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An Bord Pleanála Oral Hearing

Irish Water

Greater Dublin Drainage

AN BORD PLEANÁLA

TIME 10:05 BY

21 MAR 2019

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Brief of Evidence

Population and Human Health: Population

Richard Hamilton

Qualifications and Role on the Proposed Project

- 1 My name is Richard Hamilton. I am a chartered Town Planner with over 20 years' experience working in Ireland. I hold a Master of Science (MSc) degree in Town and Country Planning from Heriot-Watt University, Edinburgh and a Bachelor of Arts (BA (Hons)) degree in Geography and History from University College Dublin. I am a member of the Irish Planning Institute and the Royal Town Planning Institute. I am a former Chairperson of RTPI Ireland (2004) and I am an associate member of the Institute of Place Management.
- 2 I am currently a Director in Future Analytics Consulting (FAC). FAC provides consultancy services in Planning, Research and Economics with extensive experience in research, analytical reports and studies (analysis of spatial data) covering a diverse mix of topics, from future needs studies and demographic analysis to economic renewal feasibility reports, and from EU research projects on regional resilience (including socio-economic, physical/environmental aspects) to retail and housing models. FAC has an expertise in the preparation of Tourism plans and strategies including the Dún Laoghaire-Rathdown Tourism Strategy and Marketing Plan (2017-22) and the Limerick Tourism Strategy and Marketing Plan (2017-23).
- 3 My relevant experience in Population assessment for projects includes the Glenamuck Road District Road Scheme Environmental Impact Assessment Report (EIAR) for Dún Laoghaire-Rathdown County Council, the College Green Public Plaza EIAR (2018) for Dublin City Council and the Poolbeg West EIAR (current). I have also undertaken a range of relevant projects including the Dublin Docklands Social Infrastructure Audit for DDDA/Dublin City Council (2015); the Dublin Housing Strategy Co-ordination Paper 2015 for the Housing Agency, Integrated Impact Assessments (which include Sustainability Appraisal and Equality Impact Appraisal) on behalf of Greater London Authority between 2012 and 2015 accompanying Opportunity Area Planning Framework documents (OAPFs) for Old Oak and Park Royal OAPF (2015), White City OAPF January 2013 and Croydon OAPF (2012). I am responsible for the preparation of the Chapter 6 Population in Volume 3 Part A of the EIAR.

Relevant Environmental Impact Assessment Report References

- 4 In order to properly address the issues raised in submissions and observations made to the Board which raised issues in relation to Population, this statement briefly outlines the likely significant effects and mitigation measures proposed in respect of those issues.
- 5 It is also pertinent to note that the requirements for EIARs after the 2014 EIA Directive (as distinct from EIS under the 2011 EIA Directive (codification)) has placed emphasis on Population and Human Health. Indeed, the European Commission Guidelines, Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU) refer to Population and Human Health as one of the environmental factors that had been expanded in the 2014 amendments to the Directive under Article 3 (section 1.3.1 and box 12 of the EC Guidelines). This additional emphasis is also noted in the EPA's (2017) Draft Guidelines on the information to be contained in the Environmental Impact Assessment Reports (section 3, 2.29).
- 6 Accordingly, the impact of the GDD Project on Population is addressed in Section 6.4 and 6.5 in Chapter 6 in Volume 3 Part A of the EIAR. Chapter 6 assesses the potential impacts on the human environment and quality of life in the general vicinity of the Project. The assessment considers attributes and characteristics associated with population, community and residential settlement, economic activities and employment, community infrastructure, and tourism and recreation. Figures 6.1 to 6.10 in Volume 5, part A of the EIAR provide mapping on the location of residential buildings, land use zoning, economic activity, commercial clusters, health care facilities, schools, tourism, public amenities, and sporting and community infrastructure in proximity to the proposed Wastewater Treatment Plant (WwTP) and the alignment of the proposed orbital sewer route and outfall pipeline route.

