

Our Ref: ABP-301908-18



Celia Herbert
119 Newtown Court
Clarehall
Dublin 13

Date: 22rd 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

An Bord Pleanála
64 Malaborough Street,
Dublin 1

AN BORD PLEANÁLA	
Received:	17/8/18
Fee:	€50 cash.
Receipt No:	

17th of August

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, outfall pipeline and regional biosolids store facility

Case reference: 06F. PC0152

AN BORD PLEANÁLA	
TIME	BY <i>hand</i>
17 AUG 2018	
LTR DATER	FROM <i>C</i>
PL	LDG-007684-18

To whom this may concern,

We, the residents of Newtown Court, believe that the plant mentioned above is now in the final phase of planning. We confirm that we object to the above proposed project and location. We enclose the fee of €50.00 with this letter. The objections are listed below

Location

This plant will be so close to us here at Newtown Court as we are located on the R139, and we feel this plant will be totally unsuitable for such a development given its proximity to us. A wastewater treatment plant has the potential to seriously harm our health and quality of life.

The risks are based on:

- increased traffic on the R139, due to the projected daily increase of 26 trucks delivering wastewater into the WwTP. The planning application does not propose a solution to this increase of traffic on the R139. The planning application only mentions that a "comprehensive traffic management plan will be put in place for the construction period". There are no further details on this traffic management plan available in the application or any of the support documents.
Based on these two observations alone, the planning application should be rejected on grounds of "insufficient information provided to assess impact".
- Particulate emissions could cause health issues. The planning application does not propose a solution to any health and safety objections, but rather proposes to look at health and safety during the detailed design phase. This means that currently there is no way of knowing what health and safety impacts there will be. The planning application should be rejected on grounds of "insufficient information provided to assess impact".
- Environmental impact may be widespread as it is proposed that treated wastewater is pumped out into the sea 1 kilometre north-east of Ireland's Eye. There is no impact assessment on the wildlife there, nor on the Portmarnock Beach, the only blue-flag beach in the area. The planning application should be rejected on grounds of "insufficient information provided to assess impact".

Odour

This is a major worry to us as our children will be growing up so closely to this plant. Odours will be inevitable regardless of the odour suppression measure put into place. We already have odour issue with Bewley's which is also based on the R139 and with various, regularly occurring, illegal fires. We fear that this will also be the case of odours coming from the new plan.

The planning application admits that an "odour control system will be designed". This simply means that currently there is no odour control system available that "ensures that odour does not give rise to any nuisance beyond the boundary of the WwTP". We would like to draw attention to this, as the system that is yet to be designed forms integral part of the promises of the planning application, and thus the planning application cannot be accepted without further information. Under the laws of tort, nuisance and negligence, the residents of Newtown Court will take a case against Irish Water if there is any impact on us.

Furthermore, the planning application "ensures that odour does not give rise to any nuisance beyond the boundary of the WwTP" without providing any means of testing air quality inside or outside the plant boundaries. This means that we will be at the behest of Irish Water and other Government Agencies to periodically measure air quality in order to ascertain that the WwTP operates within boundaries of national and international regulations.

Traffic

Traffic is also very heavy on the R139 4 children have already lost their lives on this road. We have been refused access to this road due to the high volume of traffic. We also have trucks heading to Dublin port using this road. Traffic on this road has already reached saturation point.

The planning application does not incorporate any plan for infrastructure use or increase of infrastructure not directly related to the project, but merely documents that a comprehensive traffic management plan will be put in place for during the construction phase. After construction has finished, traffic to and from the WwTP will be left to its own devices, and will cause increased traffic (daily, an additional 26 trucks will deliver wastewater to the WwTP). There is no notion of impact assessment to the local communities around the WwTP.

The planning application should be rejected on ground of "insufficient information provided to assess impact".

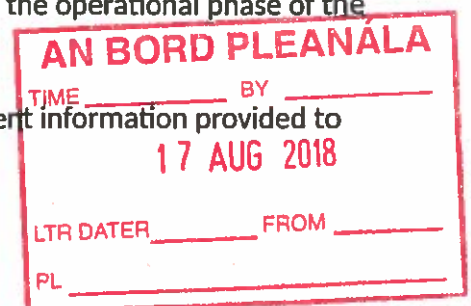
Noise

We will suffer constant and ongoing noise pollution from the operation of this plant.

The planning application seeks permission of starting construction at 07:00 weekdays and 08:00 Saturdays. This is unacceptable to us, since the noise levels will disturb morning rest. The planning application seeks permission to end construction at 19:00 weekdays and 16:30 Saturdays. This is unacceptable to us, since the noise levels will disturb peace and tranquillity in the area.

There is no information on noise levels or management of noise for the operational phase of the WwTP.

The planning application should be rejected on ground of "insufficient information provided to assess impact".



Environmental disasters

The planning application provides for the construction and operation of an underground Orbital Sewer from Blanchardstown to Clonshaugh of 13,750. The planning application has no impact assessment as to what might happen to the environment in case the Orbital Sewer should break underground.

The Journal of Environmental and Public Health from March 2016, titled "Impact on the Quality of Life When Living Close to a Municipal WwTP" [Vantarakis et al], mentions following impacts

- High concentration of airborne pathogenic micro-organisms in the aerosol samples collected around the WwTPs;
- In the population around WwTP the report found significant increase in headaches, tiredness, concentration difficulties, gastrointestinal symptoms and skin diseases;
- Micro-organisms move in the air as a consequence of wind movement, which sweeps them away from various habitats and surroundings (soil, water, waste, plant surfaces, animals and other), or are introduced during the processes of sneezing, coughing or sewage aeration.
- Various bacterial and fungal communities have been isolated from all types of aerobic and anaerobic WwTP.
- Bioaerosols may contain different types of micro-organisms such as viruses, pathogenic bacteria, and fungi, capable of causing skin, digestive system, respiratory, and nervous system diseases and human allergies.

None of these impacts have been considered in the planning application, and the impact on the communities surrounding the proposed WwTP, namely Clonshaugh, Belmayne, Belcamp, Baldoyle, Portmarnock, Malahide, Clarehall, Donaghmede, has not been assessed.

The impact on aquatic communities can include eutrophication, hypoxia, flood environment with antibiotics and hormones from human urine and faeces which causes abnormal growth and reproduction of the exposed animals.

Lastly, Ireland's Eye is the breeding site for protected bird species, and as such, the EU Birds Directive needs to be considered. The planning application does not assess the impact on these species, and as such, therefore, the EU Birds Directive must take precedence.

Based on these findings, the planning application should be rejected on grounds of "insufficient information provided to assess impact".

Previous applications for this WwTP in other regions of Ireland have received more than 10,000 (ten thousand) objections due to the impact on wildlife and population.

I would ask that An Bord Pleanála review this proposal again in light of the issues and concerns highlighted.

Yours sincerely,

Celia Herbert 119 Newtown
Stephen Casey 118 Newtown
Nicola Casey 112 Newtown

