

Transport Infrastructure Ireland
Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8
D08DK10

Date: 22 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 Sir / Madam,

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 An Bord Pleanála when they have been processed by the Board.

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,

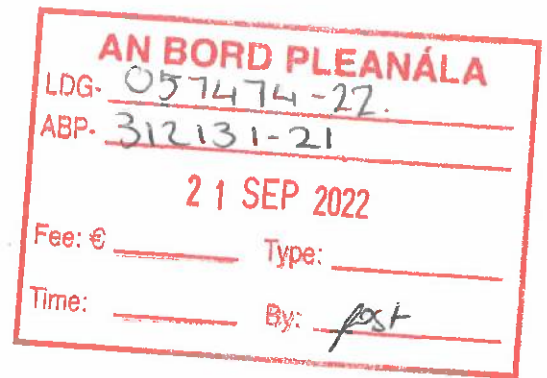
Eimear Reilly
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PA09

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Dáta Date:	Ár dTag Our Ref.:	Bhur dTag Your Ref.:
19/09/2022	TII22-120012	312131-21

RE: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility -Strategic Infrastructure Development (SID) application

Dear Secretary,

Transport Infrastructure Ireland (TII) acknowledges receipt of your notice dated 26th of August 2022.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users.

The approach adopted by TII in making submission is to seek to uphold official policy and guidance as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Regard is also had to other relevant guidance available at www.tii.ie.

In this instance the proposed development consists of 4 no. interrelated distinct developments:

- A new wastewater treatment plant (WWTP) including sludge hub centre and roads at Clonshagh, Fingal,
- Orbital sewer between the proposed WWTP and Blanchardstown including odour control unit adjacent to the R122 at Dubber, Fingal,
- Outfall pipeline, including a multipoint marine diffuser, between the proposed WWTP and the final discharge point approx. 1 km northeast of Ireland's Eye; and
- Regional Biosolids Storage Facility (RBSF) at Newtown, Dublin 11.

TII notes that the above mentioned RBSF is included in a concurrent SID application alongside a revised upgrade of the Ringsend WWTP under ref. 301798-18 (ref. on www.pleanala.ie PL29S.301798).

It is further noted that the proposed orbital sewer is to run broadly parallel to the M50 and thus crosses the M1 and N2. A series of construction compounds are proposed. Construction compounds 1, 2 and 3 abut the national road network.

The applicant circulated EIAR Scoping requests in 2013, 2016 and 2017. TII responded to these requests in December 2013 (Our ref. NRA13-88929), June 2016 (Our ref. TII16-94896) and December 2017 (Our Ref. TII17-99825) noting the intention to cross the national road network and requiring consultation with TII and local authority roads sections to avoid the Greater Dublin Drainage (GDD) Scheme prejudicing the efficient operation or future roads schemes upgrades.

In this regard TII required that the GDD Scheme identify existing and future national roads and their structures to ascertain the GDD Scheme's relationship with same and means of access to/from the development to/from the national road(s).

TII provided further advice that any crossings of the existing motorway network will require approval from the Authority under Section 53 of the Roads Act, 1993 (as amended) and that best practice should be observed setting out basic principles for motorway and national road crossings.

TII notes the recording of the 2013 and 2017 EIAR Scoping responses at Appendix A2.1 and A2.2 of the submitted EIAR.

TII submits the following observations:

1. Any crossings of the existing motorway network will require approval from TII under Section 53 of the Roads Act, 1993 (as amended).

Methods/techniques employed in traversing the existing national road network should ensure that the safety and standards of the national road network is maintained through appropriate best practice construction methods. All structures, access chambers, valves or other such devices associated with the routine maintenance and operation of the project proposal, etc. shall be located outside the road reservation of the national road.

In particular, when crossing or boring above/below motorway and national road carriageway, levels should be determined in consultation with and shall be subject to the agreement of TII and the relevant County Council, and in circumstances where the crossing arises on a section of road that has been contracted to a third party under a PPP Contract, the PPP Company. Specific plans and details will be required.

With respect to motorway and national road crossings, TII notes the proposed trenchless crossings. TII consent/agreements for the construction of a pipeline should ensure for the following basic principles (subject to allowances for local conditions) being met:

- the launch and reception pits for the Pipeline are located outside the road reservation,
 - the Pipeline will be installed at such depth so as not to conflict with the drainage for the Motorway or existing national road drainage system,
 - neither the Works nor the Pipeline will damage or interfere with the Motorway or national road,
 - there are no bolted joints in that part of the Pipeline traversing the road reservation, and
 - Any maintenance and/or future planned upgrades of the Pipeline at the crossing location can be carried out without access to the road reservation.
2. 'Metro North' is referred to in the submitted EIAR Appendices A2.1 and A2.2 as a matter consulted upon with TII. This project is reconfigured as Metrolink. Future Metro/Luas/BRT lines are a matter for the NTA.

TII requests that the above observations are taken into consideration by the Board in the assessment of this application.

TII trusts that the foregoing comments prove of assistance to the Board in dealing with this matter.

Yours sincerely,



Alban Mills
Senior Regulatory & Administration Executive
Transport Infrastructure Ireland