Our Ref: ABP-301908-18 P.A.Reg.Ref:

Your Ref:



Mary Stack Failte Ireland 88-95 Amiens Street Dublin 1

9th November 2018

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 & Newtown, Fingal County & Dublin

Dear 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 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.

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,

**Kieran** Somers

Tel

**Executive Officer** Direct Line:01-873 7107

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An Bord Pleanála

64 Marlborough Street

Dublin 1

Γ	AN BORD PLEANÁLA
	18 OCT 2018
	LTR DATED FROM
	LDG
	ABP

18<sup>th</sup> October 2018

# ABP Ref. PL06F. 301908-18

Notice of Further Information in Respect of a Direct Planning Application to An Bord Pleanála in respect of a Strategic Infrastructure Development: Greater Dublin Drainage Project. (A Proposed Wastewater Treatment Plant, Orbital Sewer, Outfall Pipeline, Sludge Hub Storage Centre and Regional Biosolids Storage Facility)

Dear Sir/ Madam,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response a letter from Jacobs Engineering Ireland Ltd dated 12<sup>th</sup> September 2018 seeking a submission/ observation in relation to the proposed development.

Fáilte Ireland welcomes the opportunity to comment on the Greater Dublin Drainage Project and greatly appreciates the need for this development as a crucial piece of enabling infrastructure for the future proper planning and sustainable development of the metropolitan area. The aim of this observation is to protect both existing and potential tourism amenities in the area likely to be affected by the proposed development.

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. The Irish landscape is one of the primary assets for tourism in the country, and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country,

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it is essential that the quality, character and distinctiveness of this valuable resource is protected. Associated with this is tourism infrastructure which is also the basis for tourism development and the satisfaction and utilisation of existing destination resources.

Fáilte Ireland would like to thank An Bord Pleanála for the opportunity to provide input to the planning process of the subject application and hope that this submission is of assistance in informing the Board's assessment of the proposal.

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Mary Stack.

**Mary Stack** 

Environmental & Planning Unit, Fáilte Ireland

# CUNNANE STRATTON REYNOLDS

# Assessment of the Proposed Greater Dublin Drainage Project

# REPORT

CUNNANE STRATTON REYNOLDS

Prepared by Cunnane Stratton Reynolds Ltd For Fáilte Ireland

October 2018

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## **Document Control Sheet**

Date	Issue	Ву	Туре
15/10/18	Draft	CL	Draft
17/10/18	Rev A	FI	Revision
18/10/18	Rev B	CL/EMP	Revision
18/10/18	Final	EMP	Issue

Issued	Signed
Eamonn Prenter	Hanon henta
	Director

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Disclaimer: The advice in this report has been informed by a search of the available online planning history and development plan zoning objectives for the site in question, and excludes consideration of other existing or potential, perceived or actual issues including but not exclusively relating to wayleaves, other rights of way, ownership, availability or otherwise of access, flood risk, infrastructural constraints, and of other advices produced in relation to the site by other parties. Our advice has been prepared without consultation with any other party including the local authority in whose jurisdiction the site is located. We reserve the right to amend the advice contained in the report based upon the availability of further information as and when it may become available.



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# 1.0 INTRODUCTION

Cunnane Stratton Reynolds Ltd on behalf of Failte Ireland has undertaken a review of the submitted application and has undertaken a site area visit of the length of the proposed project to ascertain the likely impact of the proposed development on tourism amenity within the project area.

This is a strategic overview assessment of the impact of the proposed development on tourism amenities and a more detailed assessment of the likely impact on specific facilities, amenities and infrastructure is a matter for the other parties concerned.

# 2.0 STRUCTURE OF THIS SUBMISSION

Given the extended size and length of the proposed project, Cunnane Stratton Reynolds has assessed the likely impact in the context of three spatial segments of the proposed project, each with distinguishing characteristics of physical and built development. In each segment, the key components of development are identified, the nature or characteristics of the area within which that segment is located is identified, and finally the construction and operational impacts are identified. The proposed scheme has also been assessed against the planning policies and objectives in place over the length of the scheme.

