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**Christine Brennan**

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**From:** Aisling Reilly  
**Sent:** Tuesday 8 October 2024 16:58  
**To:** Christine Brennan  
**Subject:** FW: 312131 Memo re Tech Expertise  
**Attachments:** Memo 312131 Request for Technical Expertise.docx; 312131 EIAR Contents.docx

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**From:** Alaine Clarke <a.clarke@pleanala.ie>  
**Sent:** Thursday, October 3, 2024 5:01 PM  
**To:** Aisling Reilly <A.Reilly@pleanala.ie>  
**Cc:** Sarah Lynch <s.lynch@pleanala.ie>  
**Subject:** 312131 Memo re Tech Expertise

Hi Aisling,

Would you mind placing this memo and associated doc on the file please. Sarah has approved the Memo.

Kind regards,  
Alaine

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**From:** Sarah Lynch <s.lynch@pleanala.ie>  
**Sent:** 02 October 2024 15:46  
**To:** Alaine Clarke <a.clarke@pleanala.ie>  
**Subject:** RE: 312131 Draft memo re Tech Expertise

This is fine thanks

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**From:** Alaine Clarke <a.clarke@pleanala.ie>  
**Sent:** Wednesday, October 2, 2024 3:36 PM  
**To:** Sarah Lynch <s.lynch@pleanala.ie>  
**Subject:** 312131 Draft memo re Tech Expertise

 [Memo 312131 Request for Technical Expertise.docx](#)

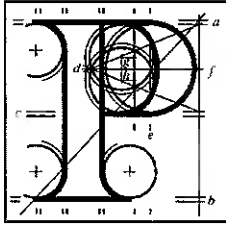
Hi Sarah,

If you would rather a soft copy (rather than the link) please advise.

Kind regards,

Alaine Clarke

Inspectorate



An  
Bord  
Pleanála

## Memorandum

ABP-312131-21

Request for Technical Expertise

**To:** Sarah Lynch, Assistant Director of Planning

**From:** Alaine Clarke, SPI

**Re:** Request for technical expertise

**Date:** 2<sup>nd</sup> October 2024

### Proposed Development

The elements of the Proposed Project comprise:

- A new proposed Wastewater Treatment Plant (WwTP) and Sludge Hub Centre on a 29.8 hectare (ha) site at Clonshagh (Clonshaugh);
- A proposed underground orbital sewer (a set of pipes and drains to transfer wastewater) from Blanchardstown to Clonshagh, including a new proposed pumping station (a building containing machinery for pumping wastewater along the orbital sewer) at Abbotstown;
- A proposed sewer to divert part of the North Fringe Sewer (NFS) to the new proposed WwTP;
- A proposed outfall pipeline (a pipe and discharge point of treated wastewater) from the new WwTP to discharge the treated wastewater to the Irish Sea; and
- Regional Biosolids Storage Facility (RBSF) (building(s) where solids created as a result of wastewater treatment which can be reused are stored) to be located on an 11ha site at Newtown, Dublin 11.

The Proposed Project will be able to treat wastewater for an estimated average daily load equivalent to a population of 500,000 people (also referred to as a 'population

equivalent') at 2050 and provide sludge treatment for approximately 18,500 tonnes of dry solids per annum at 2050. The proposed RBSF will be able to store 35,400m<sup>3</sup> of biosolids.

The proposed orbital sewer route will divert wastewater from existing and newly developed areas in the north, west and north-west of the Ringsend catchment, including Blanchardstown, Mulhuddart, parts of east Meath and Leixlip. The diversion of part of the existing NFS will divert existing flows from that sewer to the proposed WwTP.

### **Background**

An Bord Pleanála (ABP) previously made a decision to grant the planning application for the Greater Dublin Drainage Project by Order dated 11 November 2019 under reference number ABP-301908-18. 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, given the passage of time since the submission of the original planning application, that Uisce Éireann should have the opportunity to update, where appropriate, the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) and any other information submitted. The updated reports etc were received by An Bord Pleanála on 26<sup>th</sup> October 2023 and 22<sup>nd</sup> November 2023, and following revised notices and consultations, 22 no. submissions were received.

It should be noted that, following remittal, the Board specifically requested the applicant to provide its views "*on whether the discharge of waste water from the proposed development, in conjunction with existing discharge to the receiving waters would cause or exacerbate breaches of the combined approach (as described in the Waste Water Discharge (Authorisation) Regulations 2007, as amended).*"

Art 44.(4) of the 2207 Regulations (as amended) requires consultation with the EPA in relation to the likely impact of the proposed development on waste water discharges.

### **Inspectorate Addendum Report**

The Board issued a direction (dated 11/07/2024) that Inspectorate are to prepare an Addendum Report on the basis of the further information and submissions received post August 2022 and any further information subsequently received. The Addendum Report should inter alia address the question of whether the discharge of wastewater from the proposed development, in conjunction with the existing discharge to receiving waters, would cause or exacerbate breaches of the combined approach.

It should be noted that the Judgement states (para. 66) that reconsideration of the application is from the point at which the Inspector's report was submitted to the first respondent (ABP) i.e. there is no requirement to revisit matters that have not been subject to revisions in the information submitted by the applicant on 26<sup>th</sup> October 2023 and 22<sup>nd</sup> November 2023.

#### **Request for Technical Expertise:**

Having regard to a description of the proposed development, the nature of this case (i.e. remittal), the issues raised in the submissions received, the issue of combined approach, the fact that the outfall is proposed to be located in the North-West Irish Sea candidate SPA which was not designated at the time of the earlier application, I consider that the assessment would benefit from technical expertise as follows:

(a) Review of the relevant information, particularly the EIAR (e.g. Marine Water Quality, Chapter 8) and the WFD Assessment (separate report), by in-house Environmental Scientist and preparation of specific advice in relation to (i) the adequacy of the WFD Assessment and (ii) the combined approach. It is considered that a technical report(s) will be required to supplement the Inspector's Report.

(b) Review of the NIS by in-house Ecologist in particular having regard to the North-West Irish Sea candidate SPA. A number of the submissions raise particular ecological issues (both marine and terrestrial). These matters are being reviewed by me - such review to further inform the direction of ecological advice. It is considered that a technical report will be required to supplement the Inspector's Report.

There will be cross-over of information relating to compilation of the above supplementary reports particularly having regard to WFD protected areas.

It should be noted that the applicant has been invited to comment on the submissions, such comments may be relevant to the above reports.

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Alaine Clarke

Inspectorate

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