Our Ref: ABP-301908-18



Elizabeth Sherlock 49 Newbury Avenue Clonshaugh Dublin 17

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 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

Teil Glao Áitiúil Facs Láithrean Gréasáin Ríomhphost

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64 Sráid Maoilbhride Baile Átha Cliath 1 D01 V002

64 Marlborough Street Dublin 1 D01 V902

Received: Mrs Elizabeth Sherlock Receipt No: 16/08 49 Newbury Avenue Clonshaugh Dublin 17 15 August 2018 1)G

The Secretary An Bord Pleanála 64 Marlborough Street Dublin 1

Case Ref: 06F PC0152

Subject: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility.

Dear Secretary

We refer to the above planning application from Irish Water to develop a new regional wastewater treatment facility in Clonshaugh. We strongly object to this planning application. The potential health and environmental impacts from the waste of several counties transported into our locality is a huge concern for the community.

We would like to reject this proposal for planning permission for this facility for the following reasons:

- 1. Location: This agricultural site is totally unsuitable for such development given its close proximity to densely populated areas including Clonshaugh, Priorswood, and Darndale as well as new estates on the Northern Fringe such as Clongriffin, Clarehall and Belmayne. A Waste Water Treatment Plant has the potential to seriously injure the residential amenities of the householders living in these estates. This site is also close to Dublin Airport and the Clayton hotel, and the plant has the capacity to impact considerably on the operation of these business concerns. In addition, this site is very close to parkland known as Belcamp/ Priorswood Park which is bounded by Clonshaugh Road, the R139 and Clonshaugh Park, and poses a real health and safety risk to the many frequent users of this park on a daily basis including many children.
- Size: The plant is too big and will treat waste for over three quarter of a million people. It goes
 against best practice which would be to have smaller plants built in a variety of locations
 instead.
- 3. It will have a negative impact and will lower the reputation of the area, which has already been affected by over-population and socio-economic issues which the community are striving to over-come.
- 4. Beaches: Portmarnock beach is the only Blue Flag beach we have. This waste will be brought back in by the tides destroying the only good beach we have.
- 5. This will have negative impacts on tourism and leisure in this area including the visual impact on the ground and overhead, as it is on the DAA flight path with aircraft constantly flying overhead.

6. Noise: Local residents will suffer constant and ongoing noise pollution as a result of the operation of the plant.

- 7. Odour. The smell from the plant is going to affect everyone in the area. This is a major worry, having regard to what the residents living beside the Ringsend plant had to endure despite assurances given to them previously. Odour will be inevitable regardless of the odour suppression measures put in place. Inadequate design structures and maintenance operations of the plant will give rise to increased odour problems. Bewleys Coffee based at Northern Cross emits a coffee smell which can be experienced by householders living within a radius of several miles and the real fear is that this will also be the situation in the case of odours coming from the new plant.
- 8. Construction Phase

We are concerned about the inevitable noise arising from the construction phase of the plant itself and the outflow pipes should the project proceed. In addition, construction traffic should not be allowed to use Baskin Lane or Clonshaugh Road which are only minor country roads and were never built for the amount of traffic using them. Traffic disruption at the Malahide Road/Baskin Lane junction would also be a major problem if the outflow pipes are built as planned.

- Traffic: Numerous lorry movements in the area connected to the operation of the plant will greatly diminish the quality of life of local residents. Traffic on the major and minor roads in this locality has already reached saturation point.
- 10. Treatment: Secondary treatment is completely inadequate in this high technological and scientific age.
- 11. Visual Amenities: The plant will be visually obtrusive given its proposed height.
- 12. Wildlife: A large scale Waste Water Treatment Plant will seriously affect the bird and wildlife of this agricultural area. This includes badgers, hares, buzzards, and wild pheasants. The European Habitats, Birds, and EIA Directives will potentially be breached should this planning application be granted.
- 13. Pollution: There is a distinct threat of pollution resulting from the normal operation of the plant or from an accident or systems failure. The deliberate release of raw sewage through the marine outfall pipe is a real possibility.
- 14. The entire Dublin Bay was designated as a Biosphere in order to protect its sensitive ecosystem. This designation took place after the site at Clonshaugh was selected for this plant.
- 15. The following special areas are under threat should this plan succeed; Dublin Bay, North Bull Island, Portmarnock Strand, Baldoyle Estuary, Lambay Island, Skerries Island, Rockabill, Malahide Estuary, Ireland's Eye, Balbriggan/Skerries Designated Shellfish Waters, and Malahide Designated Shellfish Waters. Special Areas of Conservation, Special Protection Areas, and Shellfish Waters Designations are especially relevant in this case.
- 16. No houses from our area or surrounding areas will percerviced by this plant, yet we will have to put up with the consequences of having it on our double provide the surrounding areas will be serviced by this plant, yet we will have
- 17. We note from the Public and Stakeholder Participation Report that every was only one meeting held with the Clonshaugh residents and this was in the initial phase of the November 2014. There have been no further meetings and we would be a major stakeholder as the plant will be positioned only 300 metres to the nearest house. The proposed site for this plant is much too close to the residential area, schools chotels and other amenities.
- 18. Also the Public and Stakeholder Participation report notes a public information evening was held on 29th November 2017 in Northern Cross for Clonshaugh residents. To our knowledge there was no such meeting. We were never informed of this and never had the opportunity to attend this meeting. Can you please advise how many meetings were held between the different stakeholders/communities?

19. Due to the size of this plan, any accident will be major and have detrimental consequences on the population in our area.

We request an open and oral meeting be provided in respect of this application due to the serious impact this has on our community.

The below named residents vehemently object to this proposal.

Yours faithfully

Elizabeth Sherlock

James and Betty Sherlock, 49 Newbury Avenue Mark and Richelle Bailey, 47 Newbury Avenue Mark and Vivienne Burch, 17 Newbury Avenue Patricia Cafferty, 10 Newbury Lawns Pauline Robinson, 55 Newbury Avenue

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