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- 7 The stakeholder and community consultation (Section 6.2.3 in Chapter 6 in Volume 3 Part A of the EIAR) highlighted potential concerns regarding issues of odour from the proposed WwTP, environmental impacts, community gain, amenity, recreation and construction disturbance. Potential local economic impacts were also duly considered including fisheries, agricultural sectors and affected landowners.
- 8 Mitigation measures have been proposed to minimise adverse impacts on residents and businesses, including the appointment of a Community Liaison Officer (CLO). The role of the CLO will be to maintain an open, transparent and positive relationship with members of the public, resident's groups, businesses and any other organisations affected by the construction works. The CLO will work closely with the local community to ensure that information on the nature and duration of all works is provided and that all efforts to address any issues and concerns are made in a timely fashion. The CLO will act as a contact point for local stakeholders including residents associations, sporting clubs, schools, businesses and other community organisations in the area.
- 9 A Fisheries Liaison Officer will also be appointed to minimise potential impacts on commercial and recreational fishing. Their role is similar to the CLO, but focused on engaging with and communicating with fishermen and marine based operators preceding and during off-shore work periods. A dedicated Construction Phase Traffic Control and Management Plan will be implemented to mitigate against potential traffic delays; and allow for alternative access arrangements; alternative and replacement sporting and leisure facilities and rehabilitation work at affected sites.
- 10 There is potential for disruption to social and commercial activity, some sporting and recreational facilities arising from the Construction Phase of the Proposed Project, primarily because of temporary disturbance to the local minor roads. The EIAR concludes that with the implementation of appropriate mitigation measures, no significant residual impacts are anticipated to occur. Table 6.7 of Chapter 6 of the EIAR summarises the residual impact (i.e., post mitigation) as follows:
- Restrictions on accessibility to Coolbrook Cottages, properties at Silloge Green and Dubber Cottages – Slight Negative Brief Residual Impact;
 - Access to Craobh Chiaráin GAA club - Neutral and Imperceptible Residual Impact;
 - Access to a waste recycling facility on Coolmine Road - Slight Negative Brief Residual Impact;
 - Part of the national cross-country track (NSC Ireland) lies within the pipeline wayleave and will be temporarily unavailable –Moderate Negative Temporary Residual Impact;
 - Impact to Kinsealy Equine Centre as a result of pipeline construction – Moderate Negative Temporary Residual Impact.
- 11 In the long term, the EIAR considers the Proposed Project will have a significant and positive impact by enabling the future development and expansion of population and residential housing to take place in Fingal and the Greater Dublin Area. There will also be positive impacts on social and commercial activity, for example in the creation of new employment opportunities, the increase in demands for materials and services and the economic benefits that will consequently arise both during the Construction Phase and the Operational Phase.

Response to Issues Raised in Submissions

- 12 A number of submissions or responses made to the Board raised issues in relation to Population, covering subjects including impacts on local communities, tourism, recreation and economic activities. The main issues raised are addressed in turn below.

Submissions Relating to Impacts due to Proximity of the Proposed WwTP

- 13 Approximately 50 submissions¹ from individuals, community groups and public representatives (including Darragh O'Brien TD, Denise Mitchell TD, Finian McGrath TD, Sean Haughey TD, Councillor Tom Brabazon, Sean Haughey TD and Richard Bruton TD) have made reference to the proximity of the proposed WwTP to the local community, citing an anticipated impact on amenities such as schools, hotels, parks, sports clubs, playgrounds, homes and gardens. This group of submissions reflected a concern that normal everyday activities would primarily be affected by odour emanating from the WwTP which would impact on the liveability of an area or the enjoyment of outdoor spaces. For sports clubs, there is an expressed concern that they will be affected by proximity to the WwTP because of the outdoor nature of their activities.
- 14 Several submissions (approximately 4) considered that the proposed WwTP would affect the local community due to its scale, arguing that the separation distance to receptors is inadequate for such a large plant. The point has also been presented that smaller, more local plants were to be built, this could be coupled with education at local level regarding sewage treatment and disposal. A submission from elected members of Dublin City Council suggests that the proposed WwTP is 'huge and detrimental' to the amenity of residents of large suburbs within Dublin City area to the south. Some 45² submissions argue that the value of residential property would be negatively affected, with arguments again citing the influence of odour on populations, visual presence or geographic proximity.

Response:

The impact of the proposed WwTP has been fully assessed in the EIAR and application documentation, having regard to its proximity to populations, communities, facilities and amenities. Impacts relating to Air Quality are addressed in Chapter 14 Air Quality, Odour and Climate. No impacts are predicted to arise as a result of odour. It has been concluded that there will be no negative impacts on the residents of large suburbs within Dublin City. Figure 1³ (attached) illustrates the location of the sensitive receptors in 100m bands set back from the perimeter of the WwTP. It clearly shows that there are no sensitive receptors located in close proximity to the WwTP boundary.

- 15 It is considered that communities in the study area may experience some temporary impacts as a result of the Construction Phase (Section 6.6.2 in Chapter 6 in Volume 3 Part A of the EIAR). In general, however, the residual impacts identified in these chapters are considered to be Slight and Not Significant with the implementation of the mitigation measures⁴.

