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# **Greater Dublin Drainage Project Addendum**

Environmental Impact Assessment Report Addendum: Volume 3A Part A of 6

**Chapter 21A Material Assets** 

Uisce Éireann

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# 21. Material Assets

# 21.1 Introduction

As detailed in Chapter 1A (Introduction) in Volume 2A Part A of this Environmental Impact Assessment Report (EIAR) Addendum, we have reviewed Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application, in the light of:

- Changes to the baseline environment;
- The requirement for updated surveys; and
- Changes to the law, policy, and industry standards and guidance in the intervening period.

Table 21.1 includes a summary of the project elements which were incorporated into the planning design for the Greater Dublin Drainage Project (hereafter referred to as the Proposed Project) following direction at the Oral Hearing in 2019 and the subsequent planning conditions applied to the 2018 planning application submission. A full description is included in Chapter 4A (Description of the Proposed Project) in Volume 2A Part A of the EIAR Addendum. The remaining elements of the Proposed Project included in the 2018 planning application remain unchanged.

 Table 21.1: Updated Proposed Project Elements

Updated Element	Outline Description of Updated Element			
Ultraviolet (UV) Treatment	<ul> <li>UV Treatment is to be included in the treatment process at the proposed wastewater treatment plant (WwTP) in the northern section of the WwTP site.</li> <li>The UV treatment system will be designed for the expected flows at the plant and will be installed on the final effluent line. UV treatment will be in operation 24 hours a day, 365 days a year.</li> <li>The UV system will consist of a minimum of three and a maximum of four treatment units located below or partially below ground level with an above-ground Motor Control Centre (MCC) (in a kiosk) along with minor maintenance and control equipment (e.g. shut-off button, frame for supporting, retracting and cleaning of UV lamps etc.).</li> </ul>			
River Mayne Culvert Extension	• Extension of the River Mayne Culvert on the proposed access road to the WwTP by 4m (from 21m to 25m) to cater for the full width of the future north south link road.			

This Addendum Chapter should be read in conjunction with Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application.

Please refer to Section 12A (Material Assets) in Volume 4A Part A of this EIAR Addendum for the updated assessment of material assets in relation to the proposed Regional Biosolids Storage Facility element of the Proposed Project.

# 21.2 Major Utilities and Natural Features

#### 21.2.1 Introduction

In this Section, any changes to the baseline environment with regards to current major utilities and natural features since the original 2018 planning application were evaluated.

#### 21.2.2 Methodology

This Section of Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application was reviewed in order to determine if there have been any updates to the legislation and / or guidance governing the assessment of material assets in the intervening period.

The following updated guidelines and reference materials have been considered as part of this Addendum Chapter but have been determined to have no impact on the previous assessment completed as part of the 2018 planning application:

- Environmental Protection Agency (EPA) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (hereafter referred to as the updated EPA Guidelines) (EPA 2022); and
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of the Environment, Community and Local Government 2018).

The assessment of the potential effect of the Proposed Project on material assets had previously been undertaken in accordance with the Draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (hereafter referred to as the Draft EPA Guidelines) (EPA 2017), which had been drafted to facilitate compliance with Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (hereafter referred to as the EIA Directive). In 2022, the EPA published the finalised updated EPA Guidelines, which were not significantly different from the Draft EPA Guidelines, and which also facilitate compliance with the EIA Directive. The updated EPA Guidelines have been considered as part of this Addendum Chapter and given the degree of change from the Draft EPA Guidelines, it has been determined to have no material impact on the previous assessment completed as part of the 2018 planning application.

Section 3.3.6 of the updated EPA Guidelines suggests that 'Material Assets' should cover the areas of Built Services, Roads and Traffic, and Waste Management. It further states:

#### 'Material Assets

In Directive 2011/92/EU this factor included architectural and archaeological heritage. Directive 2014/52/EU includes those heritage aspects as components of cultural heritage. Material assets can now be taken to mean built services and infrastructure. Traffic is included because in effect traffic consumes transport infrastructure. Sealing of agricultural land and effects on mining or quarrying potential come under the factors of land and soils.'

The updates to Traffic and Transport and Waste Management are dealt with in Chapter 13A (Traffic and Transport) and Chapter 20A (Waste) in Volume 3A Part A of this EIAR Addendum, respectively. The material assets considered in this Addendum Chapter are the built services and proposed rail projects for which reserved corridors have been identified, but also natural features, such as river crossings.

There are no changes to the information presented in this Section of the EIAR in the 2018 planning application, in relation to the consultation undertaken, prior to submission of the 2018 planning application. No formal consultation was undertaken with utility providers in preparing this Addendum Chapter, other than to request updated maps of utilities in the vicinity of the Proposed Project works. These, along with a review of all available information from the Fingal County Council (FCC) Fingal Development Plan 2023 - 2029 (FCC 2023), the planning register of FCC, the foreshore licensing register, and An Bord Pleanála (ABP) planning applications since 2018, have been used in assessing impacts.

