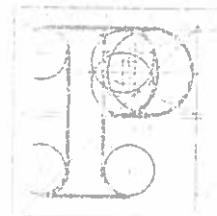


Our Ref: ABP-301908-18



An  
Bord  
Pleanála

Eugene Farrell  
10 Clonshaugh Lawn  
Clonshaugh  
Dublin 17

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 Sir

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



Mr. Eugene Farrell  
Ms. Clare Daly  
10 Clonshaugh Lawn  
Clonshaugh  
Dublin 17

17<sup>th</sup> August 2018

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

AN BORD PLEANÁLA	
TIME _____	BY <u>HAND</u>
17 AUG 2018	
LTR DATER _____	FROM _____
PL <u>LOG.007761-18</u>	

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

**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,

Please accept this objection of the above proposed development at the townlands of Clonshaugh, Dubber and Newtown.

Please find attached the fee of €50

The application was lodged on the 20<sup>th</sup> of June 2018 and our objection is submitted before the deadline of 5.30pm on the 17<sup>th</sup> of August 2018.

We wish to object to the above planning application for the Strategic Infrastructure Development at Clonshaugh as it is contrary to the National Spatial Strategy 2002-2020 and the Fingal Development Plan 2017-2023.

#### **Contrary to the National Spatial Strategy 2002-2020**

The focus of the National Spatial Strategy is on the relationship between people and the places where they live and work. It seeks to unlock potential growth, progress and development in a balanced way.

The location of the proposed waste water treatment plant is in an area that is widely considered disadvantaged both socially and economically. The development of such a facility in a disadvantaged area is contrary to the focus of the National Spatial Strategy.

As a residents of Clonshaugh, we have noted that the area is consistently excluded from large scale projects that would unlock our potential and growth, such as better transport networks (there is one public bus route with no rail system and no plan for any). Instead the only development that the

AN BORD PLEANÁLA	
Received: <u>17/8/18</u>	
Fee: <u>€50 cash</u>	
Receipt No: _____	

greater Clonshaugh area has been made a part of, is the allocation of modular housing for the homeless and now the potential for a large scale waste water treatment facility.

The lack of positive development is not in line with National Spatial Strategy's goal of *'Bringing together the location of houses, amenities, shops, employment and transport'*.

A core message of the NSS is to provide *'Better places to live in'*. The aim of this is to ensure that our towns develop in a way that meets the economic and social needs of its population. The development of a giant waste water treatment facility in a socially and economically disadvantaged town does not serve to achieve this core message the NSS.

#### **Contrary to the Fingal Development Plan 2017-2023**

The development plan states that the council is committed to developing a more socially inclusive society and promoting participation and access for all. The plan states the following, *'All practices of consultation, policy-making and practice must not just include, but be driven by, the views and needs of excluded groups'*. It's list of those deemed to be socially excluded includes travellers and those with disabilities. The proposed development is in close proximity of a number of traveller communities and the special needs centre of St. Michael's House. The views and needs of these groups were not included in the planning consultation of this facility. The development of the plan was most definitely not driven by the local community or it's socially excluded groups.

Chapter 4 of the plan outlines the development strategy for the Balgriffin and Belcamp area. This area includes the location for the proposed water treatment facility. The development strategy for the area is to create vibrant residential communities with appropriate local services and community facilities. It states that the new built environment will respect the rich built and natural heritage of the surrounding environment while recognising the ecological sensitivity and hydrological connection with adjacent European sites. The proposed development of a waste water treatment facility on a large site in the Balgriffin and Belcamp area is contrary to the development strategy of creating vibrant residential communities on this site.

Chapter 3 of the plan states that the provision of good community facilities and services in accessible and appropriate locations is important because they contribute positively to an enhanced quality of life. The proposed waste water treatment facility would be situated directly adjacent to the Craobh Chiarain GAA pitches and changing rooms. These pitches provide the local GAA community with a place to train and play matches. The development of a large scale industrial facility adjacent to the pitches would impact on the appropriateness and accessibility of this highly used local amenity. A CPO has already been proposed for part of Craobh Chiarain's land.


The regional planning guideline for Fingal estimates a population growth of over 35,000 people by 2022, this represents a need for over 3,000 new housing units per year until 2022. Chapter 2 of the Fingal Development Plan states that the housing need of the area will not be met in the short term but that the delivery of housing is a priority. The use of the land for a waste water treatment facility instead of the provision housing and local amenities is contrary to this 'priority'.

#### **Conclusion**

We submit that the proposed development is unsuitable for the subject site. It will not encourage growth or progression of our already disadvantaged area. The proposed development does not show

evidence that it is in accordance with the National Spatial Strategy or the Fingal Development Plan.  
The Board is respectfully requested to refuse permission for the proposed development.

Yours Sincerely.

  
*Clare Daly*  
Eugene Farrell  
Clare Daly



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