

Our Ref: ABP-301908-18



Linda O Grady  
DAA  
Head Office  
Dublin Airport  
Co. Dublin

Date: 24th 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.

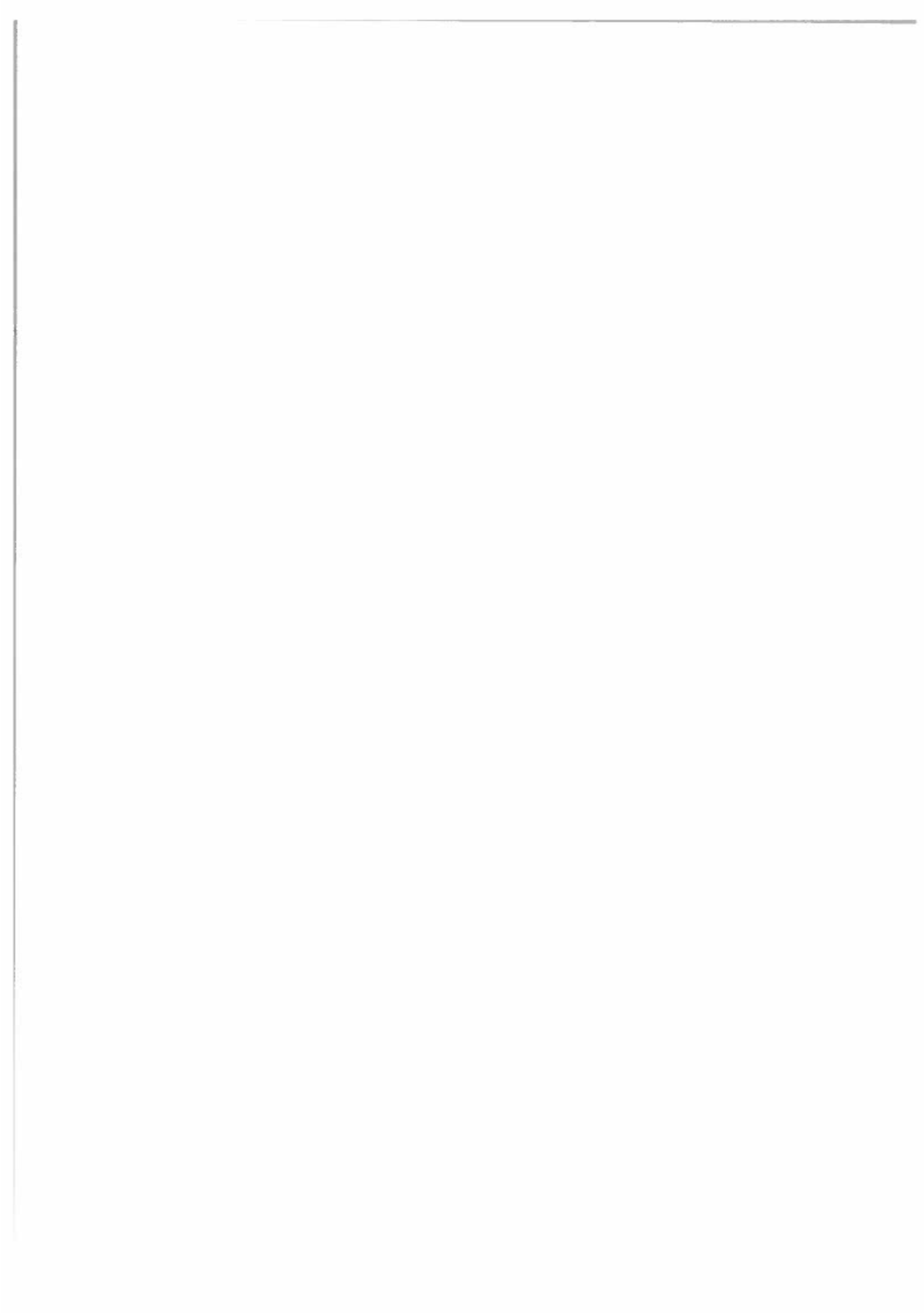
Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Dublin City Council and Fingal County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://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,

