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An Bord Pleanála Oral Hearing

Irish Water

Greater Dublin Drainage

Brief of Evidence

Consultation

Dan O'Boyle

AN BORD PLEANÁLA	
TIME <u>1pm</u>	BY _____
20 MAR 2019	
LTR DATED _____	FROM _____
PL _____	

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Qualifications and Role on the Proposed Project

- 1 My name is Dan O'Boyle. I am a Director with RPS Project Communications with 18 years' professional experience in communications and consultation. I hold a Bachelor's degree in Communications Studies and a Master's degree in Public Relations.
- 2 RPS Project Communications is a specialist team of stakeholder engagement and consultation experts. We advise on best practice consultation to inform and enhance the delivery of national and international projects and programmes.
- 3 Since 2011, we have worked collaboratively with Fingal County Council, with Irish Water, with our technical and environmental colleagues, with the public, and with all stakeholders to support and inform the delivery of the Greater Dublin Drainage Project.
- 4 In developing an application for permission for the Proposed Project, Irish Water, and previously Fingal County Council, consulted with members of the public and all interested stakeholders in accordance with the following legislative, planning, and best practice requirements:
 - Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters;
 - Environmental Impact Assessment Directive (both 2011 codification and 2014);
 - Planning and Development Acts; and
 - Best practice principles on public participation including the *An Bord Pleanála Guide to Public Participation in Strategic Infrastructure Development*.
- 5 The consultation objectives were that the public were given early and effective opportunities to participate in the project development process, to inform the identification of a proposed solution to meeting Dublin's wastewater treatment requirements, and to participate in the planning and environmental decision-making procedures when all options are open and before a decision on the request for consent is taken.
- 6 The project team committed at the outset to identify the public concerned, to provide information on the project and to provide early opportunities for the public to participate in the decision-making process. The project team sought to ensure that all communication and consultation was accessible, meaningful and accountable.
- 7 In delivering on these commitments over an eight-year pre-planning period, the Proposed Project consultation process has pushed the boundaries of best practice public participation for a major infrastructural development.

Responding to the Statutory Consultation

- 8 In its Oral Hearing Agenda, the Board has requested that Irish Water addresses issues in relation to consultation arising on the application for permission and, in particular, to respond to issues raised in the submissions and observations made to the Board in that regard.
- 9 For ease of reference, it should be noted that Chapter 3 of *Irish Water's Response to Submissions document (January 2019)* identifies those submissions made to the Board which raise issues or queries on the consultation process and contains Irish Water's substantive written responses to the issues raised.

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- 10 Consultation or communications were raised as topics in 50 of the 174 submissions received during the statutory consultation and the issues raised in those submissions are considered and responded to hereafter.

Issue – Consultation and Communications Process

Submission:

- 11 As listed in Section 3.2.1 of the Response to Submissions Report, 36 submissions received from public representatives, community organisations and individuals, queried the consultation process, and, how consultation and engagement was conducted with communities in proximity to the Proposed Project.
- 12 Some of the feedback contended that there was a lack of communication with local communities in proximity to the proposed infrastructure.

Response:

- 13 In responding to this issue, I will briefly outline the consultation process and activities that were implemented in order to generate widespread awareness and high levels of public participation in the Proposed Project.
- 14 The *Greater Dublin Drainage Public and Stakeholder Participation Report* (GDD PSPR), submitted with the planning application details the extensive consultation and stakeholder engagement undertaken between 2011 and 2018 and the manner in which feedback provided has informed the decision-making process, including at the site selection, environmental investigation and preliminary design stages.
- 15 At the outset, a comprehensive communications and consultation programme for the project was developed. This programme set out multiple consultation opportunities as a central component of the project development process.
- 16 A project roadmap (as shown on screen) was produced and published at the outset in 2011 and was updated as the project progressed. The purpose of the roadmap was to provide an indicative timeline showing the phases of development and the aligned opportunities for public input. A copy of the project roadmap is contained at Figure 1-1 of the GDD PSPR and has been available on the project website since 2011.
- 17 In generating awareness of the project, a launch was organised by Fingal County Council which included a media announcement in April 2011.
- 18 A wide-ranging stakeholder identification and mapping process was conducted at the outset and updated ahead of each consultation phase. Public representatives and community groups within the project study area were written to at the beginning of the project and were updated throughout the pre-planning period.
- 19 A website - greaterdublindrainage.ie - was established at launch and regularly updated. The website has been a central information resource for anyone interested in the project. All technical reports, consultation reports, project updates, Frequently Asked Questions, press releases, roadmaps, infographics and the project video have been available on the website. To date, more than 38,000 people have accessed project information from of the website.
- 20 An information service (phone/email/post) has operated daily since 2011 and has been used by thousands of stakeholders to access information on the Proposed Project.

