



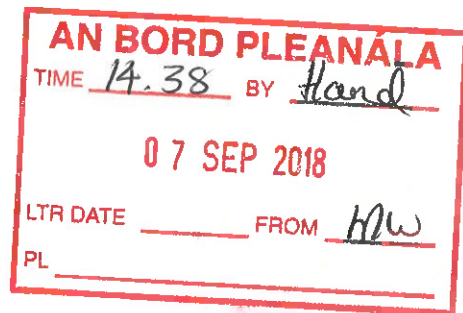
Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

An Roinn Phleanála & Forbairt Maoine  
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8  
*Oifigeach Poiblí Ainmnithe faoin Acht um Brístocaireacht a Rialáil 2015*

Planning & Property Development Department,  
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8.  
*Designated Public Official under the Regulation of Lobbying Act 2015*

T. 01 222 3319 F. 01 222 2278 [mary.conway@dublincity.ie](mailto:mary.conway@dublincity.ie)

Mr Kieran Somers,  
Executive Officer,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1



6<sup>th</sup> September 2018

Re: Submission under Section 37E(4) of the Planning and Development Acts 2000 to 2010 in relation to the proposed development of the Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility located in the Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City

An Bord Pleanála Ref No: ABP-301908-18

Dear Secretary,

Please find enclosed report in relation to the proposed development of a new waste water treatment plan and associated infrastructure located in the townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City which was considered at the City Council meeting held on 3<sup>rd</sup> September 2018.

The City Council noted the contents of Report No. 212/2018 and agreed an addendum to the report. A copy of the report presented to the City Council together with the addendum is attached for your attention.

Yours sincerely,

  
Mary Conway  
Deputy City Planner



To the Lord Mayor and  
Members of Dublin City Council

Report No. 212/2018  
Report of the Assistant Chief Executive



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

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**Submission under Section 37E(4) of the Planning and Development Acts 2000 to 2010 in relation to the proposed development of the 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**

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Please find attached the report of the Executive in relation to the proposed development of the 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

The Planning Authority has concluded that the proposed development is compliant with national and regional planning policy, the policies, objectives and development standards of the Dublin City Development Plan 2016-2022. In the event of permission being granted by An Bord Pleanála, the Planning Authority requests that the Board attach a number of conditions as set out in the end of the report.

Members of the Council may by resolution submit comments to An Bord Pleanála, which will be appended to the Executive's Report

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**Richard Shakespeare**  
**Assistant Chief Executive,**  
**Dublin City Council**  
**September 2018**

**Dublin City Council Ref: PARTX/0021**

**An Bord Pleanála Ref: ABP-301908-18**

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**Submission under Section 37E(4) of the Planning and Development Acts 2000 as amended in relation to the proposed development of the 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**

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### **Requirements of the Planning Authority**

The proposed development comprising the Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility at the Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City has been accepted as an infrastructure project and the application for the development has therefore been made to An Bord Pleanala (ABP). As per the requirements of S37E(4), Dublin City Council, in whose administrative area part of the development is to take place, namely the 600m, 1.5m diameter Connecting Sewer from the North Fringe Sewer (NFS) to the WWTP and the Access Road from existing R139, is obliged to prepare and submit to the Board a report setting out the views of the authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area. S37E(5) requires that the Chief Executive shall submit the report to members of the authority and seek the views of the members on the proposed development before submitting any report to An Bord Pleanala.

### **Description of Proposed Development and scope of this report**

The proposed development is required to meet the need for additional wastewater treatment within the Dublin area. This is a strategic need identified in National, Regional and Local strategic and planning policy documents. The new project will serve the wastewater needs of existing and future drainage catchments in the north, west and northwest areas of Greater Dublin.

The project will have the capacity to provide sustainable treatment for municipal wastewater sludge and domestic septage (waste material removed from a septic tank) from within Fingal County Council's Wastewater Treatment Plants and septage to produce a 'biosolid' end product and will utilise the bio-gas produced during the treatment process as an energy source on site.

