

Thomas P. Broughan T.D.
Dáil Eireann
Leinster House
Kildare Street
Dublin 2

Date: 30th July 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 Deputy,

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,

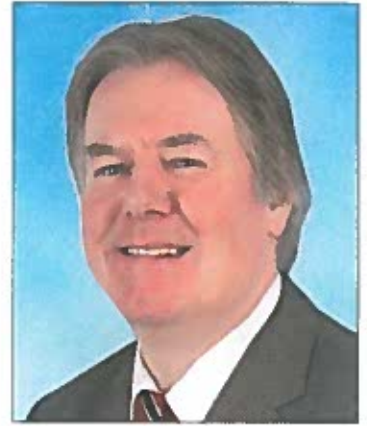

PP Kieran Somers
Executive Officer
Direct Line: 01-873 7107



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DÁIL ÉIREANN
BAILE ÁTHA CLIATH 2



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

26th July 2018.

**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.**

**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,

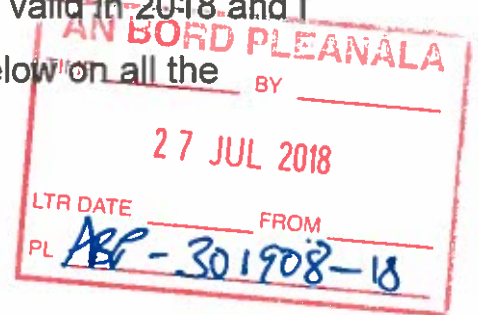
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Received:	27.7.18
Fee:	€70 Cash
Receipt No:	

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TIME	9.27
BY	hand
ABP-301908-18	
27 JUL 2018	
LTR DATE	
FROM	DM
PL	LDG-007037-18

On behalf of constituents in Clonshaugh, Riverside, Caragh Park,
Northern Close, Moatview, Belcamp, Darndale, Burnell, Newtown,
Belmayne, Parkside, The Coast (Baldoyle), and all the northern parishes

of Dublin Bay North constituency and on behalf of former constituents in Cloghran, Kinsealy, Balgriffin and Portmarnock, I wish to object strongly to the location of the above project just inside Fingal County on the northern boundary of the constituency I represent. On behalf of these constituents and myself, in November 2011, May 2012 and July 2012, I objected to the siting of a Wastewater Treatment Plant in Clonshaugh and the associated discharge system into Baldoyle Bay and the Dublin Bay Biosphere. I include copies of those comprehensive objections below at Appendix 1 (Nov. 2011), at Appendix 2 (May 2012) and at Appendix 3 (July 2012).

The key and insuperable arguments against the Clonshaugh/Baldoyle Bay location in those submissions remain completely valid in 2018 and I again outline my constituents' profound objections below on all the following grounds:



The Clonshaugh Location is Wrong and Deeply Exacerbates the Planning Failures in the North Fringe of Dublin City and South Fringe of Fingal County.

The AOS Planning Report for Irish Water makes a basic case for a new Regional Wastewater Treatment Plant (WwTP) of 500,000 PE capacity based on studies referenced at Chapt. 1.7 and the obvious fact that the population of the Greater Dublin Area and indeed Leinster is heading for 3 million inhabitants by 2040 or so. But the Project Context and Strategic Planning Overview at Chapt. 1.6 does not address the unique planning conditions and history of the proposed receiving area at Clonshaugh and

Baldoyle Bay. Indeed, even a brief persusal of chapters 2 to 7 of the AOS Planning Report confirms why this location is totally wrong for the WwTP and the rest of this project.

The proposed 29.8 hectare site for this huge sewage and sludge treatment plant, the proposed Outfall Pipeline Corridor across the fragile hydrosphere of the Mayne River Basin and the environmentally crazy proposal to dump sewage wastewater just 1 kilometre offshore from Portmarnock's Velvet Strand represent a total disregard for essential principles of sustainable planning. Clearly, as I argued in 2011 and 2012, either of the other two so-called 'preferred Treatment Plant' sites in the central district of Fingal County would be immensely preferable on planning, engineering, environmental and cost benefit grounds as locations for this sewage infrastructure. Annsbrook and Newtowncorduff in north central Fingal with their marine outfalls in the Northern Outfall Study Area are far superior locations on all the above planning criteria. Importantly, of course on safety grounds, both Annsbrook and Newtowncorduff are over 10 kilometres north of Dublin Airport and it's flight paths while Clonshaugh is located just a kilometre or so from the airport terminals and astoundingly almost in the centre of the lower flight path for almost all of Dublin Airport's annual landings of millions of passengers.

The recitation of national, regional, county and local area plans and water plans in Chapt. 3 of the AOS Planning Report in no way justifies the glib conclusion in Chapt. 3.5, 'Overall Compliance With Planning Policy'. The planning record shows clearly that the planning of the North Fringe (Dublin City Council) and South Fringe (Fingal County Council) has been often disastrous over the past 20 years. Crass developer-led

planning and supine, ineffective and incompetent invigilation by the two local authorities are at the core of those failures. New communities have been bedevilled by serious structural (pyrite), insulation and fire safety design and construction flaws over the past 12 years. Key and essential social infrastructure including public transport, health, education, security, recreational and youth services are still grossly deficient or not delivered to the new areas at all. For nearly a decade, large stretches of development and amenity land have lain derelict and uncared for. Long promised street and traffic management infrastructure (such as the Malahide Road Bypass and the Northern Parkway Avenue) remain on the drawing board without government funding or local authority support.

The residents of the older parishes in Clonshaugh, Priorswood and Darndale directly south of the proposed WwTP are appalled at the prospect of this fundamental change in the longstanding plans they believed were in train for the districts of Old Clonshaugh and Belcamp College. Those residents are now faced with years of disruption and heavy construction and sludge traffic, with regular noise and with the possibility of bad odours and emissions into the air, the hydrosphere, and their general environment. Originally a new highly planned residential urban district stretching perhaps 3 kilometres out from the north eastern edge of Dublin City was considered from the mid-1990's with up to 25,000 homes, ancillary commercial and services development and perhaps more than 50,000 new residents.

A large area of Old Clonshaugh was designated to be a high employment high tech industrial/business park as an extension to Clonshaugh Industrial Estate and in the heart of the Dublin Airport business development zone. Belcamp College and environs was

intended to be a mixed density high quality residential district building on developments at Burnell, Newtown, Clare Hall and Belmayne. The people of the North Coolock parishes of Clonshaugh/Priorswood, Bonnybrook, Kilmore and Darndale generally looked forward to those proposals, having endured decades of problems associated with living on the northern edge of Dublin City combined with shocking government underinvestment in the social infrastructure of those areas. So in 2011 and 2012, the last proposal the hard pressed residents of all the above districts wanted to hear about was this astonishing plan to locate what they called 'a monster sewage plant' and massive sewage sludge terminal on the Old Clonshaugh boundary of the district. That remains their opinion today.

None of the plans cited in the AOS study ever referred to any planning rationale for a huge sewage plant in Clonshaugh. Indeed most constituents expected such a plant (or indeed a series of smaller plants) to be located in the Swords development region or further north at a site like Annsbrook or Newtowncorduff. To proceed with a Clonshaugh and Clonshaugh to Baldoyle location will be a disaster in sustainable planning terms for Clonshaugh and it's neighboring parishes, for all the North/South Fringe and for Baldoyle Bay and the whole Dublin Bay biosphere. Indeed Chapt. 4 of the AOS (Sectoral Policies and Objectives) in reviewing the Fingal County Plan (2017 - 2023), Objectives highlights several crucial planning objectives which raise insuperable problems with the Clonshaugh and Baldoyle Bay locations and which I'll expand upon later in this submission.

It Is Incredible That The Erroneous Jacobs Tobin Studies on the Sewage Plant Location Were Not Subjected to Independent Review.

Jacobs Tobin's earlier research in 2011/2012 ignored the very serious location problems raised by objectors then and the company continues to ignore them in Plan ABP 301908/18. The Environmental Impact Assessment Report (Vol. 2, Part A of 6) by Jacobs Tobin is fatally flawed and raises the need for a full independent assessment of the 'most favorable' location criteria and their application to Clonsaugh and Baldoyle Bay. Like other documents in the Irish Water Plan presentation, Chapt. 5 (Consideration of Alternatives) discusses the 'straw man' of a 'Do Nothing Scenario' which is not an issue, given the growth of Dublin and Leinster. But Sections 5.6 and 5.7 of Chapter 5 repeat the earlier (2012) canards for which there is no credible environmental or economic basis.

No mention is made e.g. of the grave public concern among Dublin Bay North constituents during the Phase 1, Phase 2 and Phase 3 consultation process that intense political pressure was brought to bear on this process to ensure that 21 of the original sites were abandoned in favour of siting the sewage plant on the precise southern Fingal border and as close as possible to Dublin City Council residential estates. As I queried at the time, no cost assessment or cost benefit figures were produced by the Jacobs Tobin studies and I believe that the environmental and socio-economic costs for Clonsaugh and Baldoyle Bay should have removed these locations at Phase 1 (when 22 sites were reduced down to 12).

A so-called 'overall assessment matrix' and 'Least Favourable' classification was developed at Phase 2. Again, by any reasonable analysis of key criteria, Clonshaugh should not have been included in the 3 so-called 'emerging preferred sites'. Phase 4 identified that it was technically possible to build at Annsbrook and Newtowncorduff and amazingly, the Baldoyle Outfall seemed to be the key factor in Jacobs Tobin declaring that Clonshaugh was the 'more favourable' site. The Jacobs Tobin Report's conclusion that Clonshaugh/Baldoyle Bay was 'of less ecological value when compared to the other two sites' is shocking and utterly absurd.

Besides alleged political pressure, the fundamental short-sighted reason for selecting Clonshaugh/Baldoyle seems to have been that 'the total length of pipeline for this site option is significantly shorter than the pipeline for the other two site options'. But the overall costs in environmental degradation and loss of residential amenity for the communities I represent by Irish Water choosing Clonshaugh/Baldoyle will be profoundly significant across Dublin Bay North in the decades ahead. These costs include the socio-economic, environmental, traffic and public safety impacts of this huge 75 acre sewage plant and closeby marine outfall.

Chapt. 5.7 of Jacobs Tobin (Consideration of Alternatives) is also fatally flawed in its hydrodynamic modelling. My constituents in Howth, Sutton and Baldoyle and former constituents in Portmarnock are aghast at the sea charts included in this chapter. The so-called Northern Outfall of course would be much deeper several kilometres from the coastline and so the discharge comparison with the so-called Southern Outfall is

another 'straw man' and indeed a nonsensical comparison. But any discharges at one kilometre from the north Dublin shoreline are grossly irresponsible and very damaging to our marine ecology. The comparison of a site west of Ireland's Eye with a supposedly better site north east of the island is also completely ludicrous since both outfalls will equally damage Baldoyle Bay, the Velvet Strand, Portmarnock and the UNESCO biosphere site of Dublin Bay. Finally, the conclusion at Chapt. 5.7 targeting a discharge point one kilometre north east of Ireland's Eye is a dreadfully regressive step in the fight to maintain the integrity of the Irish Sea ecosystem.

The Environmental Impact Assessment Report is Not a Credible Assessment for Clonsaugh/Baldoyle Bay.

The E.I.A.R. Report for Irish Water produced by Jacobs Tobin totally lacks credibility and simply regurgitates the flawed location reasoning of 2011/2012. Vol. 1, the Non-Technical Summary and Vol. 3, Part A Main Report for the Proposed Project ignore major key concerns of constituents on the construction and operation of the proposed project, on the impacts on the local receiving population and human health, on the fragile hydrology, marine water quality and biodiversity of the region, on air quality and noise, on the operation of Dublin Airport and on many other very serious negative impacts of the sewage plant and its marine outfall. The statement on Page 8 of the EIAR Vol. 1 Non-Technical Summary that 'the current design is indicative and will be used by the future contractor to prepare a detailed design for the construction and operation of the proposed project' is extraordinary and totally different to any other planning application I have ever invigilated.

