

Terri Gray & Paul Burke  
19 Clonshaugh Heights  
Clonshaugh  
Dublin 17

**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.

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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<b>AN BORD PLEANÁLA</b>	
LDG-	057862-22
ABP-	312131-22 (PA)
27 SEP 2022	
Fee: €	Type:
Time:	By: <i>post</i>

Terri Gray & Paul Burke  
19 Clonsaugh Heights  
Clonsaugh  
Dublin 17

25<sup>th</sup> September 2022

**Ref: ABP-312131-21 Greater Dublin Drainage Project**

Dear Eimear

Thank you for your letter dated 26<sup>th</sup> August and advising that the above project has finally been re-activated. According to the high court ruling on 4<sup>th</sup> May 2021 this planning was referred to the board, yet it is now Sept 2022 and a significant lapse in time has occurred.

**Why has this taken so long to re-activate the case and communicate with all interested parties?**

We wish to make a submission and **to object** to this development for the following reasons;

#### **Site Selection**

I attended the Oral Hearing and raised my concerns on the site selection process and how the selection process was flawed. I pointed out that the selection process used to determine Clonsaugh as the designated site and the Southern corridor as the designated pipeline needed to be evaluated closely as the criteria used was not balanced. It is weighted and favours the southern route simply because it is shorter and more cost effective with little regard to impact it will have on a heavily populated area or the special area of conservation.

This large facility will be placed in the middle of a highly residential area and despite being advised that no odour would be omitted in correspondence and meetings with Irish Water in the planning phase, we were in fact advised at the Oral Hearing by Irish Water that there would be an odour omitted some of the time. This was one of the main concerns raised by residents and yet it was dismissed right up to the oral hearing.

In addition to all concerns raised previously we now find that the **new flight path is directly over Clonsaugh and in particular right over the proposed site for this plant**. This plant will omit gases at several points throughout the day and currently planes fly over every 3-4 minutes.

**Was this properly assessed when choosing this site as surely this poses a considerable risk to the local population?**

#### **Evaluation now outdated**

The reports and all initial reviews for this project are completely out of date now

- When initial planning on this site was done, two key locations had been declared candidate Special Areas of Conservation, but now Baldoyle Bay SAC and Ireland's Eye SAC are both full SACs and should be protected and they are essential to the eco system on the area.
- In recent times many environmental laws at national and EU Level have been changed and updated, so all evaluations in terms of EIAR and NIS will need to be completely redone.
- The cumulative impact on the environment of all new planning applications granted consent since the NIS for this project was completed in 2018 should be considered. This is very worrying as the plant is



huge and output will have a severe impact on sea and plant life. Such developments include but are not limited to, Dublin Array, Howth Pier Extension, New Dumping at Sea licences for Dublin Port, Huntstown Power station and Data Centre, Stadtkraft Synchronous Compensator Compound at Belcamp, Gannon Homes SHD at Belcamp, Amazon Data Centre, IDA Lands remediation works and 2<sup>nd</sup> Runway at Dublin Airport to include new environmental corridors and Public safety Zones.

- New developments granted and changes to land layouts may also require a new CPO or at very least amendments to CPO.

#### **UV Treatment**

At the oral hearing we were advised that UV Treatment on the wastewater being discharged would be conducted, but no report was issued on how the process would take place, so we were unable to review and evaluate the efficacy of this proposal with a plant of this size. Once again, the planning process was not transparent and could not be fully evaluated by all interested parties.

No drawings or plans relating the buildings or associated infrastructure of the material change of a new UV element of the project have been submitted.

#### **Biogas Storage**

It was not clear to us at all in the application that there would be a biogas storage element to the development. We only discovered this when we were informed by another objector that the "waste recovery facility" would generate and store biogas on site.

How much Gas will be stored?

What risks are associated with BioGas Storage?

What is the Blast radius in event of an accident?

Will an explosion and associated plume impact the flight path?

Should the Health and Safety Authority be involved as a consultant with this application?

#### **Public consultation under Aarhus convention:**

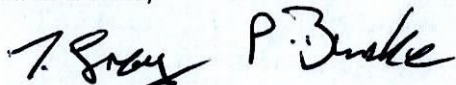
Under the planning guidelines issued by the regulator in 2020, 10.3 states that any person and interested parties can make a submission / objection to a planning application, yet a significant number of new homes have been built adjacent to the this proposed site. The people who bought these homes and are living there have been excluded from the planning process as only parties who have previously made a submission are aware that the project has been re-activated and are permitted to take part.

By actively excluding these residents the planning process is once again flawed and the whole planning process should be re-opened correctly:

- To include all parties and public concerned
- To include up to date EIAR and NIS with all surveys pre 2018 retaken and updated to 2022
- Revised and updated cumulative impact study done as part of EIAR and NIS
- Comprehensive evaluation done on location and impact on the flight path
- All relevant engineering and network capacity figures updated to Census 2022 rather than outdated Census 2016

I look forward to hearing from you and would urge the Board to consider all the points raised above and re-open the whole process to ensure all parties can get involved and a full, complete, and accurate evaluation on all aspects of this project can be evaluated.

Yours sincerely

  
Terri Gray & Paul Burke