

Our Ref: ABP-301908-18



Peter Daly  
2 Clonshaugh Close  
Dublin 17

Date: 22nd 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.

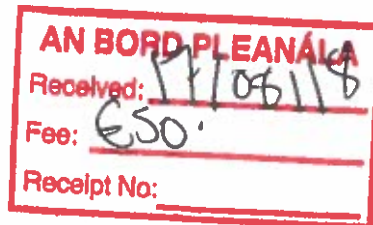
Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Dublin City Council and Fingal County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

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,

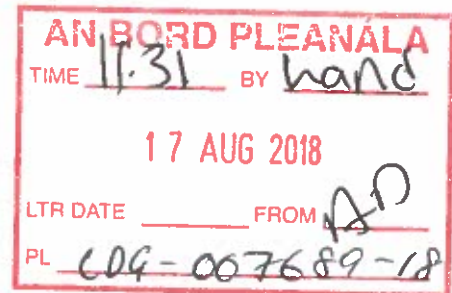
Kieran Somers  
Executive Officer  
Direct Line: 01-873 7107



Peter Daly  
2 Clonshaugh  
Close  
Dublin 17

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

15th August 2018.



**Re: PL06F.301908 (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.**

**For The Greater Dublin Drainage Project Proposed Wastewater Treatment Plant, Sludge Hub Centre, Orbital Sewer, Outfall Pipeline and Regional Biosolids Storage Facility (And Referencing SID/03/18 in relation to Component 2 for Regional Biosolids Storage Facility at Newtown, North Road, D.11).**

Dear Secretary,

I have paid the fee of €50.

Firstly, I welcome the facility to object and make observations on this project. I would like to point out though, that the Strategic Infrastructure Development route and the cost to make an observation are an impediment to most people in the local area of Dublin 17, given the €50 fee and the huge volume of information in the application. It is overwhelming. I trust the board will use its expertise and knowledge to **refuse permission** for this project, based on its illogical and unreasonable location. It has been clearly chosen on the basis of capital expenditure with little regard for the surrounding receiving environments or communities.

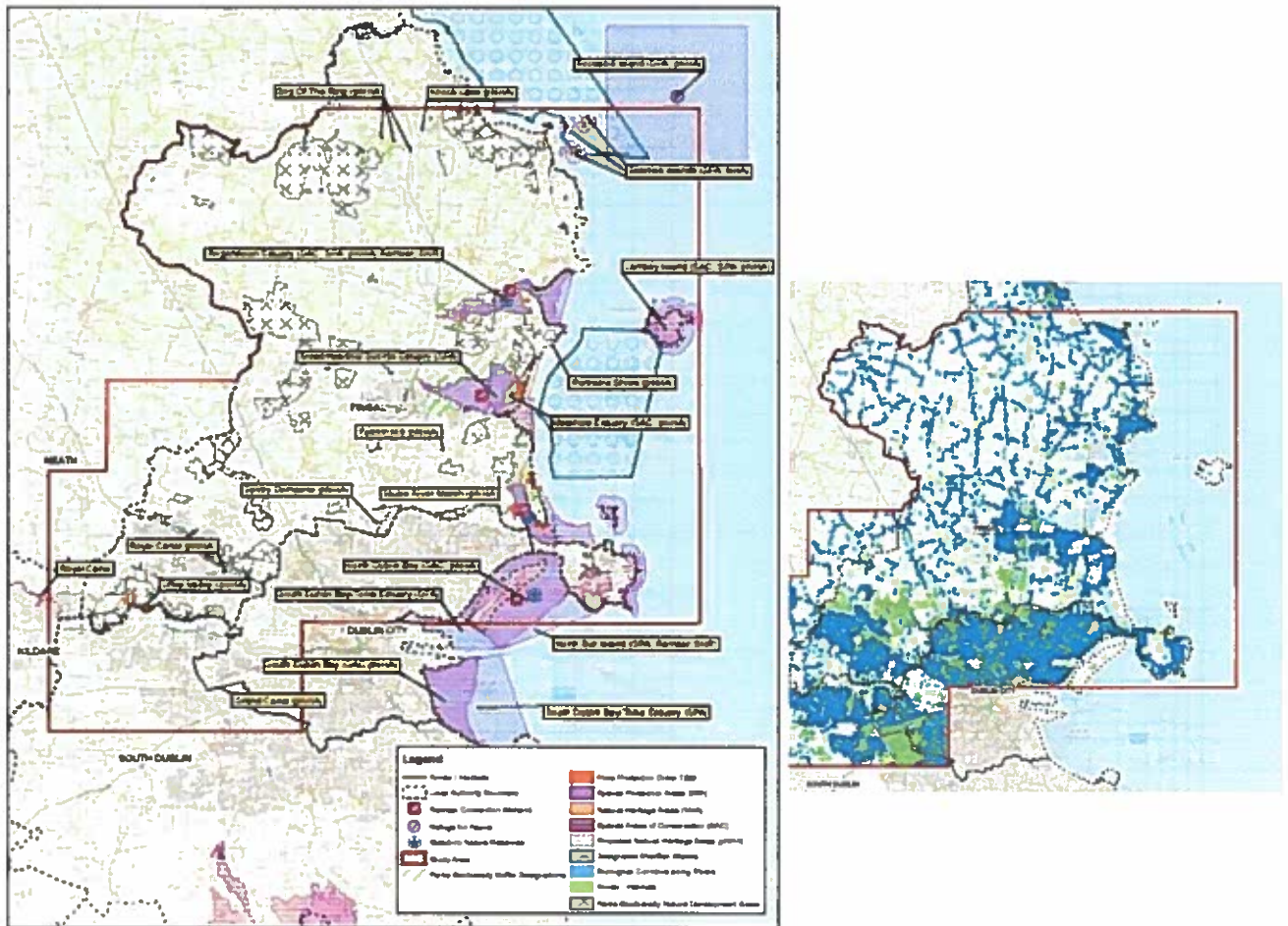
I'm glad that the decision is in the hands of An Bord Pleanála and not a Local Authority whom have shown to have vested interest and bias throughout the whole process.