The Project will be carried out in a single phase in the form of three construction contracts –

- a) Design Build for Orbital Sewer and Land-based outfall
- b) Design Build for Marine outfall
- c) Design Build Operate for the Wastewater Treatment Plant

The development consists of the following elements:

- Regional Wastewater Treatment Plant (WwTP), of 500,000PE capacity to be located on a 29.8ha site in the townland of Clonshagh in Fingal
- Sludge Hub Centre3 (SHC) to be co-located on the same site as the Regional WwTP
- A 13.7km length Orbital Sewer from Blanchardstown to the WwTP at Clonshagh (Clonshaugh), including an Odour Control Unit (max. 10m x 5m and 5m high vent stack) at Dubber (5.2km of a 1.4m diameter rising main and 8.5km of a 1.8m diameter gravity sewer)
- A 600m, 1.5m diameter Connecting Sewer from the North Fringe Sewer (NFS) to the WwTP
- Abbotstown Pumping Station to be located in the grounds of the National Sports Campus on a 0.4ha site
- An 11.3km length, 1.8m diameter Outfall Pipeline from the WwTP to the outfall point approximately one kilometre north-east of Ireland's Eye (5.4km land based and 5.9km marine section)
- Regional Biosolids Storage Facility (RBSF) to be located on an 11ha site at Newtown
- Access Road from existing R139, and new egress point (left-turn only) onto the Clonshaugh Road
- All associated construction compounds and ancillary work areas

The 600m, 1.5m diameter Connecting Sewer from the North Fringe Sewer (NFS) to the WwTP and the Access Road from existing R139 are partially located within the Dublin City Council administrative area. The scope of this report deals with the specifics of the elements within the City Council area in addition to demonstrating how the proposed overall development is in accordance with Dublin City Development Plan policies and objectives and the policies and objectives of the Clongriffin-Belmayne Local Area Plan 2012-2018.

## **Site Description**

The orbital sewer would run fully within the Fingal County boundary for its full length in a west-east direction from Abbotstown where a new Pumping Station would be constructed in the grounds of the National Sports Campus to the north of the M50 motorway Junction 6 with the proposed Regional Biosolids Storage Facility located in Newtown near the N2. The 13.7km orbital sewer would ultimately terminate at the new Wastewater Treatment Plant (WwTP) in Clonshagh, north of the R139 and greater than 1.5km distance from that road.

Once the wastewater has been treated it will leave the WwTP via an outfall pipeline, also fully within Fingal county which will run in a general west-east direction for 5.4km before crossing the peninsula at Portmarnock and becoming a marine based outfall pipeline off Velvet Strand which will extend 5.9km into the Irish Sea and one kilometre north-east of Ireland's Eye where outfall will then disperse.

With regard to the elements within the City Council boundary - the diversion to the North Fringe Sewer and access road - are both north of the N32 and approximately north of Cara Park. The existing site conditions are that of either cultivated farm land or, closer to the R139, idle and vegetated land holdings.

## **Planning History**

There is no planning history for this site; however, there have been a number of applications in recent years for the Ringsend Wastewater Treatment Plant including a current proposal to introduce new technology in the form of Aerobic Granular Sludge (AGS) technology and the omission of a previously approved 9km long sea outfall tunnel. The current proposal of the Greater Dublin Drainage Project is intended to alleviate some of the over capacity issues currently experienced at Ringsend.

## **Policy Context**

At European Level: the Urban Waste Water Treatment Directive and the Water Framework Directive.

At National Level:

- The National Planning Framework (adopted 29<sup>th</sup> May 2018) and the National Development Plan 2018-2027
- Irish Water Services Strategic Plan - A Plan for the future of Water Services (2015-2040);
- The National Wastewater Sludge Management Plan (2016-2041);
- The River Basin Management Plan for Ireland 2018-2021.

At Regional Level:

- the Regional Planning Guidelines for the Greater Dublin Area 2010-2022
- the Eastern-Midlands Region Waste Management Plan 2015-2021
- Irish Water Greater Dublin Drainage Strategy: Overview & Future Strategic Needs Asset Strategy May 2018

Local Planning Context: Fingal Development Plan 2017-2023, Dublin City Development Plan 2016-2022

## **Departmental Reports**

The following Dublin City Council Departments and Divisions submitted a report and their response has been taken on board as part of the Planning Authority's Report:

1. Environment and Transportation Department, Drainage Division – no objection subject to conditions
2. Roads and Streets Department, Roads and Traffic Planning Division - no objection subject to conditions

Copies of the reports received are attached as an Appendix

## **Planning Assessment:**

## Planning Policy

The European, National and Regional strategic planning context is set out in the Planning Application Report. It is stated that at a European policy level, the proposed project would ensure compliance with both the Urban Waste Water Treatment Directive and the Water Framework Directive.