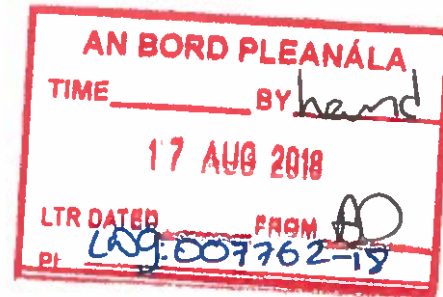
Kieran Somers  
Executive Officer  
Direct Line: 01-8737107



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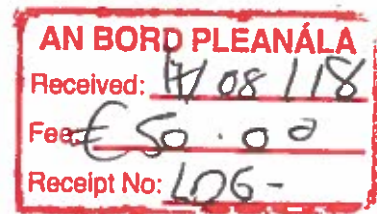
daa public limited company  
Head Office: Dublin Airport,  
Co Dublin, Ireland



The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902

Date: 17<sup>th</sup> August 2018

Ref No: 2.2.24



Dear Sir/Madam,

**Re: Observation to PL06F.301908 for 10-year permission for Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility at Deanstown, Abbotstown, Dunsink, Sheephill, Cappogue, Kildonan, Part of Huntstown, Coldwinters, Baleskin, Dubber, Merryfalls, Silogue, Ballymun, Ballystruan, Turnapin Great, Collinstown, Commons, Dardistown, Toberbunny and Clonshagh, Co. Dublin.**

daa, Head Office, Dublin Airport, Co. Dublin, in its capacity as a statutory consultee under Article 28(1)(i) of the *Planning and Development Regulations 2001 (SI No. 600 of 2001)*, welcomes and supports the Greater Dublin Drainage Project as an enabler of economic growth in the Fingal and Dublin City area.

As an airport operator, daa is responsible for the management and safe operation of Dublin and Cork Airports. The company's statutory remit includes a mandate to take all proper measures for the safety, security, management, control, regulation, operation, marketing and development of its airports, and a duty to take steps either alone or in conjunction with other persons as are necessary for the efficient operation, safety, management and development of its airports. It is in light of these duties and responsibilities that daa makes the following observation regarding the above proposed development.

An Bord Stiúrthóirí | Board of Directors Niall Greene, Patricia King, Colm McCarthy, Paul Mehlhorn, Barry Nevin, Eric Nolan, Paul Schütz (German), Denis Smyth, Gerry Walsh, Dalton Philips – Príomhfheidhmeannach/Chief Executive

Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. Uimhir Chláraithe: 9401 Éire  
Registered Office: Dublin Airport, Co. Dublin. Registered Number: 9401 Ireland

daa wish to highlight the following considerations with respect to the proposed Greater Dublin Drainage Strategy;

- Future additional wastewater demands generated by increased growth in Dublin Airport should be considered in establishing appropriate future capacity projections.
- The route of the proposed Orbital Sewer must not adversely affect the management, operation or future development plans of Dublin Airport.
- The construction and operation of the proposed wastewater treatment plant (WwTP) and proposed sustainable drainage systems (SuDS) measures should not give rise to any increase in bird activity.
- Regard should be had to recommendations of the ERM Report *Public Safety Zones, 2005* on development within the Outer Public Safety Zones.
- Odour control management measures should be adhered to in full to ensure there are no adverse effects on Dublin Airport.
- Requirements for crane usage during construction should be agreed in advance with daa and with the Irish Aviation Authority.

The observations below apply to the wastewater treatment plant (WwTP) at Clonshaugh in Fingal and the proposed Orbital Sewer Route from Clonshaugh to Abbotstown Pumping Station.

#### Irish Water Infrastructure Capacity

Passenger traffic through Dublin Airport has grown substantially and is expected to continue in line with economic forecasts. To address continuing growth in passenger numbers, it is important that any future projections consider these increased wastewater requirements and incorporate into the design, construction and operation of a future Drainage Strategy for the Greater Dublin Area.

