Our Ref: ABP-301908-18

An Bord Pleanála

Sean Lyons
30 Coolmine Woods
Blanchardstown
Dublin 15

Date: 8th 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 and Newtown, County Fingal and Dublin City

Dear Sir,

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. A receipt for the fee lodged is enclosed.

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 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
Executive Officer
Direct Line: 01-873 7107

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The Secretary,

An Bord Pleanála,

64 Marlborough Street,

Dublin 1

D01 U902

Re: Proposed four Wastewater/Sewage Storage Tanks of 5 million litres each in front of Connolly Hospital and sewage pumping station in Abbotstown along with orbital sewage pipe to Clonshaugh North Dublin

18th October 2018

Dear Secretary,

The siting of the four tank and pumping station should be considered as one and the same. We object in particular at the siting of the four wastewater/sewage storage tanks in the front grounds of Connolly Hospital to accommodate the expansion of the Greater Dublin-Kildare-Meath sewage treatment for the following reasons:

Environment

1. The close proximity of tanks approximately 200 metres West of Connolly Hospital, the Children's Hospital, St Francis Hospice and the surrounding densely populated community, the Edmond Rice School and the town centre. The continuous hum from the motors and transformers. *See Map 1*
2. The sheer volume 20 million litres of sewage stored at this location and the volume of gases produced, which include; carbon dioxide, methane, ammonia and hydrogen sulphide which will blow directly across the hospital, school and hospice. Each tank has an 8-metre high forced draught ventilation shaft. *See Sketch 2*
3. The sewage storage tanks will have to be cleared of debris on a regular basis.
4. The tanker taking the debris away from the storage tanks and pump screens will travel by the hospital and densely populated areas with the risk of foul smells.

5. The odour from the sewage tanks will be a great debilitating discomfort and annoyance to patients. staff and the surrounding population. **It would appear that effluent from Kepak abattoir will also be stored in these tanks.** *See Map 5*

6. If the existing pipe 9C to Ringsend is disconnected (which it should not) then at times of flooding. electricity failure or pump breakdown. sewage could be discharged in the vicinity of the hospital.

7. The annoyance and disruption to patients. staff and families attending the hospital. school and hospice during construction and operation will be considerable.

8. The proposed pipe route to Clonshaugh is not ideal. because of the great number of bends. which increases flow friction. the big number of land crossings and CPO's required is not the least costly. *See Map 3*

9. The cost of energy in pumping along the proposed pipe line could be reduced if a lower OD and more direct route was to be taken.

10. We are asking the Bord to refuse permission for this project.

Amelioration

Many of the aforementioned issues raised could be ameliorated if interception of the existing sewer pipe 9C was to take place East/South of the M50 as indicated on Map 4. where the pumps and tanks would be away from patients. staff and community. Dunsink Lane could be used by the service tankers. which would have direct access to the N3.

