

An Bord Pleanála, Oral Hearing Case No. ABP-301908

Madam Inspector, Ladies and Gentlemen.

(F) (52)

AN BORD PLEANALA	
TIME _____	BY _____
26 MAR 2019	
LTR DATED _____	FROM _____
PL _____	

I am Eamonn Hart , a resident of Clonshaugh since 1974.

My objections are as previous and as listed.

Because Dublin Bay is a designated UNESCO Biosphere area since 2015, consisting of three Zones, Transition, Buffer and Core zones. The proposed building of this Huge Sewage Treatment Plant in the Clonshaugh area and with the outfall at Irelands Eye it raises concerns as the entire project is within the designated area of all three of the above zones.

Should Dublin Bay Biosphere committee be notified as to the proposed siting of the Sewage treatment plant within the Biosphere if so I did not see them listed, is it an oversight. It may not be necessary to notify them as the four Dublin councils have representatives who sit on the Biosphere committee, can they sit on the committee given there maybe a conflict of interest with Fingal council involved. Please can this be clarified if they need to be notified officially as per 37E(3)(C) .

At a presentation meeting in the Hilton hotel Northern Cross on the 29th November 2017, maps with site and plant outlines were small and not to scale, with no reference points except road names. It contained no existing buildings so it was hard to judge what impact it would have on the area with regard to the size of the site and the plant itself. information on the proposed plant was not offered freely but came as a response to our questions, it was not volunteered and so having attended I was left no wiser, except to the fact that it would not impact on us as no sewage from Clonshaugh would be treated in this plant, it was for the Greater Dublin, Meath and Kildare areas and I was assured that everything would be alright with no impact what so ever. There will be no

odours, being hidden from view, and completely covered in, with mounds and trees all round the site perimeter, it will not be seen with no comparison to the Ringsend plant. The above remarks were the standard replies, from the representatives present who in my opinion were public relations people and not project engineers who would be more informed. There was always a lack of information. It is interesting to note that a 600mtr infeed pipeline from the local sewerage system is now part of the proposal.

I paid the fee and lodged my objections, even so I am outnumbered by Specialists, & Engineers from Irish Water and Fingal County Council etc, we are not on the same level technically, but I will put my faith in the hands of my fellow objectors from Blanchardstown and all areas along the proposed pipeline to the outfall at Portmarnock and argue on, not alone, but with great support and kindred spirit of fellow objectors, neighbours and Local Independent Politicians alike. It has united the residents of the Fingal and Dublin areas involved, something the proposers never envisaged when they picked Clonshaugh as the site and applied for Planning Permission.

The selection process was a farce there was no logical explanation, with its proximity to 8,000 homes in estates along the firing line which is the (N32) R139. From the Clayton Hotel and Swifts Grove on the west side heading east past Clonshaugh, Newbury, Priorswood, Moatview, Belcamp, Darndale estates to the Hilton hotel on the east end of the R139 and Malahide road junction. With more farms and houses on the Clonshaugh road north and Apartment Complexes on the south side, the R139 dissects the Clonshaugh road which runs from Northside Shopping Centre to the north end nearest to the proposed site exit.

Young children are worried that the smell from the plant will stop them from playing in our park. I have seen generations of children grow up and play in the park as my

children and grandchildren have done. We have a well used park with great facilities for all sports and leisure activities. We are not an economical deprived area as some people like to think, we are a proud hard working Community who have thrived despite broken promises from certain political parties. We have loyal politicians who live in the area and know the needs of the people and who are fighting for the building of much needed social and affordable housing and not a sewer plant of the proposed size and magnitude that will be of no benefit to the people or the environment of the area as a whole.

If I was asked to pick a site for a plant especially one this size Clonsaugh would not be my choice for reasons as follows.

1: Its proximity to Dublin Airport and Flightpath.

On the Flightpath and 2.2 Km from the airport, it is a potential recipe for disaster giving that most airline crashes occur at take off or landing. If an Aircraft crashed into the proposed plant with a mixture of aviation fuel, methane and biosolids (fertiliser) we have the ingredients for a huge bomb and a tragedy with serious amounts of injuries and deaths not only for passengers but local residents alike. Low flying aircraft are a constant concern.

Did Irish Water contemplate such sceneario when picking this site for the building of this huge plant on a 30 hectare site.

2: Site is on farmland, infringing on the designated greenbelt area and to be obtained by compulsory purchase order.

By applying for a CPO to buy this site and remove a farmer, and his family from their land and home is not decent and is a form of bullying. Bullying in any shape or form is frowned upon and will not be tolerated in this day and age.

With proper planning Fingal County Council should have had land available for this project given that it had 18 years

to do so.

3: Situated between two prominent international tourist hotels.

The Clayton Hotel which is situated 400 to 600 metres depending on which way the crow flies (or which report you read) is the closest hotel to the perimeter fence, there are houses on the Clonsaugh road,(next to the site exit road) much closer at just 150 mtrs . This hotel has added two extra storeys to their building showing confidence in the tourist industry, they also have for some years now looked after unfortunate families who through no fault of their own are homeless due to house costs and bad planning.

The other hotel on the east side of the R139 known locally as the Darndale Hilton, like the Clayton enjoy tourist and commercial trade as well as catering for local functions such as Birthday parties, weddings and funerals.

A record 35 million passengers passed through Dublin Airport last year, with a projected 38 million this year 2019.

4: Close to Bewleys factory and Craobh Ciarans Gaa grounds.