Following the submission of the application for planning approval for the Proposed Project to ABP on 20 June 2018, the application documentation was placed on display during the period 28 June 2018 to 17 August 2018 (a seven week period). Additionally, the application documentation was made available to view and download on a dedicated website (<u>www.gddapplication.ie</u>). Prescribed bodies, the general public, landowners and other interested parties were invited to make submissions on:

- The likely effects on the environment of the Proposed Project; and
- The implications of the Proposed Project for proper planning and sustainable development in the area concerned.

Following this consultation period, it came to the attention of the Applicant on 19 July 2018 that in relation to the documents which were lodged with the planning application, some documentation forming part of the EIAR were inadvertently omitted. By agreement with ABP, these documents were placed on display during the period 13 September 2018 to 18 October 2018 (a five-week period) and prescribed bodies, the general public, landowners and other interested parties were invited to make further submissions on the entirety of the

planning application until 18 October 2018. A total of 174 submissions / observations were received; comprising 145 from the first consultation period and 29 from the second consultation period.

All submissions were reviewed by Uisce Éireann and the Project Team, and responses were provided in A Response to Submissions Report (Uisce Éireann 2019) which was published in January 2019, including those which specifically related to material assets.

Following an Oral Hearing process, ABP previously made a decision to grant the planning application by Order dated 11 November 2019 under reference number ABP-301908-18 for Proposed Project. That decision was quashed by Order of the High Court and the case was remitted by that Court to ABP for a fresh determination. Following the remittal Order, ABP decided that given the passage of time since the submission of the original planning application, and in accordance with Section 37F(1)(c) of the Planning and Development Act 2000 (as amended), Uisce Éireann should have the opportunity to update, where appropriate, the EIAR and Natura Impact Statement, and any other information submitted.

In light of this, ABP contacted those who had made submissions as part of the original consultation process in 2018 advising that the case had been reactivated under a new reference number (ABP-312131-21) and invited those interested parties to make any further general submissions / observations on the planning application by 30 September 2022. A total of 16 submissions were received and have been considered in the updates to the EIAR as part of this Addendum. Where a submission that relates to material assets does not require an update to this Addendum Chapter, but does require further clarification based on the information provided either in the original EIAR submitted as part of the 2018 planning application or the information in this Addendum Report, responses will be provided in a new Response to Submissions Report which will be submitted to ABP as a separate report (in line with the process followed for the original 2019 A Response to Submissions Report), following the submission of the Addendum.

#### 21.2.3 Impact Assessment Criteria

The impact assessment criteria in the updated EPA Guidelines (EPA 2022) remains unchanged from the criteria used in the previous Draft EPA Guidelines (EPA 2017). Therefore, the criteria outlined in this Section of the EIAR in the 2018 planning application remain unchanged.

#### 21.2.4 Baseline Environment

During the routing process of the proposed pipeline routes, major utilities and natural features were taken into consideration. This included existing infrastructure and natural features, in addition to the consideration of major planned infrastructure and this informed the routing of the proposed pipeline routes.

A desk-based review has been undertaken to assess any changes to the baseline environment with regards to current existing major utilities and natural features, since the original 2018 planning application. This included a review of the Fingal Development Plan 2023-2029 (FCC 2023), the planning register of FCC, the foreshore licensing register, ABP applications since 2018, and mapping of utilities made available by Gas Networks Ireland (GNI) and the Electricity Supply Board Network (ESBN), and trunk water main and sewer mapping from FCC and Uisce Éireann. Table 21.2 outlines any changes to infrastructure considered since the 2018 planning application.

#### Table 21.2: Major Utility Routing Constraints

Description of Constraint	Comment	
James Connolly Memorial Hospital and grounds	Unchanged since 2018 planning application	
Existing gas transmission infrastructure which lies immediately north of, and runs parallel to, the M50 Motorway to west of Cappagh Road.	Unchanged since 2018 planning application	
Proposed Metro West route (corridor reserved)	Unchanged since 2018 planning application	
Electricity Supply Board (ESB) substation at N2 National Road/M50 Motorway interchange	Unchanged since 2018 planning application	
Metro West depot (proposed, but site reserved)	Unchanged since 2018 planning application	
MetroLink depot (proposed, but site reserved)	Unchanged since 2018 planning application	
MetroLink route (proposed, but corridor reserved) – particularly the section in tunnel from depot through the Dublin Airport complex.	Submitted for planning under reference 314724. Remaining information unchanged since 2018 planning application.	
Aviation Fuel Transmission Pipeline from Dublin Port to Dublin Airport (new)	Construction of this utility has been undertaken since 2018 and is currently approximately 50% complete.	
Baldoyle to Portmarnock Greenway (new)	Since 2018 a Greenway running from Baldoyle to Portmarnock, parallel to the existing R106 Regional Road has been constructed.	