- Segment 1 covers the proposed project from Connolly Hospital to the western edge of the Dublin Airport, including the proposed Abbotstown Pumping Station. This segment will be covered in Section 3 of this observation;
- Segment 2 covers the proposed project from the eastern edge of the Dublin Airport to the eastern edge of the proposed Clonshaugh WWTP. This segment will be covered in section 4 of this observation;
- Segment 3 covers the proposed project from the outflow of the proposed Clonshaugh WWTP to the discharge location in the Irish Sea. This segment will be covered in Section 5 of this observation.

It should also be noted that the proposed time scale for construction will span from the end of 2021 to the end of 2024.

# 3.0 SEGMENT 1 – PROPOSED PROJECT FROM CONNOLLY HOSPITAL TO DUBLIN AIRPORT

### 3.1 The Proposed Development in Segment One

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The first segment of the proposed project includes the western end of the proposed project near Connolly Hospital, where the existing Blanchardstown Drainage Scheme will join it before it passes through the proposed Abbotstown Pumping Station. The proposed project then continues along past the adjacent research laboratory, passing through the townlands of Kildonan before crossing the N2. It then passes through the townlands of Dubber and Silloga before crossing the outskirts of Ballymun and turning sharply northwards towards Collinstown. There, it briefly abuts the Dublin Airport boundary before crossing the M1, entering into the townlands of Clonshaugh and joining to the Clonshaugh WWTP.

The proposed Abbotstown Pumping Station is to be located on lands adjacent to Connolly Hospital, within the parkland settings of Abbotstown Demesne. The pumping station is a critical piece of infrastructure at the Blanchardstown sewer.

# 3.2 Existing Environment and Tourism Amenity Baseline

The area within which this segment is located contains tourism and social, economic and transportation infrastructure including Dublin Airport and the M50 orbital route around Dublin connecting the capital to the rest of the island.

The landscape character of the area, associated with this part of the proposed development, is characterised by roads, domestic and international transport infrastructure, built development, substantial residential areas and the town centres of Blanchardstown and Swords. The landscape is heavily urbanised in this location.

The key tourism assets in this location are as follows:

- 1) Dublin Airport
- 2) National Sports Campus including the National Aquatic Centre
- 3) Other Tourist Attractions in the Area

1) Dublin Airport

Dublin Airport is the "first stop for the majority of the visitors who arrive in Ireland. From the airport, a substantial landscape can be seen in various vantage points throughout the airport and elevated carparks, and from planes that are coming in to land.

2) National Sports Campus including National Aquatic Centre

The western end of the proposed project is close to the National Aquatic Centre, which received 1,099,756 visits in 2017, and is an enabler of tourism for the region.

#### 3) Other Tourist Attractions in the Area

There are numerous country demesnes and protected structures including Abbottstown House that are located in close proximity to the western end of the proposed development. These include Dubber Castle which is of local historical interest.

### **3.3 Impact on Tourist Amenities**

#### **Construction Period**

#### Traffic Impact

During the construction period impact is likely to be limited to a substantial increase in traffic, including construction traffic for the project on the Snugborough and Waterville Roads as they access the location of the proposed Pumping Station at Abbottstown. This location is landlocked on the eastern side by the M50 and all site traffic will have to access through the National Sports Campus if it is to avoid access through the sensitive Connolly Hospital grounds. The likely impact of construction traffic on the campus will be limited to the construction period.

#### **Operational Period**

There are no anticipated substantial impacts on these tourism assets during the period that the Dublin Main Drainage Scheme is in operation.

# 4.0 SEGMENT 2 - PROPOSED PROJECT FROM DUBLIN AIRPORT TO THE CLONSHAUGH WWTP

## 4.1 The Proposed Development in Segment 2

Segment 2 of the proposed project runs from the south-eastern side of Dublin Airport (in the townland of Commons) to the eastern side of the proposed Clonshaugh WWTP.