At national level, the implementation of the Greater Dublin Strategic Drainage Study, through enlarging capacity in existing wastewater treatment plants (Ringsend) and providing a new treatment plant in North County Dublin - known as the Greater Dublin Drainage Project (GDD) Project is a stated goal (National Strategic Outcome 9) in the National Planning Framework. The Greater Dublin Drainage Project is listed as a specific project in the National Development Plan 2018-2027 with the stated objective to augment the existing plant in Ringsend and facilitate economic development, cater for a growing population and protect the environment.

The proposed Project aims to provide strategic, long-term sustainable wastewater drainage and treatment infrastructure that the Greater Dublin Area (GDA) requires for its continued social and economic development. The initiative involves the provision of new wastewater treatment works, a co-located sludge hub centre, pumping station, a new orbital drainage network in the northern part of the Greater Dublin Area, an Odour Control Unit (OCU), a marine outfall, and the proposed regional biosolids storage facility (at Newtown, Co. Fingal), which also forms part of the current Ringsend planning application lodged with An Bord Pleanála Ref: ABP-301798-18 (Dublin City Council Ref: PARTX/0020).

It is also stated that the proposal is in accordance with the following national strategic plans:

- Irish Water Services Strategic Plan - A Plan for the future of Water Services (2015-2040);
- The National Wastewater Sludge Management Plan (2016-2041);
- The River Basin Management Plan for Ireland 2018-2021.

At a regional level, the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 identify the proposed Project as one of ten projects listed as Critical Strategic Projects for Waste Water & Surface Water.

It is stated policy in the Eastern-Midlands Region Waste Management Plan 2015-2021 *to work with the relevant stakeholders and take measures to ensure systems and facilities are in place for the safe and sustainable management of sludges.*

Irish Water carried out a review of the Greater Dublin Drainage Strategy in May 2018 and concluded that the projected loading on the Ringsend WwTP would reach the site capacity of 2.4 million population equivalent between 2024 and 2027 depending on the actual growth realised in the catchment. The proposed development of the orbital sewer and Wastewater Treatment Plant is intended to provide additional capacity, redirecting wastewater generated by the north and northwest Greater Dublin Area away from the Ringsend WwTP and providing for future development both in the north and northwest area as well as within the city centre.

At local planning level, the Dublin City Development Plan 2016-2022 sets out policies and objectives required to achieve the Core Strategy of the plan. The proposal has been considered with regard to the Core Strategy and the policies and objectives of the current Dublin City Development Plan and in particular the dual aspirations of providing the necessary infrastructure to facilitate development while protecting and improving water quality in Dublin Bay.

### **Providing the necessary infrastructure to facilitate development**

The Development Plan identifies that the efficient and timely delivery of necessary infrastructure capacity in advance of the planned quantum of development is a prerequisite for successful urban development. Ensuring the delivery of this infrastructure in a sustainable manner, which enhances the quality of the city's environment and facilitates the sustainable economic growth and co-ordinated development of the city, is also an essential requirement.

The Plan recognises that the Dublin region is facing a number of infrastructural challenges, particularly in the supply and demand for high-quality drinking water and for wastewater treatment to provide for future population growth, addressing deterioration of the existing networks, including substandard drainage infrastructure, and encouraging water conservation and states that progressing the development of the Greater Dublin Regional Wastewater Treatment Plant, Marine Outfall and orbital sewer to be located in the northern part of the Greater Dublin Area is essential to the future growth of the Dublin region.

