



Chambers Ireland  
11 St Stephen's Green  
Dublin 2

**Date:** 07 October 2022

**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 be advised that there is no fee associated with making a submission on this case. Accordingly, a refund in the amount of €50 will be issued to the debit/credit card that was used to make payment through the Board's online portal.

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 Fingal County Council 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](http://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,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

PA04

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**Chambers  
Ireland**  
Advancing business together



## Greater Dublin Drainage Scheme

Submission by Chambers Ireland to An Bord Pleanála

September 2022

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 40 members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

In September 2019, our Network pledged to advocate for and support the advancement of the Sustainable Development Goals. In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), advancements in gender equality



(SDG 5), viable industries, innovation, and infrastructure (SDG 9) and progress in climate action (SDG 13).<sup>1</sup>

The Greater Dublin Drainage Scheme is particularly relevant in the context of clean water and sanitation (SDG 6), and life below water (SDG 14). Focusing on the scheme in the context of both goals helps to ensure the availability and sustainable management of water and sanitation for all, and to cement the importance of water and sanitation in our national political agenda.

In line with our previous submission regarding the National Water Resources Plan,<sup>2</sup> we underline the importance to our member Chambers and the business community throughout Ireland of the creation of a sustainable and reliable clean water supply (including the safe disposal of wastewater). As we stated in that submission, Government policy is uniquely dependent on water infrastructure which is unfortunately insufficient.

Currently, our water infrastructure limits the growth of numerous towns and cities; our treatment and transmission infrastructure requires urgent upgrades and improvement, and in many cases our infrastructure needs to be overhauled. There are also the immediate interests of businesses to consider, which are dependent on the essential and continuous supply of water to keep their operations open. In the context of longer-term planning, schemes like the Greater Dublin Drainage Scheme are pivotal to Ireland becoming an increasingly sustainable and environmentally sound economy.

Bearing the above in mind, we emphasise that urgent investments by Irish Water over the coming years are required as pivotal supports to our economic growth, climate strategies and our long-term resilience against future shocks; be they climate-related or economic.

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<sup>1</sup> The Chambers Ireland SDGs. Available at: <https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/>

<sup>2</sup> Chambers Ireland submission to the Irish Water National Water Resources Plan. Available at: <https://www.chambers.ie/wp-content/uploads/2021/03/Chambers-Irelands-Submission-on-the-Irish-Water-National-Water-Resources-Plan.pdf>

## **Chambers Ireland's Perspective on the Greater Dublin Drainage Scheme**

An Bord Pleanála (ABP) are reactivating the reference ABP-312131-21 (previously ABP-301908-18). Chambers Ireland submitted its views on the original scheme in 2018, when we highlighted its importance for housing, strategic urban growth, and attracting foreign direct investment.

Chief among our points raised in our earlier submission was the point that the Greater Dublin Drainage Scheme represents a significant step in developing and expanding wastewater infrastructure for Dublin and surrounding areas. This project will enable economic growth in areas where substantial scope for housing and industry development exists.

In particular, we noted that the Greater Dublin Drainage Scheme would cater for denser growth in the city centre and further development in North Dublin. We additionally emphasised that the projected increase in wastewater of over 50% by 2050 must be adequately collected, treated, and returned to the environment with minimal impact. Finally, we underlined the significance of the project in light of the targets of the National Planning Framework.

Our views on the scheme fundamentally remain the same and we view it as a much-needed development. Our position is such that any decision taken regarding the scheme should give due consideration to population growth and sustainable wastewater treatment. The Greater Dublin Drainage Scheme is a key part of Irish Water's investment in new wastewater infrastructure in greater Dublin and will protect public health, safeguard our environment and facilitate sustainable growth up to 2050 and beyond. It will form part of the primary infrastructure network that is necessary to enable and support residential and commercial development.

Firstly, as a major pillar of the National Planning Framework is the concentration of growth in areas that can support denser populations, we stress that the Greater Dublin



Drainage Scheme should be implemented at the earliest opportunity, due to increasing population size, and the significant growth that is projected out to 2050. With Census 2022 demonstrating that population growth has already been exceeding expectations, the need for the Greater Dublin Drainage Scheme has become even more pressing.

The new regional wastewater treatment facility and associated infrastructure is required to serve the growing population of North Dublin and parts of the surrounding counties of Kildare and Meath. Once operational, Dublin's new regional wastewater treatment facility will have the capacity to serve the equivalent of half a million people into the future. It is imperative the scheme is in place so that infrastructure exists which can scale parallel to this increased population. The population of Ireland and the relevant areas will grow substantially over the next 30 years. Currently 1.9 million people (circa 40% of Ireland's population) live and work in the Greater Dublin Area and by 2040, a further 450,000 people are estimated to join them. This continued population growth and subsequent increased commercial activity means the volume of wastewater generated in greater Dublin is projected to increase by more than 50% over the next 30 years.

Secondly, sustainable growth in these urban areas will be delayed for as long as the Greater Dublin Drainage Scheme scheme is postponed. The capacity of our cities and towns to grow is guided by the capacity of waste-water facilities, which have suffered from long-term underinvestment, to prevent damage to the environment.

Investment the Greater Dublin Drainage Scheme is vital to support the rapid growth in its catchment area. Otherwise, the demand for housing will see the dispersal of our population across an even wider area towards where it is possible to squeeze once-off housing onto the existing infrastructure.

The delivery of the Greater Dublin Drainage Scheme is also a key strategic investment priority under the National Planning Framework and the renewed National Development Plan 2021-2030. It is also a strategic policy objective of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, the Fingal Development Plan 2017-2023 and the Dublin City Development Plan 2016-2022. Non-implementation of the Greater Dublin Drainage Scheme scheme would therefore run

contrary to our interlinking national and region policy which is pivotal for the sustainable growth of our urban areas.

Finally, adequate wastewater infrastructure is not only vital to support the sustainable growth of our communities and businesses, but to protect the environment also. Irish Water needs to have adequate capacity to collect and treat wastewater so that the treated water can be safely returned to the environment. As a vital, once-in-a-generation project, the Greater Dublin Drainage Scheme will help facilitate Irish Water in its role and ensure that the wastewater generated every day in our homes, schools and workplaces will be treated safely in compliance with the EU and national wastewater treatment regulations. Specifically, the project will provide the long-term treatment capacity needed now that the country's largest wastewater facility at Ringsend reaches its upgraded maximum capacity. The Greater Dublin Drainage Scheme should be fast-tracked as a matter of priority and receive the requisite investment and planning approval so that sustainable wastewater treatment is in place.