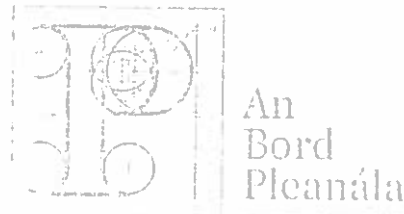


Our Ref: ABP-301908-18



John Lyons  
People Before Profit  
City Hall  
Dublin 2

Date: 16th 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 Councillor,

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: 01-873 7107



**AN BORD PLEANÁLA**  
Received: 13-08-18  
Fee: €50 cheque  
Receipt No: 402-007441-18

**AN BORD PLEANÁLA**  
TIME 16.30 BY hand  
**13 AUG 2018**  
LTR DATE \_\_\_\_\_ FROM LC  
PL \_\_\_\_\_

Cllr John Lyons

People Before Profit

City Hall,

Dublin 2

The Secretary,

An Bord Pleanála,

64 Malborough Street,

Dublin 1.

**Re. Greater Dublin Drainage Project**

To whom it may concern,

I am lodging this submission in opposition to the planning application for the development of the Greater Dublin Drainage project, consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility located in County Fingal and Dublin City.

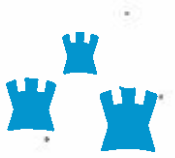
The planning application to construct a 500,000 P.E. wastewater treatment plant on a 29.8 hectare site at Clonshaugh which will not serve the needs of people living in the Northern Fringe communities of Clonshaugh, Riverside, Belcamp, Darndale, Ayrfield, Clarehall, Balgriffen, Clongriffin, Donaghmede and Baldoyle, whilst negatively affecting their quality of life as well as impacting negatively upon the Dublin Bay Biosphere must be rejected for the following reasons:

Sustainable development? The case for rejecting the Non-Project Alternatives Considered, specifically the proposal to construct a network of community WwTPs, in favour of a single WwTP, has not been adequately made: insufficient data supplied to demonstrate that a single WwTP is more environmentally, economically and socially beneficial than a network of community WwTPs.

The implications of the proposed development for proper planning and sustainable development: It is admitted that the construction and operational stages of the WwTP will have a negative impact on the nearby residential estates due to the impact on the road network, the number of junctions or sections already operating above capacity.

The suggested mitigating proposals cannot remedy this problem, which will have a significantly negative impact on the communities in the immediate vicinity of the WwTP.

The negative impacts of the proposed project associated with the construction phase include disturbance from noise and dust, road closures or diversions, traffic congestion,



disturbance to fishing activities and beach goers, disturbance of recreational facilities and closure of rights of way will not be sufficiently mitigated by the proposed measures: this means that the negative impact upon the communities affected will be enormous, and for what? This WwTP will not be serving the needs of families in the immediate vicinity yet they will be the ones to suffer during the construction phase.

The applicant's admission that those living close to the construction of the Proposed Project will endure adverse impacts in terms of noise and air quality should result in the rejection of this planning application as, if granted, the construction would result in severe impositions upon the local community with no community gain. This would go against proper planning and sustainable development.

The proposed impacts in relation to human health of the Proposed Project, the potential for socio-economic gain, have not been proven but are merely vague assertions in relation to the reduction of unemployment, decreases in social inequality, etc...

**Biodiversity (Marine)** The applicant's assessment considered the potential impacts on the flora and fauna found on the sea bed, marine mammals, marine birds, fish, plankton and water quality during the Construction Phase and Operational Phases.

There are nine European protected sites within 10km of the Proposed Project. European protected Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within 5km of the Proposed Project include: • Baldoyle Bay; • Howth Head; • Malahide Estuary; North Dublin Bay; • Ireland's Eye; • Rockabill to Dalkey Island; and • North Bull Island.

Along with the EIAR, a Natura Impact Statement (NIS) has been carried out in line with the requirements of the European Union (EU) Habitats Directive to assess potential negative impacts on European sites in the vicinity of the Proposed Project.

The key sources of potential impacts to marine flora and fauna during construction are:

- Surface runoff and/or construction waste entering into the estuary;
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- Release of compressed air;
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- Sea bed disturbance from dredging;
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- Disturbance from vessel traffic.



It is proposed that mitigation measures will be put in place to reduce Construction Phase impacts. It is admitted however that even with the effective implementation of these measures, this project will have a negative impact upon the environment.

Lastly, I am formally requesting that an oral hearing takes place with regard to this planning application.



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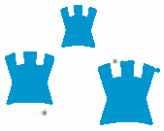
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