¹ Submissions listed at section 7.2.1, para. 216 of Greater Dublin Drainage Project: Response to Submissions, January 2019

² Ibid, section 7.7.3, para. 280

³ Drawing submitted with planning application Sensitive Receptors within 1 KM – Clonshagh, Alternative Site Assessment and Route Selection Report

⁴ The impact of the Proposed Project on Population is addressed in Section 6.4 and 6.5 in Chapter 6 in Volume 3 Part A of the EIAR. Tourism, Public Amenities and Community Infrastructure for the proposed WwTP is assessed in Section 6.5.4 and for the proposed outfall pipeline routes in Section 6.6.4.

Recreation and Sporting facilities

- 16 The EIAR also addresses the impacts on a number of specific amenities, namely Emsworth House, Belcamp Hutchinson, Craobh Chiaráin GAA club, Darndale and Belcamp Parks and Cumann Peil Innisfail. The impact on these sites is assessed to be Neutral and Imperceptible, with the implementation of the proposed mitigation measures, where required. In other words, measures such as the permanent re-routing of the access road at Craobh Chiaráin will ensure access to the club grounds remains undisrupted during the works and the clubs can continue their normal activities. The only exception is at Emsworth House, which it is predicted will experience a Moderate, Negative Temporary impact as a result of construction works taking place on the grounds and the presence of temporary construction compound no. 7 on the lands immediately adjacent to the house's northern boundary. However, it is notable that the use of the construction compound is temporary (typically not more than 6 months) at that location.

Scale

- 17 The EIAR appraisal takes full account of the scale of the facility as described in detail in the EIAR. The EIAR finds that there will be no negative impact on adjacent population areas arising from the Construction or Operational Phases. It is, therefore, considered that the scale of the facility has no impact on Population and no negative impact will arise that would require to be ameliorated by reduction in scale of the proposed WwTP.

Property

- 18 Having regard to the submission on property value, there is an assumed link between the development of the WwTP and negative effects such as odour without due regard to the evidence in the EIAR, which asserts there is no such direct or indirect impact. No impacts are predicted to arise as a result of odour⁵. It is also noted that the EIAR finds that the Proposed Project will not give rise to a negative visual impact⁶ as the landscaping and design approach will allow the WwTP site to visually read as a business campus. Therefore, for the purposes of environment assessment the pertinent consideration is that there will be no negative impacts on residential amenity. Indeed, the WwTP will facilitate future residential development in the project's catchment serviced with significantly improved waste water treatment infrastructure. Given that there will be no additional significant impacts on the community during the Operational Phase, it is not considered that there will be any negative impact that would give rise to a diminution of residential property values arising from the Proposed Project.

Submissions Relating to Impacts on Tourism

- 19 The issue of Tourism was raised in many submissions from various perspectives. Several submissions raised a general issue that Fingal as a tourist destination was threatened by the Project and that the Project would have a negative impact on tourism in the area. Approximately 26⁷ submissions from groups, individuals and representatives (Denise Mitchell TD & Others, Councillor John Lyons and Senator Lorraine Clifford-Lee) suggested that Tourism associated with Dublin Bay's status as a UNESCO biosphere will be impacted by the long-term implication of the proposed WwTP on the identity of the area and Portmarnock Beach (which holds Blue Flag status).
- 20 It has also been submitted that Tourism will be threatened due to the presence of noxious fumes deterring visitors to the area and Ireland in general. Two submissions stated that the proposed WwTP's proximity to Dublin Airport could jeopardise growth in aviation, and that if the odour controls fail, tourists arriving at Dublin Airport would be subjected to the odours from the proposed WwTP.

⁵ Impacts relating to Air Quality are addressed in Chapter 14 Air Quality, Odour and Climate.

⁶ Impacts relating to visual impact are addressed in Volume 3 Part A Chapter 12, Landscape and Visual.