The main strategic issues for the current plan period are identified as: Providing necessary infrastructure and the securing of corridors for utility infrastructure to match the compact spatial pattern of development; aligning the settlement and economic elements of the core strategy with Irish Water's strategy for the development and expansion of water and wastewater infrastructure in line with the investment programme and connections policy which are subject to the approval by the Commission for Energy Regulator (CER)

The Development Plan sets out the following policies in support of Irish Water in providing, maintaining and improving drinking water and developing and improving wastewater treatment:

It is the policy of Dublin City Council:

#### **Policy S11**

*To support and facilitate Irish Water in the provision of high-quality drinking water, water conservation, and in the development and improvement of the water and wastewater systems to meet anticipated demands for clean and resilient water supplies and wastewater requirements for the city and region, all in accordance with the recommendations set out in the 'Greater Dublin Water Supply Strategic Study' and 'The Greater Dublin Strategic Drainage Study'.*

#### **Policy S12**



*To support and facilitate Irish Water to ensure the upgrading of wastewater infrastructure, in particular the upgrading of the Ringsend Wastewater Treatment Plant, and to support the development of the Greater Dublin Regional Wastewater Treatment Plant, the North Docklands Sewage Scheme, the Marine Outfall and orbital sewer to be located in the northern part of the Greater Dublin Area to serve the Dublin region as part of the Greater Dublin Strategic Drainage Strategy.*

It is the Policy of Dublin City Council:

- *SI1: To support and facilitate Irish Water in the provision of high-quality drinking water, water conservation, and in the development and improvement of the water and wastewater systems to meet anticipated demands for clean and resilient water supplies and wastewater requirements for the city and region, all in accordance with the recommendations set out in the 'Greater Dublin Water Supply Strategic Study' and 'The Greater Dublin Strategic Drainage Study'.*
- *SI2: To support and facilitate Irish Water to ensure the upgrading of wastewater infrastructure, in particular the upgrading of the Ringsend Wastewater Treatment Plant, and to support the development of the Greater Dublin Regional Wastewater Treatment Plant, the North Docklands Sewage Scheme, the Marine Outfall and orbital sewer to be located in the northern part of the Greater Dublin Area to serve the Dublin region as part of the Greater Dublin Strategic Drainage Strategy.*
- *SI3: To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exists or will become available within the life of a planning permission.*

It is an Objective of Dublin City Council:

- *SIO1: To support Irish Water in the implementation of the 'Water Services Strategic Plan – A Plan for the Future of Water Services'.*
- *SIO2: To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realise the development objectives of this plan.*

The proposed drainage system is also supported by policy set out in the Clongriffin-Belmayne Local Area Plan 2012-2018

#### 14.0 Infrastructure and Services Strategy

*To deliver the necessary infrastructure to ensure adequate capacity to accommodate the quantum of development envisaged by the local area plan, and to ensure that the delivery of this infrastructure enhances the quality of the areas environment and facilitates the sustainable economic growth and co-ordinates development of the North Fringe Area.*

#### 14.3 Wastewater Network and Treatment

*The North Fringe LAP is part of the North Fringe Sewer catchment which ultimately discharges to the Regional Waste Water Treatment Plant at Ringsend via the North Fringe Sewer. At the time of preparing this LAP Ringsend Waste Water Treatment Plant is operating at its design capacity. Dublin City Council is currently finalising proposals to*

increase the capacity of the plant from 1.7 million PE (population equivalent) to 2.1 million PE, with a target completion date of 2015.

In 2010, the Environmental Protection Agency granted a Discharge Licence to Dublin City Council under the Waste Water Discharge (Authorisation) Regulations (2007). Dublin City Council must comply with the conditions of this discharge licence. The ultimate objective of this licence is to restrict discharges from the wastewater network into rivers and waters. The 2007 Regulations also require that the Water Service Authority satisfies itself that there is drainage capacity available in the network prior to granting a planning permission for any development. This requirement will apply to all developments within the LAP

A major new trunk sewer (the North Fringe Sewer) was constructed in 2004 to serve most of the North Fringe Lands. It was designed to allow development occur in this area and is the main outlet for foul flows for most of the area under study. There are a number of branch sewers off the main sewer. The most significant branch sewers were on the Malahide Road and Grange Road.

The lands within the proposed LAP area are all part of the original design catchment for the North Fringe Sewer, and hence, at a strategic level, there is adequate capacity to facilitate development within this area. Any hydraulic deficiencies in parts of the older foul network are fairly localised and will be addressed as part of the normal development management process.