Local residents have profound environmental concerns including the visual impact on the landscape of the WwTP and sludge centre, noise generation by the operation of the project (and by additional traffic) , odours and smells produced by the secondary and tertiary treatment process and sludge facility, possible future incidents involving escape of contaminated water and/or methane and other poisonous gases (as happened at Ringsend and other sewage plants here and abroad in the past), the general negative impacts on the whole environment of North Coolock and the North Fringe and the profound effect on hydrology of the region and the receiving marine environment.

With the exception of traffic impacts, the EIAR fails to address most of the above concerns in any forensic detail. Although the height of the new structures are said to be a maximum of 18 meters, the tallest buildings will be placed on the southern part of the 30 ha. site, easily visible from Caragh Park and Moatview Estates. The photomontages in Vol. 6 of the EIAR are completely useless. Normally a clear visual design of a future structure is provided in a planning application. Here all we can see are barely visible yellow lines indicating major changes to the Clonshaugh landscape. Local residents rightly ask why no model of the proposed structures was produced and perhaps displayed locally in Coolock Library. (Residents say that even the T.V architect Dermot Bannon always makes a model of a single house re-design). The EIAR says that according to the Environmental Protection Agency, air quality data and site specific surveys at 12 locations around the proposed project, that the existing air quality is within EU and national standards.

The EIAR admits that there will be negative emissions of particulate matters and vehicle emissions during construction, but there is no analysis whatsoever of the generation of odours and air pollutants during the operation of the WwTP. There is also no risk analysis for the dangers posed by the plant for the general health of the people of the North Coolock and North Fringe parishes. We are only informed that there will be an 'Odour Management Plan' of which there are no details given by Jacobs Tobin.

The receiving district in Clonshaugh already has to contend with significant noise and vibration. This comes mainly from aircraft (especially on days when take-off must go east to rise into a prevailing easterly wind). But there is also significant noise from vehicles travelling 7/24 on the N32/R139 which is in effect the M50 extension. I myself campaigned to have 60 kph signs painted on this road to deter continually speeding drivers who break the 60 kph limit. Residents in Clonshaugh and Moatview also complain of noise from a huge ESB networks facility which was built (apparently outside the planning permission process) and which would adjoin the new sewage plant. The EIAR refers to noise and vibration which will be generated by micro-tunnelling works and construction of the WwTP and to a suite of noise and vibration mitigation measures at the Clonshaugh site and eastwards to Baldoyle Bay. Irish Water is also committed in the EIAR to 'regular noise audits' during construction but constituents rightly fear that existing unacceptable noise and vibration levels in this area will greatly increase when the WwTP and sludge plant comes online.

Clearly there are profound fears that the presence of the sewage plant will impact on nearby residential estates, including reducing residential

amenity and devaluing these properties. Most importantly however are deep concerns for the health of the receiving population. The EIAR admits that 'positive and negative impacts can be expected as a result of the proposed projects'. But the study ascribes all the negative impacts to the construction phase only. Mitigation measures are proposed such as 'a Construction Traffic Management Plan', alternative temporary recreational facilities, Fisheries Liaison Offices ect. But there is no detailed forensic examination of the dangers to human health from the operation of the proposed project.

In an application like this from Irish Water, detailed studies with reference to other wastewater facilities at home and throughout the EU might have been expected. Vol. 1 of the Jacobs Tobin EIAR simply concludes that 'there are however a limited number of individuals primarily those living close to the construction of the proposed project, for whom there may be slight adverse impacts in terms of noise and air quality during the construction phase. This admission however totally fails to address local concerns about the long-term impacts of the WwTP and sludge centre on the health of the residents of the 5 to 6,000 households within a few kilometres of the proposed project.

The Environmental Impact Assessment Report Produced by Jacobs Tobin is Especially Deficient in Relation to the Fragile Hydrology and Marine Biosystems of the Receiving Environment.

The J.B Barry and Partners/Jacobs Tobin Risk Assessment outline a methodology at Chapter 21 of 'avoid, substitute, justify, mitigate and proceed' in relation to flood risk management. But the study then proceeds to ignore it's own methodology in chapters 3, 4 and 5. The

Moyne River catchment has flooded regularly throughout my time as a public representative when adverse weather and tidal conditions produced serious flooding in Baldoyle and the North Fringe. Indeed a large area south of the Moyne River in Baldoyle is a polder with the central area below sea level in Seagrange Park and environs.

The Flood Risk Assessment agrees at Chapter 3.2 that the area 'immediately east of (the WwTP) site is a region which ranges from a moderate to an extreme vulnerability classification'. Chapter 3.3 also agrees that the National Flood Hazard Mapping Website shows that seven locations of historic flooding were recorded in areas close to the WwTP. These sites astonishingly include Stockhole Lane and Balgriffin a few hundred metres north east and directly east of the proposed WwTP. The 26 km of land based pipeline route of course crosses 3 rivers, the Santry, the Mayne and the Cuckoo. It is little reassuring to local residents that the J.B. Barry and Partners report states that 'the portion of the site within the 100 year fluvial and 200 year tidal will be used for landscaping purposes' and that the WwTP site itself is in Flood Zone C (low risk probability of tidal flooding).

The J.B Barry/Jacobs Tobin Flood Risk Assessment concludes that the 'main potential source of flood risk to the proposed WwTP is from fluvial flooding from the Cuckoo stream'. But as the report notes, the Cuckoo is a tributary of the Moyne River which has flooded every few years during the past 3 decades, sometimes westwards as far as Balgriffin and further west. There is thus no basis for the conclusion in Chapter 5.2 that 'there will be indiscernible impacts from the proposed project on the existing flood regimes of the area'. Much local hydrology concern is focused also on the installation of the Marine Outfall under Baldoyle

Estuary and the Portmarnock peninsula out to the Irish Sea. The construction compounds listed in appendices B and C include a location at Portmarnock Beach Car Park, at a significant ecologically fragile site.

Linked closely to these concerns are the fears of potential contamination of the marine environment in Baldoyle Bay from the construction and especially the operational phase of the WwTP and sludge centre. We are informed in the EIAR that an 'assessment used mathematical modelling' to evaluate the dredging and pipe laying of the marine outfall pipe and the continuous discharge of treated wastewater through this pipe into the sea. But this modelling does nothing to lessen the profound belief of my constituents that Baldoyle Bay is an environmentally shocking choice for the WwTP outfall.

Constituents are deeply proud that the Dublin Bay Biosphere (of which Baldoyle Bay is part) is the world's only biosphere in a capital city region. This biosphere of course was designated by UNESCO in 2015 and expanded on the designation of the North Bull Island in 1981. The designation also includes Howth Head and Ireland's Eye and complements the Special Amenity Status of the Howth peninsula designated by the government and Fingal County Council in 1998. Public representatives like myself have also long campaigned for special areas of conservation (SAC) and indeed National Park status for all of this unique biosphere. (The North Bull Island is of course an EU designated SAC also). Ireland's Eye is also a protected bird sanctuary and both the island and Howth itself are home to large colonies of herring gulls, common and black guillemots, cormorants, gannets, puffins and many other seabird species.

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Constituents are particularly worried about potential damage to the marine biosphere from medical and pharmaceutical residues and priority hazardous and pathogenic substances in even tertiary treated water. Constituents are also concerned at possible leakage and operational pumping failures in the buffer zone of the Dublin Bay Biosphere which of course includes the WwTp site and the pipeline to the marine outfall. I am also reminded by constituents of court cases taken against Irish Water following incidents of sewage pollution at treatment plants in Balbriggan, Limerick, Cork and Galway. They also mention that in June 2018 temporary swimming restrictions had to be imposed by Dublin City Council at Dollymount, Sandymount and Merrion beaches following a breakdown at a Waste Water pumping station which discharged sewage water into the River Liffey. As I write this brief submission, Clontarf constituents complain of sewage residues on Bull Island (presumably from operational failures at the Ringsend Wastewater facility).

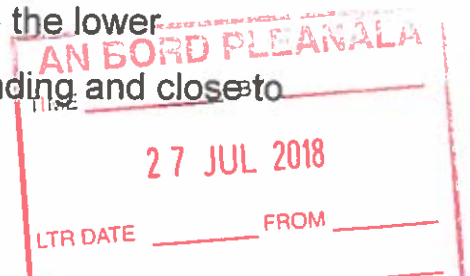
Finally, the above constituents wish me to stress one important fact on the WwTP and outfall location. They note correctly that the location decision at Clonshaugh was made in 2013. This was two years prior to the designation of the whole of Dublin Bay (including Baldoyle Bay) as a Biosphere in 2015. Given this designation, constituents therefore believe that the Jacob Tobin location consultation process is rendered null and void and the decision to locate one or a number of small local sewage plants in Fingal must begin 'ab initio'.

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The AOS Planning Report for Irish Water Does Not Address Local Concerns Relating to the Airport and the Siting of the WwTP in Clonshaugh.

During earlier 'consultations' in 2011 and 2012 and in recent weeks, Clonshaugh, Priorswood and Darndale residents have raised the problem that the proposed WwTP and sludge plant lies directly on the Dublin Airport flight path in very close proximity to the main runway of the airport. It is again striking that the AOS Planning Report was prepared on the basis of the Dublin Airport local area plan of 2006, given that in the past 12 years the airport has changed beyond recognition. The report admits that objective DA10 of the Fingal County Development Plan 2017-2023 is to restrict development which would give rise to conflicts with aircraft movements on environmental or safety ground on lands in the vicinity of the airport and on the main flight paths serving the airport. Objective DA13 of the same County Plan is even more specific, committing to 'Promote appropriate land use patterns in the vicinity of the flight paths serving the airport, having regard to the precautionary principles, based on existing and anticipated environmental and safety impacts of aircraft movements'.

Yet the crass decision to choose the Clonshaugh site places the proposal WwTP directly on the edge of the core flight path into Dublin Airport and just a kilometre or so from the airport terminals. Constituents believe that on public safety grounds, the Dublin Airport Authority should again strongly object to the location of the sewage plant at this site. Constituents raise concerns about operational facilities at a future WwTP which might release noxious gases like methane into the lower atmosphere through which planes are rapidly descending and close to

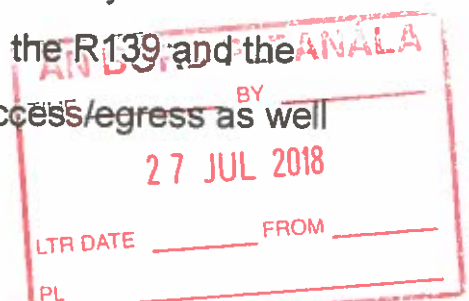


landing. Such a scenario raises fears of a catastrophe for airplane passengers and crews and for the residents of the receiving environment.

Nowhere in the AOS and Jacobs Tobin reports is there any reference to a risk analysis for such (hopefully unlikely) but possible event, Indeed in the past, some of the worst air crashes have occurred close to airports. Constituents rightly ask why should such an unnecessary grave danger be created for airplane and passengers (projected to rise to 50 million people per annum by 2035/40) and for local North Coolock/North Fringe residents. Given the dearth of research on this matter in planning application ABP 301908-18, the plan to site this sewage project at Clonshaugh/Baldoyle Bay should be rejected out of hand.

The Jacob Tobin Traffic Management Plan Does Not Address Residents Fears of Traffic Gridlock in North Coolock and the North Fringe.

Local residents are very concerned that both the construction and operational phases of Plan ABP-301908-18 will bring major additional heavy vehicle traffic to the R139/N32, the Stockhole Lane/R139 roundabout and to the R139/M1/M50 roundabout itself. The R139/Clare Hall Avenue/Malahide Road junction will also be badly impacted. The Clonshaugh and Priorswood estates of course use the already very busy Clonshaugh Road/R139 Junction and homes at Caragh Park and Northern Close/Old Belcamp Lane are accessed directly from that road. The Burnell district is also directly accessed from the R139 and the future large Belcamp College estates will have access/egress as well



from the R139. In addition, St. Michael's House has an important service facility for citizens with intellectual disabilities opening onto the R139. The very popular GAA hurling and football club Croabh Chiaráin also has its main pitch facilities with its entrance on the R139 and this youth and sports complex will be next door to the planned WwTP and sludge centre. There are also a number of homes with direct access to the R139.