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- 21 34 information events have been held locally within the project area including at Abbotstown, Blanchardstown, Balbriggan, Baldoyle, Coolock, Northern Cross, Swords, Malahide, Portmarnock and Howth.
- 22 Half of the events (17 no.) were held in areas in proximity to the proposed treatment plant. The events were usually held on weekdays between 2pm and 8pm. Seven events were held on Saturdays to facilitate access. The events were advertised in advance in national and local media and via press release, interviews, email notifications, and social media updates. More than 2,000 people were registered as having attended the public information events between 2011 and 2018.
- 23 196 stakeholder meetings/briefings were organised by the project team in the pre-planning phases with a wide range of stakeholders including with landowners, residents' associations, community organisations, environmental interest groups, public representatives, businesses, local authorities, utilities and other interested stakeholders.
- 24 In response to early consultation feedback, three study tours, with free transportation, were arranged to Shanganagh WwTP in 2013 and 2014 for residents, landowners and public representatives. These tours provided a useful opportunity for local stakeholders to experience a modern wastewater treatment plant in operation.
- 25 At each key stage of project development, presentations were made to Fingal County Council, to Dublin City Council and on a regular basis to the Howth-Malahide and North Central Area committees. Presentations were made to Kildare County Council and Meath County Council in the earlier phases of development with regular updates issuing thereafter. Briefings were also held for national elected representatives and all project updates were issued to all public representatives in the greater Dublin area.
- 26 The extensive consultation and engagement programme undertaken for the Proposed Project has included:
- 7 focused periods of non-statutory public consultation between 2011 and 2018. These informed the site selection and environmental assessment processes for the new wastewater treatment plant, the associated drainage network, and the regional biosolids storage facility; and
 - 4 statutory consultations including EIS scoping consultations (2013 & 2017), a Foreshore Licence Application consultation (2014-2015), pre-application discussions with the Planning Authority (2013-2018) and statutory public consultation on the planning application as held under the direction of the Board (2018).
- 27 In addition, there has been ongoing stakeholder engagement since 2011. The project team has been available to meet with all interested stakeholders at all stages and will continue to be so.
- 28 The consultation and engagement programme resulted in 34,551 submissions being received.
- 29 All submissions were recorded, categorised, reported, reviewed, and responded to by the appropriate technical and environmental experts as part of the project development process. As noted in paragraphs 30 - 32, four consultation reports and four consultation response reports were produced and published throughout the pre-planning period. These reports have resulted in significant changes to the proposed solution as documented in Section 7 of the *Public and Stakeholder Participation Report*.
- 30 The issues raised in the feedback received were acknowledged in the following consultation reports which were published on the project website and put on public display at local libraries and civic offices:
- *Constraints Consultation Report published in August 2011*

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- *Preliminary Screening Outcomes Report, Consultation Report, published in April 2012*
- *Emerging Preferred Sites and Routes Report, Consultation Report, published May 2012*
- *Final Preferred Site and Route Report and Issues to be Considered in the Environmental Impact Statement, Consultation Report, published in December 2013.*

- 31 These reports acknowledged the issues raised and the information provided by members of the public and stakeholder organisations including on local constraints and features within the study area and other issues.
- 32 The consultation reports and accompanying submissions were then shared with the relevant technical and environmental experts for their consideration and response.
- 33 Response Reports for the first, second and third public consultations were published in the technical reports at the next stage of project development. These are:
- *Preliminary Screening Outcomes, Consultation Response Report, published May 2012*
 - *Emerging Preferred Sites and Routes, Consultation Response Report, published November 2012*
 - *Final Preferred Site and Route, Consultation Response Report, published in June 2013.*
 - *Responses to the issues raised during the fourth consultation are contained in the Environmental Impact Assessment Report which forms part of the planning application, published in June 2018.*
- 34 It is important to acknowledge that most of the submissions received during the site's assessment phase, while accepting the need for adequate wastewater treatment, were objections to the siting of the proposed WwTP. This is also acknowledged in the published consultation reports which are available to download from the project website greaterdublindrainage.ie.
- 35 The environmental issues raised including on air quality, odour, noise, human health, water quality and other issues have been responded to in the published consultation response reports and in the Environmental Impact Assessment Report which will be further discussed in the coming days.