The proposed project will intersect the proposed Metro North servicing Dublin Airport. The proposed project through this segment is mostly pipeline. Clonshaugh WWTP to the east will be a large wastewater facility that will process the wastewater from the proposed project. This facility will be built on agricultural grounds.

# 4.2 Existing Environment and Tourism Amenity Baseline

The area covered by Segment 2 of the project, contains a section of the orbital pipeline and Clonshaugh WWTP. The land within this segment is characterised by Dublin Airport and intermittent industrial and agricultural land before crossing the M1 and reaching the location of the Clonshaugh WWTP, in the townlands of Clonshaugh. Surrounding Clonshaugh are two demesnes: Belcamp House and Springhill House (Springhill immediately east and Belcamp House to the south of the proposed Clonshaugh WWTP). There are no other significant tourism assets in this segment.

#### 4.3 Impact on Tourist Amenities

#### **Construction Period**

#### Visual Impact

The Clonshaugh WWTP and works associated with it will have a visual impact on tourism assets to the east of the site due to the scale of the WWTP (c. 28 ha with structures up to 18m in height) as building works progress.

#### Traffic Impact

The most impactful element of the proposed development in this segment is the WWTP and the construction traffic associated with it. Construction traffic will amount to 10 heavy earth moving vehicles and >50 HDV (Heavy Duty Vehicle) movements in and out of the site per day.

#### Noise and Air Quality Impact

Noise and disturbance and dust will be expected during construction periods.

#### **Operational Period**

#### Landscape and Visual Impact

The Landscape and Visual, Archaeological, Architectural and Cultural Heritage assessments contained in the Environmental Impact Assessment Report (EIAR) show that significant visual impacts will occur in the surrounding areas of Dublin Airport, St. Doolagh's and the immediate demesne, house and gardens located around the proposed Clonshaugh WWTP (herein referred to as the WWTP) at least in the short to medium term (0 to 10 years).

The key component of the proposed scheme in this segment is the Clonshaugh WWTP which is projected to reach a maximum height of 18m when constructed. Whilst landscape screening is proposed as mitigation around this facility in the form of Scots Pine and Alder trees (shown in Figure 12.4 Landscape and Visual Mitigation Concept of the EIAR) which will, in time, grow to 20m, it is considered that the maturation of these trees will not occur for at least 10 years. For this period, and possibly beyond maturation, the proposed WWTP will likely still be visible, from the airport, the demesne and country house landscape to the east, north and south of the proposed plant due to the shedding of leaves and the dropping of branches.

#### Landscape, Cultural and Architectural Heritage Impact

The Landscape and Visual Assessment contained within Chapter 12 of the EIAR for the proposed project states on page 33:

"This is a relatively discrete enclave of connected demesne landscapes that line the western side of the R107 Malahide Road to the north of Clarehall. These designed heritage landscapes tend to be heavily enclosed by mature trees, and whilst this landscape unit transitions relatively seamlessly into the rural landscape to the west, it has an abrupt boundary to the east corresponding with the busy R107 Malahide Road. This is reflected in the HSL zoning pattern of the Green Infrastructure 1 map. Susceptibility and value relate to the sense of tranquillity and heritage within generally contrasting surroundings. This HSL will be primarily impacted by the proposed WwTP site and the western end of the proposed outfall pipeline route (land based section)."

There are likely to be two varying degrees of visual impact over the 10 year period to reaching maturity of the screening proposed. The western section of this segment, at the airport and M1 is less sensitive to change and the landscape and visual impact likely to be less pronounced over the initial operational period. To the east, with the sensitivity of the Malahide Road demesnes and immediate surroundings (noted as a designated Heritage Area in the Fingal County Development Plan), a more substantial negative visual impact of the completed WWTP is likely to be experienced by visitors to this part of Fingal, at least whilst the landscape screening proposed takes root and reaches maturity.