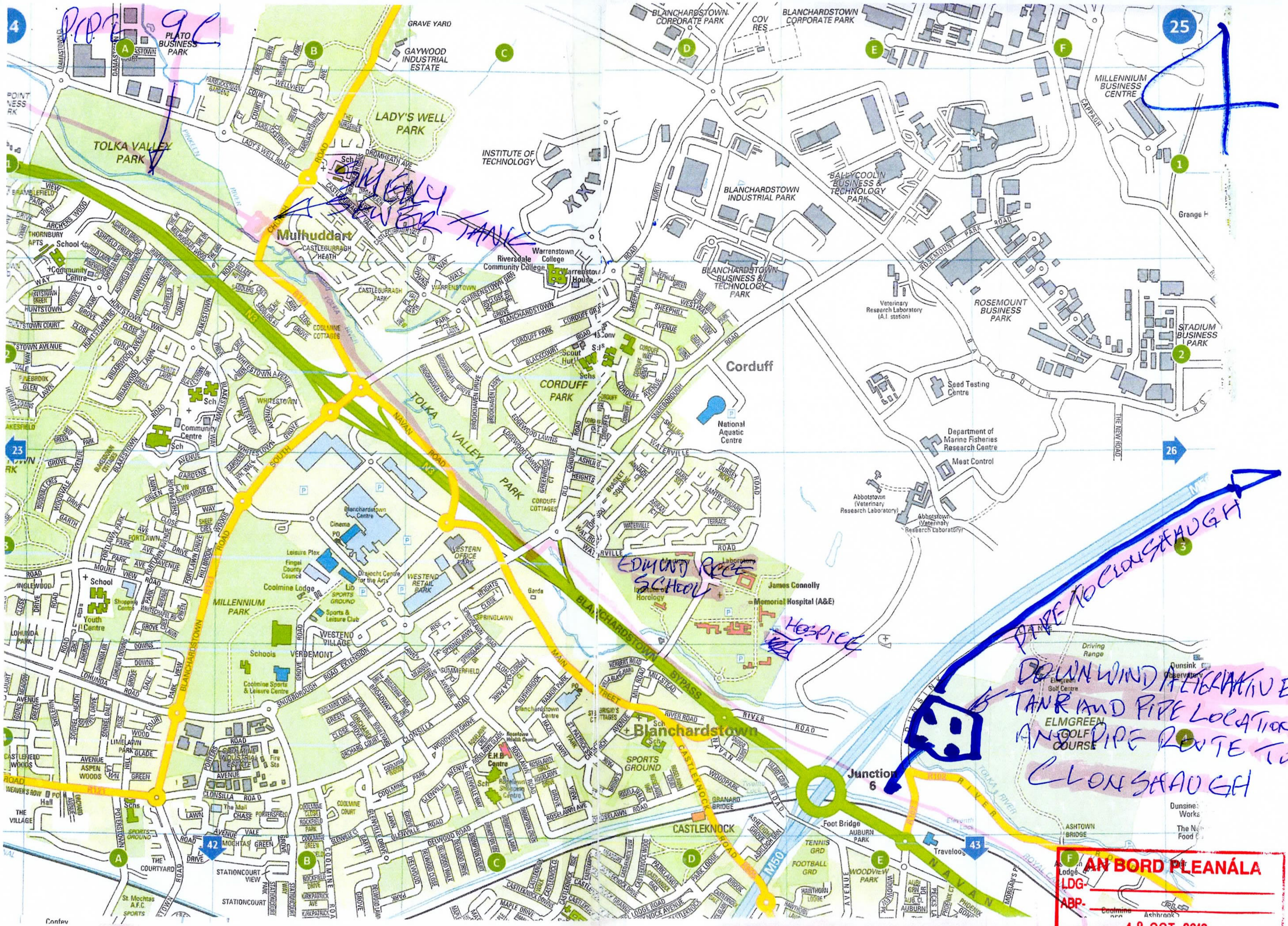
The alternative pipeline route to Clonshaugh running parallel to the M50 would cross mainly public lands. be shorter. more direct and at a lower OD level. thus. reducing construction and running costs to commercial rate and residential property taxpayers. *See Map 4 and 4A*

Anaerobic Digestion

Ideally the sewage and other organic wastes could be anaerobically digested at this new tank location providing heat and power to the hospital. fertiliser from the solids to farmers. thus further improving the economy and the environment. The liquid residue could be tertiary treated in a reed bed reducing commercial and residential property tax.

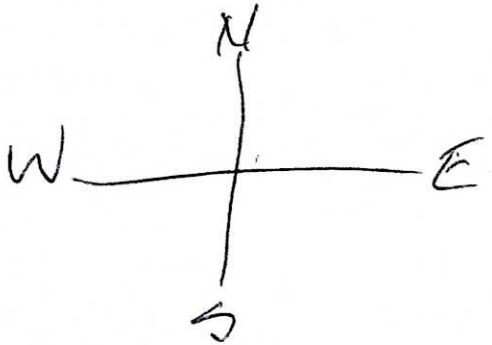
Is Mise Le Meas,

Seán Lyons



Land Profile at Hospital Location

Prevailing Wind Direction is from the West



Gases from tanks include Carbon Di Oxide, Methane, Ammonia, and Hydrogen Sulfide Blow across Hospitals, School and Hospital