Issue – Consultation and Engagement between 2014 - 2018

Submission:

- 36 Several submissions queried the level of public information and engagement for the Proposed Project during the environmental investigation and assessment period from 2014-2018.

Response:

- 37 During this period, the project team continued to adopt a proactive approach to public and stakeholder engagement as described in Chapter 4 of the GDD PSPR. Awareness of the project was maintained during this period through holding 18 public information events, issuing 14 project updates, and organising and attending regular briefings with community groups, public representatives, local authorities and other stakeholders.
- 38 Three focused consultations, supported by local public information events, were held in 2017 to inform the identification of a preferred site for the Regional Biosolids Storage Facility. These were:

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- Stage 1 – February – March 2017 – Consultation on study area and constraints;
- Stage 2 – May – June 2017 – Consultation on potentially suitable sites; and
- Stage 3 – August – October 2017 – Consultation on preferred site and Environmental Impact Assessment Report & Natura Impact Statement scoping report.

- 39 Open days, advertised in national and local media in advance, were held at venues close to each identified site option including at Saggart, Newpark (x 2 no.) and Dunboyne. A stakeholder list was created and project updates were issued to all identified and subscribed stakeholders.
- 40 499 no. submissions were received during the RBSF site selection consultations. All public and stakeholder feedback was reviewed and considered and consultation reports were produced and published on the RBSF webpage on the Irish Water website and notified to all RBSF and Proposed Project stakeholders via project update emails. These reports form appendices to the planning documentation for the Proposed Project.
- 41 In November 2017, a public information campaign was undertaken by Irish Water for the Proposed Project. Again, this activity was not required by law but was undertaken to maintain awareness of the Proposed Project and to provide additional opportunities for engagement with the project team. The campaign provided over six months advance notification of the anticipated timeline for submitting a planning application for the Proposed Project.
- 42 The campaign included three public information events in November 2017 at Portmarnock (21st), Abbotstown (27th), and Northern Cross (29th). These events were advertised in advance in national and local media and via a newsletter mailout to 11,000 homes and businesses across north Dublin. The newsletter was issued to all addresses within a 1.5km radius of the proposed treatment plant, pumping station and biosolids storage facility and within 500m of the orbital sewer pipeline.

Issue – Consultation with Vulnerable Stakeholders

Submission:

- 43 Several submissions queried how the project team has consulted with vulnerable stakeholders in proximity to the proposed WwTP including with the St. Michael's House organisation, which provides services to people with intellectual disabilities, and with private nursing homes located at Stockhole Lane and at Northern Cross.

Response:

- 44 An early consultation meeting took place with the management of St. Michael's House in June 2012. Further engagement took place with the management of St. Michael's House in relation to air and noise monitoring surveys in July 2015, in January 2016 and in June 2017.
- 45 In addition, all project updates were issued to all subscribed organisations including St. Michael's House. As noted in November 2017, a project newsletter containing information on the proposed project, the timescale to planning and details of the public information events was issued to all addresses in proximity to the proposed project.

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Issue – Consultation with the Traveller Community

Submission:

- 46 Several submissions queried how the project team has consulted with the Traveller Community.

Response:

- 47 An early consultation meeting took place with representatives of TravAct - the north Dublin Traveller advocacy and support organisation - in June 2012. A number of submissions were received from residents of Cara Park to the sites assessment consultations in 2012 and 2013. The issues raised were acknowledged in the consultation reports published and responded to in the consultation response reports published at the next stage.
- 48 As noted, 34 advertised public information events were held locally between 2011-2018 and 19 updates were issued along with a newsletter mailout to all homes and businesses in proximity to the proposed infrastructure.
- 49 The project team has been and continues to be available to engage with all stakeholders at public information events, via the telephone/email service or at pre-arranged briefings and meetings.

Issue – Consultation and Engagement with Stakeholders in Coastal Areas

Submission:

- 50 Three submissions queried how consultation was conducted with stakeholders in Howth and in other coastal areas in relation to the proposed marine outfall.

