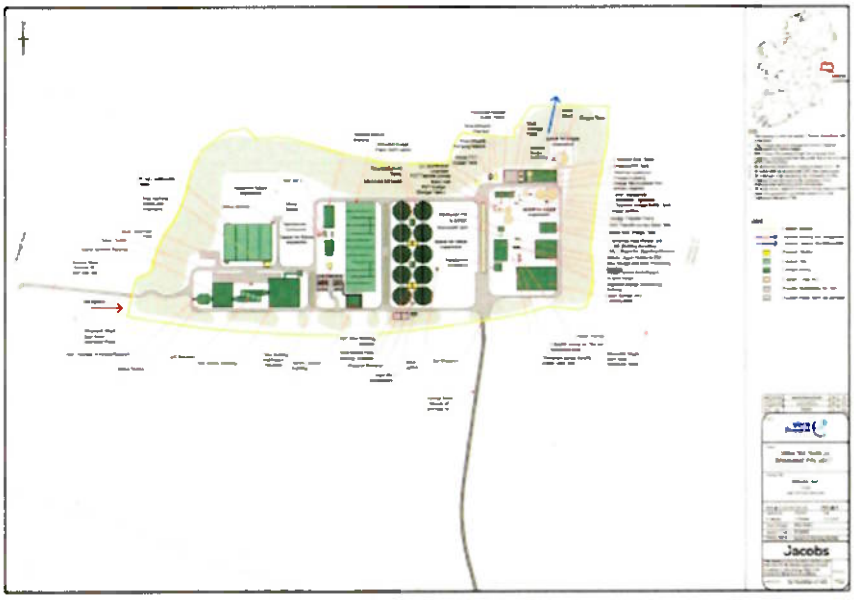
The 2023 Application reviewed the data from 2018 and updated the archaeological background. But the Non-Technical Summary states that no additional or different mitigation is proposed from the 2018 works.

Recommendation

An overall project planning condition (as outlined in Section 8 of this document) would cover all normal elements of this project. It would be useful if the quantity of advance trial trench testing in the greenfield areas were specified. If the testing is at 12% of site area, and where no archaeological remains are found, then there would normally be no requirement to monitor the construction works in those blank areas.

1 INTRODUCTION





Proposed Project is to develop a new Wastewater Treatment Plant (29 hectares) at Clonshagh and associated infrastructure to serve the growing population of the Greater Dublin Area (GDA).

As set out in the EIAR in the 2018 planning application, the Proposed Project will increase the wastewater drainage and treatment capacity in the GDA, protecting public health, safeguarding the environment and facilitating social and economic growth to 2050 and beyond. The elements of the Proposed Project comprise:

- *A new proposed Wastewater Treatment Plant (WwTP) and Sludge Hub Centre on a 29.8 hectare (ha) site at Clonshagh (Clonshaugh);*
- *A proposed underground orbital sewer (a set of pipes and drains to transfer wastewater) from Blanchardstown to Clonshagh, including a new proposed pumping station (a building containing machinery for pumping wastewater along the orbital sewer) at Abbotstown;*
- *A proposed sewer to divert part of the North Fringe Sewer (NFS) to the new proposed WwTP;*
- *A proposed outfall pipeline (a pipe and discharge point of treated wastewater) from the new WwTP to discharge the treated wastewater to the Irish Sea; and*
- *Regional Biosolids Storage Facility (RBSF) (building(s) where solids created as a result of wastewater treatment which can be reused are stored) to be located on an 11ha site at Newtown, Dublin 11.*

2 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

The 2023 Application included the following information in the Non-Technical Summary:

A desk-based review has been undertaken to assess any changes to the baseline environment with regards to archaeological, architectural and cultural heritage since the original 2018 planning application. The review found that there have been some changes since the 2018 submission as outlined below:

- *A total of 29 additional recorded sites have been identified within the study area of the Proposed Project;*
- *Three additional recorded shipwrecks within the study area of the Proposed Project have been added to the Shipwreck Inventory;*
- *One additional structure from within the study area was added to the Fingal County Council Record of Protected Structures;*
- *Three of the 21 Areas of Archaeological Potential identified in the 2018 planning application have been reclassified as recorded monuments; and*
- *14 additional excavations and archaeological fieldwork records were available for locations within the study area.*

Based on the review of the changes to the existing baseline data as outlined above, the updated impact assessment concludes that there are no additional significant impacts predicted upon features of heritage importance during either the Construction Phase or the Operational Phase of the Proposed Project when compared to the impact assessment undertaken for the EIAR in the 2018 planning application. The main difference was that a ring ditch (AH 44) which was previously identified as having a Direct, Negative, Significant impact has now been preserved in-situ by another development, and as such will no longer be subject to a direct impact.

