

Submission to An Bord Pleanála by Seán Haughey TD and Cllr. Seán Paul Mahon

The Secretary
An Bord Pleanála
Strategic Infrastructure Development
64 Marlborough Street
Dublin 1

14th August 2018

A Chara,

Irish Water has submitted a planning application for a new Regional Waste Water Treatment Plant at Clonshaugh Dublin 17, reference number 06F.PC0152. We are strongly opposed to this proposal.

Location

This agricultural site is totally unsuitable for such development given its close proximity to densely populated areas including Clonshaugh, Priorswood, and Dardale as well as the new estates on the Northern Fringe such as Clongriffin, Clarehall, and Belmayne. A Waste Water Treatment Plant has the potential to seriously injure the residential amenities of the householders living in these estates. The site is also close to Dublin Airport and the Clayton Hotel, and the plant has the capacity to impact considerably on the operation of these business concerns. In addition, this site is very close to the parkland known as Priorswood Park which is bounded by Clonshaugh Road, the R139 and Clonshaugh Park, and poses a real health and safety risk to the many frequent users of this park on a daily basis including many children.

Construction Phase

We are concerned about the inevitable noise arising from the construction phase of the plant itself and the outflow pipes should the project proceed. In addition, construction traffic should not be allowed to use Baskin Lane or Clonshaugh Road which are only minor country roads and were never built for the amount of traffic using them. Traffic disruption at the Malahide Road/Baskin Lane junction would also be a major problem if the outflow pipes are built as planned.

Noise

Local residents will suffer constant and ongoing noise pollution as a result of the operation of the plant.

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Odour

This is a major worry, having regard to what the residents living beside the Ringsend plant had to endure despite assurances given to them previously. Odour will be inevitable regardless of the odour suppression measures put in place. Inadequate design structures and maintenance operations of the plant will give rise to increased odour problems. Bewleys Coffee based at Northern Cross emits a coffee smell which can be experienced by householders living within a radius of several miles and the real fear is that this will also be the situation in the case of odours coming from the new plant.

Traffic

Numerous lorry movements in the area connected to the operation of the plant will greatly diminish the quality of life of local residents. Traffic on the major and minor roads in this locality has already reached saturation point.

Treatment

Secondary treatment is completely inadequate in this high technological and scientific age.

Visual Amenities

The plant will be visually obtrusive given its proposed height.

Wildlife

A large scale Waste Water Treatment Plant will seriously affect the bird and wildlife of this agricultural area. This includes baggers, hares, buzzards, and wild pheasants. The European Habitats, Birds, and EIA Directives will potentially be breached should this planning application be granted.

Pollution

There is a distinct threat of pollution resulting from the normal operation of the plant or from an accident or systems failure. The deliberate release of raw sewage through the marine outfall pipe is a real possibility.

The entire of Dublin Bay was designated as a Biosphere in order to protect its sensitive ecosystem. This designation took place after the site at Clonsbaugh was selected for this plant.

The following special areas are under threat should this plan succeed; Dublin Bay, North Bull Island, Portmarnock Strand, Baldoyle Estuary, Lambay Island, Skerries Island, Rockabill, Malahide Estuary, Ireland's Eye, Balbriggan/Skerries Designated Shellfish Waters, and Malahide Designated Shellfish Waters. Special Areas of Conservation, Special Protection Areas, and Shellfish Waters Designations are especially relevant in this case.

We are vehemently opposed to the principal of large scale Regional Waste Water Treatment Plants. The provision of localised plants is more environmentally sustainable and in keeping with environmental principles generally. Sewage should be treated as close as possible to the source of its production and it would be preferable to provide multiple smaller treatment plants to avoid the possibility of a major environmental disaster.

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In short, this proposal is contrary to proper planning and development and constitutes a public health threat to residents living in the area given the detrimental affect the operation of the plant will have on their air quality.

Finally, given the scale of opposition to this proposal and the complexity of the issues involved we are requesting that an oral hearing be provided for in respect of this application so that these concerns can be dealt with in public.

Yours sincerely,

Seán Haughey TD
FF Spokesperson on EU Affairs

Cllr. Seán Paul Mahon
Dublin City Council