Response:

- 51 As per Section 3 and Section 4 of the GDD PSPR, engagement with stakeholders in coastal areas of north Dublin took place during the alternative sites assessment (2011-2013) and continued during the environmental investigations phase (2014-2018).
- 52 Recent activities have included holding three series of public information events at Howth, Baldoyle and Portmarnock in July 2014, July 2015 and November 2017. Press advertising in national and local media and project updates were used to promote the information events in advance.
- 53 Ahead of the commencement of the marine investigations in July 2015, information on the project was issued proactively to all identified community stakeholders in Howth listed on the Fingal Community Network List and direct door-to-door outreach by the project team was undertaken with businesses and organisations on West Pier, Howth.
- 54 Engagement with marine leisure (diving, kayaking and sailing organisations), fishing (commercial fishing and seafood processors) and statutory stakeholders (including the Department of Agriculture, Food and the Marine and the Sea Fisheries Protection Authority) was undertaken at arranged meetings including at Howth in July 2015 and in April 2018.
- 55 Individual meetings and engagement with community associations and businesses in Portmarnock, Baldoyle, Sutton and Howth and other stakeholders with an interest in the marine environment has been undertaken on an ongoing basis since 2011 and the project team continues to be available to meet with all interested stakeholders.

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Issue – Community Gain

Submission:

- 56 Nine submissions received raised the issue of community benefit/gain. Some submissions contended that there is no community gain associated with the proposed development while others suggested that community gain should provide youth and sport supports in areas in proximity to the proposed infrastructure.
- 57 In its report, Fingal County Council has acknowledged the appropriateness of the GDD Community Benefits Scheme as proposed by Irish Water and has further requested a community gain fund.

Response:

- 58 In addition to its many inherent benefits, Irish Water recognises that the delivery of the Proposed Project presents opportunities for benefits to accrue locally during construction and operation.
- 59 We have reviewed and considered the feedback provided by members of the public and other interested stakeholders throughout all of the consultations to date relating to community gain.
- 60 In response, Irish Water has proposed a GDD Community Benefits Scheme which is designed to leverage the significant public expenditure associated with the project, so as to maximise the benefits for communities in proximity to the proposed infrastructure.
- 61 A detailed Community Needs Analysis Study was undertaken by RPS on behalf of Irish Water. This study provided a factual basis for understanding and evaluating the social, economic and environmental needs of communities in proximity to the proposed project.
- 62 Following a socio-economic and demographic analysis, a detailed community infrastructure audit was undertaken within the study area. The results of these two phases of research were considered in combination with the feedback on community gain as provided by members of the public and other stakeholders during the various consultations since the start of the project. Priorities for social, economic and environmental development were then identified and assessed. The research findings suggest that initiatives which deliver economic (employment/enterprise), educational or environmental benefits would be most beneficial to communities in proximity to the proposed project.
- 63 Irish Water's commitments, as set out in the GDD Community Benefits Scheme and as summarised in Table 2 of the Response to Submissions Report, include: a social procurement initiative to provide local employment opportunities for new entrant employees/job seekers. Providing opportunities for SMEs and social enterprises to benefit from the delivery of the infrastructure. A Permanent Wastewater Education Zone to be located at the treatment plant. And supports for local projects that seek to enhance or protect the local built or natural environment.
- 64 The proposed community benefits scheme provides a fair and proportionate benefit for the effects associated with developing this vitally important piece of regional wastewater infrastructure.

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Response to Specific Issues Raised in Observers' Submissions

65 Chapter 3 of the *Irish Water's Response to Submissions* January 2019 document provides responses by Irish Water to a number of other specific issues raised in observer's submissions including:

- Site Notices at Clonsaugh and Howth;
- Accessibility of the Planning Application and Statutory Consultation;
- Public Information Event held at the Hilton Hotel, Northern Cross on 29 November 2017;
- A model of the proposed wastewater treatment plant;
- Information issued on the treatment processes to be installed at the new WwTP; and
- A query relating to the proposed project timeline.

Conclusion - How Consultation has Informed and Influenced the Proposed Project

66 Chapter 7 of the GDD PSPR details how consultation feedback over the past eight years has informed the development of the Proposed Project.

67 The non-statutory and statutory consultations and engagement undertaken for the Proposed Project has resulted in 34,551 submissions.

68 The feedback provided has resulted in significant actions and enhancements to the proposed project including:

- Following early feedback, provided during the Constraints Consultation in 2011, the project team undertook to identify potential site locations which would allow for a 300m buffer zone from sensitive receptors. This is substantially in excess of the 100m minimum distance from odour producing units recommended in the Fingal Development Plan;
- Following the initial consultations (including early engagement with Dublin Airport Authority and other local stakeholders), the project team proposed that all treatment tanks and units at the new facility will be fully covered. This has significant benefits in terms of odour management;
- On foot of feedback from the farming community, a specialist agronomist was engaged at an early stage to conduct a detailed assessment of potential impacts on agriculture and horticulture within the study area which informed the sites assessment process;
- Following consultations with the fishing community, with the Irish Whale and Dolphin Group, with the National Parks and Wildlife Service and with the Sea Fisheries Protection Authority, a range of surveys were undertaken to provide multi-annual data on the marine environment. This has enabled the project team to propose appropriate construction methodologies and schedules which avoid, reduce and offset potential impacts;
- Alternative pipeline construction methodologies have been proposed where feasible, including trenchless techniques/micro-tunnelling, in order to avoid or minimise construction related impacts;

