

Sean Haughey TD  
Dail Eireann  
Leinster House  
Kildare Street  
Dublin 2

**Date:** 16 September 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 Deputy,

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 Dublin City Council and 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

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Seán Haughey TD

The Secretary  
An Bord Pleanála  
Strategic Infrastructure Development  
64 Marlborough Street  
Dublin 1

<b>AN BORD PLEANÁLA</b>	
LDG-	057133 - 22
ABP-	312131-21
12 SEP 2022	
Fee: €	50
Type:	cheque
Time:	
By:	post

8<sup>th</sup> September 2022

A Chara,

Irish Water has submitted a planning application for a new Regional Wastewater Treatment Plant at Clonsaugh Dublin 17, reference number ABP-312131-21. I am still strongly opposed to this proposal.

#### Location

This agricultural site is totally unsuitable for such development given its close proximity to densely populated areas including Clonsaugh, Priorswood, and Darndale as well as the new estates on the Northern Fringe such as Clongriffin, Clarehall, and Belmayne. A Wastewater Treatment Plant has the potential to seriously injure the residential amenities of the householders living in these estates. The site is also close to Dublin Airport and the Clayton Hotel, and the plant has the capacity to impact considerably on the operation of these business concerns. In addition, this site is very close to the parkland known as Priorswood Park which is bounded by Clonsaugh Road/Stockhole Lane, the R139 and Clonsaugh Park, and poses a real health and safety risk to the many frequent users of this park on a daily basis including many children.

#### Construction Phase

I am concerned about the inevitable noise arising from the construction phase of the plant itself and the outflow pipes should the project proceed. In addition, construction traffic should not be allowed to use Baskin Lane or Clonsaugh Road which are only minor country roads and were never built for the amount of traffic using them. Traffic disruption at the Malahide Road/Baskin Lane junction would also be a major problem if the outflow pipes are built as planned.

#### Noise

Local residents will suffer constant and ongoing noise pollution as a result of the operation of the plant.



### Odour

This is a major worry, having regard to what the residents living beside the Ringsend plant had to endure despite assurances given to them previously. Odour will be inevitable regardless of the odour suppression measures put in place. Inadequate design structures and maintenance operations of the plant will give rise to increased odour problems. Bewleys Coffee based at Northern Cross emits a coffee smell which can be experienced by householders living within a radius of several miles and the real fear is that this will also be the situation in the case of odours coming from the new plant.

### Traffic

Numerous lorry movements in the area connected to the operation of the plant will greatly diminish the quality of life of local residents. Traffic on the major and minor roads in this locality has already reached saturation point.

### Treatment

Secondary treatment is completely inadequate in this high technological and scientific age.

### Visual Amenities

The plant will be visually obtrusive given its proposed height.

### Wildlife

A large scale Waste Water Treatment Plant will seriously affect the bird and wildlife of this agricultural area. This includes baggers, hares, buzzards, and wild pheasants. The European Habitats, Birds, and EIA Directives will potentially be breached should this planning application be granted.

### Pollution

There is a distinct threat of pollution resulting from the normal operation of the plant or from an accident or systems failure. The deliberate release of raw sewage through the marine outfall pipe is a real possibility.

The entire of Dublin Bay was designated as a Biosphere in order to protect its sensitive ecosystem. This designation took place after the site at Clonsaugh was selected for this plant.

The following special areas are under threat should this plan succeed;

Dublin Bay, North Bull Island, Portmarnock Strand, Baldoyle Estuary, Lambay Island, Skerries Island, Rockabill, Malahide Estuary, Ireland's Eye, Balbriggan/Skerries Designated Shellfish Waters, and Malahide Designated Shellfish Waters. Special Areas of Conservation, Special Protection Areas, and Shellfish Waters Designations are especially relevant in this case.

In addition, the discharge of wastewater from the proposed development, in conjunction with existing discharge into the receiving waters, will cause or exacerbate breaches of aspects of water regulations.

I also suggest that the planning decision by An Bord Pleanála in respect of an application for residential development on the playing fields of St. Paul's College, Sybil Hill, Raheny, Dublin 5, is very relevant in this case and in particular points 1 and 2 listed under "Reasons and Considerations" (APB-307444-20).

The Light-Bellied Brent Geese feed on the Clonshaugh site and photographic evidence to this effect has already been submitted to An Bord Pleanála by other objectors.

The impact of the proposed development on the following sites must be thoroughly investigated.

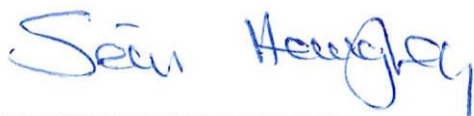
1. UNESCO Biosphere – Dublin Bay and North Bull Island.
2. Habitats Directive
3. North Bull Island Special Protection Area (site code 004006)
4. The South Dublin Bay and River Tolka Estuary SPA (site code 004024)
5. The Baldoyle Bay SPA (site code 004016)
6. The Malahide Estuary SPA (site code 004025)
7. Rodgerstown Estuary SPA (site code 004015)

I am strongly opposed to the principle of large-scale Regional Wastewater Treatment Plants. The provision of localised plants is more environmentally sustainable and in keeping with environmental principles generally. Sewage should be treated as close as possible to the source of its production and it would be preferable to provide multiple smaller treatment plants to avoid the possibility of a major environmental disaster.

Finally, given the recent High Court case regarding this application, it would be important for An Bord Pleanála to seek the views of the Environmental Protection Agency on this matter.

I believe that the proposed sewage treatment plant at Clonshaugh will seriously injure the residential amenities of householders living nearby. The plant threatens their public health. The size and scale of the project means it is totally contrary to the proper planning and sustainable development of this area.

Yours sincerely,



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Seán Haughey TD