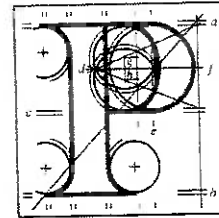


Our Case Number: ABP-312131-21



**An
Bord
Pleanála**

Peter Sweetman
and Wild Ireland Defence CLG
c/o Rosspoint South
Ballina
Co. Mayo

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,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

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PETER SWEETMAN & Wild Ireland Defence CLG
C/O/ ROSSPORT SOUTH
BALLINA
COUNTY MAYO
sweetmanplanning@gmail.com

7th June 2024

Re: ABP case 312131

Description: Greater Dublin Drainage Project, Orbital Sewer, Wastewater Treatment Plant,
Southern outfall and discharge point at Ireland's Eye.

I was alerted to this public consultation by Sabrina Joyce-Kemper and have had little time to make a full observation and so adopt without prejudice all of Ms Joyce-Kempers submissions relating to this 3122131 and 301908.

The Revised NIS indicated that site proximity was a main factor in screening out NATURA2000 sites such as Howth Head SAC/ Howth Head SPA, etc, and no scientific reasoning was given for screening out. Under the requirements of Case C-258/11, Peter Sweetman and Others v An Bord Pleanála the correct approach would be to request further Information or to refuse the application. Case C-258/11, Peter Sweetman and Others v An Bord Pleanála states at 44;

“So far as concerns the assessment carried out under Article 6(3) of the Habitats Directive, it should be pointed out that it cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned” The findings in this assessment are not complete, precise and definitive.

The project description for the application is incomplete in that no indication of biogas storage at Clonsaugh site or spreading of Sewage Sludge on agricultural land is proposed. No identification of the lands that the Sewage sludge will be spread on is presented, despite this data being available to Uisce Éireann, via the county council sludge registers. Furthermore, all baseline data must be included in the screening assessment in keeping with NPWS guidance to enable a scientifically robust consideration of the report. There is a lack of consideration given to the ‘in-combination’ impact of other projects that interact with the construction and operational elements of the activity. The findings in this assessment are not complete, precise and definitive.

The judgement of the CJEU in Case C-323/17 People Over Wind and Peter Sweetman v Coillte Teoranta also clearly states that the applicants approach on AA screening and assessment is unacceptable, I reserve my right to make a fuller submission on the matter of impacts on NATURA2000 Sites when an NIS that is in accordance with the law is submitted

Modelling should be based on worse case scenarios including accurate emissions. The data, modelling and surveys seem too dated to be considered precise and definitive, with some data dating back as far as early 2000's.

The fee of €50.00 accompanies this submission via the ABP SID Portal.

Peter Sweetman
Wild Ireland Defence CLG