⁷ Submissions listed at section 7.2.2, para. 232 of Greater Dublin Drainage Project: Response to Submissions, January 2019

- 21 21⁸ submissions from individuals, groups or public representatives have made the case that there will be a negative impact on Tourism arising from a negative perception, image or publicity associated with the proposed WwTP.
- 22 Approximately 7⁹ submissions (including Councillor Tom Brabazon) note that the Clayton Hotel and Hilton Hotel are popular tourist spots and make the case that the Proposed Project will have a negative impact resulting from odour and the proximity of the proposed WwTP. Dalata Hotel Group (Clayton Hotel) submit that the Proposed Project will result in undue detrimental impacts on the operation and amenity of the established hotel.
- 23 Fáilte Ireland has stated that it is essential that the quality, character and distinctiveness of our landscape be protected, as this is one of the main tourist attractions in Ireland. Fáilte Ireland noted that there will be an impact from the loss of public access to Velvet Strand during construction. 2 submissions stated that the location of proposed temporary construction compound no. 10 will have a negative impact as the pathway to Velvet Strand will be disrupted. This access is important as it is used by swimmers and tourists to Portmarnock all year round. In addition, the submissions were concerned with potential impacts to this sand dunes. It is also submitted that there would be a negative impact on those accessing and using the Golf Links Hotel and the two Golf Clubs in Portmarnock due to access restrictions and traffic caused during the Construction Phase.

Response:

- 24 Tourism, public amenities and community infrastructure are addressed in Section 6.5.4 in Chapter 6 in Volume 3 Part A of the EIAR. Figure 6.10 in Volume 5 Part A of the EIAR comprehensively maps tourism, public amenities, sporting and community infrastructure. The EIAR comprehensively identifies tourism facilities. The tourism resource and potential of Fingal and, in particular, the coast is fully acknowledged, highlighting the coastline within the study area has a number of recreational features including coastal walks, beaches including Velvet Strand at Portmarnock and the Burrow Beach, Sutton, which are popular for water based recreational activities such as swimming, sailing and other water related activities. Sea angling and fishing are also popular activities along the Fingal coastline with angling and fishing carried out from beaches, harbours, piers and boats close to the shore and offshore. The EIAR notes the area between Ireland's Eye and Lambay Island is popular for sailing enthusiasts with local regattas, national sailing championships and other international sailing events taking place. No tourism amenities/facilities of note were identified within the study area of the proposed WwTP. The EIAR concludes that the Project is not anticipated to give rise to adverse impacts on tourism attractions.

Dublin Airport

- 25 Dublin Airport is the primary international access point nationally and to the region. As construction will not have a noticeable impact on access to and from Dublin Airport, there will be a Neutral and Imperceptible Impact on the accessibility of the region or the local tourism base¹⁰. It is noted that daa have submitted an observation in support of the Proposed Project. Having regard to Chapter 12, Landscape and Visual, in Volume 3 Part A of the Environmental Impact Assessment Report (EIAR), it is noted that the WwTP represents the most visible permanent aspect of the Project. However, the response has been to seek to blend and buffer the site within its surroundings - providing hedgerows within the WwTP site and extensive planting around the perimeter. In effect the WwTP site will visually read as a business campus, with no discernible characteristics when viewed from the air, that could be interpreted as having any negative impact on Tourism.

⁸ Ibid, section 7.3.1, para. 265

⁹ Ibid, section 7.2.3, para. 239

¹⁰ Population is addressed in Volume 3, Part A at section 6.4 and 6.5 of the EIAR. Tourism, Public Amenities and Community Infrastructure for WwTP is assessed at section 6.5.4. Figure 6.10 comprehensively maps Tourism, Public Amenities, Sporting and Community Infrastructure.

Hotels

- 26 Section 6.3.6 in Chapter 6 in Volume 3 Part A of the EIAR notes the location of the Clayton Hotel on Clonshaugh Road and the location of the Carlton Hotel near Collinstown Cross in its assessment. The Clayton is c.600m from the landscaped boundary of the WwTP and as noted above (with reference to Chapter 12 of the EIAR) does not have a visual impact. The location of The Portmarnock Hotel and Golf Links are also noted in Section 6.3.7. As noted above, having regard to finding of Chapter 14 Air Quality, Odour and Climate of the EIAR (no impacts are predicted to arise as a result of odour that would affect the amenity or air quality for the hotels' guests or employees. There is, therefore, no potential for negative impacts on the operation of hotels, and tourist and visitor activity arising from the interrelationship of Population and Odour. It is considered that there will be no negative impact on the operation and amenity of the Clayton Hotel. With reference to visual impact (Chapter 12 of EIAR) the WwTP site in terms of design and boundary planting will not give rise to any impacts on hotels.