In Dublin City Council and Fingal County Council Development Plans up to 2018 the building of large residential and ancillary commercial and service developments at Belcamp College and the creation of the high tech Fingal Business Park at Clonshaugh were predicated on major improvements to the local roads network. In particular, Dublin City Council has planned and brought to approval for funding stage a major bypass of the N32/R139/Malahide Road/Clare Hall Avenue junction. From the most recent enquiries I made about this bypass, it was to cost about €50 million and would permit a town centre development at Clare Hall/Burnell. Dublin City Council and Fingal have also included a 'Northern Parkway' in plans over the past 20 years and this road was intended to be a new outer link road connecting the Coast estates of Baldoyle, Clongriffin, Belmayne, Balgriffin and the new Belcamp/Clonshaugh development. There are extant plans also for a new road network linking Portmarnock, Kinsealy and Cloghran/Clonshaugh. Constituents believe the consideration of any major development at Clonshaugh and Belcamp is completely premature until the Malahide Road Bypass and Northern Parkway are built.



Plan ABP 301908-18 will simply greatly increase the often gridlock conditions at the junctions referred to above. Indeed at the morning and evening rush hours, there are often long tailbacks at the key junctions at both ends of the N32/R139 . At quieter times of course there is often excessive speed (over 60kph limit) despite the on-road 60 kph which my office campaigned for and had installed.

The Jacob Tobin EIAR Vol. 3 Part A Chapter 13 Traffic and Transport Report gives no supporting basis for its estimates of traffic growth at 13.5.4. Residents are particularly concerned that the access to the WwTP construction and operational site will be from the R139 (400 metres from the south of the site) and directly opposite Carragh Park estate. While the egress road (230 metres from the west of the site) is onto old Clonshaugh Road, the Old Clonshaugh Road/N32/R139 roundabout and the adjoining motorways roundabout will both be deeply impacted. WwTP construction will be over 5 phases from 2022-2024 with the outfall pipeline to Baldoyle and Portmarnock excavated over the 4 later phases.

The summaries of traffic performance analysis at Tables 13.7, 13.8 and 13.9 seem again to have little statistical basis but even they show that the Clonshaugh Road/R139 roundabout is currently gridlocked with projected queues of more than a 1000 vehicles at the p.m peak and more than 800 vehicles at the a.m peak. Table 13.11 shows that the R123 Moyne Road/R106 Coast Road junction is already seriously over capacity on all arms of that junction. The R106 Coast Road/Station Road Portmarnock mini-roundabout is also shown as over capacity on all arms of the junction. The figures and estimates in all these tables seem to be based on an OSCADY traffic analysis. But little weighting seems to have

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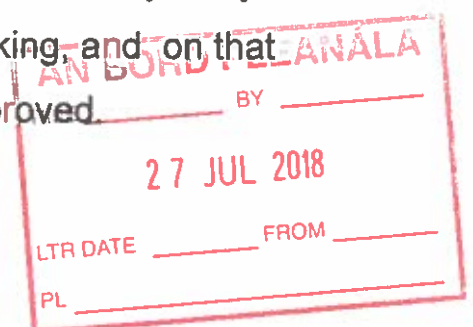
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been applied to the certain development of Dublin Airport and it's industrial zones over the next 5/6 years. There is little or no consideration also of the certain residential and commercial expansion of the North (DCC)/South (FCC) Fringe of Dublin city. So the conclusions at Chapter 13.6.1 on the construction phase are generally flawed.

During the operational phase, residents have key concerns about the 'fleet of trucks removing sludge from the proposed WwTP to the proposed RBSF 'mentioned at 13.7.1. The proposal for 'left-turn-only' access and egress is welcome but again the Traffic growth figures given at 13.7.4 have an unclear basis. Table 13.8 on estimates for Traffic at the Clonshaugh Road/Clayton Hotel roundabout and the Clonshaugh Road roundabout itself seem to ignore future major developments at these locations (such as the approved massive 10-storey new Carra Shore Hotel). But queues of up to 400 to 600 vehicles at the AM and PM peaks are forecast for 2025, up to 800 at 2030 am and pm peaks and 800 to 1000 at the 2040 am and pm peaks. The summary of traffic performance analysis in Table 13.18 of course shows the Clonshaugh Road roundabout currently at over capacity traffic. The conclusion at 13.8.1 on the N32/R139 access and the Clonshaugh Junctions are again presumably based on OSCADY analysis but are also flawed for these critical junctions. The traffic forecasts discussed above and the outline construction traffic management plan and operational phase mitigation measures underline the need for a full traffic and transportation assessment of the WwTP and sludge centre project. The analysis by Jacob Tobin in Chapter 13 of the EIAR is gravely lacking, and on that account also Plan ABP 301908-18 should not be approved.



The Total Lack of Consultation with Neighbouring Communities and the Necessity for an Oral Hearing.

As the appendices attached to this brief submission illustrate there was some consultation with the people of North Coolock in 2011/2012 by Jacobs Tobin and Dublin City and Fingal County Council water and drainage engineers. But the current application, Plan ABP 301908-18 was submitted abruptly and without warning to the receiving communities. Many residents who came to meet me received no information at all and there seems to have been only a belated sporadic effort to reach and inform households. Unlike in 2011 and 2012, there are no visible site notices on either the R139/N32 or on Old Clonsaugh Road/Stockhole Lane near where the egress exit will be located.

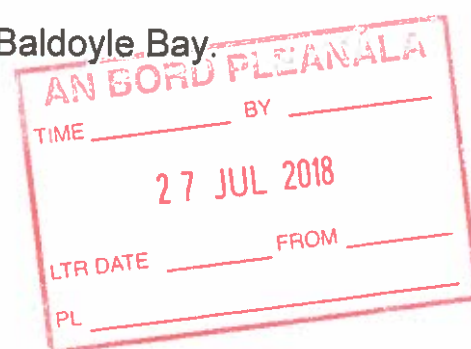
As many constituents have repeated, the AOS and Jacobs Tobin reports and documents on the website (<https://www.gddapplication.ie/>) are complex and not easily accessible for many interested citizens. I myself only learned of the submission for planning permission under the 2016 Planning Act from Fingal County Council's Weekly Planning lists (Week 25, 2018) and a belated note from Irish Water. Democratic and transparent scrutiny is essential for all planning proposals, especially large infrastructural developments under the Bord Pleanála fast track process. But there has been no flow of information from the proposers into the receiving communities during this short 7-week submission period. (I have of course directly alerted the 4 or 5,000 households who are closest to the proposed WwTP and alerted the rest of Dublin Bay North constituency through my social media accounts and website.



But there is a huge lacuna in information and communication between Irish Water and the parishes of North Coolock and the North Fringe. Expected detailed displays of maps and drawings of all buildings and pipeworks at local libraries and community centres have not taken place. The key request by constituents (mentioned above) that there should be a model of the proposed WwTP, Sludge Centre and Regional Bio-Solids Plant has not been acceded to. Indeed, even at this stage, there seems to be only 'indicative plans' for the WwTP which is simply not good enough for a proposal of this magnitude.

Many constituents believe that the Clonshaugh/Baldoyle Bay proposal is now insuperably flawed and out of time. The UNESCO Biosphere designation of Dublin Bay and Baldoyle Bay in 2015 totally changes the very weak assumptions made by the proposers in 2011/2012. The location decision made in 2013 would have been impossible in 2015 and is not now remotely feasible in 2018. A legal challenge on this issue is bound to be considered by Irish and European courts, should the UNESCO biosphere designation of Baldoyle Bay be disregarded by An Bord Pleanála. Information and discussion on a number of smaller sewage plants for West Dublin and Central Fingal were key features of the 2011/2012 consultation and submissions. Such proposals (excluding Clonshaugh/Baldoyle Bay) should now be urgently re-examined and developed.

For all the above reasons, a full Oral Hearing on Plan ABP 301908-48 is essential and I now request an Oral Hearing on all aspects of the planning of the WwTP project at Clonshaugh and Baldoyle Bay.



Conclusion: The Proposal for a WwTP at Clonshaugh/Baldoyle Bay Must be Turned Down.

On all the grounds outlined above, I believe permission should not be granted by An Bord Pleanála to Plan ABP 301908-18. The choice of Clonshaugh, so close to thousands of households was fundamentally wrong in 2012/2013 and would be a huge blow to sustainable planning of the whole North/South Fringe. The evaluation of the site location studies by Jacobs Tobin would not have been approved by any independent or international review. The Environmental Impact Assessment Report by Jacobs Tobin is not a credible analysis of the serious impacts on the human health of the receiving population, on the visual impacts of the receiving environment, and on air quality impacts and noise vibration impacts for the people of North Coolock and the North Fringe.

The EIAR and Planning Report is particularly lacking in its brief analysis of the hydrology and marine biosystems of the receiving biosphere. The JB Barry Flood Risk Assessment ignores the fluvial history of Clonshaugh and the North Fringe. The designation of Baldoyle Bay as part of the Dublin Bay UNESCO Biosphere in 2015 renders this planning application unsustainable, unviable and pointless. Constituents' deep concerns regarding the siting of the WwTP on the lower main flight path to Dublin Airport again constitutes an insuperable obstacle to plan ABP 301908-18. Constituents are hoping that the Dublin Airport Authority will also make a detailed submission on the application.

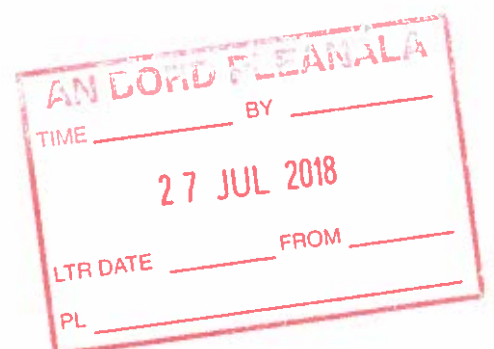
The Jacobs Tobin Traffic and Transport assessment seeks to minimise traffic impacts of the daily 'Fleet of trucks' from the Sludge Centre



through the already congested junctions of the R139/N32 and also other major sewage plant traffic during construction and operations down to 2025 and beyond. Constituents complain bitterly about the lack of consultation and information on the WwTP Project and for that reason, I believe An Bord Pleanála must hold an Oral Hearing into Plan ABP 301908-18. Such an Oral Hearing will clearly demonstrate that for all the above reasons the WwTP proposal for Clonsaugh/Baldoyle Bay must be refused.

Very Best Wishes,


Thomas P. Broughan
Independent TD for Dublin Bay North



Appendix A

**SUBMISSION TO PHASE 2 OF THE GREATER
DUBLIN DRAINAGE PROJECT:
SELECTION OF THREE EMERGING
PREFERRED SITE OPTIONS**

**Addendum to my Submission of Wednesday,
May 23rd 2012**

Deputy Thomas P. Broughan T.D.

Dublin North East

Thursday, 5th July 2012



From discussions with residents, water and drainage engineers and other interested citizens, I wish to briefly add the following concerns regarding the possibility of Clonsaugh as a site for the Greater Dublin Drainage Project.