#### Major Utilities

There are no changes to the existing major utilities (including gas transmission infrastructure, power transmission infrastructure, rail infrastructure, motorways, national primary roads and other roads, water supply infrastructure, wastewater collection infrastructure, communications infrastructure, and hospital infrastructure), and natural features (including significant watercourses, beaches and bays), that will be crossed by the Proposed Project that were presented in this Section of the EIAR in the 2018 planning application.

While there have been changes to the planned MetroLink Project since 2018, the crossing of the proposed orbital sewer route and MetroLink, immediately east of Junction 4 on the M50 Motorway remains unchanged. Therefore, no changes are required to the routing of the proposed orbital sewer route on foot of the changes to MetroLink. The two crossings of the planned Dart West route to the east of Silloge Golf Club and at the Cappagh Road also remain unchanged and no changes to the routing of the Proposed Project are required.

The route for the 200mm (millimetre) diameter aviation fuel pipeline to Dublin Airport runs along the Clonshaugh Road (L2051 Local Road) and will cross the proposed orbital sewer route approximately 200m west of the proposed WwTP. The depth of the fuel pipeline will be in the range of 1m to 1.5m (metres) below ground level, and therefore, will not have an impact on the section of the proposed orbital sewer route which will be tunnelled under the L2051 Local Road with over 2m cover to the top of the proposed orbital sewer.

Construction of the Baldoyle to Portmarnock Greenway commenced in July 2019 and was completed in May 2020. The cycleway and footpath run parallel to the existing R106 Regional Road. The proposed outfall pipeline route (marine section) will cross the greenway approximately 200m north of the junction of the R106 Regional Road and the R123 Moyne Road. This section of the proposed outfall pipeline route (marine section) will be tunnelled at a depth of approximately 15m, and therefore, there will be no impact on the Greenway.

#### Natural Features

There are no changes to the natural features outlined in this Section of the EIAR in the 2018 planning application. Therefore, there are no changes required to this Section of the EIAR in the 2018 planning application.

#### Summary of Major Utilities and Natural Features

Table 21.3 below provides a summary of the number of crossings of major utilities and natural features by the Proposed Project.

Feature Type	Feature / Infrastructure	No. of Crossings	
		2018 EIAR	2023 EIAR Addendum
Major Utilities	Gas transmission	3	3
(Existing, including	High voltage power transmission	23	23
reserved rail	Rail – existing	1	1
corridors)	M1 Motorway	1	1
	N2 National Road	1	1
	Other significant roads	14	14
	Water supply – trunk watermains	9	9
	Wastewater collection – large diameter	3	3
	Communications infrastructure	1	1
	Connolly Hospital	1	1
	Rail – proposed (MetroLink and Dart West reserved corridors)	3	3
	Fuel Pipeline – aviation fuel pipeline from Dublin Port to Airport now under construction	0	1
	Greenways	0	1
Natural	Rivers and streams	6	6
Features	Baldoyle Bay and Portmarnock Beach	1	1

Table 21.3: Updated Summary of Crossings of Major Utilities and Natural Features by the Proposed Pipeline Routes

#### 21.2.5 Predicted Potential Impacts

The updated Proposed Project elements, as outlined in Section 21.1, have been considered against the previous assessment for material assets included in the 2018 planning application. There is no change to the number of crossings of existing major utilities or natural features stated in Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR in the 2018 planning application. Two additional crossings have been identified as part of this Addendum assessment (Aviation Fuel Pipeline and the Baldoyle to Portmarnock Greenway). However, the Proposed Project will not directly interact with either asset and, therefore, no additional impact is predicted.

As there are no changes to the predicted impacts set out in this Section of EIAR in the 2018 planning application, the assessment of material assets (major utilities and natural features) remains the same as presented in this Section of the EIAR in the 2018 planning application.

#### 21.2.6 Mitigation Measures

The updates to the Proposed Project elements outlined in Section 21.1, and the updates to the baseline environment outlined in Section 21.2, were assessed and deemed not to result in any additional impacts, above those identified in the original Chapter 21 (Material Assets) included in Volume 3 Part A of the EIAR in the 2018 planning application.

In the intervening period, the ESBN have published an updated Code of Practice for Avoiding Danger from Overhead Electricity Lines (ESBN 2019). All overhead electricity lines (OHLs) will be protected in accordance with this code of practice during construction.

As the impacts outlined in Chapter 21 (Material Assets) included in Volume 3 Part A of the EIAR in the 2018 planning application have not changed, and there are no other new or updated codes, policies, practices or guidelines published since 2018, no further amendments to the mitigation measures outlined in this Section of the EIAR in the 2018 planning application are required.