Passenger growth projections at Dublin Airport indicate a need for expansion of airport infrastructure, for which a key component includes surface and foul water management capacity. While designing this infrastructure, Dublin Airport is developing a Drainage Masterplan to consider the future foul sewage requirements, particularly surface water runoff contaminated with aircraft and pavement de-icing chemicals, both of which are an essential part of safe airport operations.

daa has reviewed the *Greater Dublin Drainage Engineering Design Report* accompanying the planning documentation, noting the proposed WwTP capacity holds a 500,000 Population Equivalent (PE) while the Orbital Sewer has been sized as a 1.8m diameter gravity sewer. From the planning document: *Irish Water Greater Dublin Drainage Strategy: Overview and Future Strategic Needs Asset Planning*, it is understood that load projections have been estimated to account for population increases within the Ringsend Agglomeration catchment, however, industrial loading assumptions are not entirely clear. Section 5.2.3 of the document states that industrial growth has been assumed at "an increase of 150,000 p.e. in

*industrial load from 2020/2021, attributable to specific identified industrial interest, designated SIC (Significant Industrial Customer)."* It is understood that the allowance for the SIC refers to the Leixlip WwTP within the Lower Liffey Valley agglomeration, while in future the proposed Leixlip Transfer pipeline will transfer excess flow from Leixlip to the Clonshaugh WwTP. With this exception, we cannot ascertain what allowance has been made for any industrial growth. It is instead proposed that large one-off demands from new industries would be provided for by utilising available resources including headroom (20%) and if required, upsizing of treatment plants and networks, in accordance with the Water Services Strategic Plan (WSSP).

As the airport grows, it is vital that sufficient provision is made for the Dublin Airport site through the calculation of adequate load projections by the planned operation date of 2024 and thereafter. Therefore, daa seeks clarification that that future additional demands generated by increased growth in Dublin Airport can be catered for in the proposed Drainage Strategy.

#### Proposed Orbital Sewer Route

The Proposed Orbital Sewer Route includes diversion of a section of the North Fringe Sewer (NFS) and collects sewage from a number of localities including Dublin Airport. It is understood that the proposed Orbital Sewer will take sewage to the proposed WwTP at Clonshaugh via gravity for treatment before discharge at the proposed outfall into the Irish Sea near Portmarnock.

The route of the proposed Orbital Sewer has been assessed with regard to its effects on the management and operation of Dublin Airport.

The pipeline alignment west of the R132 road passes through airport lands and are not yet developed, while the alignment to the east of the R132 road passes through daa lands that are currently proposed for the construction of the proposed East West Distributor Road. Where the pipeline crosses busy public road intersections or daa car park access points, daa will need confirmation the pipeline will be constructed at sufficient depth to allow road build over in the future and where required, will avail of tunnelling techniques to minimise disruption.

Where a wayleave separates daa land from public roads and neighbouring lands, daa request a condition be attached to ensure future road access that may cross the wayleave can be developed as required to enable possible future development (See Appendix 1). This is particularly important east of the R132, where future airport development is likely.

Finally, as the proposed Orbital Sewer Route intersects lands safeguarded for the proposed East West Distributor Road and permitted Dublin Port-Airport Fuel Pipeline (FCC PI. Ref: F15A/0141 and DCC PI. Ref: 2552/15 (PL29N.245738)) Docks Aviation Fuel Pipeline, it is recommended that the Applicant consult with Fingal County Council Roads Division and Independent Pipeline Company (Fingleton White and Reynolds Logistics) to

ensure the proposed pipeline will not negatively affect these proposed and permitted projects.

#### Bird Hazard

The proposed WwTP in Clonsaugh is not of itself, of concern to daa. However, the site of the proposed WwTP is located in an area in which the presence of attractants of scavenging birds would be a hazard for air safety. While accepting that a certain amount of bird activity is an integral part of the natural environment, given the proximity of the facility to the Runway 10/28, it is essential that the construction and operation of the wastewater treatment facility will not give rise to any increase in bird activity.