#### Greater Dublin Drainage Initiative

The initiative aims to provide strategic drainage infrastructure that the Greater Dublin Area (GDA) requires to continue to develop, both socially and economically. The initiative involves consultation with the local authorities across the region including Dublin City Council and involves the provision of:

- A new wastewater treatment works;
- A marine outfall, and
- A new drainage network in the northern part of the GDA.

The initiative is important to ensure that future growth in the region can be accommodated with properly planned services and infrastructure capacity. It is an important project in order to facilitate employment, social progress and economic growth in the Dublin Region, hand-in hand with the improvement and protection of water quality in line with the WFD.

Under this project, three sites are emerging as preferred site options for the proposed Regional Wastewater Plant in North Dublin including a site at Clonsillaugh (Option 3) which is adjacent to the boundary with Dublin City Council and within the area of wider context for the Clongriffin-Belmayne (North Fringe) LAP. A public consultation process has been undertaken for these options and a planning process, including EIS and environmental assessments will be required for the eventual site and design.

#### Objective ISO8

Dublin City Council will engage in consultations with the Greater Dublin Drainage Initiative to ensure that the optional locations emerging for the proposed Regional Wastewater Plant in North Dublin including any EIS and any environmental assessment done do not negatively

*impact on Dublin City Council neighbourhoods, including the implementation of policies and objectives of the Clongriffin-Belmayne (North Fringe) LAP.*

### **Natura 2000**

The Habitats Directive and the Birds Directive list habitats and species which are considered to be important and in need of protection. These sites are referred to as European Sites. Sites designated for wild birds are termed Special Protection Areas (SPAs) and sites designated for natural habitat types or other species are termed Special Areas of Conservation (SACs). The network of European sites is referred to as Natura 2000.

The Natura Impact Statement prepared by the applicant identifies the following SPA and SAC designated areas in the vicinity of the proposed development:

Baldoye Bay SPA  
Ireland's Eye SPA  
Lambay Island SAC  
Malahide Estuary SPA  
Malahide Estuary SAC  
South Dublin Bay and River Tolka Estuary SPA  
North Bull Island SPA  
Howth Head Coast SPA  
Rogerstown Estuary SPA  
Rogerstown Estuary SAC  
Dalkey Island SPA  
North Dublin Bay SAC  
South Dublin Bay SAC  
Howth Head SAC  
Skerries Islands SPA  
Rockabill SPA  
Rockabill to Dalkey Island SAC.

The City Council considers that the submitted Natura Impact Statement is generally satisfactory in terms of identifying the relevant Natura 2000 sites and the potential adverse impacts on the integrity of designated Natura 2000 Sites along the Dublin coastline in view of their conservation objectives. Mitigation measures are proposed for either or both the construction and operation stages for some of these sites but the NIS also identifies that no further mitigation is required for the following sites other than the implementation of measures prescribed in the Construction Environmental Management Plan and surface water management plan for construction activities associated with all elements of the project:

1. North Dublin Bay SAC;
2. North Bull Island SPA;
3. Malahide Estuary SPA;
4. Malahide Estuary SAC;
5. Howth Head Coast SPA;
6. Howth Head Coast SAC;
7. South Dublin Bay and River Tolka Estuary SPA;

8. Rogerstown Estuary SAC;
9. Rogerstown Estuary SPA;
10. Lambay Island SPA;
11. Dalkey Island SPA;
12. Skerries Islands SPA; and
13. Rockabill SPA

The Natura Impact Statement therefore concludes that the development would have no undue impacts on any Natura 2000 sites within the Dublin City Council boundary.

### **Zoning and other designations**

The 600m, 1.5m diameter Connecting Sewer from the North Fringe Sewer to the WwTP and the access from the existing R139 are located on lands zoned Z14 – *To seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and "Z6" would be the predominant uses.* Within the zoning objective public service installations are a permissible use.

The proposed access road off the R139 is identified on the Zoning Map B as being a road scheme to be delivered. The proposed Connecting Sewer and Access Road are therefore consistent with and fully compliant with the stated zoning objective for the area.

