

Our Ref: ABP-301908-18

PA Reg Ref:

Your Ref: Clontarf Residents Association



An
Bord
Pleanála

Deirdre Nichol
35 Castle Avenue
Clontarf
Dublin 3

Date: 23 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

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

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

AN BORD PLEANÁLA
TIME 14.15 BY HAND
17 AUG 2018
LTR DATE _____ FROM AD
PL LOG-007748-18.

17th August 2018

Ref: PL06F PC0152 / PL06F 301908

Strategic Infrastructure Development

Greater Dublin Drainage project

Wastewater Treatment Plant Clonshaugh

Dear Sir/Madam

The Clontarf Residents' Association (CRA) would like to make the following observations on the above application and enclose herewith €50 fee.

The application should be rejected on the basis that:

- (1) the proposed plant will have a serious negative impact on the neighbouring residential communities, and,
- (2) the proposal to dispose of the waste material in Dublin Bay is not in keeping with the safeguards and protections afforded to the Bay.

Site Location

The proposed site is in close proximity to a large number of densely populated housing estates. An industrial plant on the scale proposed is totally unsuitable in a residential area. The proposed height of the facility will be out of keeping with the scale of the neighbouring buildings. The residents will suffer significant negative impacts due to the volume of traffic movements to and from the site, as well as problems with noise pollution, and potential odour issues. These are serious issues that will affect the resident's day to day living.

Treatment & Disposal

The proposal for secondary treatment only of waste prior to disposal is simply not adequate. In our view the dumping of sewage in this state in Dublin Bay will potentially have serious negative impacts on the water quality in the Bay.

The beaches around the Dublin coastline are important amenities. This year in particular there have been numerous occasions when the water quality did not meet bathing standards due to problems with the Ringsend treatment plant. If this second treatment plant were to come on stream it is highly likely that similar failings would occur with the result that untreated water would be either accidentally or deliberately released into Dublin Bay.

The UNESCO Biosphere Reserve designation that applied to the North Bull Island since 1981 was extended to include the entire Dublin Bay area, including the proposed dump site, in 2015. It is the world's only Biosphere located largely within a capital city.¹ Biospheres are areas where internationally important wildlife species and habitats are found. It is intended that they would be actively managed to balance the needs of mankind with the needs of mother nature. The Biosphere is covered by EU legislation – the Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds, S.I. No. 291 of 1985) and the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, S.I. No. 94 of 1987) and designated as a Special Protection Area (SPA) and a Special Area of Conservation (SAC).

Ireland's record in terms of compliance with these EU regulations is poor to say the least. To approve this proposal and dump poorly treated waste into the Bay would have serious negative consequences for the Bay area, its flora and fauna, and may well be in breach of these EU directives.

Conclusion

It is our view that smaller localised plants that enable sewage to be treated close to source, that are more environmentally friendly, that do not pose a threat to internationally important endangered species would provide a better long terms solution to the waste water treatment needs. We respectfully ask that the application be refused.

Yours sincerely

Deirdre Nichol
Chairperson



¹ Dublin Bay Biosphere Leaflet from www.dublinbaybiosphere.ie