The protection of Dublin Airport from inappropriate land uses is supported by the *Fingal Development Plan 2017-2023* which contains the following objective in respect of lands surrounding Dublin Airport:

#### ***Objective DA13***

*Promote appropriate land use patterns in the vicinity of the flight paths serving the Airport, having regard to the precautionary principle, based on existing and anticipated environmental and safety impacts of aircraft movements.*

In this respect, daa requests that a condition be attached to any grant of permission requiring that no organic material which may attract bird activity should be allowed to be present in the open on the site. No effluent or other by-products, whether liquid or solid, of wastewater treatment which may allow or increase the availability of food or grit sources for birds, should be permitted to be in the open and accessible to birds on site.

A review of the 'Greater Dublin Drainage Engineering Design Report' accompanying the planning application has identified several proposed Sustainable Drainage Systems (SuDS) measures for the purpose of surface water management at each of the proposed facilities. These include; rainwater harvesting, swales, filter drains, permeable paving and underground attenuation storage. Though daa support the principal of SuDS, measures that include standing open bodies of water can act as a bird attractant and hence pose an aviation safety hazard in the vicinity of the airport.

Dublin Airport supports the use of SuDS measures provided open water is not a permanent feature of any of these systems. Should any changes to the surface water management proposals arise throughout the design stage that result in open water (such as retention ponds), it is requested that daa is consulted in order to assess the potential for any change to act as a bird attractant, with potentially negative impacts for aviation safety.

The application comprises two proposed temporary compounds which are located on daa land. In this regard, daa requests further information and details from Irish Water to agree any location and orientation of these compounds.

### Public Safety Zone

The proposed temporary compounds are located in the Outer Public Safety Zone. The Fingal Development Plan 2017-2023 contains the following objective in respect of these areas:

#### ***Objective DA14***

*Review Public Safety Zones associated with Dublin Airport and Implement the policies to be determined by the Government in relation these Public Safety Zones.*

Regard should be had to recommendations of the ERM Report *Public Safety Zones, 2005* on development within the Outer Public Safety Zones.

### Odour

daa note the inclusion of an air dispersion modelling in the EIAR (Chapter 14) and odour abatement systems as discussed in Section 14.4. of the EIA Report.

The status of Dublin Airport as a principal gateway to Ireland makes it critical to ensure that no odours emanate from the facility and become detectable in surrounding areas. Therefore, should An Bord Pleanála wish to grant permission for the proposed development, it is requested that all design measures detailed in Section 14 of the EIA Report proposed to contain and treat odour are implemented in full.

### Obstacle Limitation

The proximity of the proposed wastewater treatment plant to the airport means the operation of cranes during construction may cause concerns in relation to air safety, and at a minimum, requires further detailed assessment in relation to flight procedures at Dublin Airport. daa requests that a condition is attached to any grant of permission, requiring the developer to agree any proposals for crane operations in advance of construction with daa and with the Irish Aviation Authority.

Having regard to the above points, daa requests the following be considered in the assessment of the application;

1. Sufficient capacity for additional wastewater demands generated by Dublin Airport;
2. Effects of proposed Orbital Sewer Route on access to daa land;
3. Bird activity and aviation safety especially with regard to surface water management;
4. Regard to *Public Safety Zones 2005* for Dublin Airport;
5. Odour management for Proposed WwTP;
6. Crane operations near Dublin Airport;
7. Details to be provided in respect of any temporary construction compounds.

Should the Board be minded to grant permission, daa requests that the following conditions are applied;

1. Any wayleave shall provide and safeguard for the provision of access to daa land from public roads.
2. All design measures proposed to contain and treat odour detailed in Section 14 of the EIA Report will be implemented in full.
3. The use of cranes during construction shall be agreed in advance with the Irish Aviation Authority (IAA) and the Dublin Airport Authority (DAA).

Please do not hesitate to contact us if you have any queries.