### **Impact on amenity**

Dublin City Council is satisfied that the elements of the proposed development which fall within the Council boundary would not have any excessive or undue impact on the amenities of the area. The orbital sewer, pumping station, biosolids facility, Wastewater Treatment Plant and outfall pipeline are stated as being designed to protect existing amenities in terms of odours and noise and the WwTP will be designed to be unobtrusive and set into the landscape. Dublin City Council is satisfied with the commitments made by the applicant to this end and that the development would not lead to undue or excessive impacts on the amenities of the area.

### **Roads and Traffic**

The Roads and Traffic Planning Division has assessed the proposal and is generally satisfied with the proposed access from the R139 and requests the following conditions to be attached to any grant of permission:

1. *Any alterations to the existing public road network including the provision of works required to facilitate the new left turn junction providing access only into the proposed Wastewater Treatment Plant, all new road markings and any other works required for the development shall be agreed in writing with the Environment and Transportation Department at Dublin City Council prior to commencement of any development. All costs to facilitate these works shall be at the expense of the developer.*
2. *A detailed Construction Management Plan to include a detailed traffic management plan for the construction phase of the development shall be submitted for written agreement with Dublin City Council.*

3. *Construction and operation related HGV trips will comply with Dublin City Councils HGV Management Strategy. All HGVs during construction and operation shall use the M50 and R139 to access the Wastewater Treatment Plant . No HGVs shall use local roads to access or egress the site.*
4. *Where abnormal load movements arise, an abnormal load permit will be made to Dublin City Council and where possible any abnormal load movements shall be restricted to evening or night-time.*
5. *During construction and operation phase, traffic to and from the subject site shall operate as to minimise the impact on the local community.*
6. *The developer shall be obliged to comply with the requirements set out in the Code of Practice.*
7. *All costs incurred by Dublin City Council, including any repairs to the public road and services necessary as a result of development, shall be at the expense of the developer. Work in the public road may only be carried out by Dublin City Council.*

#### **Environment and Transportation Department, Drainage Division**

Drainage Division has assessed the proposal and is generally satisfied with the content of the application and requests the following conditions to be attached to any grant of permission:

- a) There is no objection to this development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from [www.dublincity.ie](http://www.dublincity.ie) Forms and Downloads).
- b) Records of public surface water sewers are indicative and must be verified on site. The Developer must carry out a comprehensive site survey to establish all public surface water sewers that may be on the site. If surface water infrastructure is found that is not on public records the Developer must immediately contact Dublin City Council's Drainage Division to ascertain their requirements. Detailed "as-constructed" drainage layouts for all diversions, extensions and abandonment of public surface water sewers; in both hard and soft copy in an approved format are to be submitted by the Developer to the Drainage Division for written approval. Please refer to Section 5 of the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.
- c) A connection from this development to the public surface water sewer network will only be granted when the developer has obtained the written permission of the Drainage Division and fulfilled all the planning requirements including the payment of any financial levies. All expense associated with carrying out the connection work are the responsibility of the developer. Developers are not permitted to connect to the public surface water network system without written permission from the Drainage Division. Any unauthorised connections shall be removed by the Drainage Division at the developer's expense. A licence will be required from the Drainage Division to allow the connection work to be carried out. Permission of the Roads Dept must also be obtained for any work in the public roadway.
- d) Discharge of groundwater to the public drainage network may be permitted during construction subject to a trade effluent discharge license being obtained from Drainage Division Council as required by the Local Government (Water Pollution) Acts, 1977 and 1990.
- e) The development shall incorporate Sustainable Drainage Systems in the management of surface water, with a minimum requirement of a 3 stage treatment

approach. Full details of these shall be agreed in writing with Drainage Division prior to commencement of construction.

f) The mitigation measures as outlined in the Surface Water Management Plan in relation to trenchless construction shall be implemented.

## **Conclusion**

The overall development of the new sewer and treatment facilities is fully supported by Dublin City Council as seen in the policies and objectives of the Development Plan and the Clongriffin-Belmayne Local Area Plan. Provision of the new Drainage Project will support ongoing development within the Clongriffin-Belmayne area as well as within the wider North Central/North West administrative area in the longer term as part of the catchment of the new Orbital Sewer. The Ringsend Wastewater Treatment Plant is presently significantly overloaded and additional capacity is critically necessary which would be greatly aided by the current proposal. The development of the Greater Dublin Drainage Project has been under design, public consultation, stakeholder consultation and detail design for a considerable number of years and is acknowledged by Dublin City Council as critical infrastructure for the ongoing sustainable development of the Greater Dublin Area.