As a result of there being minimal change in the impact assessment results, there are no additional mitigation measures required above those identified within the 2018 planning application. Given that AH 44 will no longer be subject to a direct impact, the archaeological mitigation is no longer required for this site.

In summary, the impact assessment and mitigation measures detailed in the EIAR in the 2018 planning application remain unchanged, with the exception that there will no longer be any direct negative impacts on a recorded ring ditch site (AH 44).

NR Comment:

The new sites, 2018 mitigation measures and the location of those measures should be put in a single map series. Maybe this is included in the missing Appendix 16 chapter?

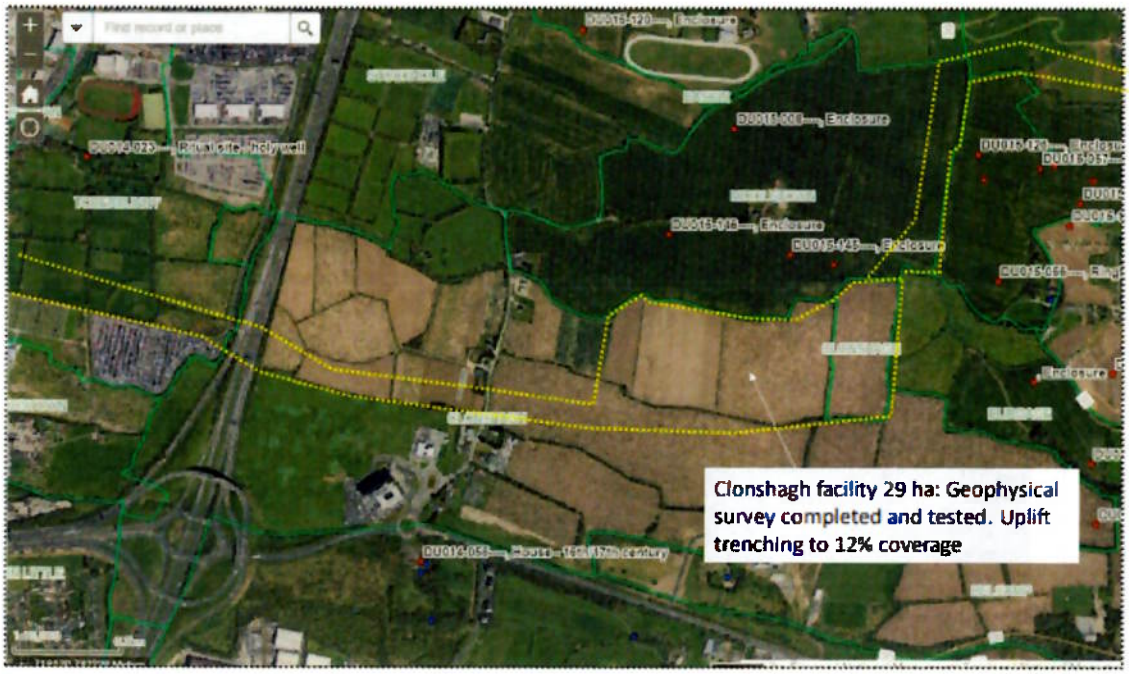
3 MAP REGRESSION

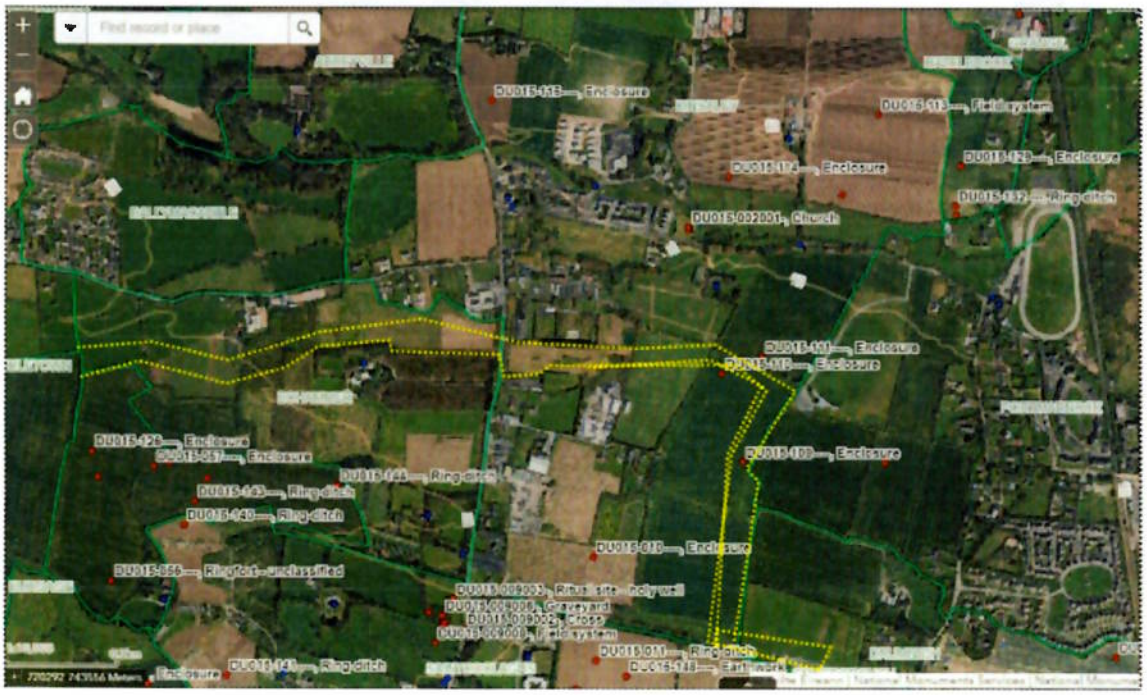
The 2018 docs shows a thorough map regression and the Down Survey features seem to have already been added to the SMR / RMP as far as they are known. Extracts from the present SMR are given below in a series from west to east:


Find record or place
DU014-104----, Enclosure
DU014-017----, Enclosure
DU014-018----, Castle - unclassified
DU014-019----, House - indeterminate date
DU014-106----, Enclosure
DU014-108----, Enclosure
DU014-110----, Enclosure
DU014-107----, Field system
DU014-087----, Inn
DU014-132----, Ring-ditch
DU014-130----, Ring-ditch
DU014-137----, Ring-ditch
DU014-102----, Enclosure
DU014-135----, Habitation site
DU014-020001-, House - 16th/17th century
DU014-020002-, Castle - unclassified
DU014022----, Enclos
DU014-139----, Earthwork
DU014-123----, Enclosure
DU014-021----, Field system


Find record or place
DU014-136----, Earthwork
DU014-121----, Enclosure
DU014-120----, Cremation pit
DU014-119----, Burnt mound

8


Clonshagh facility 29 ha: Geophysical survey completed and tested. Uplift trenching to 12% coverage