Portmarnock Beach/Velvet Strand

- 27 The maintenance of the status of Portmarnock Beach and the UNESCO status of Dublin Bay are clearly important considerations. The EIAR¹¹ fully recognises that the coast is important for recreational amenity. The EIAR also notes that proposed temporary construction compound no. 10 will encompass part of the public car park lands on the Golf Links Road. There will be no impacts on the golf course. A section of the Velvet Strand Beach car parking area will be unavailable to the public for the duration of the marine related works – this area is located in the unpaved section of the carpark (a green area in which there are no formally marked out car parking spaces but on which an informal extension of the car park has occurred over time). It is estimated that approximately 12 spaces for cars in this area would be unavailable during the Construction Phase. However, the public pedestrian pathway will be unaffected and access to the beach will be maintained at all times. This will have a Moderate Negative Temporary Impact in terms of accessibility and amenity to the access to Velvet Strand Beach (as outlined in Section 6.6.4 in Chapter 6 in Volume 3 Part A of the EIAR. Mitigation measures proposed for the Construction Phase of the marine works seek to reduce, as far as practicable, any adverse impacts on the local sailing community. However, it is likely that Slight Negative Temporary Impacts on marine recreation will arise in this section of the shoreline.

Image/Perception

- 28 Having regard to comments on perception, it is noted that while subjective, social concerns are relevant to the assessment of the significance of an impact, but they must be weighed appropriately with objective, scientific impacts. As such, it is important that the assessment distinguishes between subjective opinions on the impacts of the Project, as distinct from the subjectivity itself (perception or image). For example, odour will not be detectable beyond the site boundary which allows the objective, scientifically quantifiable assessment to conclude there will be no impact on nearby communities. Therefore, perception or image still needs to relate to evidence rather than being evidence itself. The most pertinent consideration is the conclusion of the EIAR is that the impact of the project will be positive and of tremendous benefit to the city and in particular the project catchment.

Submissions Relating to Impacts on Economic and Commercial Interests

- 29 Approximately 28¹² submissions (including Darragh O'Brien TD and Senator Lorraine Clifford-Lee) state that there will be a detrimental impact to vulnerable tourism and water recreation industries. It is also submitted that water should be treated to the highest level and there are concerns about the impact on water quality,

¹¹ *Ibid*

¹² Submissions listed at section 7.2.4, para. 244 and 245 of Greater Dublin Drainage Project: Response to Submissions, January 2019

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especially at Howth and the knock-on impact on fisheries and tourism. It is stated that vulnerable businesses (sea fishing and water recreation industries) will suffer if raw sewage is released in the water.

- 30 Malahide is currently at 'A' status, as monitored by the Sea Fisheries Protection Authority which means that fish are fit for the live export market. Several submissions note that should this status be reduced, the fisheries industry will be significantly devalued. It is highlighted that the razor clam fishing industry provides employment and sustains local maritime communities by supplying a multimillion-euro market for Ireland.
- 31 Approximately 30¹³ submissions (including Councillor Alison Gilliland) stated that there will be negative impacts on local businesses including local shops resulting from odours emanating from the proposed WwTP. One submission stated that several local businesses (including restaurants, cafes, a shopping centre) within 300m of the proposed WwTP will be affected by construction.
- 32 Two submissions stated that there will be disruption to the local community during the Construction Phase and that there will be annoyance caused to patients, staff and families attending Connolly Hospital and St. Francis' Hospice during the Construction and Operational Phases.

Response:

- 33 In respect of fisheries, the Section 6.6.3 in Chapter 6 in Volume 3 Part A of the EIAR¹⁴ notes that dredging for the proposed outfall pipeline route (marine section) installation will take place over the period March to October (though it is likely that the appointed contractor(s) will mobilise between June and September). A safety advisory zone of 250m either side of the centreline will be maintained during the Construction Phase for health and safety purposes. The construction works will be on a phased basis to ensure that a large commercial fishing channel area will remain open at all times. While the offshore works are temporary in nature, there will be a Slight Negative Temporary Impact on the commercial fisheries sector in the locality as a result of the temporary loss of some trawling ground during the Construction Phase.
- 34 The proposed outfall pipeline route (marine section) is to discharge treated wastewater approximately 1km north-east of Ireland's Eye. The proposed discharge is designed to comply with Directive 2006/7/EC of the European Parliament and of the Council of 15 February 2006 concerning the management of bathing water quality and repealing Directive 76/160/EEC (Bathing Water Directive) and Council Directive 91/271/EEC concerning urban waste water treatment (Urban Wastewater Treatment Directive) and this is addressed in full in Chapter 8 Marine Water Quality and Chapter 9 Biodiversity (Marine) in Volume 3 Part A of the EIAR. Having regard to section 9 of the Response to Submissions document, (January 2019) document, it is highlighted that a number of scenarios have been modelled which provide confidence that a failure event will not occur due to the extensive fail-safe systems described (including power backup, monitoring and storage capacity) systems described – there will not be a system failure, and in unlikely event of such an occurrence this would not have a significant negative impact on the receiving environment. Furthermore, as presented in the evidence by Mr. Alan Berry and further analysis completed by Marja Aberson (a marine ecologist specialising in shellfish), Irish Water has determined that it will apply additional UV treatment to all effluent discharges. Mr. Berry's evidence highlights that this represents 'an abundance of caution' to ensure the protection of the shellfish.
- 35 The impact on commercial fisheries is therefore anticipated to be Neutral and Imperceptible, once the proposed outfall pipeline route (marine section) is operational. As a mitigation measure, a Fisheries Liaison Officer will be appointed by Irish Water to minimise potential impacts on commercial and recreational fishing.