In addition the reduction in demand upon the Ringsend WwTP as a result of the new capacity in the GDDP will allow for that facility to accommodate further treatment demand from existing and future developments in the Dublin City Council administrative area such as Docklands Strategic Development Zone (SDZ), Grangegorman (SDZ) and Dublin city centre. The GDDP will also allow for the Ringsend WwTP to reduce/eliminate breaches of the EPA licence and the Urban Wastewater Treatment Directive and to allow that facility to upgrade and increase capacity and to build up headroom to provide resilience in the event of a breakdown at the facility.

With regard to compliance of the GDDP with European, national and local policies and requirements it is considered that, as the development is functionally within the administrative area of Fingal County Council and that An Bord Pleanála is the competent planning authority, it is for those authorities to comment on such matters but it would appear to Dublin City Council that the application generally accords with all such requirements in addition to being consistent with, and heavily supported by, the statutory Dublin City Development 2016-2022 and the Clongriffin-Belmayne Local Area Plan 2012-2018.

With regard to the specific works which would be carried out within the administrative area of Dublin City Council – the 600m 1.5m Connecting Sewer from the North Fringe Sewer to the Wastewater Treatment Plant and the Access Road from existing R139 – the relevant departments within Dublin City Council have assessed the proposals and are satisfied with these elements.

In the event that An Bord Pleanála is satisfied that the proposed development should be approved, the Planning Authority requests that the permission be conditioned to ensure that the development is carried out in accordance with the proper planning and sustainable development of the area and suggested conditions are included in the reports attached in the appendix.

## **APPENDIX: Internal Dublin City Council Reports**

1. Environment and Transportation Department
2. Roads and Traffic Planning Division Report

## **1. Environment and Transportation Department**

### **ENGINEERING DEPARTMENT – DRAINAGE DIVISION**

Our ref: - MT/dd

02/08/2018

Application Number PARTX/0021

Location Located in County Fingal and with a 60m section of pipeline in Dublin City.  
Applicant Irish Water Colvill House, 24-26 Talbot Street, Dublin 1  
Date Lodged  
Application Type Strategic Infrastructural Development  
Agent Jacobs Engineering Ireland Limited Merrion House, 4, Merrion Road, Dublin 4  
Planner

Drainage Division, Engineering Department-  
Report to Dublin Planning Officer

-Drainage Report prepared on the Strategic Infrastructure Project titled 'Greater Dublin Drainage Project', in relation to the proposed works within DCC boundaries. These works include the diversion of the north fringe (NF) sewer and construction of an entrance road to the proposed WWTP.

-There is no objection to this development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from [www.dublincity.ie](http://www.dublincity.ie) Forms and Downloads).

-Records of public surface water sewers are indicative and must be verified on site. The Developer must carry out a comprehensive site survey to establish all public surface water sewers that may be on the site. If surface water infrastructure is found that is not on public records the Developer must immediately contact Dublin City Council's Drainage Division to ascertain their requirements. Detailed "as-constructed" drainage layouts for all diversions, extensions and abandonment of public surface water sewers; in both hard and soft copy in an approved format are to be submitted by the Developer to the Drainage Division for written approval. Please refer to Section 5 of the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.

-A connection from this development to the public surface water sewer network will only be granted when the developer has obtained the written permission of the Drainage Division and fulfilled all the planning requirements including the payment of any financial levies. All expense associated with carrying out the connection work are the responsibility of the developer. Developers are not permitted to connect to the public surface water network system without written permission from the Drainage Division. Any unauthorised connections shall be removed by the Drainage Division at the developer's expense. A licence will be required from the Drainage Division to allow the connection work to be carried out. Permission of the Roads Dept must also be obtained for any work in the public roadway.

-Discharge of groundwater to the public drainage network may be permitted during construction subject to a trade effluent discharge license being obtained from Drainage Division Council as required by the Local Government (Water Pollution) Acts, 1977 and 1990.



-The development shall incorporate Sustainable Drainage Systems in the management of surface water, with a minimum requirement of a 3 stage treatment approach. Full details of these shall be agreed in writing with Drainage Division prior to commencement of construction.