Bewleys Northern Cross Food Factory has roasted and packaged coffee beans on this site for some years now and depending on the direction of the wind the aroma of the roasting beans can carry over for at least a kilometer.

Craobh Ciarans hurling and football club train and play matches at this facility and at the moment enjoy the good healthy environment of their sporting venue, this would be destroyed if this plant was to go ahead .

5: R139 (N32) a main feeder for the M1 and M50 Motorways is a two lane dual carriageway and has no bus lanes as depicted in the maps showing the site entrance on the R139. Out dated maps used in this instant.

Formally the N32, the R139 is a busy feeder road for both the M1 and M50 on the west side to the Northern Cross on the east side. Traffic from Malahide, Portmarnock, Baldoyle, Coolock Donaghmede, and all surrounding areas use this road to gain access to both motorways.

While traffic can be described as moderate and moving it can suddenly change to slow or stop/go at peak periods. For various reasons such as accidents on either or both motorways, closure of the port tunnel, wet Fridays or sheer volume of traffic it can resemble a vast car park. An incident or accident on Clonsaugh road North of the R139 or Clonsaugh road south (with a restriction on vehicles over 3.5 tonnes) can cause long term traffic jams both ways along the R139, Malahide road, Oscar Traynor road and all other feeder routes.

Both Clonsaugh road North and South are rat runs for people working in the Coolock area, industrial estates and cause delays to traffic trying to enter and exit the R139.

6: In a Greenbelt with Public parks and play grounds.

In the green belt, Belcamp Park is in close proximity (300mts) to the proposed site. This Public Park, caters for all ages with Tiny Tots and older children's playgrounds. Soccer and Gaelic football grounds, Pitch and Putt, Floodlit, (all weather) Tennis and Football Facilities. The Park is used all year round during daylight hours bringing joy to both young and old alike.

7: Housing Estates, Schools, shops and Apartments with over 8,000 families not considered to be at risk as they fall outside the 300mtr zone.

8: Cara Park  Site.

Housing more families and facing directly across from the proposed site. Like all the other homes on or near R139 is deemed outside the catchment area, and therefore at no risk

9: St. Michaels House.

Why was this site picked so close to their facility.

10: Northern Cross/Malahide road/ Baldoyle road intersection.

Together with Clare Hall shopping centre and retail park traffic, makes it a very busy junction, this is without construction traffic.

Summary:

In 1975 when signing for our house in Dublin County Council offices I was told that no new housing estates would be built between our estate and the Airport, this for safety reasons. It has remained like that since then, the exception being the motorways and Bewleys Hotel now called the Clayton. A Halting site and a Nursing home were built on Stockhole lane near the Baskins.

Fingal County Council replaced Dublin County Council and look after Business in the North of the County. We are Dublin Civic Council now and nearer the airport due to the new flightpath to the new 2.6 km runway, planes are larger hence the longer landing and takeoff strip. To think of constructing a plant of this magnitude is a reckless and foolhardy act and contrary to good health and safety procedures with no regard for employees welfare or the well being of the residents who live close to the plant.

Dublin Airport is 75mtrs above sea level I do not know the height of the proposed site, was height above sea level used in any calculations that may be critical to airborne pollution. With the height of the building at 18mtrs and stacks 9 or 24 mtrs high what is the overall height with the addition of the roof. What level of air quality will exist should a roof be fitted and will it require higher stacks to give better control.

The choice of Clonshaugh for this Sewage Treatment Plant is baffling to all objectors but not so for Irish Water and Fingal County Council alike. Despite all their college degrees their delivery was not convincing even though they were speaking in their own briefs and own selected fields and subjects. Their briefs were not done by themselves alone but with junior engineers and clerical staff to the envy of objectors who even with families and friends find it hard to put together any decent objection to the proposed project.

It is hard to accept that a project such as this, the brainchild of Fingal Co.Co. and called the Greater Dublin Drainage project, will import raw material from Kildare towns like Kilcock, Maynooth, Leixlip and Meath towns such as Dunboyne, Ashbourne etc all big enough towns that should be able to look after their own waste while the Ringsend Plant struggled to cope with Dublins waste. Kilcock to Clonshaugh a journey of approximately 60 Km, to a site the most southerly in Fingal on the Dublin County border, an area directly facing the housing estates where 8,000 families live 300mtrs from the site that no sewage from the Clonshaugh areas would be treated. Fingal CC conducted a study and choose Portrane as the site for a waste water treatment plant but after vocal opposition it ordered a review of the study. The review produced nine sites with Portrane ruled out as unsuitable, out of the the 9 sites three sites were picked Annsbrook and Newtowncorduff in Lusk and the outfall in Loughshinny north of Rush. Clonshaugh was the third site and was chosen as it is ecologically and environmentally better according to the the project engineers who also said that they can now survey the site. The cost at this time 2013 was 500million, the price is the same today 2019. The other sites in Lusk were also deemed unsuitable without any vocal opposition.

When planning permission was applied for it was decided to oppose and object to the proposed project. I do not think that any amount of vocal opposition to Fingal CC at this point would result in a review and the site deemed unsuitable. Vocal opposition from all objectors will get this site and project deemed unsuitable because Clonshaugh is the only site that is Genuinely UNSUITABLE all other sites were deemed unsuitable without any reports published or the other 6 sites named by Fingal CC. Its not a level playing field.

Thank you Madam Inspector for your patience.