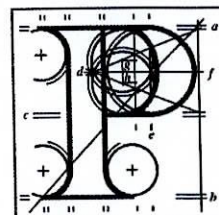


Our Case Number: ABP-312131-21



An
Bord
Pleanála

Maria Murphy
"St. Anne's"
Kinsealy Lane
Maladie
Co. Dublin

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 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.

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

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

PA04

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
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"St. Annes's"

Kinsealy Lane

Malahide

County Dublin

K36AC90

25 September 2022

AN BORD PLEANÁLA	
LDG-	057868-22
ABP-	312131-21
28 SEP 2022	
Fee: €	Type:
Time:	By: post

Dear Sir/Madam,

As per your letter dated 26 August 2022 re new reference Case Number ABP-312131-21 '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', and the reactivation of application ABP-301908-18. I wish to register my continued objection to a plant of this magnitude. My concerns remain undiminished.

I wish to object to the pursuance of the above project on the following grounds:

1. **THE THREAT OF POLLUTION** resulting from an accident or systems failure; or as an inevitable consequence of the deliberate release of sewage through the marine outfall pipe following heavy rainfall. In particular, I believe that the precautionary principle of the Habitats Directive be used in order to protect the following areas:
 - **Rogerstown Estuary**, which is a National Heritage Area, a Special Area of Conservation (SAC 000208), a Special Protection Area (SPA 004015) and a Wetland Site of International Importance under the Ramsar Convention. Rogerstown Estuary is protected by EU Birds' Directive 79/409/EEC and EU Habitats Directive 992/45/EEC and is a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.
 - **Lambay Island**, which is a Special Area of Conservation (SAC 000204) and a Special Protection Area (SPA 004069).
 - **Skerries Islands**, which is a Special Protected Area (SPA 004014).
 - **Rockabill**, which is a Special Protection Area (SPA 004014).
 - **Malahide Estuary**, which is a Special Protection Area (SPA 004025).
 - **Ireland's Eye**, which is a Special Protection Area (SPA 0041170).
 - **Balbriggan/Skerries Designated Shellfish Waters** (designated as per S.I. No. 286 of 2006).
 - **Malahide Designated Shellfish Waters** (designated as per S.I. No. 286 of 2006).

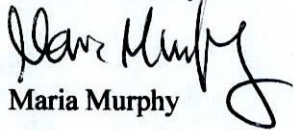
In the event of a discharge of raw sewage from a location in the Northern Outfall Study Area, I believe Rogerstown Estuary and Lambay Island to be in danger of pollution, regardless of tidal conditions; whereas Skerries Islands, Rockabill and the Balbriggan/Skerries Designated Shellfish Waters would be in particular danger if the tide were in flood; and Malahide Estuary, Ireland's Eye and the Malahide Designated Shellfish Waters in particular danger if the tide were in ebb.

For an example of a systems failure in a similar plant, please refer to the event in June 2007 at the Leith plant in Edinburgh, when over 120 million litres of sewage was discharged into the Firth of Forth over a 60 hour period. For an example of a deliberate release of sewage because of heavy rainfall, please refer to the incident at Mogden (London) in June 2011, resulting in the deaths of thousands of fish.

2. **THE INEVITABLE ODOUR PROBLEMS IN A PLANT OF THIS SIZE** because of the volume of sewage being treated. The plants in Edinburgh and Mogden, as well as the closer example of Ringsend in Dublin City have well-documented problems of this nature over many years.

3. **THE SCALE OF THE PLANT.** I object on the grounds that I believe that sewage should be treated as close as possible to the source of its production on the grounds that the Polluter Pays principle; and also because the development of multiple smaller treatment plants mitigates the environmental impact of any disaster and also reduce the odour problem incurred in any one area.

Yours Faithfully,


Maria Murphy