-The mitigation measures as outlined in the Surface Water Management Plan in relation to trenchless construction shall be implemented.

\_\_\_\_\_  
For Executive Manager (Engineering)

\_\_\_\_\_  
Date

## **2. Roads and Traffic Planning Division Report**

It is recommended that the following conditions be attached to permission if granted:

1. Any alterations to the existing public road network including the provision of works required to facilitate the new left turn junction providing access only into the proposed Wastewater Treatment Plant, all new road markings and any other works required for the development shall be agreed in writing with the Environment and Transportation Department at Dublin City Council prior to commencement of any development. All costs to facilitate these works shall be at the expense of the developer.
2. A detailed Construction Management Plan to include a detailed traffic management plan for the construction phase of the development shall be submitted for written agreement with Dublin City Council.
3. Construction and operation related HGV trips will comply with Dublin City Councils HGV Management Strategy. All HGVs during construction and operation shall use the M50 and R139 to access the Wastewater Treatment Plant . No HGVs shall use local roads to access or egress the site.
4. Where abnormal load movements arise, an abnormal load permit will be made to Dublin City Council and where possible any abnormal load movements shall be restricted to evening or night-time.
5. During construction and operation phase, traffic to and from the subject site shall operate as to minimise the impact on the local community.
6. The developer shall be obliged to comply with the requirements set out in the Code of Practice.
7. All costs incurred by Dublin City Council, including any repairs to the public road and services necessary as a result of development, shall be at the expense of the developer. Work in the public road may only be carried out by Dublin City Council.



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

Chief Executive's Office,  
Civic Offices, Wood Quay, Dublin 8.

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**Mr Richard Shakespeare  
Assistant Chief Executive  
Planning & Property Development  
Block 4 Floor 3  
Civic Offices  
Dublin 8**

5<sup>th</sup> September 2018

Our Ref: SW/DNR/0309

Dear Richard,

I wish to inform you that Dublin City Council at the Monthly Meeting held on 3<sup>rd</sup> September 2018 having considered Report No. 212/2018 of the Assistant Chief Executive (R. Shakespeare) - Submission under Section 37E(4) of the Planning and Development Acts 2000 to 2010 in relation to the proposed development of the 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 adopted the following resolution:

**"That Dublin City Council notes the contents of Report No. 212/2018 and agrees the following addendum to the report –**

**We believe that the proposed sewerage treatment plant at Clonshaugh will be seriously injurious to residential amenity in the City Council area. We believe that the size and scale of the project is not in keeping with proper planning and development in that it will undermine future housing development and job creation and retention in the area. The project will be injurious to local wildlife and remove productive farmland, GAA club and pitches. It will contravene the Habitats Directive and by its nature and size will offend against the well established EU Proximity Principle. There are also very serious concerns about outflow into Dublin Bay into Malahide Estuary which could have a negative impact on the UNESCO Biosphere in Dublin Bay and Bull Island."**

Councillors also made the following observations at the meeting of the 3<sup>rd</sup> September 2018 to be included in the submission:

- a. The proposed WWTP is huge, and detrimental to the amenity of residents of large suburbs within Dublin City a short distance away. The proposed WWTP should be in north Fingal (there were nine sites considered) away from residential areas.

- b. This large scale project will have serious construction impacts on local communities.
- c. Residents do not trust the assertion that there will be no adverse odours outside the site.
- d. Traffic, both during construction and in operation will put a huge strain on the local road network.
- e. Employment would be welcome.
- f. The Board should employ experts to analyse the environmental impacts, rather than accept the environmental reports as given.
- g. Dublin as a region needs to face up to its responsibilities to provide Waste Water Infrastructure in a number of locations rather than just Ringsend.
- h. Proposed WWTP is so large that if something went wrong the results would be catastrophic – much better to have more, smaller plants.
- i. During summer there were 2 raw sewage overflows into Dublin Bay. Lack of trust that this will not happen again.
- j. This is a much needed piece of regional infrastructure to take the Dublin Metropolitan area beyond 2.4mpps in accordance with the National Development plan.

**Deirdre Ni Raghallaigh**  
**Senior Executive Officer**