#### **Flawed selection process**

Capital costs appears to be the main driver for the selection of the pipe route selected and location Wastewater treatment plant (WwTP) and little account taken for of the effects on and residual risks to areas or population numbers effected. Yes, the shortest distance between two points is a straight line, but it's not good planning.

Please undertake this short logic test (my six year olds attempt is located in Appendix A).

Look at the figure below: Draw a line avoiding the as many populated areas (GREY) and special areas of conservation (SAC) or Special Protection Areas (SPA) (PURPLE) as possible. Remember, the closer you are to the purple and grey the worse the effects will be if anything should go wrong, so further away is better. (To help you, we have provided an additional map showing 'sensitive receptors'-these are actually real people. Try to avoid as many of these as possible too, especially when they're really close together).



I forgot to mention there are some rules, your line should finish in the northern part of the Greater Dublin Area.





The Greater Dublin Strategic Drainage Study (GDSDS) involving the seven local authorities of the GDA was completed in 2005 and has an associated Strategic Environmental Assessment (SEA). The Study carried out an in depth assessment of Dublin's drainage system. Key recommendations of the GDSDS Final Strategy, was the expansion of Ringsend Wastewater Treatment Plant to its ultimate capacity and the development of a new Regional Wastewater Treatment Plant, Orbital Drainage Network and Marine Outfall in the **northern part of the GDA**, are being pursued. Irish Water is developing the Greater Dublin Drainage (GDD) Project (previously led by Fingal County Council). The GDD is a regional wastewater project designed to serve the Greater Dublin Area by augmenting the Ringsend Wastewater Treatment Plant. It implements the recommendations of the Greater Dublin Strategic Drainage Study (GDSDS) Final Strategy and the SEA of the GDSDS"

#### MAP OF GREATER DUBLIN AREA



Note North sign

Place finger over northern part of the GDA.....

Logic would suggest that the outfall is not, as stated in the FCDP or sought be the GDSDS in the northern part of the GDA.

**Project Response:**

The proposed Project is compliant with the provisions and objectives of the FCDP. As has been identified above, support and provision for the proposed Project is expressed in a number of instances and by various references in the FCDP. Key provisions of the development plan are included within Section 7.2 and Objective WT03, wherein specific reference is made to the GDD project. The proposed Project also complies with a significant number of the Plan's objectives for foul drainage and wastewater treatment (as is reflected within the planning application documentation and as further outlined within this Planning Report).