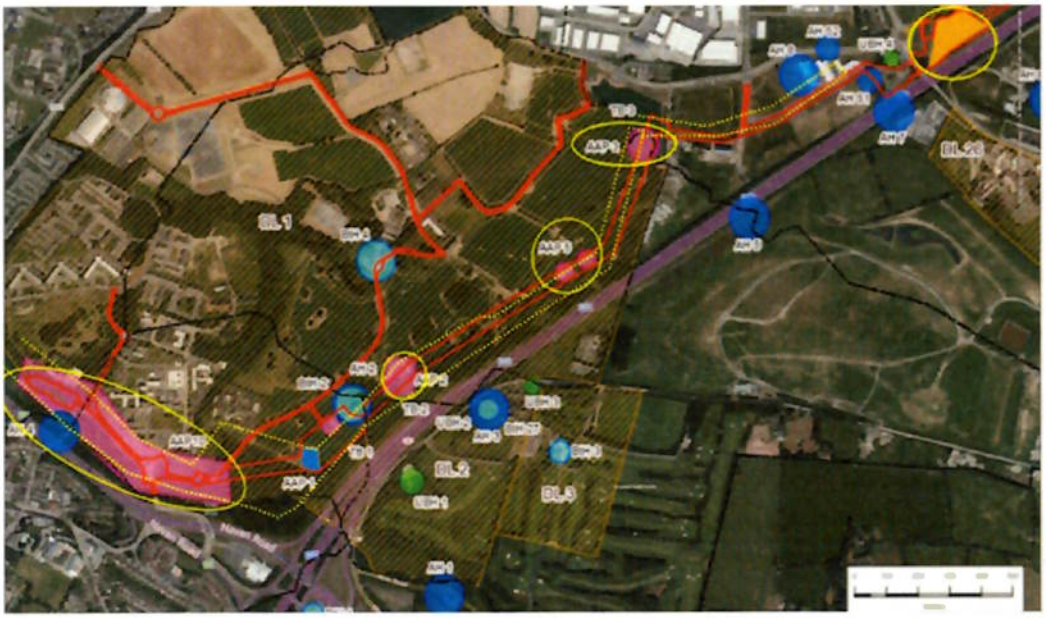


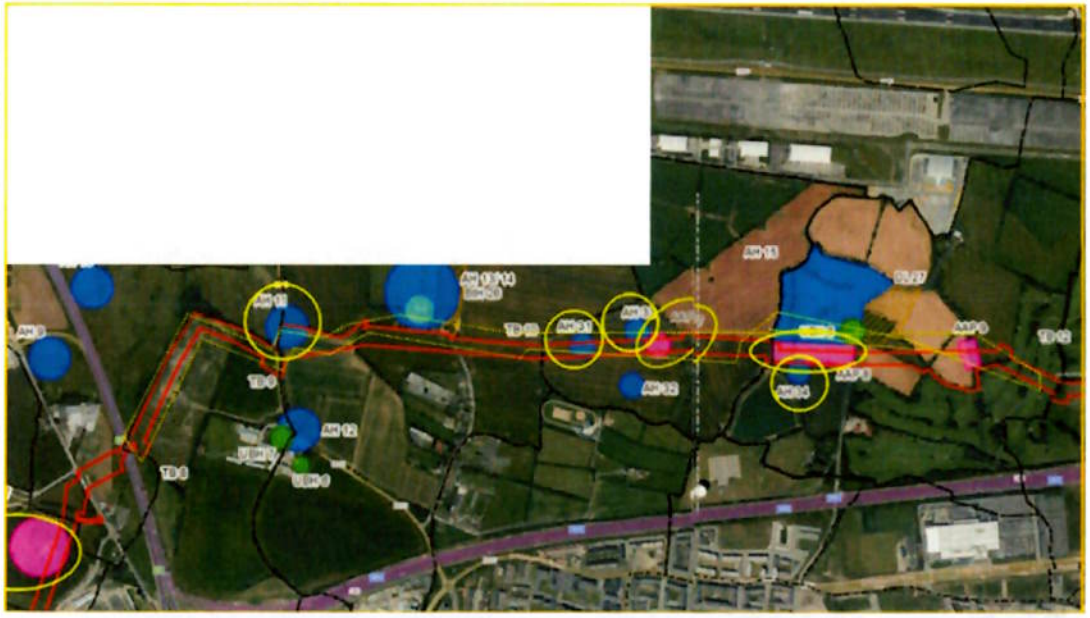
4 ARCHITECTURAL HERITAGE

Only summary review by me. There is always the potential for unknown architectural heritage to be encountered on the scheme and if this is not covered under archaeological mitigation works, then it should be assessed to determine what level of architectural heritage record survey is required (if any) and the results added to the mitigation report.