**ONGOING SERIOUS ENVIRONMENTAL & ENGINEERING
PROBLEMS WITH LARGE SECONDARY & TERTIARY WASTE
WATER TREATMENT PLANTS**

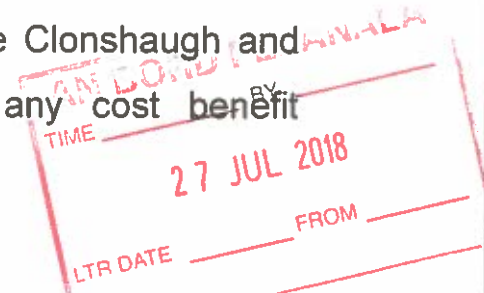
Concerns remain regarding odour and engineering problems at the massive Ringsend Water Treatment Plant. Attention has also been drawn to the major additional cost at Ringsend to control odour

emissions for the past three or four years. There is also an ongoing concern at the additional costs of meeting the EU Bathing Water Directive because of the history of the Ringsend plant. Constituents have drawn parallels between the siting of Harlem's North Ring Wastewater Treatment Plant in New York City and the attempt to put the Fingal plant on the exact border of Clonsaugh and North Coolock. In addition, of course, there was a disastrous fire (following rain) at the Harlem facility in July 2011 with shocking impacts on local residents as sewage gushed into the Hudson River. The Harlem plant was intended for the New York City Upper West Side but due to powerful political influence was sited in Harlem instead.

Recently (last month) also in Pittsburgh, Pennsylvania methane emissions from the Struthers Wastewater Treatment Plant exploded (with obvious parallels and implications for any plant to be sited in the Dublin Airport zone). Across the Atlantic, the Halifax, Nova Scotia Province somewhat resembles the geography of Ireland. In February 2008, due to serious electrical and mechanical problems, following rainfall, 187 million litres of raw sewage was released into Halifax Sound (bay). Similar problems have emerged at major works treatment plants in locations as diverse as Sydney, Australia and Boston, Massachusetts

THE LACK OF A BASIC COST BENEFIT ANALYSIS FOR EACH OF THE 9 & LATER 3 "PREFERRED" SITES

The lack of a Cost Benefit Analysis for each of the nine sites examined is a grave deficiency of the Jacobs Tobin report. The twelve (often vague and poorly researched) elements used to investigate Clonsaugh and the other eight possible locations totally ignore any cost benefit

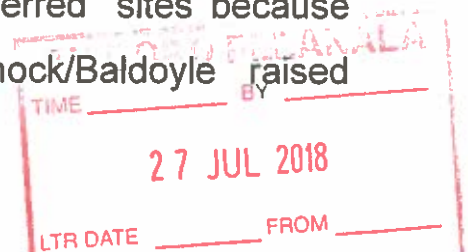


appraisal, especially in relation to the receiving population and alternative (and long planned) land uses for the North Fringe. Looking at Cost Benefit Analyses for other comparably sized proposals, for example, the plant at Halifax, Nova Scotia, it is clear that there could not be a positive NPV for the CLonshaugh site (no matter what the level of discounts were set at). But the preparation of a C.B.A. for each of the nine sites should have been a basic prerequisite of any professional report such as Jacob Tobin. The lack of such an analysis is astonishing and will also have to be raised at local authority and national level. The inherent damage that this massive sewage plant will do to the already fragile socio-economic prospects of the people of the North Fringe in terms of the environment, society, economy and marine ecosystem at the outfall clearly points to a seriously negative NPV. Many studies have shown that technical and engineering solutions cannot be separated from their social impacts. (For example see *"From Pipe Dreams to Tunnel Vision, Engineering Decision-Making and Sydney's Sewage System"* by Sharon Bedler).

To evaluate any possible site for this regional wastewater site without a numerical evaluation of all the societal and economic impacts on my constituents means that Jacobs Tobin is hopelessly flawed (and of course a similar analysis can be applied to the eight other sites).

THE PROPOSED OUTFALL FROM CLONHSAUGH AT BALDOYLE BAY IS UNCONSCIABLE

It is also clear from recent meetings and research that Jacobs Tobin should have excluded Clonshaugh from the "preferred" sites because the proposed Clonshaugh outfall at Portmarnock/Baldoyle raised



insuperable environmental dangers. Portmarnock's Velvet Strand achieved Blue Flag status in the past three years precisely because the Howth outfall was no longer operational and designated Shellfish Areas maps used by Jacobs Tobin are out of date and irrelevant. The literature on water treatment systems in the UK and around the world is paying increasing attention to the impact of synthetic chemicals and endocrine disrupting chemicals in wastewater outfalls, river and marine outfall environments. Chemicals which disrupt the endocrine system of fish, birds and mammals are present in a massive range of chemicals which end up in the sewage system including dioxins, PCBs, heavy metals and nonylphenols. Several studies such as Holmes et al (1999) have noted the impact of these endocrine disruptive chemicals on fish and crustacean populations. (These issues are also highly relevant to a Cost Benefit Analysis of each site and outfall).

Most concerning to the UK government in recent reports is the impact of chemical run-offs from human medicines. On June 13th 2012 last I asked Minister Phil Hogan about the impact of Ethinyl Estradiol EE2 effluent on Irish wastewater systems and whether Ireland would face similar huge costs to the UK (under the EU Water Directive) of upgrading existing sewage plants to address the run-off of the chemical into our fragile marine environment.

Minister Hogan told me in a reply that the EU Commission published a proposal in January to include an extra 15 chemicals including 17 alpha-ethinylestradiol (EE2) and two other pharmaceutical substances with the list of 33 existing priority substances. The Environmental Protection Agency recently issued a research call for proposals to examine the damage caused to the marine environment by chemicals such as EE2.

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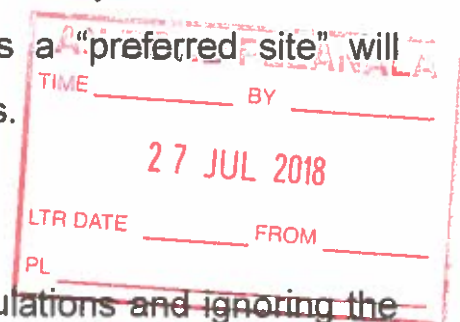
No effort of any kind was made by Jacobs Tobin to research or evaluate the above appalling likely impacts of an outfall from a sewage plant into Baldoyle Bay. The certain disastrous impact of bacteriological pollution especially on bivalve molluscs (which feed by water filtering) makes any outfall at Portmarnock/Baldoyle an impossibility.

THE DISASTROUS IMPACT ON NORTH FRINGE & NORTH EAST COMMUNITIES IS NOT EVALUATED BY JACOBS TOBIN

The overwhelming view of constituents I have met over the past two months (and whom I alerted to this sewage plant proposal) is one of a sense of desolation that this proposal could have been progressed this far (effectively almost through three consultations) without informing them of all aspects of the plan. The management of the project so far has all the hallmarks of a total split between the technical and the social which I referred to above.

It is deeply insulting to disregard the huge communities of 8,000 and more housing units which will lie within a few hundred metres of the proposed Clonsaugh site. As I mentioned in my main submission, the seven or eight parishes most concerned have suffered greatly from grotesque and egregious planning and local authority failures over the past four decades. To choose Clonsaugh as a "preferred site" will simply be another chapter in this litany of failures.

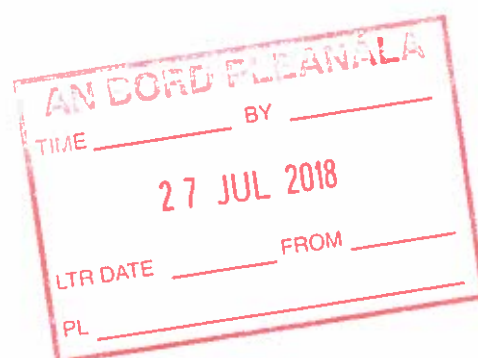
Ignoring the profound needs of larger local populations and ignoring the grave failures of the past when making infrastructural decisions is a key



theme of "Water Time and European Cities" by Petri S. Juuti and Tapio S. Katko (Tampere Universal Press, 2005). The book is a survey of EU Water and Wastewater systems and urges that the lessons of many centuries of human engineering should never be ignored when developing plans for a new water services facility. Jacobs Tobin and the Greater Dublin Drainage Project needs to remember these lessons also.

Yours Sincerely,

Thomas P. Broughan T.D.
Labour T.D. for Dublin North East



Appendix A

SUBMISSION TO THE GREATER DUBLIN DRAINAGE PROJECT

Deputy Thomas P. Broughan T.D.

Labour, Dublin North East

November 2011

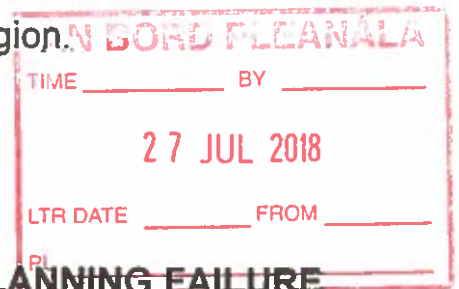


INTRODUCTION

I wish to submit the following observations and comments on behalf of my constituents in Cloghran, Balgriffin, Clonshaugh, Darndale, Belcamp, Belmayne, Burnell, Clongriffin, The Coast, Baldoyle, and Portmarnock to the consultation on the Greater Dublin Drainage project. In particular, I would like to strongly oppose the proposal that Clonshaugh and Cloghran are two of the nine suggested locations currently being considered by Fingal County Council as the site for a massive new wastewater treatment plant.

As I have recently argued in strong submissions to the North Fringe Local Area Plans that I have sent to Fingal County Council, Dublin City Council and the Department of the Environment, it would be outrageous and completely unjustifiable to locate the massive new sewage plant in either Clonshaugh or Cloghran. At the outset of this consultation, Fingal County Council must entirely dismiss the ludicrous notion that either

Clonshaugh or Cloghran are suitable locations for the North Dublin sewage plant for the greater Swords and Fingal region.



SITES WOULD COMPOUND NORTH FRINGE PLANNING FAILURE

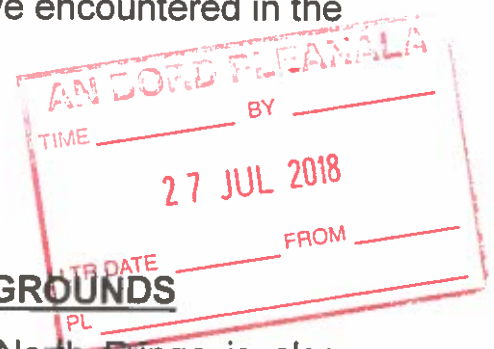
The North Fringe is a vast new urban district of up to 25,000 new residential units in Dublin 13 stretching from Clonshaugh through Donaghmede to Portmarnock and encompassing Burnell, Belmayne, Clongriffin and The Coast, Baldoyle. The North Fringe has already become a very welcome addition to Dublin North East constituency and there are many very successful new communities within the North Fringe including Burnell, Belmayne and Clongriffin Town.

But at the moment the North Fringe stands on a precipice given the number of planning disasters that have beset the new district since construction began. These include the devastating discovery of hundreds of pyrite-affected homes and the shocking fire safety and other structural defects that have come to light in the Priory Hall complex. There are also a number of unfinished estates (for example Castlemoyne Estate) and empty or unfinished commercial and local shopping centres across the North Fringe (for example Belmayne and Clongriffin Town Squares) that urgently need to be completed to the highest standards for the sake of present and future residents. I have long argued that the North Fringe should be designated as a statutory Strategic Development Zone (SDZ) or other statutory planning instrument. An SDZ is urgently necessary to ensure that all outstanding completion and remediation works are carried out. It would also ensure the delivery of all key, long-promised social services so that the North

Fringe becomes a pleasant, community-oriented district for all current and future residents.

Given the range of planning challenges facing the North Fringe, it would be catastrophic to then locate a major new sewage and wastewater plant in the wider North Fringe region (which is where the proposed Clonsaugh and Cloghran sites lie). A new massive waste water treatment facility would cause major disruption and inconvenience to a district that is already struggling to contend with the failures of previous “developer-led” planning. I originally proposed the establishment of the North Fringe Forum to bring all stakeholders together including local residents, service providers, public representatives, Dublin City Council and Fingal County Council. For this reason also, I formally proposed to the North Fringe Forum that it must oppose both suggested North Fringe sites.

