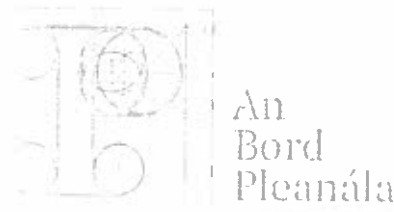


Our Ref: ABP-301908-18



CLLR. Alison Gilland
33 The Court
Larch Hill
Oscar Traynor Road
Dublin 17

Date: 20th August 2018

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility
Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City

Dear Madam

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Dublin City Council and Fingal County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-873 7107



Cllr. Alison Gilliland

33 The Court, Larch Hill, Oscar Traynor Road, Dublin 17

Tel: 086 6015154 Email: alisongilliland.ie@gmail.com

Twitter: @AlisonGilliland

Blog: www.AlisonGilliland.org

 [Gilliland.Alison1](https://www.facebook.com/Gilliland.Alison1)



An Bord Pleanála

Planning Application PL06F.301908

16th August 2018

Observations on Strategic Infrastructure Development (SID) Planning Application PL06F.301908 for a proposed Wastewater Treatment Plant, Orbital Sewer, Outfall Pipe, Sludge Hub Storage Centre and Regional Biosolids Storage Facility in County Fingal and Dublin City from Cllr Alison Gilliland, 33 The Court, Larch Hill, Oscar Traynor Rd, D17RN14 and Senator Aodhán Ó'Riordáin, Seanad Éireann, Kildare St, Dublin 1

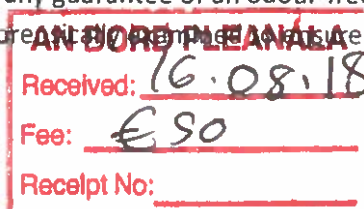
We recognise this application is a complex multi centred SID application seeking to address the wastewater treatment needs of a growing population in the Dublin and greater Dublin area, the reaching of the treatment capacity at the Ringsend Treatment Plant and the need to move to more effective, efficient and more environmentally friendly treatment technologies that this application affords.

While the relevant and required planning application documentation was provided in an open, public transparent way their technical complexity does not always afford ease of interpretation or understanding. It is therefore anticipated that the An Bord Pleanála Officials with responsibility for making the decision on this application have the relevant technical expertise and experience or can draw on same to enable them to make an informed and accountable decision.

Odour

The key concern arising from the functioning of the wastewater treatment facility, from the pumping of wastewater into the facility and from the transport of regional sludge into the facility and the removal of biosolids product from the facility is the emitting of unpleasant and unwelcome odours into the local community. While it is asserted by the Environmental Impact Assessment Report that '*odour abatement systems will be designed to ensure that the odour emissions do not reach a level that could cause odour nuisance at or outside the Proposed Project site boundary.*' (Volume 3 Part A of 6, Mitigation No. AQ6 page 39). This assertion is questioned particularly by residents in the Clonshaugh, Northern Cross, Coolock, Clarehall areas and those living along the Oscar Traynor Rd. living within approximately a 2km radius of the facility. Residents and businesses in these local communities are fearful of losing the enjoyment of their homes and as a result the impact on their general health and well-being.

Questions also arise as to how odour would be managed should there be an energy blackout or an accident at the facility - what is the emergency protocol in such an incident? While it is recognised that this facility will utilise the latest treatment technology and will be to the fore compared to other facilities, feedback from residents living near other similar facilities is mixed and does not give any guarantee of an odour-free environment. It is therefore imperative that this aspect of the application is foreseen and addressed so that odour-free assertions can be guaranteed as per the application.



Natural Environmental Protection

A second concern is the impact the various elements encompassed in this application will have on the environment. In particular the impact of the wastewater outflow pipe in Dublin Bay on the marine environment and on bathing water quality along the various nearby beaches. Other concerns include the mass movement of soil on the site and along the sewer route into the wastewater treatment facility and impact on air quality during construction and during overall functioning of the facilities.

The detailed Natura Impact Statement and the relevant details in the Environmental Impact Assessment are most welcome, in particular the various mitigation measures advised. These mitigating measures give some assurances that the impact will not be negative however these assurances can only be realised if the facility and its functioning implement all the various measures. Therefore, should this application be approved, it would be imperative that planning compliance is pro-actively involved at all stages of the building and functioning of the facility to ensure that all mitigating measures are implemented and functioning as desired. It would also be imperative that the community liaison officer communicate regularly with the local community with regard to environment protection issues.

Traffic and Transport Concerns

During functioning, it has been indicated that 14 tankers carrying sludge in sealed containers into the wastewater treatment facility and biosolids out of the facility on a daily basis. During construction other types of heavy traffic would be travelling to and from as well as around the various sites. With regard to the wastewater treatment facility, concerns arise with regard to the impact of both construction and servicing/delivery/worker traffic will have on local transport routes. We note the 21 mitigating measures detailed in the Environmental Impact Assessment Report (Volume 3 Part A of 6, Mitigation No. TT1 – TT21 pages 33- 36) particularly with regard to appropriate sign-posting and road safety measures, no site deliveries during peak hours, consideration to avoid high volumes of traffic using the same roads and road sweeping during construction. Similar to the concerns expressed about the impact of these facilities and the building process to realise them on the natural environment, should this application be approved, it would be imperative that planning compliance is pro-actively involved at all stages of the building and functioning of the facility to ensure that all mitigating measures stated are implemented and the facility functions as intended. It would also be imperative that the community liaison officer communicate regularly with the local community with regard to traffic management.

Conclusion

While there are other concerns including the suitability of the overall location of the wastewater treatment plant on valuable agricultural land close to residential areas and that perhaps might be more effectively re-zoned for much needed housing, most concerns can be summarised as a lack of trust regarding the assertions that the facility will be odour free, that the community liaison officer will work closely with the local communities, that it will be an incident free building site and an incident free facility. Therefore, it is essential that An Bord Pleanála assess each and every detail of this application with a forensic lens taking the concerns expressed herein and the concerns of the various local residents submitted into consideration in the application decision making process.

Kind Regards,

The block contains two handwritten signatures. The first signature, on the left, is written in cursive and appears to read 'Alison Gilliland'. The second signature, on the right, is also in cursive and appears to read 'Aodhán Ó'Riordáin'. Both signatures are written in dark ink.

Cllr Alison Gilliland & Senator Aodhán Ó'Riordáin