# 5.0 Segment 3: Outflow from the Proposed Clonshaugh WWTP to Discharge in the Irish Sea

#### 5.1 The Proposed Development in Segment 3

The proposed project in Segment 3 comprises principally the landward marine outfall pipeline encircling St. Doolagh's and the marine outfall pipeline crossing the Baldoyle Estuary SAC and Portmarnock Sand Spit to the discharge location some 1km west of Ireland's Eye SAC. It is this segment within which tourism amenities, infrastructure and attractions are most sensitive to the impacts of both the construction and operational phase of the proposed project.

# 5.2 Existing Environment and Tourism Amenity Baseline

This segment comprises rolling agricultural fields with demesne lands to the west, while the east is comprised of estuarine and coastal landscape types. Along the coast there are

beaches, hotels, golf courses and small scenic coastal villages. Scenic views of the coast and islands in the area have earned a protected view status along stretches of the Coast Road and the Golf Links Road which both overlook the Baldoyle Estuary. This area is zoned High Amenity, is of exceptional landscape quality and sensitive landscape setting. Most of the Portmarnock Sand Spit is comprised of coastal dunes. The Velvet Strand was awarded a Blue Flag Beach & Green Coast Award in 2018.

The following locations have been spatially identified as tourism related receptors and amenities for this segment:

- 1) St. Doolagh's House, Park, Church, grounds and other items of local archaeological and cultural significance;
- 2) Baldoyle Estuary SAC and Coast Road between Malahide and Howth;
- 3) Portmarnock Hotel and Golf Links
- 4) Portmarnock Golf Club;
- 5) Velvet Strand

#### 5.3 Impact on Tourist Amenities

#### **Construction Period**

The construction period of the proposed project will result in temporary loss of public access to Velvet Strand, which a Blue Flag Beach on the coast to the south of Portmarnock for the duration of the construction of the Marine outfall pipeline as the public car park on Golf Links Road will be utilised as a construction compound from early 2022 to late 2023.

#### Traffic Impact

St. Doolagh's listed house and grounds, church and park are several of a large number of local sites of heritage and are of local interest within a relatively confined area. It is noted however that the proposed project detours significantly around this area which greatly reduces the likely impact of construction traffic on what are generally regional, local and rural roads. However, a construction compound is proposed to be located along the R107 / Malahide Road. A second compound will be located to the east approximately 1km from the R107 / Malahide Road. A relatively large amount of construction related traffic is proposed in this area over the summer periods of 2022 and 2023 and is likely to deter visitors from this historical and scenic coastal area during this time.

The Coast Road provides access to Malahide Castle. The latest visitor figures in 2017 for Malahide Castle are 151,749 visitors per annum. While Malahide Castle can be accessed by road through other road routes such as Swords, access to the Portmarnock Sand Spit, golf courses and beaches do not have a direct alternative route. The Coast Road is the primary route through Portmarnock and is the only access to the hotel, golf course and Velvet Strand. It should be noted that there is a strong likelihood that the entirety of the Portmarnock area could be bypassed by visitors during the construction period due to road closures and heavy construction traffic.

The presence of two more construction compounds will directly impact access to Portmarnock Hotel Golf Links, Velvet Strand and Portmarnock Golf Club over the summer periods of 2022 and 2023 when access to the hotel may be limited at busy construction periods.

The construction phase of the proposed project will temporarily impact negatively upon the people who visit Portmarnock Golf Course, particularly during the summer months when golf is most popular. The years of 2022 and 2023 will be significantly impactful.

#### Landscape and Visual Impact

The substantial increase in vehicular traffic in this sensitive coastal location is likely to have a significant impact on tourist's experience of this highly sensitive coastal location. Baldoyle Estuary SAC is part of the Baldoyle Bay Special Area of Conservation and Special Protection Area. There are two protected views that the proposed project will intersect- these are along the length of Coast Road facing east across the Baldoyle Estuary and along Golf Links Road, facing west across the Baldoyle Estuary.

A proposed temporary construction compound is to be located on the western side of the Coastal Road. At the point where the proposed marine outfall pipe enters the estuary on route to the sand spit of Portmarnock, Ireland's Eye SAC. The first sign of Lambey Island can be seen from the road.