It would also go against natural justice to locate a sewage plant (with all of the accompanying inconvenience for local residents during its construction and operation) that will serve central and north Fingal in the North Fringe instead of in the key Swords new catchment areas north of Swords itself (and given the awful difficulties we have encountered in the North Fringe and that I have outlined above).



IMPOSSIBLE LOCATION ON ENVIRONMENTAL GROUNDS

In addition to its unique planning difficulties, the North Fringe is also characterised by its unique environment. In fact, the core coastal area of the North Fringe at Baldoyle/Portmarnock is a polder. A few weeks ago during the so-called “monster” rain there was again serious flooding

in these districts (despite improvements to the Moyne River estuary and tidal gate). It would be environmental lunacy to disrupt this already distinct and delicate environment by placing a massive sewage plant at Clonsaugh or Cloghran in the western area of this territory. In fact, there were earlier proposals to locate a Northside sewage plant at Baldoyle which were defeated because in effect most of Baldoyle and South Portmarnock is a polder.

Furthermore, the Portmarnock Velvet Strand is a beach that should always have been recognised as a national monument in ecological terms. The nearby Baldoyle Estuary has been, of course, a European Conservation habitat for many years. The proposal for a piped development underneath the Baldoyle Bay estuary and therefore sewage drainage at Portmarnock Velvet Strand is clearly a very dangerous and appalling prospect.

SELECTION OF CLONSHAUGH/CLOGHRAN SITES WOULD BE HOPELESSLY PREMATURE

It would also be highly premature and completely unacceptable for Fingal County Council to locate the proposed sewage plant in the wider North Fringe district when critical Local Area Plans are being developed by DCC and Fingal themselves. Any decision on the location of a sewage plant in the wider North Fringe district, would gravely pre-empt the important Local Authority LAPs. The LAPs should also clearly outline a plan to protect the unique Portmarnock/Baldoyle/Sutton and Howth areas and to ensure that region remains the area of key recreational importance for the residents of the North Fringe, Dublin North East and the whole of the Fingal and Dublin regions. This will require additional



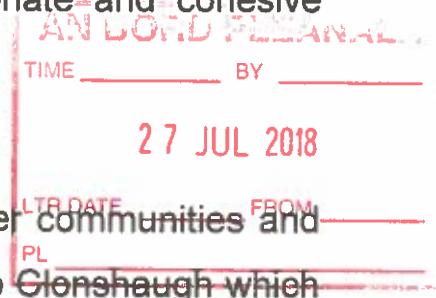
statutory safeguards for the Howth Peninsula, Dublin Bay and Baldoyle Bay including Portmarnock Beach.

I have also proposed in my submissions to the North Fringe LAPS that the whole region (one of the earliest recorded homes of the Irish people after the last Ice Age cf. the monument at Sutton Beach, when Howth was still an island etc.) would be designated a UNESCO World Heritage Site as part of the North Fringe (DCC) and South Fringe (Fingal) LAP completion plans. The location of a sewage plant would clearly severely detract from this application.

CLONSHAUGH SITE

The Clonshaugh "option" is approximately 2.5km east of Dublin Airport and 1.3km north of Belcamp and Darndale. This land parcel has a total area of 40 hectares. It would be heinously wrong to select Clonshaugh as the location for the sewage plant. This area is located in the middle of the North Fringe and is also right in the middle of the planned development of a major new city region stretching from the coast along the Moyne River basin and the N32 and right across to the Airport lands. In addition, it would make no sense to locate a massive sewage plant in the middle of a district which has already been designated as part of the lands of the critical airport economic zone. The selection of Clonshaugh as the location of a massive sewage plant would absolutely destroy these plans and would tear to shreds the appropriate and cohesive development of the lands at this location.

There are also a number of long-standing and newer communities and recreational facilities from Belcamp and eastwards to Clonshaugh which



would be grossly affected by the placement of a major sewage works plant in Clonshaugh. Burnell (in my opinion) has been one of the most successful new developments within the North Fringe. Burnell (including Newtown) is clearly a pleasant, integrated mix of residential units and shopping and commercial outlets that are also being used more and more by Belmayne residents. It would be appalling to potentially destroy this successful new residential district by imposing a vast and dominating sewage plant works just behind its vicinity.

There are also around a thousand householders in the wider Burnell and Newtown Court area who would be greatly affected by the location of a sewage plant here. A Local Area Plan is to be shortly developed for Newtown itself which must be allowed to be completed without being pre-empted by a decision by Fingal on the Greater Dublin Drainage project. West of Burnell and Newtown Court, is the wonderful Belcamp College which is a building of immense historical importance. The developer Mr. Gerry Gannon originally submitted a huge high density masterplan for this location which was rightly turned down. But clearly the Belcamp College lands will be the future location of the homes of thousands of families. Of course, I have strongly argued that any further development at this wonderful territory along the Moyne River must result in lower density, high quality homes and essential local services.

Moving westward, the outstanding Craobh Ciaran GAA club is also situated close to the proposed Clonshaugh site. Craobh Ciaran is one of the most famous hurling clubs in Dublin and hundreds of youths and young children train and play matches there on a weekly basis. It would be unthinkable to have these children and young people training and playing matches in the shadow of a massive sewage plant.

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In Clonshaugh itself, local residents also had to contend with the discovery in 2001 of a major illegal dump on I.D.A. owned lands just north of Clonshaugh and Priorswood Estates. This was an incredibly shocking event for local residents across the parishes of Clonshaugh, Belcamp, Priorswood, Bonnybrook, Darndale and all of the North East parishes downstream to Baldoyle as the affected area was said to be 250 metres long by 40 metres wide, at least three metres deep and containing more than 40,000 tonnes of waste matter including the presence of biohazard, chemical and radiological hazard, hydrocarbon hazard and landfill gas hazard from commercial (engine parts, aeronautical parts and oil drums), domestic, construction and clinical waste. At the time there was a strong suspicion of seepage from the dump into our major local River Moyne.

The illegal I.D.A, superdump was an environmental and legal time-bomb which took Trojan efforts on behalf of local people and their representatives to ensure plans were advanced to finally fully cleanse and remediate the site (which was also at an extraordinary financial cost). It would be extremely unfair therefore to now impose a super sewage plant at this location when the environment is still recovering from the effects of the appalling criminal dump that was previously established there. The ID.A. site is now set to be developed as a high tech, IT and avionics industrial and business estate with perhaps up to 10,000 jobs. This development would be wrecked by the proposal to locate the sewage plant in Clonshaugh.

Belcamp and the N32 is also the location of historic Traveller community housing over the past 40 years that is well integrated with the local surrounding districts. Given the housing and other issues faced by this

vulnerable community (and located next to the parishes of Priorswood and Darndale which have also faced major challenges over the past decades), it would be incredibly unfair to then impose an industrial size wastewater treatment plant in this vicinity.

Finally both DCC and Fingal are working on a diversion of the Malahide Road (west of the Clare Hall Avenue/Malahide Road/ N32 junction to permit the development of Clare Hall Town Square at Burnell/Clare Hall. The imposition of a sewage plant just west of this well-planned, longstanding and inevitable proposal to divert that section of the Malahide Road would destroy years of work by our roads and traffic engineers, public representatives and representatives of the local communities.

CLOGHRAN SITE

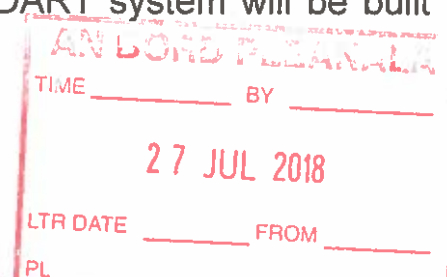
The suggestion that Cloghran (the site is approximately 2.2km east of Dublin Airport and 3.3km south of Swords comprising of a land parcel with a total area of 32 hectares) may be a suitable site for the North Dublin sewage plant is equally as ludicrous and appalling as the Clonsaugh proposal. The Cloghran proposal is also centrally situated in the vital airport economic zone. The lands in question will be incredibly valuable for decades to come and despite current economic difficulties, it is clear that the Irish economy will at least double in size by 2040 (with consequent impacts on air travel growth and for jobs and economic development in the Dublin Airport economic zone). Even the cursory cost benefit analysis that I have made myself shows that the location of a sewage plant in this area would be an appalling waste of very valuable



land resources and cost the national and local exchequers in an unacceptable way.

This high quality land must be protected and not degraded by siting a monster sewage plant there. In addition, there was recent disappointing news that Metro North has been shelved for a number of years. This was particularly disappointing given the meticulous planning in relation to Metro North that has already been carried out by the Railway Procurement Agency and Fingal County Council and given the huge boost that Metro North would have provided to economic growth and employment in the whole Dublin/Mid-Leinster region. The Bord Pleanala approved route of Metro North goes through key lands at Nevinstown right beside the proposed Cloghran site. It would therefore be ridiculously premature to propose a site at the location where Metro North is eventually set to run.

Transport Minister Varadkar insisted last week that the Dublin projects including Metro North have been in effect put on ice rather than shelved. I have strongly urged Minister Varadkar to seek out any offers from the private sector to continue building Metro North (given a long history of considerable interest in the project from EU and other transport companies and from various financial institutions.) I believe that the Minister has a huge responsibility to keep Metro North on life-support to vigorously pursue non-State funding at home and abroad to enable further works to proceed on the projects in the lifetime of this government. The Minister has also expressed his commitment to this so it would be highly inappropriate to choose Cloghran as the site for the sewage plant. An integrated Metro North/DART system will be built in



this corridor beyond doubt and Fingal's own excellent Metro Corridor plan therefore completely rules out the sewage plan for Cloghran.

Cloghran, of course, is directly under the site of the airport's flightpath and it would be highly inappropriate and also potentially unsafe to locate a massive wastewater treatment plant there. With the possible leaking of methane and other dangerous gases from the sewage plant, the proposal is therefore potentially lethal. The new runway at Dublin Airport has also already received permission (even before a recent further proposal from DAA) and this reinforces the unsuitability of locating a sewage plant on the flightpaths. This is higher ground that is also the centre of a confluence of important local rivers including the historic Cuckoo Stream. The environmental impact of locating a major plant at this location is therefore deeply worrying.

As with Clonshaugh, key community activities are carried out in this area. These include the headquarters of the outstanding Athletic Union League (AUL) which provides critical sporting and social facilities for citizens all over the Northside and lies right beside the proposed Cloghran location. The AUL has played a key role in the promotion of Association Football in the Northside generally (including in my constituency). I have supported John Delaney and the FAI to develop further district and regional headquarters for the game. It would thus be outrageous to locate sewage facilities beside the important centre of Association Football which is the AUL.

Nevinstown, (East and West), Kinsealy and Marshallstown are three of the most important districts in the Cloghran catchement area. There are longstanding plans (in particular for Nevinstown, south of the Holywell

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development) for significant housing and related services development in this region as the general area is set to grow to a population of over 100,000 over the next two to three decades. It is clear that a part of these developments in the area will be a future continuation of the existing Holywell and Kinsealy housing estates into Nevistown and Old Kinsealy. In the past I have also proposed that this location should also be considered for a new Third Level Institution for Swords and the North Fringe. Given that DCU is a national technology university, I believe North Dublin and South Fingal should also have its own general Third Level institution in an area easily adjacent to both districts and facilitated by mass public transport. This was also alluded to (firstly at the suggestion of myself and Deputy Sean Ryan) in the Metro North corridor masterplan. Given the overcapacity strain on Beaumont Hospital, I also proposed a new regional hospital for the same location for both the North Fringe and Central Fingal areas in the recent past.

CONCLUSION

In Dail Eireann, my North Dublin colleague Deputy Brendan Ryan has put forward a number of valuable alternative proposals to the massive sewage plant proposals that have been outlined under the Greater Dublin Drainage Scheme. More information is clearly needed for all Fingal communities and representatives on whether the proposal of perhaps two smaller plants for Central and North Fingal would be a more suitable and sustainable solution for waste drainage in the region.