Hospital

Ground Level Line

Tank Gases

3 metre high forced draught Ventilation stacks

Tanks

Tank site approximately 200 metres West of Hospital

200 metre

10 mts

Hospital about 10 metres above tank level

2

Greater Dublin Drainage

3

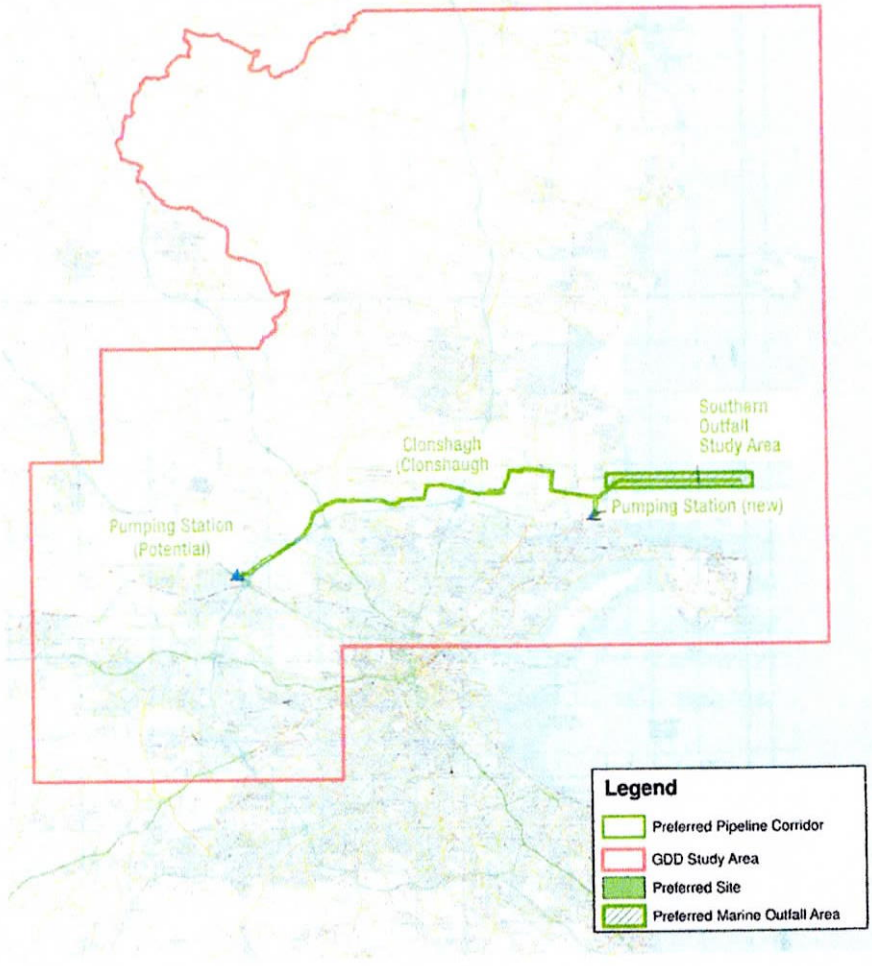
How was the Preferred Site Option chosen?

Over 13 different experts across a variety of disciplines studied the three shortlisted site options, Annsbrook, Clonshagh and Newtowncorduff, and reached the conclusion that Clonshagh is the most environmentally beneficial and technically advantageous solution and it is also the best value for money.