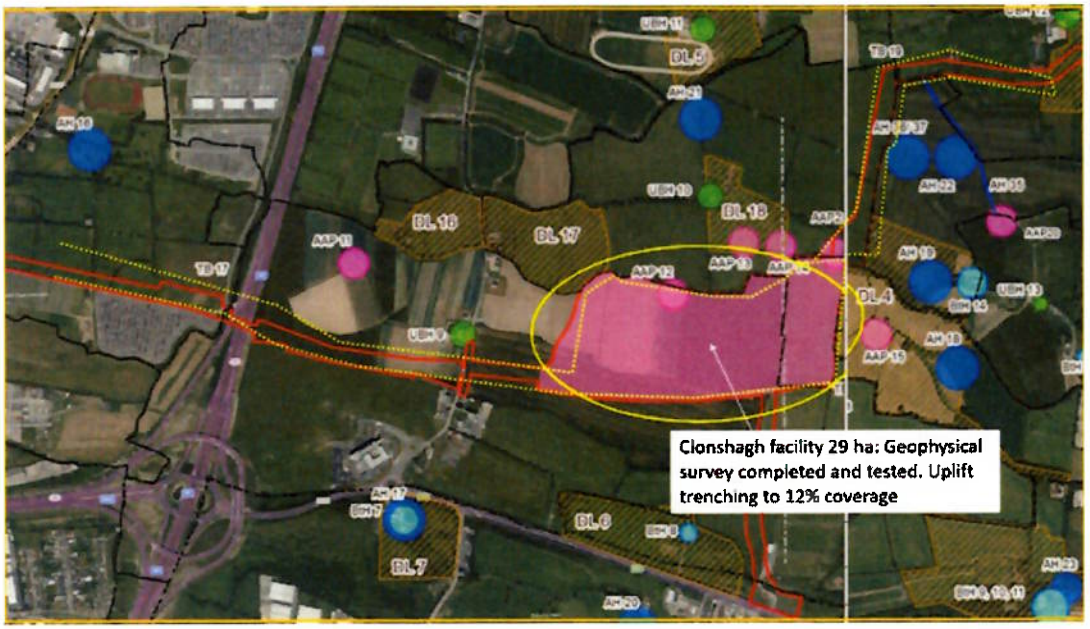
5 2018 Cultural Heritage Mapping

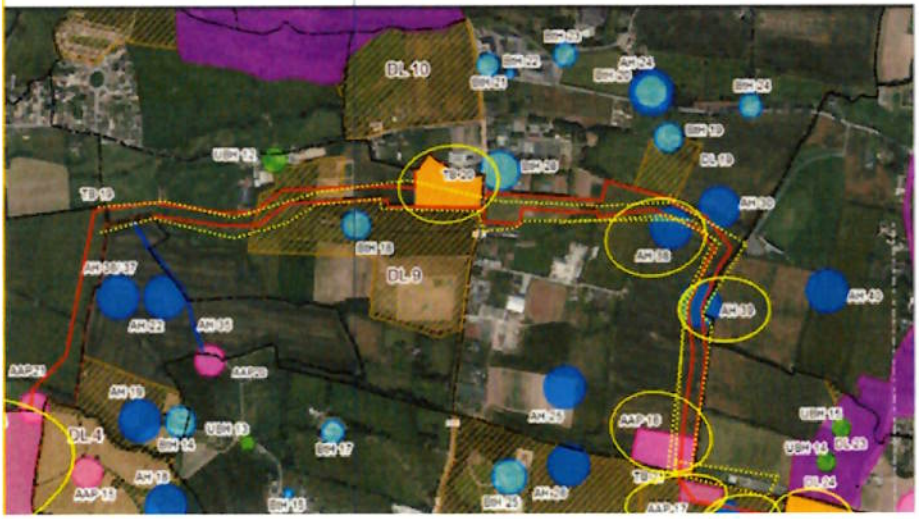
This seems to suggest that the 2023 route has been revised in several areas to avoid archaeological heritage impact noted in 2018. The detail of this is perhaps included in the missing Applicants 2023-2024 Cultural Heritage chapter.