In conclusion, both Clonsaugh and Cloghran are wildly inappropriate locations for the reasons that I have outlined above. In addition, it is clear that unfortunately seaside and coastal sites are often more suitable

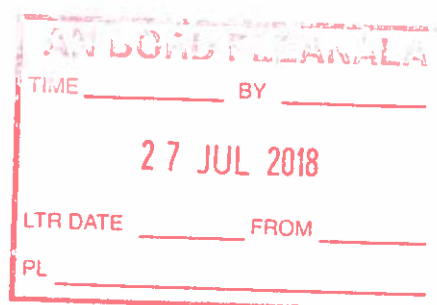
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for sewage plants than inland sites (as for example the Ringsend sewage plant).

I hope you will carefully take all of these observations into consideration on behalf of my Dublin North East constituents when the consultation process concludes and fully take on board the insuperable problems with choosing Clonshaugh or Cloghran as the site for any sewage plant.

Very Best Wishes,

Thomas P. Broughan T.D.



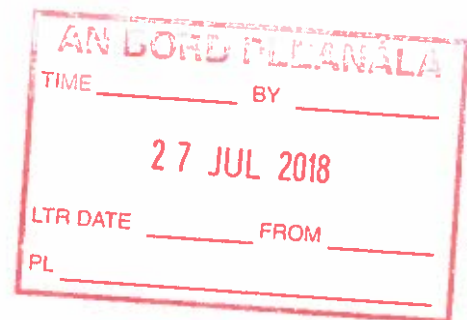
Appendix B

SUBMISSION TO PHASE 2 OF THE GREATER DUBLIN DRAINAGE PROJECT: SELECTION OF THREE EMERGING PREFERRED SITE OPTIONS

Deputy Thomas P. Broughan T.D.

Dublin North East

Wednesday, May 23rd 2012



INTRODUCTION

I wish to submit the following observations and comments on behalf of my constituents in Clonsaugh, Darndale, Belcamp, Belmayne, Burnell, Clongriffin, The Coast, Baldoyle, Portmarnock, Cloghran and Balgriffin to Phase 2 of the Greater Dublin Drainage project. Constituents were shocked last week to discover that Clonsaugh had been selected by the Jacobs Tobin Report as one of three “emerging preferred sites” for the north county Dublin wastewater treatment plant as part of the Greater Dublin Drainage project.

The proposed new super sewage plant in north Dublin will “initially be approximately one sixth the size of the Ringsend plant. It will treat 350,000 population equivalent in 2020 when the plant opens and will be

capable of treating up to 700,000 population equivalent, when it is at full capacity by 2040. (Population equivalent includes wastewater from industries, hospitals, schools, offices, businesses, etc as well as homes.)” Given the size of the proposed plant and its certain negative impacts on the huge adjacent population, it would be completely unjustifiable to select the Clonshaugh site as the location of the proposed sewage plant.

The three emerging preferred site options for the new sewage plant were announced on May 14th last as Annsbrook (approx 10km north of Dublin airport and approximately 2.7km west of Lusk with a marine outfall in the Northern Outfall Study Area); Newtowncorduff, (Approx 10km north of Dublin airport and approximately 1.0km west of Lusk, with a marine outfall in the Northern Outfall Study Area) and the Clonshaugh proposal which is 2.2km east of Dublin Airport, with a marine outfall in the Southern Outfall Area, to the north east of Ireland's Eye. The Greater Dublin Drainage project has stated that “all three project options will now be considered further in detail before one emerging preferred project option is decided on and a planning application is made to An Bord Pleanála.”

Residents in Clonshaugh and also in the adjoining areas of Darndale, Belcamp, Belmayne, Burnell and Clongriffin have rightly described the selection of Clonshaugh as one of the three preferred sites for the new plant as “cynical and outrageous.” The siting of the super sewage plant in Clonshaugh is completely inappropriate and unjustified for the following reasons:

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THE CLONSHAUGH LOCATION WOULD COMPOUND THE NORTH FRINGE PLANNING FAILURE

The North Fringe is a vast new urban district of up to 25,000 new residential units in Dublin 13 and Dublin 17 stretching from Clonshaugh through Donaghmede to Portmarnock and encompassing Burnell, Belmayne, Clongriffin and The Coast, Baldoyle. The North Fringe has already become a very welcome addition to Dublin North East constituency and there are many very successful new communities within the North Fringe including Burnell, Belmayne, Clongriffin Town, Stapolin and The Coast, Baldoyle.

But at the moment, the North Fringe stands on a precipice given the number of planning disasters that have beset the new district since construction began. These include the devastating discovery of hundreds of pyrite-affected homes and the shocking fire safety and other structural defects that have come to light in the Priory Hall complex. There are also a number of unfinished estates (for example Castlemoyne Estate) and empty or unfinished commercial and local shopping centres across the North Fringe (for example Belmayne and Clongriffin Town Squares) that urgently need to be completed to the highest standards for the sake of present and future residents. I have long argued that the North Fringe should be designated as a statutory Strategic Development Zone (SDZ) or other statutory planning instrument. An SDZ is urgently necessary to ensure that all outstanding completion and remediation works are carried out. It would also ensure the delivery of all key, long-promised social services so that the North Fringe becomes a pleasant, community-oriented district for all current and future residents. In the context of an SDZ the sewage plant proposal is both hopelessly wrong and premature.

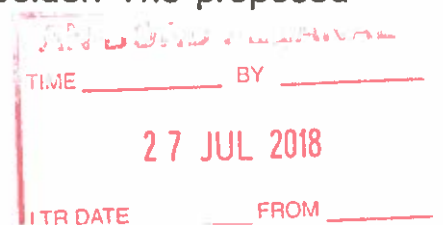
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Given the range of planning challenges facing the North Fringe, it would be catastrophic to then locate a major new sewage and wastewater plant in the wider North Fringe region (which is where the proposed Clonsaugh site lies). Such a decision would completely wreck the two Local Area Plans for this region which are currently being prepared by Dublin City Council and Fingal County Council.

A new massive waste water treatment facility would cause major disruption and inconvenience to a district that is already struggling to contend with the failures of previous “developer-led” planning. I originally proposed the establishment of the North Fringe Forum to bring all stakeholders together including local residents, service providers, public representatives, Dublin City Council and Fingal County Council. For this reason also, I formally proposed to the North Fringe Forum that it must oppose both suggested North Fringe sites. It would therefore be outrageous to locate a vast sewage plant with all of the accompanying inconvenience for local residents during both its construction and operation phases given the severe difficulties we have encountered in the North Fringe and that I have outlined above. As also referred to above, detailed final consultations are taking place on the LAPs for the North Fringe (DCC) and the South Fringe (Fingal) which I have called for and strongly supported. The current wastewater proposal would be a disgraceful attempt to pre-empt the purpose of those LAPs.

IMPOSSIBLE LOCATION ON ENVIRONMENTAL GROUNDS

In addition to its unique planning difficulties, the North Fringe is also characterised by its unique environment. In fact, the core coastal area of the North Fringe at Baldoyle/Portmarnock is a polder. The proposed



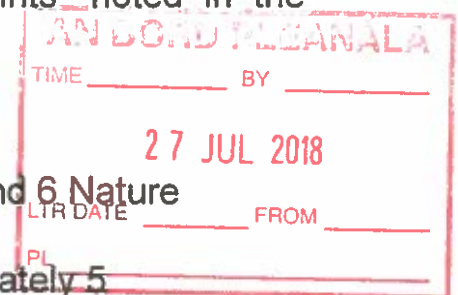
possible location of a sewage plant at the Clonshaugh site poses a significant environmental threat to the Velvet Strand, Portmarnock; Baldoyle Bay and the Malahide Estuary by any proposed southern outfall from such a plant. Baldoyle Bay and environs, of course, is a European Conservation Area and Natura 2000 site and placing a sewage outfall there would be an incredible breach of EU environmental policy. As the report itself notes in section 6.5.1 the site is just “4.6km upstream of the Baldoyle Bay Special Protection Area (SPA) with potential pathway of effect available via the Mayne River.” (p.59).

The list of potential negative environmental impacts that are listed for Clonshaugh in the report are extraordinary:

- Potential Slight Impact on Natura 2000 wetland Baldoyle Bay (SPA/SAC/pNHA)
- Potential Significant Impact on Fingal Ecological Network sites (Mayne River ecological corridor)
- Potential Moderate Impact on protected species based on length of field boundary defined by hedgerow (1.4km)
- Potential Moderate Impact on terrestrial habitats of high ecological value
- Potential Moderate Impact on birds which are the qualifying interest for the SPA
- Potential Moderate Impact for loss of winter habitat for Lapwing, Golden Plover and other wader species due to large pasture fields within the site being suitable for these birds

In addition there are significant “ecological constraints” noted in the report “within the transfer pipeline” as:

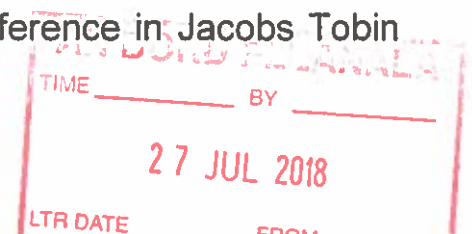
- Potential Impact on 3 Ecological Buffer Zones and 6 Nature Development Areas
- 3 crossings of ecological corridors and approximately 5 watercourse crossings, of which 2 are salmonid systems.



- Watercourse crossings upstream of a number of Natura 2000 and Natural Heritage Areas including south Dublin Bay and River Tolka Estuary, North Dublin Bay, North Bull Island and Baldoyle Bay.
- Hedgerows and other BAP habitat

Last Autumn during the so-called “monster” rain there was again serious flooding in these districts (despite improvements to the Moyne River estuary and tidal gate). Indeed the Moyne has seriously flooded at least ten times during my (almost) 20 years in Dail Eireann. It would be environmental lunacy to disrupt this already distinct and delicate environment by placing a massive sewage plant at Clonsaugh in the western area of this territory. In fact, there were earlier proposals to locate a huge Northside sewage plant at Baldoyle which were defeated because in effect most of Baldoyle and South Portmarnock is a polder. Resulting from that decision, of course, the major sewage transfer station was built in mid-Sutton in our constituency and the east of the constituency already contends with the impacts of that siting.

Furthermore, the Portmarnock Velvet Strand is a beach that should always have been recognised as a national monument in ecological terms. The Velvet Strand is the finest beach ecosystem in Fingal and among the ten or twelve most remarkable and beautiful beaches on the island of Ireland. The proposal for a piped development underneath the Baldoyle Bay estuary and thereby creating potential sewage drainage at Portmarnock Velvet Strand is clearly a very dangerous and appalling prospect. The outfall constraints for the Clonsaugh location are an insuperable difficulty for this proposal given that many of my constituents would regard the proposed outfall works and wastewater sewage outfalls as an act of national vandalism. There is no reference in Jacobs Tobin



also to the fisheries economy (for shellfish like crab and razors) in the sea areas along the Portmarnock Baldoyle Peninsula at Baldoyle Bay.

CLONSHAUGH SITE IS ON PERIPHERY OF FINGAL

It would also go against natural justice to select Clonshaugh in the North Fringe as the site for a massive sewage plant that will predominantly serve central and north Fingal (and even Meath, for example, Asbourne, Rathoath, Kilbride, Dunboyne and Clonee) instead of in the key Swords new catchment areas north of Swords itself. The proposed 2040 full operating capacity for the plant that will cater for approximately 700,000 people is clearly going to cater for the wider Swords region whose population is set to grow exponentially to 2020 and beyond.