There are a number of reasons why the Clonshagh site option is better from an environmental, technical and cost perspective:

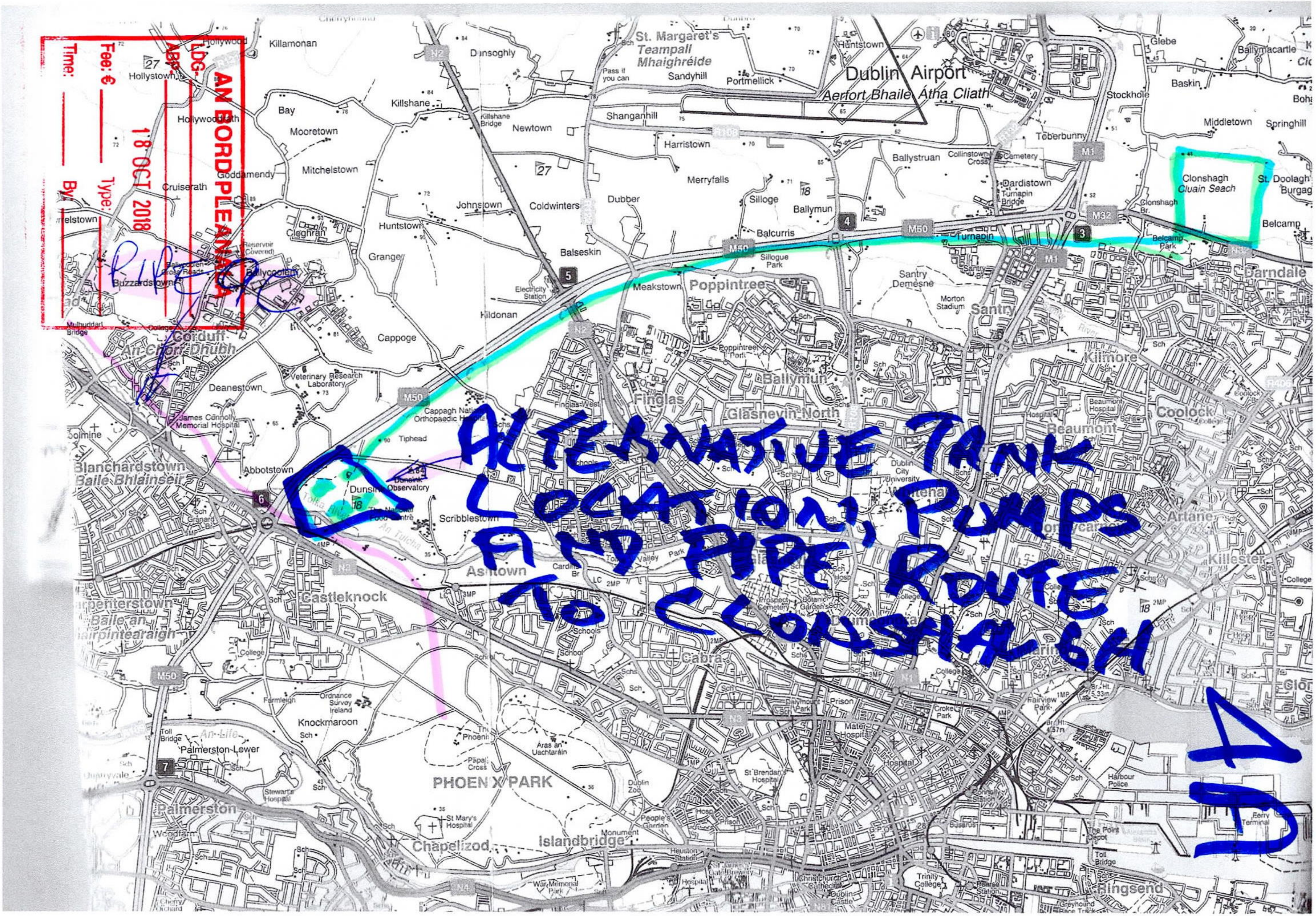
- **The Clonshagh site has less ecological value compared to the other two site options;**
- **The WwTP can be designed such that there is no impact on archaeology;**
- **This option can be designed, constructed and operated to ensure that it will not adversely affect the integrity of any Natura 2000 sites;**
- **Tunnelling of the southern outfall poses less technical difficulty compared to the northern outfall option;**
- **The southern outfall allows for better dilution and mixing of the discharge; and**
- **The total length of pipeline required is significantly shorter than that required for the other options. Therefore there will be less ecological impact, fewer watercourse crossings, lower number of existing and proposed infrastructural crossings, less potential to disrupt the landscape structure and lower energy requirements.**

Map of preferred site option (Clonshagh)



In addition to the many technical and environmental benefits, the estimated overall cost during the lifetime of the project for this preferred site option is over €80 million less than other options studied.

