

## Appendix A2.2 Summary of Stakeholder Responses (2018)

Stakeholder	Date Received	Submission Details	Response/ Mitigation
Teagasc	20.11.2017	<ul style="list-style-type: none"> <li>Nothing further to add to the proposed scope of the EIAR at this time</li> </ul>	N/A
An Taisce	24.11.2017	<ul style="list-style-type: none"> <li>An Taisce noted that energy efficient and energy recovery measures should be incorporated into the design of the Proposed Project.</li> </ul>	<ul style="list-style-type: none"> <li>Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (EPBD) requires Near Zero Energy Buildings (NZEB) by 2020 and significantly increases the amount of on-site renewable energy used in buildings. This requires consideration in the lifecycle assessment and embodied carbon calculation. It will be relevant to all buildings constructed as part of the Proposed Project. The detail design will account for this and also follow SEAI guidelines, including: <ul style="list-style-type: none"> <li>Development of energy balances;</li> <li>Determination of the minimum achievable energy performance indicator (EnPi) for the design;</li> <li>Energy benchmarks; and</li> <li>Energy variables for the design that quantify variables that impact energy performance and preparation of Measurement and Verification (M&amp;V) Plans to detail how the energy performance of the design will be measured and verified as per ISO5 0015.</li> </ul> </li> <li>The Proposed Project proposes to maximise energy recovery from the proposed WwTP and sludge treatment processes. This will be achieved using thermal hydrolysis and anaerobic digestion in the treatment of the sludge and using the biogas produced from this process to fuel on-site CHP generators to</li> </ul>

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			<p>produce electrical and thermal energy. Primary and secondary sludge produced at the proposed WwTP can be mixed with the sludge imported to the proposed SHC prior to undergoing the treatment process. Use of thermal hydrolysis with anaerobic digestion will reduce the dry matter and increase production of biogas.</p> <ul style="list-style-type: none"> <li>• A well-designed CHP system will produce power at a cost below that of retail electricity, which will reduce the overall energy consumption of the proposed WwTP and reduce emissions of greenhouse gases. Typical CHP systems can have total efficiencies of up to 80%.</li> <li>• Further details are outline in Chapter 4 Description of the Proposed Project in Volume 2 Part A of this EIAR.</li> </ul>
BirdWatch Ireland	08.12.2017	<ul style="list-style-type: none"> <li>• The construction of the pipeline and potential impacts to conservation interests in the SPAs and SACs on the route of the pipeline and out into the Irish Sea. BirdWatch Ireland's I-WeBs data and other survey data for bird species relevant to these sites and other sites not designated but important for birds will need to be consulted and included in the assessment of impacts.</li> <li>• Migratory bird species may use fields enroute from the Wastewater treatment plant to the coast for foraging. This may include Light Bellied Brent Geese, Oystercatchers, Curlew and more. It would be worthwhile contacting the Irish Brent Goose Study Group about any data that they might have for Brent Geese in this area.</li> <li>• The assessment of cumulative impacts of this project in combination with other potential projects enroute as well as other projects which have inputs to the waters of Dublin Bay will require careful consideration. This include projects which currently permit dumping at sea of dredge materials and other marine pollutants.</li> <li>• The waters surrounding the pipeline outfall are important feeding grounds for several conservation interests such as Kittiwake which has been listed as Vulnerable on the EU Red List of birds and Annex 1 bird species such as Common Tern and Roseate Tern amongst others. Assessment of impacts on</li> </ul>	<p>The following surveys have been carried out and are summarised in the Biodiversity Chapters (Chapter 9 Biodiversity (Marine), Chapter 10 Biodiversity (Marine Ornithology) and Chapter 11 Biodiversity (Terrestrial and Freshwater Aquatic)) of the EIAR.</p> <ul style="list-style-type: none"> <li>• Wetland bird surveys (high tide and low tide waterbird counts) over 3 years between December 2014 and December 2017, to characterise the abundance and distribution of bird species associated with Baldoyle Bay and the Baldoyle Bay SPA;</li> <li>• Vantage Point surveys over 3 years between December 2014 and December 2017 to assess the usage by bird species of the proposed outfall pipeline route and Ireland's Eye SPA, and supplemented by boat-based efforts to observe auk fledging the Ireland's Eye colony (2016 &amp; 2017);</li> </ul>

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		<p>these species will be important.</p> <ul style="list-style-type: none"> <li>Assessment of the impacts on forage fish for bird species should also be included.</li> <li>The impacts on water quality and a description of contingency plans for pollution incidents will need to be carefully considered. The potential failures to the treatment process as well failures at outfall will need to be described and mitigation developed.</li> <li>The timing of any construction works which may impact on conservation interests of the SPAs both inside and outside of the sites must avoid sensitive times for species (e.g. winter months for overwintering species).</li> <li>The data that BirdWatch Ireland has on bird species in the area of the pipe and outfall may throw up other issues which will need to be considered.</li> <li>The precautionary principle should also apply.</li> </ul>	<ul style="list-style-type: none"> <li>Breeding bird surveys at the WwTP in 2012; 2013, and along the whole project corridor in 2015 and 2017; and</li> <li>Over wintering farmland bird surveys across two wintering seasons; and</li> <li>Estuarine and coastal surveys will continue until March 2018.</li> <li>Consultation has taken place with the Brent Goose Study Group, who provided data for this area to inform the survey data for the EIAR.</li> <li>Chapter 22 Cumulative Impacts and Environmental Interactions includes a cumulative impact assessment</li> <li>Chapter 10 Biodiversity (Marine Ornithology) of this EIAR and the NIS address the likely significant impact for seabirds.</li> <li>A Vessel Management Plan has been developed as part of the EIA process and is appended to Chapter 10 Biodiversity (Marine Ornithology) (refer to Appendix A10.2).</li> <li>Impact to water quality and potential failure scenarios have been assessed as part of Chapter 8 Marine Water Quality.</li> </ul>
Transport Infrastructure Ireland (TII)	28.12.2017	<ul style="list-style-type: none"> <li>Provided general guidance for the EIAR on aspects that may affect the National Roads Network.</li> <li>The scheme needs to establish the relationship between the location of the proposed development and national roads. TII request that they be consulted to agree detailed specifications for the proposed structures in advance of any works.</li> <li>Crossings of the existing motorway network will require approval from TII under Section 53 of the Roads Act, 1993.</li> <li>Methods and techniques in traversing the existing road network should ensure that the safety and standards of the national road network is maintained through</li> </ul>	<ul style="list-style-type: none"> <li>The road network within the vicinity of the Proposed Project was assessed and a traffic survey to determine the magnitude of existing traffic flows and classified junction turning counts were carried out as part of the assessment for Chapter 13 Traffic and Transport (refer to Section 13.3.1, 13.5 and 13.6 for full details).</li> <li>All major roads will be crossed using trenchless techniques.</li> </ul>