It is notable that the other two “emerging preferred sites” are in the northern part of the county. In contrast the Clonshaugh site is practically on the border of the Dublin City Council boundary. It is therefore highly inappropriate to locate the Fingal wastewater treatment plant on the periphery of Fingal/Dublin City Council border instead of in the heart of the region within which the plant is set to provide services. Dublin City Council must make sure that Fingal is aware that it is not acceptable to have a super sewage plant for the Greater Dublin Region dumped in its backyard. I have therefore urged the Dublin City Manager John Tierney to direct his former Fingal colleagues to remove Clonshaugh and the North Fringe from the list of preferred sites.

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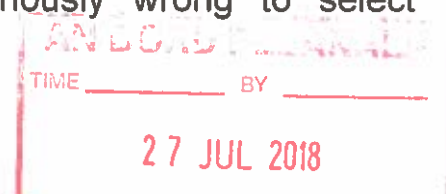
CLONSHAUGH SITE IS DANGEROUSLY PROXIMOUS TO DUBLIN AIRPORT

Clonsaugh is also an impossible site given that it is directly in line with the lower flight path of the main runway of Dublin Airport. The Phase 2 report itself notes that “the sensitivities of the site include being in close proximity to several demesne landscapes, potential elevated views from the Bewley’s and Hilton airports hotels and its location on the flight path for aircraft about to land or having just taken off from Dublin Airport.” (p.60)

Many residents and airport workers have raised with me the alarming scenario where possible methane and other dangerous gas emissions at the locality would pose a significant potential risk to airplanes landing and taking off from the Airport. I believe that this issue has not been invigilated at all in the Jacobs Tobin report and that it would therefore be unthinkable to move forward with the Clonsaugh option as one of the three preferred emerging sites. In fact, the potentially highly dangerous nature of methane emissions means that the Clonsaugh site should be immediately ruled out of contention for the location of the sewage plant. Paragraph 6.5.8 in Jacobs/Tobin on Air Quality and Odour is a total cop-out in this regard since it ignores the emissions issue and gives no reference to any other major international airport with a massive sewage plant just a few hundred metres down its main flight path.

SELECTION OF CLONSHAUGH SITE WOULD COMPROMISE THE ECONOMIC DEVELOPMENT OF THE AREA

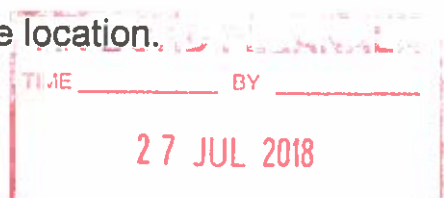
The Clonsaugh “option” is approximately 2.5km east of Dublin Airport and 1.3km north of Belcamp and Darndale. This land parcel has a total area of 40 hectares. Yet it would be heinously wrong to select



Clonshaugh as the location for the sewage plant. This location is in the western area of the North Fringe and is also right in the middle of the planned development of a major new city region stretching from the coast along the Moyne River basin and the N32 and right across to the Airport lands. In addition, it would make no sense to locate a massive sewage plant in the middle of a district which has already been designated as part of the lands of the critical airport economic zone. The selection of Clonshaugh as the location of a massive sewage plant would absolutely destroy these plans and would tear to shreds the appropriate and cohesive development of the lands at this location. Lands directly to the south, west and southwest have long been designated through IDA/Fingal County Council as the location for Fingal Industrial Park, a major high tech, transport and logistics industrial hub to further strengthen the airport economic zone and provide jobs for thousands of graduating and unemployed young Northsiders.

Unfortunately in the wider Clonshaugh, North Coolock and Dublin 17 areas there are pockets of areas with very high historic levels of unemployment. For example, in the Coolock Unemployment Exchange in 2007, 2288 people were signing on. Yet, just four years later in 2011, an incredible 5299 people were registered as unemployed at the Coolock Exchange. (There are similar figures for nearby Kilbarrack Exchange as in 2007 there were 2148 people signing on and in 2011 last there were then 5685 people signing on).

The long developed plans to develop the ID.A. site north of Clonshaugh Woods as a high tech hub referred to above could eventually facilitate perhaps up to 10,000 jobs. It would be contemptible to jeopardise these long-standing plans to further develop employment initiatives in this area by locating a massive regional sewage plant at the location.

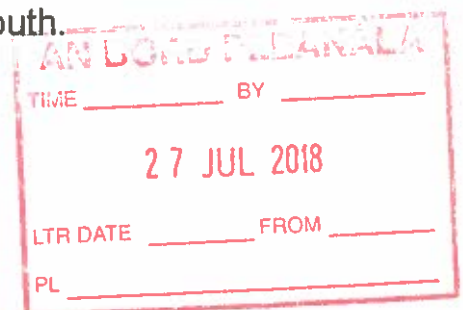


CLONSHAUGH SITE WOULD DELIVER SEVERE LOSS OF AMENITY TO LONG-STANDING LOCAL COMMUNITIES & RECREATIONAL ORGANISATIONS

There are also a number of long-standing and newer communities and recreational facilities from Belcamp and eastwards to Clonshaugh which would be grossly affected by the placement of a major sewage works plant in Clonshaugh. Burnell (in my opinion) has been one of the most successful new developments within the North Fringe. Burnell (including Newtown) just a few hundred metres south-west of the proposed site is clearly a pleasant, integrated mix of residential units and shopping and commercial outlets that are also being used more and more by Belmayne residents. It would be appalling to potentially destroy this successful new residential district by imposing a vast and dominating sewage plant works just behind its vicinity.

The Jacobs/Tobin report highlights the specific features that can be identified for this site” (and which may be potentially negatively affected) as:

- 83 residential and commercial buildings within 300m – 500m of the site boundary
- 1443 residential and commercial buildings within 0.5 – 1.0 km of the site boundary
- 4 significant amenities; football grounds 700m to the north-west, Darndale and Belcamp Parks 800m to the south west and south east respectively and Innisfail GAA club 500m to the south.



- Town of Balgriffin located approximately 0.8km to the south, population density of 1.61 per ha

But the listing here is a gross underestimation of the number of resident households and businesses which will be adversely affected by the sewage plant. In fact, the huge sewage plant would be placed just beside our famous Craobh Ciaran Hurling Club and a couple of fields across from our long settled traveller constituents in Caragh Park and Northern Park with up to 8,000 adjacent households from Clonshaugh across to Darndale Belcamp and onto Belmayne and Balgriffin deeply affected.

There are around 1400 householders in the wider Burnell and Newtown Court and Clare Hall areas who would be greatly affected by the location of a Clonshaugh sewage plant. A Local Area Plan is to be shortly developed for Newtown itself which must be allowed to be completed without being pre-empted by a decision by Fingal on the Greater Dublin Drainage project. West of Burnell and Newtown Court, is the wonderful Belcamp College which is a building of immense historical importance. To the west of Belcamp College beside the proposed site lies the ruins of Belcamp Hutchison the birthplace of Henry Grattan who secured legislative independence for Ireland in 1782. The developer Mr. Gerry Gannon originally submitted a huge high density masterplan for Belcamp which was rightly turned down. But clearly the Belcamp College lands will be the future location of the homes of thousands of families. Of course, I have strongly argued that any further development at this wonderful territory along the Moyne River must result in lower density, high quality homes and essential local services.

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Moving westward, the outstanding Craobh Ciaran GAA club as mentioned above is also situated close to the proposed Clonshaugh site. Craobh Ciaran is one of the most famous hurling clubs in Dublin and hundreds of youths and young children train and play matches there on a weekly basis. It would be unthinkable to have these children and young people training and playing matches in the shadow of a massive sewage plant.

There are clearly still major challenges for integrating the new North Fringe community with the older urban/residential and rural districts. In fact, under the "People and Communities" heading in the Phase 2 Jacobs Tobin report (p.64), the authors note that *"The Clonshaugh site is one of the weaker of the nine sites in terms of the determination of local character as the site is located in a zone of transition, i.e. a convergence of the urban and rural function, leading to a more fractured 'sense of place'. Although the site location is still moderately rural, the cumulative effect of industry, infrastructure and increasing residential density damage the rural character and identity of the area."* Clearly in this statement the authors of the report show that they are totally unaware of the planning history of the Clonshaugh/Belcamp/Burnell North Fringe and the huge efforts of local residents especially in the adjacent DCC area to create a sustainable, integrated new city district with appropriate amenity spaces and environment enhancements. Nobody ever considered that a vast regional sewage plant could be part of this future new city district. It would be disgraceful to potentially undermine the fragile cohesion of the district with such a major and unwelcome new development.

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UNFAIR TO SELECT CLONSHAUGH GIVEN ITS ONGOING SIGNIFICANT CHALLENGES

In Clonshaugh itself, local residents also had to contend with the discovery in 2001 of a major illegal dump on I.D.A. owned lands just north of Clonshaugh and Priorswood Estates (about 250 metres from the proposed sewage plant). This was an incredibly shocking event for local residents across the parishes of Clonshaugh, Belcamp, Priorswood, Bonnybrook, Darndale and all of the North East parishes downstream to Baldoyle as the affected area was said to be 250 metres long by 40 metres wide, at least three metres deep and containing more than 40,000 tonnes of waste matter including the presence of biohazard, chemical and radiological hazard, hydrocarbon hazard and landfill gas hazard from commercial (engine parts, aeronautical parts and oil drums), domestic, construction and clinical waste. At the time there was a strong suspicion of seepage from the dump into our major local River Moyne.

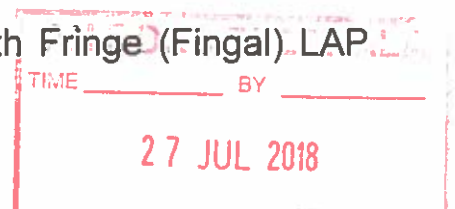
The illegal I.D.A, superdump was and may continue to be an environmental and legal time-bomb which took Trojan efforts on behalf of local people and their representatives to ensure plans were advanced to finally fully cleanse and remediate the site (which was also at an extraordinary financial cost). It would be extremely unfair therefore to now impose a super sewage plant at this location when the environment is still recovering from the effects of the appalling criminal dump that was previously established there. As mentioned above the ID.A. site is now set to be developed as a high tech, IT and avionics industrial and business estate with perhaps up to 10,000 jobs. This development would be wrecked by the proposal to locate the sewage plant in Clonshaugh.

As referred to above, Belcamp and the N32 is also the location of historic Traveller community housing over the past 40 years that is well integrated with the local surrounding districts. Given the housing and other issues faced by this vulnerable community (and located next to the parishes of Priorswood and Darndale which have also faced major challenges over the past decades), it would be incredibly unfair to then impose an industrial size wastewater treatment plant in this vicinity.

SELECTION OF CLONSHAUGH SITES WOULD BE HOPELESSLY PREMATURE

It would also be highly premature and completely unacceptable for Fingal County Council to locate the proposed sewage plant in the wider North Fringe district when critical Local Area Plans are being developed by DCC and Fingal themselves. Any decision on the location of a sewage plant in the wider North Fringe district, would gravely pre-empt the important Local Authority LAPs. The LAPs should also clearly outline a plan to protect the unique Portmarnock/Baldoyle/Sutton and Howth areas and to ensure that region remains the area of key recreational importance for the residents of the North Fringe, Dublin North East and the whole of the Fingal, Dublin and North Leinster regions. This will require additional statutory safeguards for the Howth Peninsula, Dublin Bay and Baldoyle Bay including Portmarnock Beach.

I have also proposed in my submissions to the North Fringe LAPS that the whole region (one of the earliest recorded homes of the Irish people after the last Ice Age cf. the monument at Sutton Beach, when Howth was still an island etc.) would be designated a UNESCO World Heritage Site as part of the North Fringe (DCC) and South Fringe (Fingal) LAP.



completion plans. The location of a sewage plant would clearly severely detract from this application.