Until planning approval is obtained for this preferred site option, Annsbrook and Newtowncorduff will continue to be possible site options for the project should Clonshagh be deemed unsuitable at any future stage.


AN BORD PLEANÁLA
18 OCT 2018
Time:
Fee: €
Type:
By:
ALTERNATIVE TANK LOCATION, PUMPS AND PIPE ROUTE TO CLONSHAGH
Dublin Airport
Aerfort Bhaile Átha Cliath
St. Margaret's
Teampall Mhaighréide
Clonshagh
Cluain Seach
Belcamp
Darndale
Santry
Poppintree
Ballymun
Finglas
Glasnevin North
Kilmore
Coolock
Beaumont
Artane
Killester
Blanchardstown
Baile Bhlainséir
Castleknock
Ashtown
Cabra
Dunsink Observatory
Scribblestown
Abbotstown
Corduff
An Chorr Dhubh
Cappoge
Kildonan
Balseskin
Meakstown
Dubber
Coldwinters
Johnstown
Huntstown
Mitchelstown
Mooretown
Killshane
Newtown
Harristown
Merryfalls
Sillogue
Ballymun
Balcurris
Shanganhill
Sandyhill
Portmellick
Dunsoghly
Killamonan
Hollywood
Hollystown
Bay
Stockhole
Toberbunny
Ballystruan
Dardistown
Baskin
Middletown
Springhill
Glebe
Turnapin
PHOENIX PARK
Chapelizod
Islandbridge
Palmerston
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Knockmaroon
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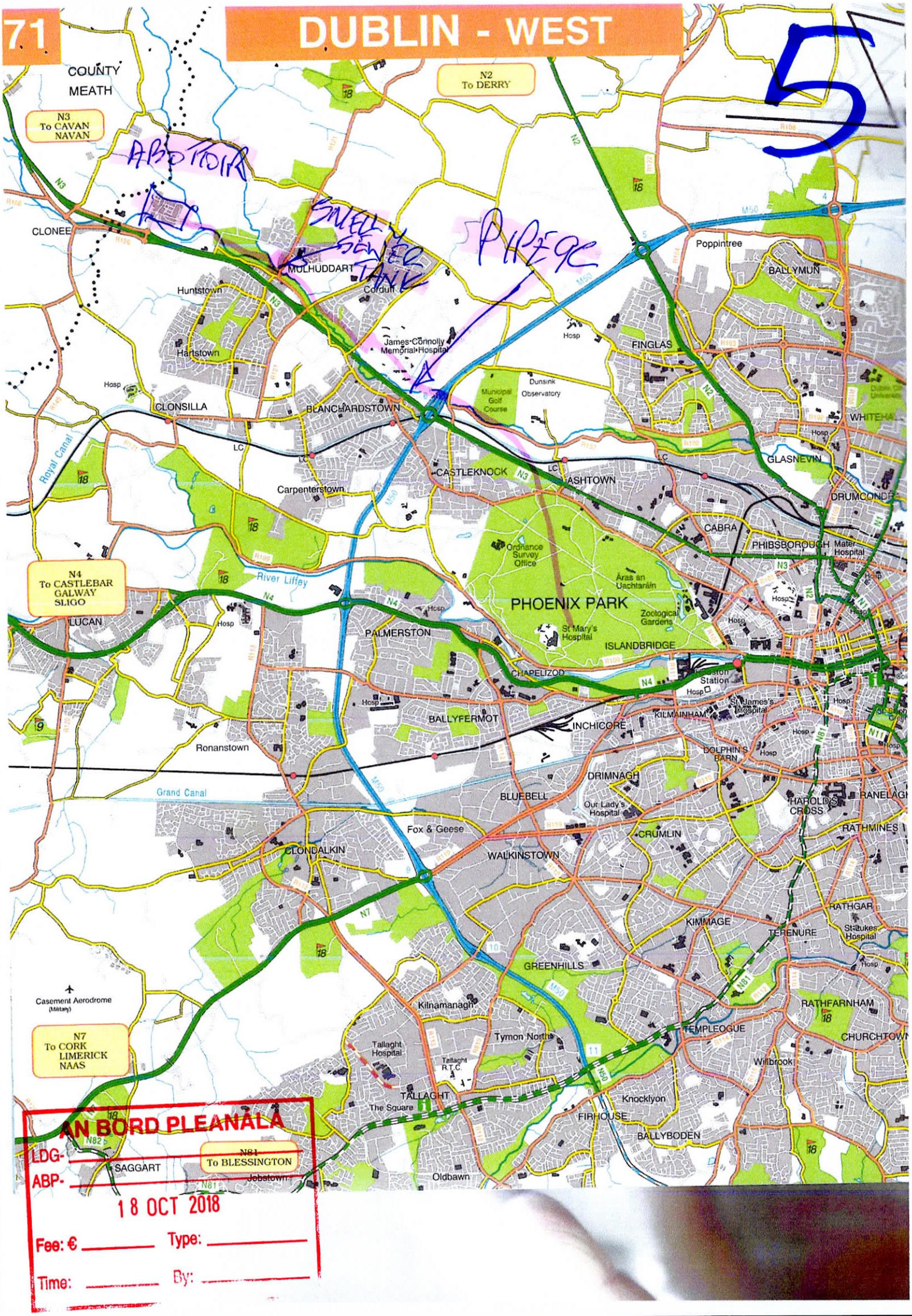