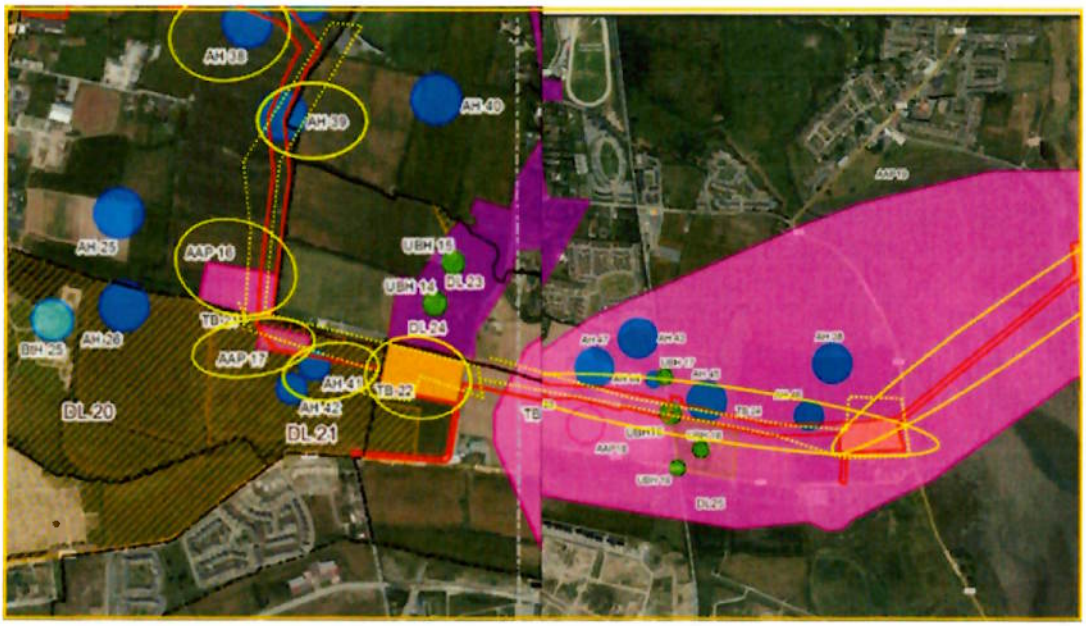


13


Clonshagh facility 29 ha: Geophysical survey completed and tested. Uplift trenching to 12% coverage



14


AH 38
AH 39
AH 40
AH 25
AAP 16
UBH 15
UBH 14
DL 23
DL 24
TB 21
AH 26
BH 25
AAP 17
AH 41
TB 22
AH 42
DL 20
DL 21

15

6 PROPOSED WORKS

Wastewater Treatment Plant, orbital Sewer, Outfall pipeline, Sludge Hub Storage Centre and Regional biosolids Storage Facility, Co Fingal & Dublin City.

7 DISCUSSION

NOTE: THE APPLICANT DOCS submitted for review as part of this updated application did not include the APPENDIX 16 CULTURAL HERITAGE REPORT. As such, there was only the information in the Non-technical summary too review and also a review of the 2018 application – which was recommended in any case.

In 2018 the Uisce Eireann Greater Dublin Drainage Project in Co Fingal & Dublin received Planning permission with an archaeological condition. Archaeological works as part of this application included:

1. Archaeological geophysical survey of selected points along the pipeline routeway (Earthsound Ltd) in 2013
2. Archaeological geophysical survey at the three proposed waste water treatment sites including AAP12 (Clonshagh) (Target Geophysics) in 2014
3. Follow-up trial trench testing of geophysical anomalies at AAP12 13E0355 (Fintan Walsh for IAC Ltd) in 2014-2015. This works found no archaeological material, but recommended that should the development proceed that the trial trench testing potential be added to comprise 12% of the green field area for this site.

2018 App (IAC Ltd) has general ARCHAEOLOGICAL mitigation of:

5 Testing known Archaeological Heritage (AH) 11, AH 31, AH 33, AH 34, AH 38, AH 39, AH 41, AH 42, AH 44 and AH 45. This will enable the compilation of a programme of works to ensure the sites are fully preserved by record.

6 Testing Areas of Archaeological Potential (AAP) 2, AAP 3, AAP 5, AAP 6, ?AAP7 AAP 8, AAP 10, AAP 12, AAP 16, AAP 17 and AAP 19. This will enable the compilation of a programme of works to ensure the sites are fully preserved by record.

7 Testing along the remaining green field areas of the proposed orbital sewer route.

8 All dredging will be monitored by a specialist underwater archaeologist under licence to the NMS of the DoCHG / DHLGH. Should any archaeological remains be identified, further mitigation, such as preservation by record, will be required.

9 No direct impacts on recorded Built Heritage sites are predicted.

10 An underwater/wade survey will be carried out in these areas prior to construction on AAP 7, AAP 8, AAP 9 and AAP 21.

11 No mitigation is deemed to be necessary in association with Designed Landscapes

12 A written and photographic Townland Boundary (TB) survey will be carried out at the following locations: TB 4, TB 5, TB 9, TB 11, TB 16 and TB 20

13 A written and photographic Townland Boundary survey, to include archaeological testing, will be carried out at the following locations: TB 3, TB 6, TB 10, TB 12, TB 13, TB 14, TB 18, TB 19, TB 21, TB 22, TB 23 and TB 24.

