

Our Ref: ABP-301908-18



Darragh and Eoghan O'Brien
Dail Eireann
Leinster House
Kildare Street
Dublin 2

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 Sirs,

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



Darragh O'Brien TD

working with

Cllr Eoghan O'Brien

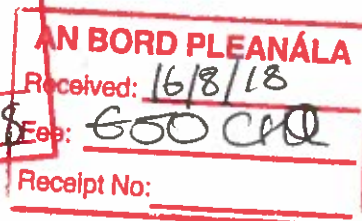
FIANNA FAÍL
THE REPUBLICAN PARTY

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

A Chara,



16th August 2018



RE: Objection to Proposed Water Treatment Plant at Clonsaugh, Co. Dublin

Reference No: 06F.PC0152

We strongly object to the greater design drainage proposed waste water treatment plant (WWTP) at Clonsaugh, Co. Dublin on the following grounds (€50 fee enclosed).

1. **Location** of a massive 500,000 PE WWTP adjacent to densely populated areas. 300m or 500m separation distance to receptors are wholly inadequate for such a large plant.
2. **Odours**: There will be odour originating regardless of the odour suppression measures taken by the design. Inadequate design maintenance and operation of the plant will give rise to increased odour problems.
3. **Design, build** and potentially operate nature of the contract for this project. Recent history has proven that this is a flawed model. One example of this would be the odour problems at Ringsend treatment plant which presented after its opening. Delays and disputes arose due to the structure of the procurement. Meanwhile the adjacent residents were left with the sickening odour problems.
4. **Environmental risk**: Recent experience of a smaller WWTP in Balbriggan has shown that raw sewage will be discharged when procedures and systems fail. Should the proposed Clonsaugh plant discharge raw sewage to sea this can only result in detrimental environmental effects on SAC, SPA, designated shellfish waters of the Dublin coastline.
5. **Disruption of the local environment**: Local wildlife such as hunting birds and other animals will be impacted by such a large scale WWTP.
6. **A cost benefit analysis** has not been produced for this site during the site selection process.



7. **Impact on the local community:** Properties will be devalued should this proposed WWTP proceed. This is grossly unfair to families who have invested in this area through house purchases, investment in local businesses, farms and the hospitality trade. There will be dozens of large lorry movements daily during the construction and operation of this plant. The first screening of the sewage and sludge would need to be transported by road, contributing to odour problems. The burden of treating sewage from the GDSDS area on the Clonsaugh, Portmarnock, Malahide and wider coastal communities is an unfair burden.
8. **Proposed location of the WWTP on prime agricultural land:** This WWTP is proposed to compulsory purchase approximately 1/3 of a productive family farm. Large regional infrastructure such as this should be located on land of poorer value and at least 5km away from densely populated areas.
9. **Detrimental impact on tourism in Dublin Coastal Areas:** WWTP have in the last 7 years caused serious environmental problems when they failed and discharged raw sewage into receiving waters. This plant will receive negative publicity and the already vulnerable tourism, sea fishing and water recreation industries will suffer the consequences. It is unlikely that the EIA will adequately address such issues.
10. **Dublin Airport Visual impact:** Millions of air passengers use Dublin Airport. This proposed plant will be within the airport flight path and safety zone.

Is sinne, le meas,

Darragh O'Brien T.D.
Spokesperson for Housing,
Planning & Local Government
Fianna Fáil

Cllr. Eoghan O'Brien
Howth/Malahide Ward
Fianna Fáil

