

Our Ref: ABP-301908-18



Clare Daly TD
Dáil Eireann
Leinster House
Kildare Street
Dublin 2

Date: 21st 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

To: The Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.



From: Clare Daly TD
Dáil Éireann
Leinster House
Kildare Street
Dublin 2.

AN BORD PLEANÁLA
Received: 17/8/18
Fee: €50 Cash
Receipt No: _____

AN BORD PLEANÁLA
TIME 14.59 BY MANO
17 AUG 2018
LTR DATE _____ FROM AB.
PL LOG: 007590-18

17/08/2018

Re: Plan ABP 301908-18 (SID/03/18) for Irish Water at Blanchardstown to
Clonsaugh, Clonsaugh, Clonsaugh to Maynetown, to Baldoyle Estuary, to
Portmarnock Golf Club and to Ireland's Eye.

For The Greater Dublin Drainage Project Proposed Wastewater Treatment Plant,
Sludge Hub Centre, Orbital Sewer, Outfall Pipeline and Regional Biosolids Storage
Facility (And Referencing SID/03/18 in relation to Component 2 for Regional
Biosolids Storage Facility at Newtown, North Road, D.11).

Dear Secretary,

On behalf of my constituents in the Fingal area bordering Dublin Bay North I wish to
object strongly to the proposal to locate a waste water treatment plant in Clonsaugh
and an associated discharge facility at Baldoyle in Dublin Bay. Comprehensive
objections were made previously in 2012 as to locating a water treatment plant in
those locations and those objections remain valid.

1. Location

The AOS Planning Report for Irish Water makes a basic case for a new Regional
Wastewater Treatment Plant (WwTP) of 500,000 PE capacity based on studies
referenced at Chapter 1.7 and the obvious fact that the population of the Greater
Dublin Area and indeed Leinster is heading for 3 million inhabitants by 2040.

However, the Project Context and Strategic Planning Overview at Chapter 1.6 do not
address the unique planning conditions and history of the proposed receiving area at

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Baile Átha Cliath 2

Clonshaugh and Baldoyle Bay. Indeed, even a brief perusal of chapters 2 to 7 of the AOS Planning Report confirms why this location is totally wrong for the WwTP and the rest of this project.

The proposed 29.8 hectare site for this huge sewage and sludge treatment plant, the proposed Outfall Pipeline Corridor across the fragile hydrosphere of the Mayne River Basin and the environmentally unsound proposal to dump sewage wastewater just 1 kilometre offshore from Portmarnock's Velvet Strand represent a total disregard for essential principles of sustainable planning.

The recitation of national, regional, county and local area plans and water plans in Chapter 3 of the AOS Planning Report in no way justifies the conclusion in Chapter 3.5, 'Overall Compliance With Planning Policy'. The planning record shows clearly that the planning of the North Fringe (Dublin City Council) and South Fringe (Fingal County Council) has been often disastrous over the past 20 years. Developer-led planning and supine, ineffective and incompetent invigilation by the two local authorities are at the core of those failures. New communities have been bedevilled by serious structural (pyrite), insulation and fire safety design and construction flaws over the past 12 years. Key and essential social infrastructure including public transport, health, education, security, recreational and youth services are still grossly deficient or not delivered to the new areas at all. For nearly a decade, large stretches of development and amenity land have lain derelict and uncared for. Long promised street and traffic management infrastructure (such as the Malahide Road Bypass and the Northern Parkway Avenue) remain on the drawing board without government funding or local authority support.

The residents of the older parishes in Clonshaugh, Priorswood and Darndale directly south of the proposed WwTP are appalled at the prospect of this fundamental change in the longstanding plans they believed were in train for the districts of Old Clonshaugh and Belcamp College. Those residents are now faced with years of disruption and heavy construction and sludge traffic, with regular noise and with the possibility of bad odours and emissions into the air, the hydrosphere, and their general environment. Originally a new highly planned residential urban district stretching 3 kilometres out from the north eastern edge of Dublin City was considered from the mid-1990's with up to 25,000 homes, ancillary commercial and services development and up to 50,000 new residents.

None of the plans cited in the AOS study ever referred to any planning rationale for a huge sewage plant in Clonshaugh. To proceed with a Clonshaugh to Baldoyle location will be a disaster in sustainable planning terms for Clonshaugh and its neighbouring communities, for all the North/South Fringe and for Baldoyle Bay and the whole Dublin Bay biosphere.

2. Jacob Tobin Study is Flawed

Jacobs Tobin's earlier research in 2011/2012 ignored the very serious location problems raised by objectors then and the company continues to ignore them in Plan ABP 301908/18. The Environmental Impact Assessment Report (Vol. 2, Part A of 6) by Jacobs Tobin is fatally flawed and raises the need for a full independent assessment of the 'most favourable' location criteria and their application to Clonsaugh and Baldoyle Bay. Like other documents in the Irish Water Plan presentation, Chapter 5 (Consideration of Alternatives) discusses the 'straw man' of a 'Do Nothing Scenario' which is not an issue, given the growth of Dublin and Leinster. But Sections 5.6 and 5.7 of Chapter 5 repeat the earlier (2012) canards for which there is no credible environmental or economic basis.

Phase 4 identified that it was technically possible to build at Annsbrook and Newtowncorduff but the Baldoyle Outfall seemed to be the key factor in Jacobs Tobin declaring that Clonsaugh was the 'more favourable' site. The Jacobs Tobin Report conclusion, that Clonsaugh/Baldoyle Bay was 'of less ecological value when compared to the other two sites', is absurd.

Besides alleged political pressure, the fundamental short-sighted reason for selecting Clonsaugh/Baldoyle seems to have been that 'the total length of pipeline for this site option is significantly shorter than the pipeline for the other two site options'. But the overall costs in environmental degradation and loss of residential amenity for the surrounding communities is significant.

Chapter 5.7 of Jacobs Tobin (Consideration of Alternatives) is also flawed in its hydrodynamic modelling. The so-called Northern Outfall of course would be much deeper several kilometres from the coastline and so the discharge comparison with the so-called Southern Outfall is a nonsensical comparison. But any discharges at one kilometre from the north Dublin shoreline are grossly irresponsible and very damaging to our marine ecology. The comparison of a site west of Ireland's Eye with a supposedly better site north east of the island is also completely ludicrous since both outfalls will equally damage Baldoyle Bay, the Velvet Strand, Portmarnock (a site used daily by swimmers) and the UNESCO biosphere site of Dublin Bay.

Finally, the conclusion at Chapter 5.7 targeting a discharge point one kilometre north east of Ireland's Eye is a regressive step in the fight to maintain the integrity of the Irish Sea ecosystem.

Yours Sincerely,



Clare Daly TD