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- Changes to the route of the proposed orbital sewer and outfall pipeline were made, where feasible, following consultations with landowners. This was to minimise impacts on their landholdings where possible;
- In response to suggestions received during consultation, additional public information events and study tours to other wastewater treatment plants were held for community stakeholders. A project overview video was also produced following a suggestion from a member of the public;
- In response to consultation feedback, as we have already seen, a project-specific Community Benefits Scheme has been proposed to deliver economic, educational and environmental benefits for local communities in proximity to the proposed infrastructure; and
- In response to the most recent statutory consultation, Irish Water has proposed, as per Section 148 of the Response to Submissions Report, that a Community Liaison Officer will be appointed for the construction phase to act as a direct point of contact for the local community and to avoid and resolve any construction related issues expediently.

69 In conclusion, there has been proactive, wide-ranging consultation and engagement throughout the pre-planning stages of the Proposed Project. Significant awareness of the project was raised and maintained. Multiple opportunities for public and stakeholder participation were provided and publicised. Feedback was sought, acknowledged, considered and acted upon. Public and stakeholder participation has been a central component of the project development process and has resulted in significant changes and enhancements to the proposed project solution.

70 Irish Water is fully committed to continuing its proactive engagement with all stakeholders throughout the construction and operation of the Proposed Project which aims to deliver the wastewater treatment capacity needed to serve the people of north Dublin and to support the sustainable development of the region.

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Appendix 1 – Relevant Figures

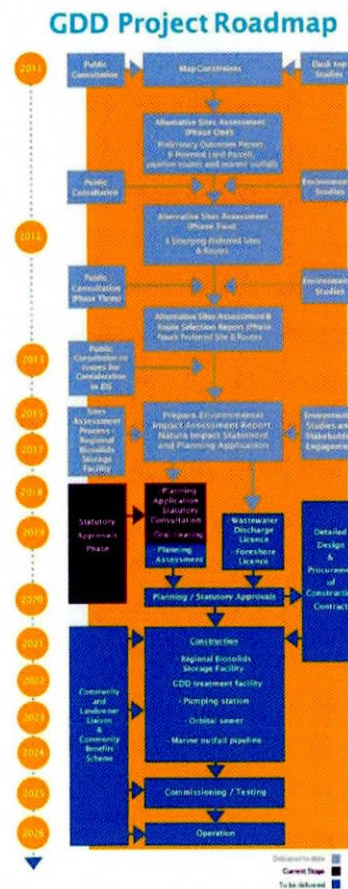
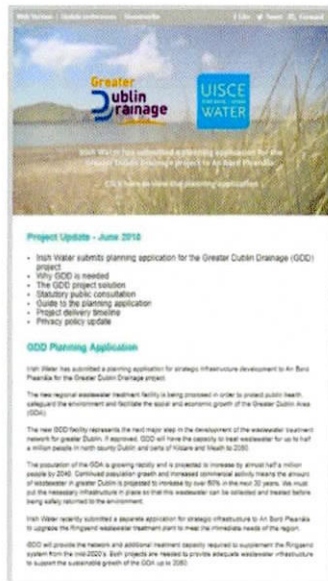


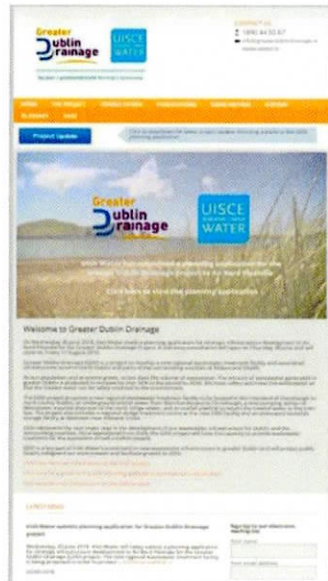
Figure 1 Project Roadmap

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Communications Tools



Project Update



Website



Infographic

All materials available at www.greaterdublindrainage.ie

Figure 2 Communications Tools

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Figure 3 Consultation