#### 21.2.7 Residual Impacts

The updates to the Proposed Project elements outlined in Section 21.1, and the updates to the baseline environment outlined in Section 21.2, were assessed and deemed not to result in any additional impacts, above those identified in the original Chapter 21 (Material Assets) included in Volume 3 Part A of the EIAR in the 2018 planning application. The residual impacts therefore remain, as presented in this Section of the EIAR in the 2018 planning application.

### 21.3 Raw Materials

#### 21.3.1 Introduction

In this Section, any changes to the baseline environment with regards to raw materials which will be required throughout the Construction Phase of the Proposed Project since the original 2018 planning application were evaluated. The main types of materials that will be required during the Construction Phase of the Proposed Project remain unchanged from the information presented in this Section of the EIAR in the 2018 planning application, and these will be sourced from local suppliers, where possible. This will include the use of bedding material from local quarries.

#### 21.3.2 Methodology

This Section of Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application was reviewed in order to determine if there have been any updates to the sourcing of raw materials and the findings of this review are outlined in the following sections.

#### 21.3.3 Baseline Environment

A review has been undertaken to assess any changes to the baseline environment, with regards to raw materials, since the original 2018 planning application. The requirement for natural resources (stone, topsoil / subsoil, bentonite, water) and other resources (concrete (in-situ / off-site), structural steel, concrete blocks, roof slates and wall and roof panels, ductile iron pipes and polyethylene pipes etc.) remain unchanged from the 2018 planning application. As with the information presented in Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR in the 2018 application, these materials will be sourced locally, where possible, or imported, where necessary. Again there are various quarries where aggregates and concrete products can be sourced (refer to Figure 21.1 (Quarry Locations in the Greater Dublin Region) in Volume 5A of this EIAR Addendum, which is an update to the previous Figure 21.10 (Quarry Locations in the Greater Dublin Region) in Volume 5 Part A of the EIAR in the 2018 planning application).

#### 21.3.4 Predicted Potential Impacts

The updated Proposed Project elements, as outlined in Section 21.1, in addition to any updates to relevant guidance and reference material, have been considered against the previous raw material assessment included in the 2018 planning application. There are no material changes to the volume of natural resources or other resources needed or sources of such materials, as outlined in Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR in the 2018 planning application. As a result, there are no changes to the predicted potential impacts set out in this Section of the EIAR in the 2018 planning application, and the assessment of material assets (raw materials) remains the same as carried out for the 2018 planning application.

#### 21.3.5 Mitigation Measures

The updates to the Proposed Project elements, as outlined in Section 21.1, in addition to any updates to relevant guidance and reference material, were assessed and deemed not to result in any additional impacts, above those identified in this Section of Chapter 21 (Material Assets) in Volume 3 Part A of the EIAR in the 2018 planning application.

There will be an emphasis placed on maximising the reuse / recovery of excavated material (soil / rock) onsite, and thereby, reducing the need for imported material and reducing the impact of traffic on surrounding roads. Where surplus excavated materials cannot be reused on-site, contact will be made with nearby sites requiring fill / capping material to investigate reuse opportunities for the surplus materials in accordance with Article 27 of S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2020, subject to EPA approval.

As the potential impacts outlined in Chapter 21 (Material Assets) included in Volume 3 Part A of the EIAR in the 2018 planning application have not changed, there are no further requirements to update the mitigation measures presented in this Section of the EIAR in the 2018 planning application and these measures will be implemented in full.

#### 21.3.6 Residual Impacts

The updates to the Proposed Project elements, in addition to any updates to relevant guidance and reference material, were assessed and deemed not to result in any additional impacts or amendments to the mitigation measures, above those identified in the original respective Section 21.3.4 and Section 21.3.5 in the EIAR in the 2018 planning application, with the exception of the application of Article 27 for reuse of materials.

The residual impacts on raw materials therefore remain, as presented in this Section of the EIAR in the 2018 planning application.

# 21.4 Difficulties Encountered in Compiling Required Information

No difficulties were encountered in compiling information for this Addendum Chapter.

# 21.5 Conclusion

This Addendum Chapter has considered all updates to elements of the Proposed Project, the baseline environment and updates to guidance and reference material since the 2018 planning application submission. Following consideration, there are no changes to the assessment of environmental impacts on material assets (major utilities and natural features, and raw materials) as a result of any of the updates discussed in this Addendum Chapter.

# 21.6 References

Department of the Environment, Community and Local Government (2018). Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

EPA (2017). Draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports

EPA (2022). Guidelines on the Information to be Contained in Environmental Impact Assessment Reports

FCC (2023). Fingal Development Plan 2023 - 2029

ESBN (2019). Code of Practice for Avoiding Danger from Overhead Electricity Lines.

Uisce Éireann (2019). Responses to Submission Report

#### **Directives and Legislation**

Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment

Planning and Development Act 2000 (as amended)

S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2020