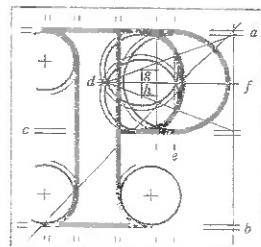


Our Ref: ABP-301908-18
P.A.Reg.Ref:

Your Ref:



An
Bord
Pleanála

Terri Gray and Paul Burke
19 Clonshaugh Heights
Clonshaugh
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
Executive Officer
Direct Line: 01-873 7107

PA09.LTR



An Bord Pleanála
64 Malborough Street
Dublin 1
17th Oct 2018
~~16th August 2018~~

AN BORD PLEANÁLA	
LDG- _____	
ABP- _____	
17 OCT 2018	
Fee: € _____	Type: _____
Time: <u>2:30</u>	By: <u>hand</u>

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

As per the letter issued by An Bord Pleanála advising the consultation period had been extended and we could amend/update our submissions, I have done some more research and read the report in more detail and have amended my objections accordingly.

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 enclosed the fee of €50.00 with this the original letter and the payment reference is PD-005447-18. The objections are listed below:

Environmental

1. The waste from this plant will be put out to sea off Baldoyle/Portmarnock and Ireland's eye. In 2015 Dublin Bay was recognised as a highly important biosphere and protected by UNESCO and this proposed plan was already in place. This recognition by UNESCO highlights the importance of water quality and the community around the designated area, yet this proposal wants to **omit 3600 litres of waste water per second at secondary level into this area**. This cannot and should not be tolerated. This poses a serious danger to marine life and anyone else who might use this particular location e.g. divers, kayakers and anglers all of whom use this location regularly.

<http://www.dublinbaybiosphere.ie/about>

Cost has been sighted as one of the reasons this location has been chosen as the outfall pipe will be shorter than the two other locations e.g. Abbotstown or Newtowncorduff, yet the cost to this protected biosphere could be huge, if there is a leak or spill and it may never recover. The risk is too great and European commission could impose Significant fines in relation to environmental damage caused to a UNESCO site. Putting the site and outfall pipes in the current location is short sighted.

The wildlife on Ireland's Eye is considerable and boats of bird watchers and tourists regularly visit, but do not interfere with it, yet we seem to overlook that this outfall pipe will damage the wildlife on this natural landscape. Irish Water has been out on the island and took details of the wildlife and numbers and will compare to these before and after the plant is build. This should not be necessary as we should not be considering placing it here.

2. Portmarnock beach (Velvet Strand) is a blue flag beach the only one on the northside of the city. It has significant historical interest as the first east-west transatlantic flight took place there. Irish Water does not have a good record thus far in smaller plants and has failed on many occasions to meet environmental standards. There has been

AN BORD PI EANAÍLA
17 OCT 2016

numerous breaches and this year in particular some beeches had to be shut down for a number of weeks as they were deemed 'not safe'. The Irish Examiner reported on the 23rd March 2017:

Irish Water were fined 19,500.00 by the Environmental Protection Agency for 11 breaches in 4 different waste water facilities, yet this new plant will be much bigger and the risk much greater.

A plant of this size would hold much greater risks to the surrounding population, nature, wildlife and marine life. A malfunction on plant which can omit 3600 litres per second out into the sea is unthinkable.

3. On the 13th August I 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

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

This project has been planned for a number of years and it is a large scale project, so all processes should be addressed at this stage. Local residents, the environment and sea life should be a priority and all processes confirmed and concerns addressed yet they seem to be unable to do this, so there is complete lack of faith and trust that Irish Water will be able to manage this plant responsibly and effectively.

4. The odour and gases which will be omitted from this plant is a big concern to us. There is a considerable amount of green fields in the proposed site, so we cannot understand why it has not moved further back from the road and away from Clonsaugh and Newbury. Is there a holding tank and how much does this hold? Will the odour from the plant be monitored? Should odours persist will the residents be compensated?

We have been advised by Irish Water that this plant is 'state of the art' and there will be no gases omitted from the plant and no odour, yet the report state there will be 25m high flare stack and these stack are used to omit gasses into atmosphere. There are at least 5 local schools nearby, so this poses a serious risk to public health.

5. All these issues should have been addressed directly with the residents.

- Have Irish Water recognised these risks?
- Are there emergency protocols in place if the plant fails?
- How are local residents protected?
- Will Irish Water indemnify local people if they fall sick because of this plant?

Consultation

6. 19th November 2014

I note from the Public and Stakeholder Participation Report there was only one meeting held with the Clonsaugh residents and this was in the initial phase on the 19th November 2014. There have been no further meetings and we would be a major stakeholder as the plant will be positioned only 300 meters to the nearest house. The proposed site for this plant is much too close to the residential area, schools, hotels and other local amenities.

29th November 2017

Also in the Public and Stakeholder Participation Report it notes a public information evening was held on 29th November in Northern Cross for Clonshaugh residents, yet no local people seem to know anything about this. Where was the notification posted for this? How many people attended this session? Are the recorded minutes? The consultation with areas further away from the plant seems to be much more extensive e.g. Howth, Baldoyle and Portmarnock, with several meetings with interested parties, yet it is proposed to build it 300 meters from our housing estate. The size of the plant is 13,200 square meters, how can this be deemed best practice to build it so close to a residential area? Belcamp Manor is a new housing estate being built and this will be 800 meters from the plant.

Bypassed Local Council

7. Irish Water bypassed the local council and made an application directly to An Bord Pleanála, 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 affect 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.

Vulnerable Communities


8. Not only have this plant been proposed less than 1 km to a highly populated residential area, but the entrance to this plant is opposite St. Michael's House which is day care centre for disabled children and Cara Park which is settled travelling community. Both of these are protected under Equal Status Act and deemed vulnerable and seldom have a voice when it comes to their rights. Irish Water seems to have little regard for the protection afforded under this Act. There was one meeting with Cara Park and St. Michael's House and both took place 6th June 2012 as per the Public and Stakeholder report issued in June 2018 and yet this deemed acceptable?

Tourism

9. The site is about 2kms from Dublin Airport and directly under the flight path. Ireland relies heavily on tourism and it would be great shame to do anything which might jeopardize the growth which has been achieved in this sector. Three odour control units are proposed, but gases will be released regularly into the environment. Should even one of these odour control units fail the smell from a plant this size would be awful and the first thing the tourists would smell coming out of Dublin Airport. Is this really what we want our tourists to smell?

I would ask that An Bord Pleanála to review this proposal again in light of the issues raised and concerns highlighted. I also think an Oral Hearing should be conducted in light of flawed consultation issues listed above and this might address some of the concerns raised.

Yours sincerely


Terri Gray & Paul Burke
19 Clonshaugh Heights
Clonshaugh
Dublin 17