¹³ *Ibid*, section 7.2.5, para. 251

¹⁴ Population and Human Health: Population is addressed in Volume 3, Part A at section 6.4 and 6.5 of the EIAR. Economic Activity for the proposed WwTP is assessed at section 6.5.3 and the proposed Orbital sewer Route and Outfall pipeline routes at section 6.6.3.

- 36 The assessment outlined in Section 6.5.3 in Chapter 6 in Volume 3 Part A of the EIAR finds that non-agricultural or non-horticultural businesses in the immediate vicinity of the proposed WwTP, including the Clayton Hotel, agricultural and horticultural uses and industrial premises located in Clonshaugh Business and Technology Park, are likely to incur a Slight Negative Temporary Impact as a result of the Construction Phase, due to potential traffic restrictions and the temporary reduction in amenity.
- 37 In terms of local business, Section 6.5.3 in Chapter 6 in Volume 3 Part A of the EIAR finds¹⁵ that there may also be an indirect Slight Positive Short-term Impact from increased use of local services and retail outlets (located at Circle K Service Station (formerly Topaz)) during the Construction Phase. Section 6.6.3 in Chapter 6 in Volume 3 Part A of the EIAR (Economic Activity) demonstrates that businesses located in Kinsealy and the R107 Malahide Road area will not be adversely affected in terms of accessibility as trenchless construction methods will be used to cross the road resulting in a Neutral and Imperceptible Impact. The presence of proposed temporary construction compound no. 7 on the R107 Malahide Road at a site adjacent to the southern boundary of a retail centre with garden centre, fruit and vegetable shop, café and a craft butchers is likely to give rise to a Slight Negative and Temporary Impact arising from construction related traffic and transfer and/or storage of construction materials. It is important to note that construction compound will be temporary, utilise localised traffic management control (under construction management plan), use timber hoarding fence and at this location the proposal to tunnel under the road will reduce disturbance.
- 38 Section 6.6.2 in Chapter 6 in Volume 3 Part A of the EIAR considers that communities in the study area may experience some temporary impacts as a result of the Construction Phase. However, the proposed orbital sewer route and Abbotstown pumping station will not impact adversely on the existing healthcare facilities in the locality, notably Connolly Hospital and St. Francis' Hospice in Blanchardstown. The impact is assessed as Neutral and Imperceptible.
- 39 Once fully operational, the Project will support economic growth and development, particularly in the catchment areas of Fingal, north Dublin, south-east Meath and north-east Kildare, as the infrastructural capacity to cater for new economic developments in these areas is greatly increased. As such, the operation of the Proposed Project is considered to have a Significant Positive Long-term Impact on both the local economy of the catchment area it serves, and the economy of the wider Dublin area and the GDA.
- 40 It is noted that daa welcomes and supports the Proposed Project as an enabler of economic growth in the Fingal and Dublin City Area. This is reflective of the overall findings of the EIAR, that the Project is of significant benefit to Fingal and the city generally.

Submissions Relating to Community Benefit

- 41 Approximately 14¹⁶ submissions make reference to the issue of community benefit (including Councillor John Lyons and Richard Bruton TD) and suggest that there is a lack of local community benefit or gain.
- 42 It is argued that levels of economic deprivation in the areas of Darndale and Belcamp should be addressed by a community benefits scheme (to serve local community youth and sport, fund local community projects and a local liaison committee) that forms part of the application. It is submitted that the location of the proposed WwTP in an area that is disadvantaged socially and economically is contrary to the National Spatial Strategy.