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		<p>appropriate best practice construction methods.</p> <ul style="list-style-type: none"> <li>Where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out.</li> <li>Address and indicate the potential for dust and other material deposition on national roads during construction and operation.</li> <li>Consultation with the National Transport Authority (NTA) should be undertaken with regard to Metro North.</li> </ul>	<ul style="list-style-type: none"> <li>Dust deposition has been assessed as part of Chapter 14 Air Quality, Odour and Climate and it is proposed that a dust deposition monitoring programme will be implemented during the Construction Phase in order to verify the continued compliance with relevant standards and limits. A number of mitigation measures for the control of dust for construction traffic and on-site activities have been outlined in Section 14.8 of Chapter 14 Air Quality, Odour and Climate</li> <li>Chapter 22 Cumulative Impacts and Environmental Interactions of this EIAR has assessed the potential cumulative impact.</li> <li>The potential Metro West Route and the Metro Link (formerly Metro North) Route have been considered in detail in Section 21.1.4 and Section 21.1.6 of Chapter 21 Material Assets. Following consultation, TII advised that they have no difficulty with the proposed orbital sewer route crossing under the proposed Metro Link or Metro West Lines. A depth of 3m below the track is sufficient to mitigate potential impact.</li> </ul>
Department of Culture, Heritage and the Gaeltacht	09.02.2018	<ul style="list-style-type: none"> <li>Ecological surveys should be carried out to assess impacts on biodiversity, fauna, flora and habitats of the site of the proposed development site including the route of any access roads, pipelines or cables etc. to survey the habitats and species present.</li> </ul>	<ul style="list-style-type: none"> <li>A range of ecological surveys have been carried out during the EIA process and include; geomorphology, marine benthos and sediment surveys, water quality profiling and sampling, fish and shellfish and plankton surveys, a walkover of Baldoyle Estuary and survey of reefs and harbour porpoise as part of the assessment for Chapter 9 Biodiversity (Marine), estuarine ornithological surveys, coastal and vantage point surveys and boat based assessment of auk fledging as part of the</li> </ul>

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		<ul style="list-style-type: none"> <li>Appropriate Assessment Guidance details provided</li> <li>Where there are impacts on protected species and their habitats, resting or breeding places, licences may be required under the Wildlife Acts or derogations under the Habitats Regulations.</li> </ul>	<p>assessment for Chapter 10 Biodiversity (Marine Ornithology) and field surveys for terrestrial habitats, bats and other mammals, farmland birds (breeding and wintering) and other species such as smooth newt, freshwater habitat assessment and assessment of protected freshwater species as part of the assessment for Chapter 11 Biodiversity (Terrestrial and Freshwater Aquatic).</p> <ul style="list-style-type: none"> <li>The Proposed Project has been assessed to consider whether there are likely significant effects from the Proposed Project on European Sites. Screening concluded that likely significant effects could be excluded for a number of European Sites. Likely significant effects could not be excluded for Baldoyle Bay SPA and Baldoyle Bay SAC, Rockabill to Dalkey Island SAC and Lambay Island SAC and Ireland's Eye SPA. Therefore, AA is required to conclude whether adverse effects upon the integrity of these European Sites will occur. An NIS is being finalised and will be submitted to ABP alongside the main EIAR with the planning application.</li> <li>A Wildlife Act licence shall be required to temporarily close the 2 badger setts identified during field surveys and another Wildlife Act licence shall be required to permanently close 3 setts identified during field surveys (Full details have been issued to the NPWS in a confidential appendix).</li> <li>Resulting from the pre-construction Potential Roos Feature (PRF) survey, all trees with</li> </ul>

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			<p>medium to high roost potential shall be examined by an experienced bat ecologist reporting to the ECoW, prior to work commencing by any appointed contractor or subcontractor on any part of the enabling works phase of the Proposed Project. should any tree be identified as a bat roost then a derogation licence application will be made to the NPWS as part of planning condition discharge and compliance with the construction contract seeking derogation from the NPWS to exclude the bats and fell the tree (refer to Section 11.7.4 of Chapter 11 Biodiversity (Terrestrial and Freshwater Aquatic).</p> <ul style="list-style-type: none"> <li>• Smooth newts must be captured at Coldwinters under a derogation licence from the NPWS during the spring migration period on their way to breed and relocated from affected ponds to an alternative pond at Coldwinters subject to agreement with the NPWS and prior to any construction works. A licence application will be submitted to NPWS in advance of submission of the S37 SID to ABP.</li> </ul>