This is a sensitive marsh area and a picturesque location. The Coast Road runs the length of the estuary from Baldoyle to the south through to Portmarnock to the north. A clear view of Howth and of Ireland's Eye can be obtained from varying places along the Coast Road, including from this location. On a clear day, Lambey Island can also be seen from the Coast Road. This view will be impacted by an increase in construction traffic in this area accessing and exiting the nearby compounds.

#### Noise Impact

Noise monitoring locations along the beach and along the edge of Baldoyle Estuary near the current public car park on Golf Links Road will monitor the level of construction noise for the duration of the proposed project. It is unlikely that noise or dust will be a factor in this location if monitored.

The construction impacts of the proposed development are likely to be more significant than the operational impacts in this segment of the proposed development.

#### **Operational Period**

The Clonshaugh WWTP is located to the west of this segment where the landscape is less sensitive to change and where the visual intrusion in terms of the built structures proposed at the plant are likely to be greatest.

Where the landscape to the east, in the coastal area, is more sensitive and more popular with visitors, the operational impact of the proposed scheme is likely to be benign.

There is a possibility that the dune system may be affected during the operation phase of the development at least for an initial period.

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# 6.0 Relevant Tourism Related Policies for the Proposed Project

# 6.1 Fingal County Development Plan 2017-2023

The Fingal County Development Plan has indicated the importance of the County's cultural, natural and architectural heritage. Relevant objectives and policies pertaining to this development are indicated in the table below.

# 6.2 Portmarnock South LAP 2013 (Extended)

The relevant objectives in the Portmarnock South Local Area Plan are also set out in the table 6.1.

Fingal County Development Plan 2017-2023			
Objective	Policy	Relevance to the Project	
CH20	Development affecting a protected structure and/or its setting to be sensitively sited and designed, compatible with the special character, and is appropriate in terms of the proposed scale, mass, height, density, layout, materials, impact on architectural or historic features, in conjunction with the existing Protected structures.	Proposed project involves trench digging within mature landscape curtilages of protected structures (within 600m of Protected structures)	
Landscape Objective NH36	<ul> <li>Development not to impinge significantly on character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic values. Development in highly sensitive areas not permitted if: <ul> <li>Unacceptable visual harm</li> <li>Introduces incongruous landscape elements</li> <li>Disturbs or loses (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.</li> </ul> </li> </ul>	Tunnelling through a sensitive Estuary and Coastal Area will change the landscape in this area, potentially causing landscape and visual harm for a temporary period during construction works with the possibility that there may be a temporary operational impact as the reinstatement of repair work to dunes takes effect.	
Landscape Objective NH40	Protect views and prospects contributing to character of the landscape from inappropriate development.	Coast Road and Portmarnock Golf Club road are protected views in High Amenity Land.	
Landscape Objective NH51	Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.	Scheme passes through a High Amenity zoned area and does not reinforce the sense of place.	
Landscape Objective NH52	Reflect and reinforce distinctiveness and sense of place of High Amenity Areas (ie) retain important features or characteristics and elements contributing to distinctiveness	Potential impact on the dune system of Velvet Strand High Amenity Area or potential	