¹⁵ Economic Activity for the proposed WwTP is assessed in Section 6.5.3 and the proposed Orbital sewer Route and Outfall pipeline routes in Section 6.6.3 in Volume 3 Part A of the EIAR. Figure 6.7 in Volume 5 Part A identifies commercial clusters within the Proposed Project Study Area

¹⁶ Submissions listed at section 7.3.2, para. 268 of Greater Dublin Drainage Project: Response to Submissions, January 2019

Response:

- 43 The GDD Project is a significant public project and infrastructure investment that supports the implementation of objectives of the National Planning Framework (NPF). The Project is referred to on page 37 of the NPF as a key future growth enabler for Dublin, to ensure 'that water supply and wastewater needs are met by new national projects to enhance the city and the wider Greater Dublin Area's water supply and increase wastewater treatment capacity'. This is also addressed in the Planning Evidence presented by Lara Gough and Section 2 of the Greater Dublin Drainage Project: Response to Submissions, January 2019 document.
- 44 The impact of the Project on Population is addressed in Section 6.4 and 6.5 in Chapter 6 in Volume 3 Part A of the EIAR. Community and residential settlement is assessed in Section 6.5.2. The assessment on community and residential settlement (Section 6.5.2), and tourism, public amenities and community infrastructure (Section 6.5.4) are noted above.
- 45 Under section 6.8 Mitigation Measures in Chapter 6 in Volume 3 Part A of the EIAR it is confirmed that a Community Liaison Officer (CLO) shall be employed during the Construction Phase of the Proposed Project to maintain an open, transparent and positive relationship with members of the public, groups and organisations affected by the works. The CLO is effectively tasked to inform people what is happening as part of the construction process at what time and in what location. The CLO will coordinate with all stakeholders to ensure the effective implementation of the Community Benefits Scheme including the delivery of the wastewater education zone at the proposed WwTP. This was referred to in the evidence of Mr. Dan O'Boyle, is referenced in Table 2 (Planning) of Section 2 of the Response to Submissions (January 2019) document and was part of the planning application documentation submitted in June 2018. It seeks to leverage the significant public expenditure so as to maximise the benefits for communities in proximity to the Proposed Project.
- 46 No negative environmental impacts on the communities identified in the submissions arising from the operation of Project are predicted.

Issue – Impact on the Traveller Community

- 47 Five submissions submitted that there is a large community of Travellers in the area and their community will be impacted (220 families approx. 450 individuals) due to the close proximity of the proposed WwTP to vulnerable communities (St. Michael's House and Cara Park (Traveller Community)).

Response:

- 48 Section 6.3.1 in Chapter 6 in Volume 3 Part A of the EIAR assessed that the closest residential development schemes to the proposed WwTP are Cara Park, within approximately 850m to the south (of WwTP), and Baskin Cottages, approximately 900m north of the proposed WwTP site boundary. Figure 6.3 illustrates Residential Buildings within the Proposed Project Study Area in Volume 5 Part A of the EIAR. Due to the distance of the settlement at Cara Park from the Proposed Project, no negative impacts are predicted in respect of this issue. In this context, there is no discernible difference between the proximity of the community at Cara Park and other residential communities in the vicinity, as due to the separation distance from the proposed facility, none will experience a negative impact arising from the operation of the WwTP.

Conclusion

- 49 In conclusion, it is highlighted that the EIAR incorporated comprehensive analysis of the catchment area population and the economic activities located therein. The stakeholder and community consultation process identified important considerations affecting this assessment. This included potential impacts on landowners and important economic activities. The submissions have highlighted issues regarding potential impacts on

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tourism, recreation and amenity (particularly at Portmarnock Beach) and the concerns of residential communities in relation to the potential impacts on residential amenity and daily activities.

- 50 A central feature of submissions on Population is the interrelation of the impact arising from odour and environmental impacts (quality waste treatment). The EIAR process provides for an integrated assessment of the impacts of the Project. The EIAR provides a comprehensive assessment of the proposed WwTP, proposed orbital sewer route and proposed Abbotstown pumping station study areas. It is clear from the EIAR (and from evidence to be tendered at this oral hearing) that the Project will not give rise to odour impacts. Therefore, a broad range of negative impacts presented by objectors to the Proposed Project in respect of tourism, economic activity and residential amenity will simply not arise.
- 51 The EIAR does acknowledge that the Construction Phase will give rise to temporary slight negative impacts in some locations. There is potential for disruption to social and commercial activity arising from the Construction Phase, primarily because of temporary disturbance to the local minor roads. However, the comprehensive mitigation strategy will ensure that such impacts are temporary and restricted in terms of spatial impact so no significant residual impacts are anticipated to occur. In other words, the considered and careful management of the construction phase activity is an integral element of the implementation strategy so what local communities and stakeholder are fully aware of works (and the control and management of all aspects of the works) in their area as they occur through the appointed Community Liaison officer.
- 52 In the long term, the Project will have a positive impact by enabling the future development and expansion of population and residential housing to take place in Fingal and the GDA. There will also be positive impacts on social and commercial activity, for example in the creation of new employment opportunities, the increase in demands for materials and services and the economic benefits that will consequently arise – both short and long-term during the Construction Phase and Operational Phase.