AN Board

Ref No:- 067PC0152

10 ABBOTSTOWN (BLANCHARDSTOWN) PUMPING STATION AND RELATED ISSUES

Q. Why is a pumping station required for Abbotstown (Blanchardstown)?

A. The Greater Dublin Drainage project proposes two new pumping stations – one near Abbotstown (Dublin 15) and another one in Grange (Dublin 13). They will pump wastewater into the underground orbital sewer to bring it to the new regional plant at Clonshagh (Clonshaugh) for treatment.

Q. Where will the proposed Abbotstown (Blanchardstown) pumping station be located?

A. The preferred site for the proposed Abbotstown (Blanchardstown) pumping station is located in the grounds of the National Sports Campus Development Authority (NSCDA) beside the M50 and 200 metres to the east of the hospital.

Q. Why are four wastewater storage tanks being built in the grounds of Connolly Hospital?

Irish Water has a separate project called the Blanchardstown Regional Drainage Scheme to upgrade the existing wastewater infrastructure in the area and this includes duplicating the existing 9C Sewer and building four storage tanks to cater for storm water overflows from the existing 9C Sewer during rainfall events, thereby protecting the River Tolka.

All wastewater coming from the Blanchardstown area drains to the Wastewater Treatment Plant at Ringsend where it is treated prior to discharge to Dublin Bay. The wastewater flows to the plant in Ringsend through the 9C sewer and this sewer is getting close to its capacity, and as a result the system needs to be upgraded. The existing 9C Sewer therefore requires upgrading that involves duplicating the main trunk sewer between Mulhuddart and the Tolka Valley Park.

The four storm water tanks are proposed to be located approximately 200 metres west of the James Connolly Hospital.

- The storage tanks will be constructed below ground level and covered.
- The stored storm water from these tanks will be returned to the 9C Sewer when rain stops, using submersible pumps.
- Odour treatment facilities will be installed at the storm water storage tanks.

A Part 8 Planning Approval for this scheme was approved by Fingal County Council in April 2008; there is currently no timeline for the proposal to go to construction stage.

Q. Will the pumping station affect the Hospital?

A. Modern pumping stations, such as that proposed by the GDD project for Abbotstown, are located largely underground with a small building overground for administration and maintenance access. The majority of the pumping station operation takes place below ground in concrete structures. Modern pumping stations are designed to limit the production of odours and any odours will be treated in line