CLONSHAUGH SITE POSES INSUPERABLE TRAFFIC DIFFICULTIES

In addition, both DCC and Fingal are working on a diversion of the Malahide Road (west of the Clare Hall Avenue/Malahide Road/ N32 junction to permit the development of Clare Hall Town Square at Burnell/Clare Hall. Clare Hall Square will be the western new town square linked by a boulevard to Clongriffin Town Square in the east of the new urban region. The imposition of a sewage plant just west of this well-planned, longstanding and inevitable proposal to divert that section of the Malahide Road would destroy years of work by our roads and traffic engineers, public representatives and representatives of the local communities. In fact, the Jabobs/Tobin report clearly acknowledges that, "The advantages of this site... could change, however, if the planned Malahide Road realignment takes place as this would run along the southern boundary of the site." There is no question that the realignment (estimated to cost up to €50 million) will form part of the next roads investment plan under the new Euro area growth strategy.

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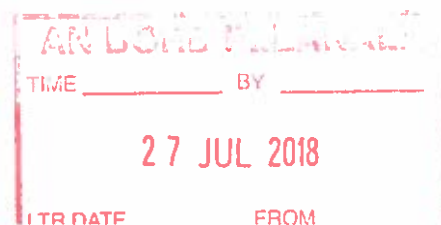
NO INVIGILATION OF OTHER MODELS OF WASTEWATER TREATMENT

The proposal under consideration is centred upon one massive regional wastewater plant that is set to initially treat 350,000 population equivalent in 2020 when it opens and eventually by 2040 it is envisaged that it will treat up to 700,000 population equivalent. Yet there appears to have been no genuine attempt to examine whether it would be more appropriate to instead go ahead with a number of smaller plants specifically attached to smaller local populations rather than the monster sewage plant that is currently on the table.

In Dail Eireann, my North Dublin colleague Deputy Brendan Ryan, has put forward a number of valuable alternative proposals to the massive sewage plant proposals in this regard. More information is clearly needed for all Fingal communities and representatives on whether the proposal of perhaps two or even three smaller plants for Central and North Fingal would be a more suitable and sustainable solution for waste drainage in the region. From now on also, all major housing and commercial developments must have a sewage investment component and strategy.

CONCLUSION

In conclusion, Clonsbaugh is a wildly inappropriate location for the reasons that I have outlined above and which are clearly outlined in the Phase 2 Jacobs/Tobin report itself. In addition, it is clear that unfortunately seaside and coastal sites are often more suitable for



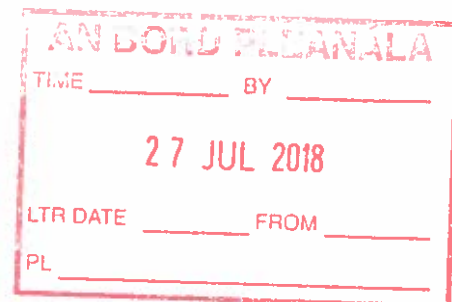
sewage plants than inland sites (as for example the Ringsend sewage plant).

I hope you will carefully take all of these observations into consideration on behalf of my Dublin North East constituents when the consultation process for Phase 2 of the Greater Dublin Drainage project concludes. Given the insuperable problems with choosing Clonsaugh as the site for any sewage plant, I hope that Clonsaugh will urgently be removed from the list of emerging preferred sites for Phase 3 and beyond.

Very Best Wishes,

Thomas P. Broughan T.D.
Dublin North East

Dail Eireann
Leinster House
Kildare Street
Dublin 2



Appendix C

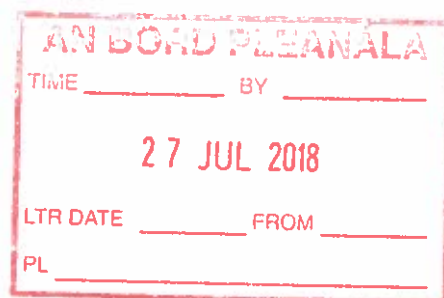
**SUBMISSION TO PHASE 2 OF THE GREATER
DUBLIN DRAINAGE PROJECT:
SELECTION OF THREE EMERGING
PREFERRED SITE OPTIONS**

**Addendum to my Submission of Wednesday,
May 23rd 2012**

Deputy Thomas P. Broughan T.D.

Dublin North East

Thursday, 5th July 2012



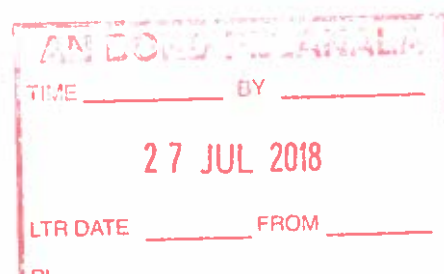
From discussions with residents, water and drainage engineers and other interested citizens, I wish to briefly add the following concerns regarding the possibility of Clonsaugh as a site for the Greater Dublin Drainage Project.

**ONGOING SERIOUS ENVIRONMENTAL & ENGINEERING
PROBLEMS WITH LARGE SECONDARY & TERTIARY WASTE
WATER TREATMENT PLANTS**

Concerns remain regarding odour and engineering problems at the massive Ringsend Water Treatment Plant. Attention has also been drawn to the major additional cost at Ringsend to control odour emissions for the past three or four years. There is also an ongoing concern at the additional costs of meeting the EU Bathing Water Directive because of the history of the Ringsend plant. Constituents have drawn parallels between the siting of Harlem's North Ring Wastewater Treatment Plant in New York City and the attempt to put the Fingal plant on the exact border of Clonsaugh and North Coolock. In addition, of course, there was a disastrous fire (following rain) at the Harlem facility in July 2011 with shocking impacts on local residents as sewage gushed into the Hudson River. The Harlem plant was intended for the New York City Upper West Side but due to powerful political influence was sited in Harlem instead.

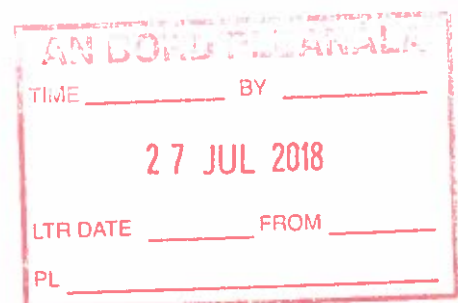
Recently (last month) also in Pittsburgh, Pennsylvania methane emissions from the Struthers Wastewater Treatment Plant exploded (with obvious parallels and implications for any plant to be sited in the Dublin Airport zone). Across the Atlantic, the Halifax, Nova Scotia Province somewhat resembles the geography of Ireland. In February 2008, due to serious electrical and mechanical problems, following rainfall, 187 million litres of raw sewage was released into Halifax Sound (bay). Similar problems have emerged at major works treatment plants in locations as diverse as Sydney, Australia and Boston, Massachusetts

THE LACK OF A BASIC COST BENEFIT ANALYSIS FOR EACH OF THE 9 & LATER 3 "PREFERRED" SITES



The lack of a Cost Benefit Analysis for each of the nine sites examined is a grave deficiency of the Jacobs Tobin report. The twelve (often vague and poorly researched) elements used to investigate Clonshaugh and the other eight possible locations totally ignore any cost benefit appraisal, especially in relation to the receiving population and alternative (and long planned) land uses for the North Fringe. Looking at Cost Benefit Analyses for other comparably sized proposals, for example, the plant at Halifax, Nova Scotia, it is clear that there could not be a positive NPV for the CLonshaugh site (no matter what the level of discounts were set at). But the preparation of a C.B.A. for each of the nine sites should have been a basic prerequisite of any professional report such as Jacob Tobin. The lack of such an analysis is astonishing and will also have to be raised at local authority and national level. The inherent damage that this massive sewage plant will do to the already fragile socio-economic prospects of the people of the North Fringe in terms of the environment, society, economy and marine ecosystem at the outfall clearly points to a seriously negative NPV. Many studies have shown that technical and engineering solutions cannot be separated from their social impacts. (For example see *"From Pipe Dreams to Tunnel Vision, Engineering Decision-Making and Sydney's Sewage System"* by Sharon Bedler).

To evaluate any possible site for this regional wastewater site without a numerical evaluation of all the societal and economic impacts on my constituents means that Jacobs Tobin is hopelessly flawed (and of course a similar analysis can be applied to the eight other sites).



THE PROPOSED OUTFALL FROM CLONHSAUGH AT BALDOYLE BAY IS UNCONSCIENCEABLE

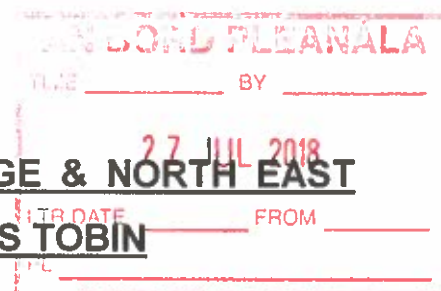
It is also clear from recent meetings and research that Jacobs Tobin should have excluded Clonshaugh from the “preferred” sites because the proposed Clonshaugh outfall at Portmarnock/Baldoyle raised insuperable environmental dangers. Portmarnock’s Velvet Strand achieved Blue Flag status in the past three years precisely because the Howth outfall was no longer operational and designated Shellfish Areas maps used by Jacobs Tobin are out of date and irrelevant. The literature on water treatment systems in the UK and around the world is paying increasing attention to the impact of synthetic chemicals and endocrine disrupting chemicals in wastewater outfalls, river and marine outfall environments. Chemicals which disrupt the endocrine system of fish, birds and mammals are present in a massive range of chemicals which end up in the sewage system including dioxins, PCBs, heavy metals and nonylphenols. Several studies such as Holmes et al (1999) have noted the impact of these endocrine disruptive chemicals on fish and crustacean populations. (These issues are also highly relevant to a Cost Benefit Analysis of each site and outfall).

Most concerning to the UK government in recent reports is the impact of chemical run-offs from human medicines. On June 13th 2012 last I asked Minister Phil Hogan about the impact of Ethinyl Estradiol EE2 effluent on Irish wastewater systems and whether Ireland would face similar huge costs to the UK (under the EU Water Directive) of upgrading existing sewage plants to address the run-off of the chemical into our fragile marine environment.

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Minister Hogan told me in a reply that the EU Commission published a proposal in January to include an extra 15 chemicals including 17 alpha-ethinylestradiol (EE2) and two other pharmaceutical substances with the list of 33 existing priority substances. The Environmental Protection Agency recently issued a research call for proposals to examine the damage caused to the marine environment by chemicals such as EE2. No effort of any kind was made by Jacobs Tobin to research or evaluate the above appalling likely impacts of an outfall from a sewage plant into Baldoyle Bay. The certain disastrous impact of bacteriological pollution especially on bivalve molluscs (which feed by water filtering) makes any outfall at Portmarnock/Baldoyle an impossibility.

**THE DISASTROUS IMPACT ON NORTH FRINGE & NORTH EAST
COMMUNITIES IS NOT EVALUATED BY JACOBS TOBIN**



The overwhelming view of constituents I have met over the past two months (and whom I alerted to this sewage plant proposal) is one of a sense of desolation that this proposal could have been progressed this far (effectively almost through three consultations) without informing them of all aspects of the plan. The management of the project so far has all the hallmarks of a total split between the technical and the social which I referred to above.

It is deeply insulting to disregard the huge communities of 8,000 and more housing units which will lie within a few hundred metres of the proposed Clonsaugh site. As I mentioned in my main submission, the seven or eight parishes most concerned have suffered greatly from grotesque and egregious planning and local authority failures over the

past four decades. To choose Clonsaugh as a “preferred site” will simply be another chapter in this litany of failures.

Ignoring the profound needs of larger local populations and ignoring the grave failures of the past when making infrastructural decisions is a key theme of “Water Time and European Cities” by Petri S. Juuti and Tapio S. Katko (Tampere Universal Press, 2005). The book is a survey of EU Water and Wastewater systems and urges that the lessons of many centuries of human engineering should never be ignored when developing plans for a new water services facility. Jacobs Tobin and the Greater Dublin Drainage Project needs to remember these lessons also.

Yours Sincerely,

Thomas P. Broughan T.D.
Labour T.D. for Dublin North East