Figure 1: Distance from WwTP boundary to sensitive receptors

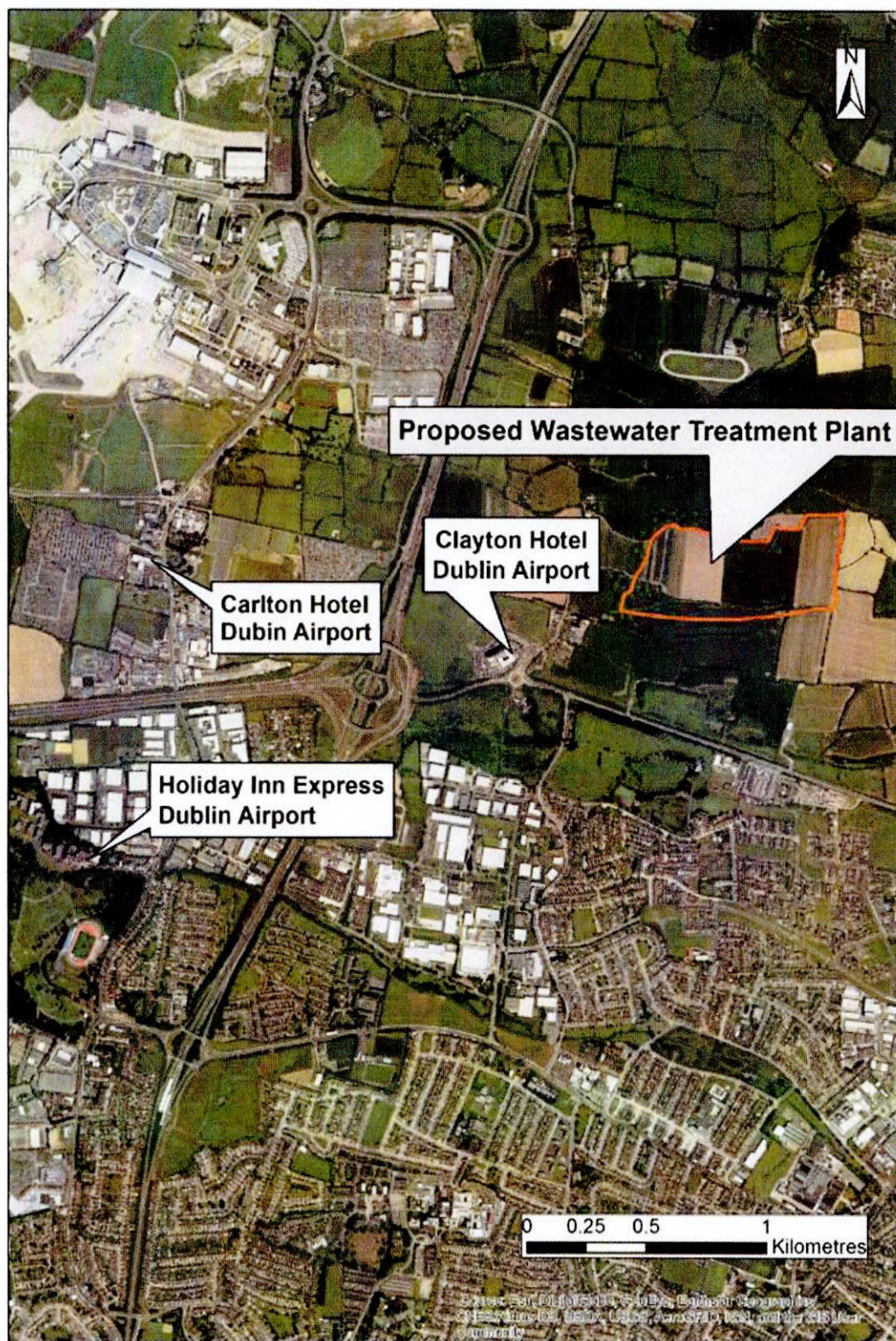


Figure 2: Proposed WwTP and SHC Surrounding Area Overview