# Table 6.1 Summary of Tourism Related Policy and Relevance to the Project

	such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.	habitats within the Baldoyle Estuary High Amenity Area)
Coastal Tourism Objective NH65	Ensure appropriate public access to coast including coastal walkways and cycleways, taking full account of need to conserve and enhance the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on European Sites and protected species.	Pipe routing through public right of way to Velvet Strand
Objective NH67	Protect beaches, and bathing areas as valuable local amenities and as a tourism resource and support the maintenance, protection and improvement of access to them.	The proposed project will restrict access to the beach during construction stage. There is no information on restoring this access following completion of the proposed project.
Portmarnock South LAP 2013 (extended)		
Objective Tl 1	Facilitate development of appropriate new recreation, leisure, tourism and service facilities and ensure access for all groups of the community.	The timing of the construction of the Fingal Coastal Way will need to be clarified by the County Council.
Objective TI 3	Facilitate and promote development of environmentally sustainable tourism products/activities enhancing special qualities of the surrounding natural and built environment.	Project will cut through parts of zoned open space with links to broader green network during construction.
Objective TI 4	Promote and facilitate development of the Fingal Coastal Way as a local and tourist amenity, promoting the archaeological and cultural heritage of the area and associated events in appropriate locations.	The timing of the construction of the Fingal Coastal Way will need to be clarified by the County Council.
Objective TI 8	Prioritise and seek early completion of the Fingal Coastal Way within plan area in co- operation with landowners, local community and relevant environmental and funding bodies.	The timing of the construction of the Fingal Coastal Way will need to be clarified by the County Council.
Objective TI 9	Promote Portmarnock as eco-tourism destination based on natural heritage and walking and cycling routes and encourage developments which sustain eco-tourism such as sustainable tourism initiatives like the Greenbox within and adjoining the plan area.	The project is likely to at least delay this objective.

Fingal County Council has identified a need for a tourism greenway, to take full advantage of the cultural and natural heritage of the area.

Section 8.7 of the Portmarnock South Local Area Plan sets out the potential of the Fingal Coastal Way as an important piece of tourism infrastructure:

"The Fingal Coastal Way is envisaged as a greenway, carrying day trippers/tourists along the coastal corridor in an eco-friendly way. It is considered an essential piece of tourism infrastructure that is seen as necessary to the success of the coastal area of Fingal ..." The location of the proposed Coastal Way is outlined in Section 8.8 of the LAP:

"A 1km section of the Fingal Coastal Way is proposed along the eastern edge of the plan lands linking to Portmarnock to the north and Baldoyle to the south and onwards where connections to the S2S - Sutton to Sandycove - walking/cycling route can be made."

The proposed project documentation does not indicate whether the Greenway will be constructed during the proposed project. This will need to be clarified by the County Council.

During the construction phase the proposed project, will have a negative impact upon existing and short-term future development of this area for tourism and visitor related activities. Visitors will likely steer clear of construction areas due potentially to noise, dust, traffic delays, and visual impacts.

# 7.0 Summary of Findings

The main impacts of the proposed development will be temporal, mainly during the construction period. There is likely to be a temporary visual impact from the WWTP at Clonshaugh whilst the tree planting proposed takes root and matures. The impact of the proposed scheme during construction is likely to be more significant for the coastal communities, scenic landscapes and tourism amenities to the east of the project area. The most significant impact is likely to be traffic and visual/landscape during this period of construction. There is the possibility that there may be an impact from the operational phase on the dunes at Velvet Strand for a temporary period. The impact on the proposed Fingal Coastal Way is unknown as the timing of construction for that proposed amenity has to be confirmed by the local authority.

This is a strategic overview assessment of the impact of the proposed development on tourism amenities and a more detailed assessment of the likely impact on specific facilities, amenities and infrastructure is a matter for the other parties concerned.

# 8.0 Conclusions

The Greater Dublin Drainage Project is a large and complex critical infrastructure project which will, once completed, provide an expanded wastewater capacity to facilitate current and future growth in the northern Dublin metropolitan area. Fáilte Ireland appreciates the need for this crucial piece of enabling infrastructure for the future proper planning and sustainable development of the metropolitan area.

This submission has provided an outline and assessment of the likely impacts to the value of the tourism amenity in this area with regard to the planning policy context and based on information provided in the planning application.

In consideration of the value of the area's tourist amenity, it is the temporary impacts created during the construction phase that will have the most significant impact on the tourism amenity of the area. The operational phase of the project may have some temporary impacts initially but it is unlikely to have significant long-term impacts.

On balance therefore and taking the above into account from a tourism perspective, Failte Ireland find it imperative that the construction period and all proposed mitigation measures set out as part of the application are strictly adhered to and in line with all proper planning and environmental requirements.



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