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

Your Ref:



Karen Yeates and Others 35 Greencastle Drive Coolock Dublin 17

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

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AN BORD PLEANÁLA	An Bord Pleanála 64 Malborough Street Dublin 1
17 OCT 2018 Fee: € Type: Time: 2:30 By: Land.	17 th August 2018 Oct.

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility

Case reference: PL06F.301908

To whom it may concern and the second second

In light of the letter received from An Bord Pleanala I would to amend and update my objection. My payment reference number PD-005424-18 and details are below. I would also like to say as I reviewed the report of this proposal and concerns by many others I think we should be given an Oral Hearing as the concerns are extensive and testament that the consultation process is flawed.

The proposed sewage plant mentioned above is now in the final phase of planning. I confirm that I object to the above proposed project and location. I enclose the fee of €50.00 with this letter. The objections are listed below:

Environmental

International best practice is to have smaller sewage plants in several locations as opposed to one large plant as it is more efficient, safer and limits risks. Irish Water is unable to maintain the smaller plants currently in place and have pleaded guilty to several environment issues quite recently. The Irish Examiner reported on the 23rd March 2017:

Irish Water was fined 19,500.00 by the Environmental Protection Agency for 11 breaches in 4 different waste water facilities.

Current EPA License issue

Irish Water continues to discharge a mixture of raw sewage and septic tank effluent into the sea at Doldrum Bay in Howth. Their EPA licence requires them to have ended this discharge by the end of 2011.

How do we know the same environmental issues will not happen with this plant? If it does the risks to the health of the surrounding population would be a disastrous.

The odour and gases which will be omitted from this plant is a big concern to us. We have a number of local factories in Coolock which omit odour occasionally e.g. Cadburys and Bewleys, but both of these are on a much smaller scale to the proposed plant. There is a considerable amount of green fields in the proposed site, so we cannot understand why it is not moved further back away from the residential area.

A colleague sent an email to Irish Water and asked what grade the treated sewage will be when it is discharged into the sea? The response was that 201

'The exact details regarding the design of the proposed project and processes to be used are not confirmed at this stage'

This is not an acceptable response to a project this size when there are concerns for public health.

Misleading report

- Maps provided in the report are miss-leading and the co-ordinates to the outfall pipe do not match. Again this is a significant error on behalf of Irish Water and we are expected to have faith that they will have interest of the community at heart.
- The report states that the plant will handle the waste of 500000 yet when interviewed on Newstalk on 26th September Jane Chambers the Project manager advised that the plant will eventually cater for many more. This is not in the report
- An Board Planula have already identified key documents which not included, therefore I would question the entire process.
- Irish Water bypassed the local council and made an application directly to An Bord Pleanala, while this can be done under the strategic infrastructure development provision Act 2007 it does not meet the criteria laid out within this. It then failed to go to area meetings and failed to meet the agreed consultation parameters for the project of this scale which effect many different areas and two different local authorities. This consultation was critical as the land lies on Fingal Co Council land, but this development will affect many local residents of Dublin City Council.
- Jane Chambers when interviewed 26th September on Newstalk repeatedly mentioned that this plant would 'be state of the art', yet the water going into the sea is being treated at a basic level and the 'state of the art' which would be tertiary level. Why is this? What about the marine life located within the outfall pipe. They should also consider the other users of the sea in that location e.g. the anglers, divers and kayakers. Irish water have failed to have meaningful consultations with them, yet they use these waters regularly.

Consultation

On the Stakeholder Participation Report there was extensive consultation with stakeholder and a total of 225 meetings held, but only two meetings in coolock - March and July 2014. No further meetings were held after that date, so we were not fully informed and shocked to discover the plant was going ahead. The proposed site for this plant is much too close to the residential area, at least five local schools, hotels and other local amenities.

The location of the outfall pipe off Ireland's Eye could also have significant damage on Howth village and the local business's and restaurants. On discussion with some of them they would under the impression that the water in the outfall pipe would be treated to the highest grade and we know that is the not the plan. Howth is a busy fishing port but an equally busy tourist location, so any impact on the current water quality will cause concern and we rely heavily on good tourist attractions.

We would ask that An Bord Pleanála to review this proposal again in light of the issues and concerned highlighted.

Yours sincerely

K. Yers & Durn + glorin Drinn e.Bor

Carol Barr 32 Greencastle Drive Coolock Dublin 17

Gerry & Gloria Quinn 39 Greencastle Drive Coolock Dublin 17

Karen Yeates 35 Greencastle Drive Coolock Dublin 17



