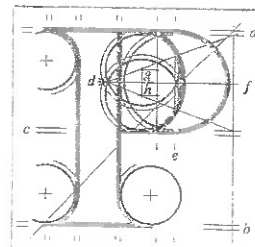


Our Ref: ABP-301908-18  
P.A.Reg.Ref:

Your Ref:



An  
Bord  
Pleanála

Máire Dunne  
98 Foxfield Park  
Raheny  
Dublin 5

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](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,

Kieran Somers  
Executive Officer  
Direct Line: 01-873 7107

PA09.LTR



**OBJECTION TO PROPOSED MASSIVE WASTE WATER TREATMENT PLANT AT CLONSHAUGH**

REF: ABP-301908-18

From: MIAE DUNNE To: Greater Dublin Drainage Project Manager

Address: 98 FOXFIELD PK, RAHEWY, DUBLIN 5.

Date: 16.10.18

I strongly object to the greater design drainage proposed waste water treatment plant (WWTP) at Clonsaugh, Co. Dublin on the following grounds, and request an oral hearing with local residents.

1. Location of a massive 700,000 PE WWTP adjacent to densely populated areas. 300m or 500m separation distance to receptors are wholly inadequate for such a large plant.
2. Odours: There will be odour originating regardless of the odour suppression measures taken by the design. Inadequate design maintenance and operation of the plant will give rise to increased odour problems.
3. Design, build and potentially operate nature of the contract for this project. Recent history has proven that this is a flawed model. One example of this would be the odour problems at Ringsend treatment plant which presented after its opening. Delays and disputes arose due to the structure of the procurement. Meanwhile the adjacent residents were left with the sickening odour problems.
4. Environmental risk: Recent experience of a smaller WWTP in Ballybrigan has shown that raw sewage will be discharged when procedures and systems fail. Should the proposed Clonsaugh plant discharge raw sewage to sea this can only result in detrimental environmental effects on SAC, SPA, designated shellfish waters of the Dublin coastline.
5. Disturbance of the local environment: Local wildlife such as hunting birds and other animals will be impacted by such a large scale WWTP.
6. A cost benefit analysis has not been produced for this site during the site selection process.
7. Impact on the local community: Properties will be devalued should this proposed WWTP proceed. This is grossly unfair to families who have invested in this area through house purchases, investment in local businesses, farms and the hospitality trade. There will be dozens of large lorry movements daily during the construction and operation of this plant. The first screening of the sewage and sludge would need to be transported by road, contributing to odour problems. The burden of treating sewage from the GDSDS area on the Clonsaugh, Portmarnock and wider coastal communities is an unfair burden.
8. Proposed location of the WWTP on prime agricultural land: This WWTP is proposed to compulsory purchase approximately 1/3 of a productive family farm. Large regional infrastructure such as this should be located on land of poorer value and at least 5km away from densely populated areas.
9. Detrimental impact on tourism in Dublin Coastal Areas: WWTP have in the last 7 years caused serious environmental problems when they failed and discharged raw sewage into receiving waters. This plant will receive negative publicity and the already vulnerable tourism, sea fishing and water recreation industries will suffer the consequences. It is unlikely that the EIA will adequately address such issues.
10. Visual impact: Millions of air passengers use Dublin Airport. The first/last vision these passengers will have is not of natural countryside but of a sewage treatment plant. This proposed vista is not a good advert of the Emerald Isle.

Re-submit

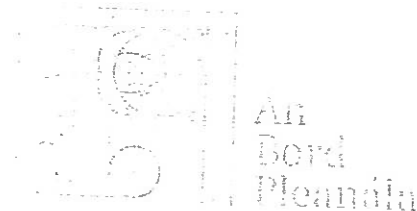
Previously paid €50

(See copy receipt attached)

LDG- _____	
AN BORD PLEANÁLA	
ABP- _____	
16 OCT 2018	
Fee: € _____	Type: _____
Time: <u>14:19</u>	By: <u>Head</u>

Our Ref: ABP-301908-18

Your Ref: Irish Water



Ciaran O'Keeffe  
Jacobs Engineering Ireland Limited  
Merrion House  
Merrion Road  
Dublin 4

Date: 30th August 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 and Newtown, County Fingal and Dublin City

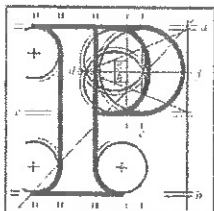
Dear Sir / Madam

I have been asked by An Bord Pleanála to refer further to the above-mentioned proposed development which is before the Board for consideration.

The Board in exercise of powers under section 37F of the Planning and Development Act 2000, as amended, and having regard to the matter which was brought to its attention relating to appendices and other particulars which were inadvertently omitted by Irish Water from the EIAR which accompanied the planning application (as lodged on the 20<sup>th</sup> June, 2018), the Board is of the opinion that further public notice is required outlining the nature of these omissions and allowing a period of not less than 5 weeks for submissions/observations to be made. The public notice should include information relating to the locations where the documentation may be inspected (same locations as per the planning application).

The applicant is also required to again notify the same prescribed bodies (as per the original planning application) and ensure that a minimum period of not less than 5 weeks is allowed for the making of submissions/observations by the said bodies. New site notices should also be erected allowing the same time period for the making of submissions/observations. The notices should include a sentence that **any person who has already paid the observer fee of €50 need not do so again in respect of a submission/observation.**

Please ensure that the last date for receipt of submissions/observations to the Board is the same for all such notices and letters to prescribed bodies and, additionally, the Commission for Railway Regulation and Irish Rail (which have separately been notified by the Board). Having reviewed the application documentation, the Board is also of the view that the Irish Aviation Authority should be notified of the planning application by Irish Water and requested to furnish any submissions it might have to the Board.



An  
Bord  
Pleanála

Admháil ar an bhFáil

**Acknowledgement of Receipt**

Uimh. Aitheantais Lóisteála:

**Lodgement ID: LDG-007651-18**

Ainm an chustaiméara: <b>Name of Customer:</b>	Máire Dunne
Gníomhaire: <b>Agent:</b>	
Cineál Lóisteála: <b>Lodgement type:</b>	Observation / Submission
Iarratas ar éisteacht ó bhéal <b>Oral Hearing Request:</b>	No
Modh Lóisteála: <b>Lodgement method:</b>	In Person
Íocaíocht Faighte: <b>Payment received:</b>	€50.00
Uimhir Thagartha Íocaíochta: <b>Payment Reference Number:</b>	PD-005403-18
Modh Íocaíochta: <b>Payment Method:</b>	Cash
Lóisteáil Faighte: <b>Lodgement Received:</b>	17/08/2018 13:31
Faighte ag: <b>Received by:</b>	Niamh Hanrahan

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
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Fax  
Website  
Email  
(01) 858 8100  
1890 275 175  
(01) 872 2684  
www.pleanala.ie  
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