Yours faithfully,

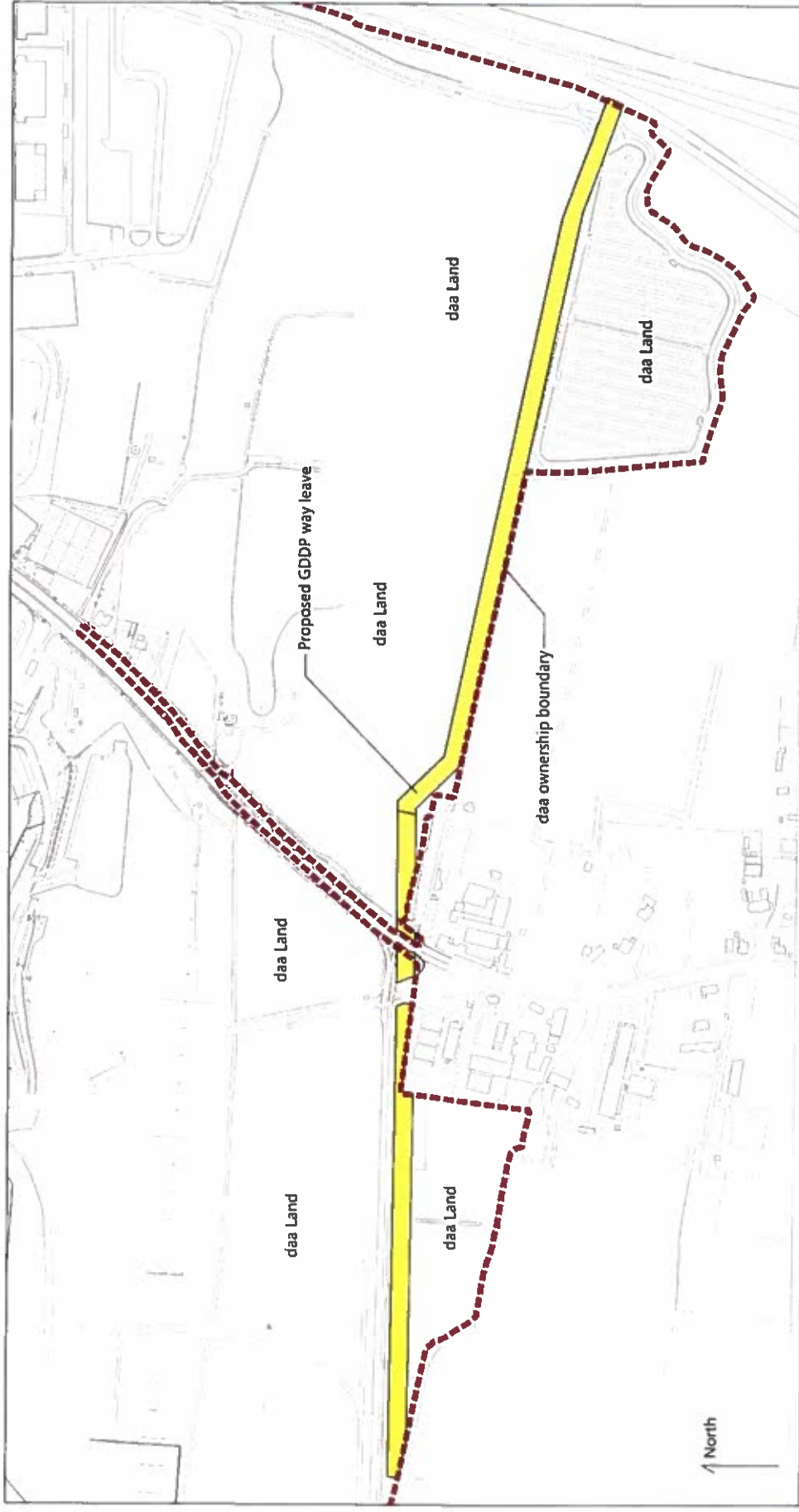
*Linda O'Grady*

Linda O'Grady

**Planning Department**



## APPENDIX 1 – GREATER DUBLIN DRAINAGE STRATEGY ON DAA LAND



GDDP Proposed Wayleave On daa Land  
NTS

An Bord Stiúrthóirí | Board of Directors Niall Greene, Patricia King, Colm McCarthy, Paul Melhörn, Barry Nevin, Eric Nolan, Paul Schutz (German), Denis Smyth, Gerry Walsh, Dalton Phillips –  
Príomhfheidhmeannacht/Chief Executive

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