The overall result of the above recommendations was to archaeologically test trench the whole project as far as possible in advance of construction and then to determine whether any sites required preservation in situ or preservation by record. Also to complete townland boundary surveys crossed by the scheme. Risings from dredging works were due to be monitored for archaeological objects.

The 2023 Application reviewed the data from 2018 and updated the archaeological background. But the Non-Technical Summary states that no additional or different mitigation is proposed from the 2018 works.

8 POTENTIAL PLANNING CONDITION

The project case is Ongoing on pleanala.ie case 312131.

A suggested Planning Condition to cover everything is laid out below. This outlines the archaeological process on a typical large-scale project to inform the Applicant and the Local Authority of the issues involved. Many of the items below are commitments that have to be made in a Section 26 Archaeological Excavation Licence; and the Applicant's Archaeologist will necessarily be bound to these once the Licence is taken out. Therefore, the various stages are laid out for clarity of a process that will happen once Planning Permission is given.

KEY STRATEGY MEETINGS: Every Project should be set up with two main strategy meetings:

- MEETING 1: The Post-Planning and in advance of Assessment phase written agreement meeting with Local Authority and National Monuments Service
- MEETING 2: The Pre-Mitigation (preservation in situ / Preservation by record) agreement meeting Local Authority and National Monuments Service

Conditions sub-stages:

1 Employ a qualified archaeologist (ie one who is National Monuments Act 1930 (as amended) Section 26 Licence eligible).

2 Notify Local Authority (LA) of works (four weeks in advance of commencement).

3 Assess the site Pre-Planning to a sufficient standard to be able to determine appropriate mitigation of known or presumed archaeological, architectural and environmental heritage from a position of knowledge. A draft Conservation Management Plan – if required – should form part of this application if the site has had sufficient advance works / surveys. *Post-Planning: it may be necessary to review the Pre-Planning assessment in the light of any further evidence that has become available.*

4 Assess the site Post-Planning under Section 26 Licence Testing +/or Construction Phase Monitoring. Note that all archaeological Assessment and Mitigation works are included under any Construction Environmental Management Plan. Some archaeological monitoring of site preparation works may also be required.

5 Complete the Post-Planning Assessment report whether Testing or Monitoring.

6 Agree in writing the Mitigation and any Conservation Management Plan that is required with both Local Authority and NMS. If the assessment has found nothing and has a suitable coverage, then the development would normally

be allowed to proceed without further archaeological work with agreement of NMS.

7 Complete Mitigation Fieldwork (Preservation in situ including a dedicated Conservation Management Plan or Preservation by Record). After this stage, the development would normally be allowed to proceed without further archaeological work; unless there were sensitive areas that were not previously available for advance works.

8 Complete Mitigation reports both Preliminary (incomplete) and Final (all tasks and analyses complete). Forward Preliminary reports which include commitments for Final reports to Local Authority and NMS, NMI. Forward Final reports to Local Authority and NMS, NMI

9 Complete Dissemination. If the works are published at a preliminary stage on Excavations.ie then they will require updating to the FINAL REPORT details once that is complete.

10 Complete and deposit records (NMS) and objects (NMI) Archive including deposition with DRI.

11 All communication related to the Archaeological Condition needs to include the correct Planning References, Development + Developer name and address (including townland), ITM, date and Report Status.

12 Conclude archaeological Condition as complete.

9 REFERENCES

www.excavations.ie – Summary of archaeological excavation from 1970+.

www.archaeology.ie – National Monuments Service website listing all SMR sites with aerial photographs.

www.osi.ie – Ordnance Survey aerial photographs (1995, 2000 & 2005) and historic OS mapping (first edition 6" and 25").
https://webapps.geohive.ie/mapviewer/index.html

http://www.logainm.ie/ - Placename index

http://www.buildingsofireland.ie/ -National Inventory of Architectural Heritage

Environment Protection Agency website
https://gis.epa.ie/EPAMaps/

http://downsurvey.tcd.ie/down-survey-maps.php Down Survey mapping

http://digitalcollections.tcd.ie/home/index.php?DRIS_ID=LCN14679989_001
Taylor & Skinner 1777-85 Maps of the Roads of Ireland

Heritage Maps
https://heritagemaps.ie/WebApps/HeritageMaps/index.html

Google Maps

Bing Maps

Bord pleanala website Ref case 312131