*Objective WT03: Facilitate the provision of appropriately sized and located waste water treatment plants and networks including a new Regional Wastewater Treatment Plant and the implementation of other recommendations of the Greater Dublin Strategic Drainage Study, in conjunction with relevant stakeholders and services providers, to facilitate development in the County and Region and to protect the water quality of Fingal's coastal and inland waters through the provision of adequate treatment of wastewater.*

**It does not comply with WT03 as the GDSDS sought an outfall in the northern part of the GDA.**

**The other alternatives to this route all had a marine outfall in the northern part of the GDA.**

Threading the (Ireland's) eye of needle to put the marine outfall on the end of shortest route to make it work is extreme. Going through Baldoyle Bay SAC, so close to Ireland's Eye SAC & finishing in the Rockabill to Dalkey SAC.

**Rockabill to Dalkey Island SAC**



## **Nuisance**

Odours – the planning application uses a 300m buffer zone, whilst it is higher than the required buffer zone in the Fingal Development Plan. The reality is odours affect people's quality of life. A waste water treatment plant will emit odours. This is fact. These odours will not dissipate at 300m, it's not a shield, especially if there is a problem (and problems do occur (see Appendix B article), you will still smell them at 2,500 houses located within a mile of the treatment plant. Ask yourself this, is it logical and reasonable to site the WwTP so close to such a large number of houses when other alternatives away from houses exist? We can smell chocolate being made in Cadburys 1.6 km away and coffee being roasted in Bewleys off the N32. This plant will be closer than that. Logic and risk mitigation would surely suggest that the less number 'sensitive receptors' in the broader area the better encase of a problem or error during the operation stage. This decision about site suitability shouldn't be made on the basis of statistical models and desktop studies, some commonsense should also apply.

**Can the board can honestly accept that this is the best logical place for the WwTP, pipe route and marine outfall?**

I trust An Bord Pleanala to make the right and logical decision and refuse this planning application.

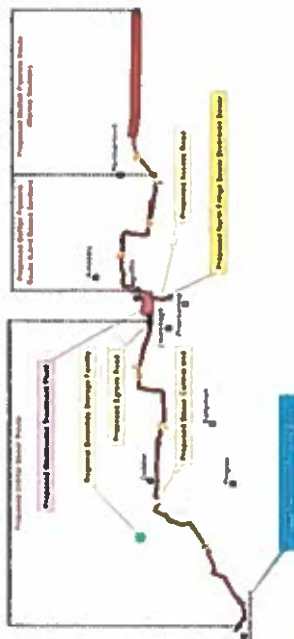
Yours sincerely

A handwritten signature in dark ink, appearing to read 'Peter Daly', with a stylized flourish at the end.

Peter Daly

[illegible]

**Logical path avoiding densely populated and SAC/SPA (as drawn by 6 yr old child asked to avoid purple and grey areas!)**







## Appendix B

0152015

Swords | Odour | Irish Water

### News

2 NOVEMBER 2017

[Go back to News \(/news/\)](#)

## Mechanical failure at Swords Wastewater Treatment Plant

**Irish Water working to carry out repairs as soon as possible**

Irish Water is aware of a bad odour at the [Swords Wastewater Treatment Plant \(/projects-plans/out-projects/swords-sewerage-scheme-1/comp0000561f83a700000272e232e\)](#) and is working with our contractor and Fingal County Council staff to resolve the issue. The issue has occurred due to a mechanical failure at the plant which impacts on the treatment process. Irish Water is working to carry out the necessary repairs as soon as possible but it is anticipated that there will be an odour in the area around the plant for a number of days. We apologise to the community impacted by the odour.

Other aspects of the plant have been investigated and there are no other issues. The incident has been reported to the Environmental Protection Agency (EPA). Irish Water would like to apologise to residents, businesses and others in the area of the wastewater treatment plant at Swords for the current bad odours and any inconvenience that this might cause.

More information is available on the [Service Updates \(/water-supply/supply-and-service-update/\)](#) section and on Twitter @IWCare. You can also call our customer care helpline, open 24/7, on 1850 278 278.

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[https://www.irishwater.ie/mechanical-failure-at-the-3/](#)