



GREATER DUBLIN DRAINAGE PROJECT:

**PUBLIC CONSULTATION REPORT ON THE ISSUES TO BE
CONSIDERED IN THE ENVIRONMENTAL IMPACT
STATEMENT**

EXECUTIVE SUMMARY

DECEMBER 2013

RPS

EXECUTIVE SUMMARY

1. PROJECT BACKGROUND

The Greater Dublin Drainage (GDD) initiative aims to provide strategic drainage infrastructure required for the Greater Dublin Area (GDA) to continue to develop. It is also required to protect the environment and ensure compliance with EU and national legislative requirements. The project involves the provision of a 26km pipeline, a wastewater treatment plant (WwTP) located at Clonshagh (Clonshaugh) and a marine outfall 6km out to sea from Baldoyle Bay. The project is being led by Fingal County Council, on behalf of Dublin City Council, Dún Laoghaire-Rathdown County Council, and South Dublin County Council, in partnership with Kildare and Meath County Councils.

2. CONSULTATION AND PUBLIC PARTICIPATION TO DATE

In accordance with the Aarhus Convention¹, public participation is an essential element of the development of any infrastructure project and the GDD project team is committed to facilitating an accessible, meaningful, and accountable consultation process with members of the public. Four rounds of public consultation have taken place since the project began in 2011. This Consultation Report² details the activities and feedback associated with the fourth phase of public consultation that focused on issues to be considered in the Environmental Impact Statement (EIS). This feedback along with a technical and environmental assessment will feed into the EIS which will form part of the application for planning approval for the project. All relevant issues and concerns will be responded to within the appendices of the EIS. It is intended to submit the planning application to An Bord Pleanála in 2014. As part of the assessment process, An Bord Pleanála will subsequently carry out statutory consultation which will provide an additional opportunity for interested stakeholders and

¹ Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, usually known as the Aarhus Convention (UNECE 1998).

² This report covers concerns and issues raised by stakeholders; however it does not name individuals in accordance with the requirements of the Data Protection Acts 1995 and 2003.

members of the public to participate in and provide input to the proposed project.

The fourth phase of consultation took place over eight weeks from the 10th June 2013 to 2nd August 2013 following publication of the *Greater Dublin Drainage Alternative Sites Assessment and Route Selection (Phase 4): Preferred Sites and Routes Report, June 2013*, which identified the preferred solution for the future development of wastewater treatment capacity in the Greater Dublin Area (a 26km pipeline, a wastewater treatment plant at Clonshagh (Clonshaugh) and an outfall pipe located 6km out to sea from Baldoyle Bay).

Printed information materials were made available as part of this phase of public consultation in order to facilitate the provision of project information to all stakeholders. This included a project brochure, factsheets, posters and displays for open day events. The consultation was advertised in local and national media and a number of interviews with members of the Project Team took place on national television, as well as national, local and community radio stations. In addition to these advertisements, 43 no. print articles were published in national and local media following a number of press releases that were issued by the Project Team in order to raise awareness of the consultation process. A large amount of online media coverage was also generated. Information was made available on the dedicated project website (www.greaterdublindrainage.com), which was visited approximately 3,200 times during this phase of consultation. Fingal County Council's website and Twitter page were also used to publicise the consultation. Update emails were sent to approximately 1,200 members of the public and Elected Representatives who had subscribed to project updates on the Greater Dublin Drainage mailing list. In recognising the role of Elected Representatives, briefings were provided throughout the consultation process in order to keep them up-to-date with the project's progress. Furthermore, updates on the project were included in both the Summer and Autumn editions of the "Fingal News"; a quarterly newsletter distributed to over 90,000 homes throughout Fingal.

Three open day events were held in County Hall, Swords in order to provide all interested parties with an opportunity to obtain information about the project and to meet with the Project Team. Following requests from stakeholders, a fourth open day was held in the Northern Cross area of Dublin. The level and extent of participation recorded from these open days is documented in this report, along with submissions made via the project

lo-call phone line, email and postal service and stakeholder meetings. In total, 13,491 no. submissions were received during this eight-week period of consultation

Each and every submission received has been reviewed and similar concerns and issues raised are grouped together under relevant headings. Some of the concerns and issues raised are summarised in the following section. Please refer to the main body of the report for further details.

3. FEEDBACK RECEIVED

3.1 AGRICULTURE, AGRONOMY AND HORTICULTURE

As it is proposed to locate part of the WwTP within agricultural land, land-use, agronomy and horticulture were issues raised by many stakeholders, including queries regarding the reputation of local produce, compensation for land, loss of agricultural land and the potential for pollution.

3.2 AIR AND ODOUR

Air quality and odour were often raised as primary concerns by stakeholders. Concerns in relation to pollutants, wind direction, heat and odours at other facilities such as at the Ringsend WwTP were often quoted. Further information was sought in relation to odour management measures proposed and odour guarantees.

3.3 AIRPORT

A number of stakeholders raised concerns in relation to the proximity of the proposed WwTP site relative to Dublin Airport including the development of the Airport Economic Zone and the risk of accidents and bird strikes along the flight path.

3.4 ALTERNATIVES

Many of the submissions received questioned the site location alternatives considered for the WwTP, pumping stations and pipeline route. The alternative of siting numerous smaller plants throughout the region rather than one large facility at Clonshagh was also queried by numerous stakeholders. Alternative treatment options and facility design options were also raised.

3.5 AQUATIC ECOLOGY AND THE AQUATIC ENVIRONMENT

The potential impact the proposed WwTP may have on aquatic ecology (flora and fauna), the fishing industry, the environment and beaches were issues raised on numerous occasions by stakeholders.

3.6 ARCHAEOLOGY, ARCHITECTURE AND CULTURAL HERITAGE

Archaeology, architecture and cultural heritage were raised by stakeholders as issues that should be considered further by the project.

3.7 CATCHMENT AND LOAD AREAS

Stakeholders queried why the proposed plant would be treating wastewater from other areas. Many stakeholders expressed the view that each area should treat their own wastewater. Queries were also raised as to whether existing WwTPs would be expanded to their maximum capacity.

3.8 COMMUNITY AND SOCIO ECONOMIC IMPACTS

A significant number of submissions objected to the project for community and socio economic reasons. Overburdening of the area and the potential impact on industry and business were often raised as concerns by stakeholders. Views were also expressed that there must be some form of appreciable community gain for the area if the project goes ahead.

3.9 CONSTRUCTION

Construction related concerns primarily centred around construction timelines, disturbance to residents in terms of traffic, safety and noise, as well as impact to lands, access constraints and height restrictions associated with the proposed site.

3.10 CONSULTATION

Numerous submissions raised consultation as a concern including a lack of awareness of the project and not enough opportunity to consult with reference to a lack of consultation with Dublin City Council residents. Consultation in terms of compliance with the Aarhus Convention was referred to in terms of the laws not being in place; however it was acknowledged that extensive consultation was undertaken for the GDD project.

3.11 CONTRACT

Concerns were raised in relation to the type of contract proposed with specific concerns noted in relation to the use of a Design-Build-Operate (DBO) contract.

3.12 COST AND FINANCIAL GAIN

Many stakeholders queried whether a Cost Benefit Analysis was completed, whether Fingal County Council would gain financially from the project and how the project would be funded.

3.13 ECOLOGY AND THE ENVIRONMENT (TERRESTRIAL)

The potential impact of the proposed project on ecology and the environment were significant issues raised amongst stakeholders. Concerns and issues raised focused on the potential impact to flora, fauna, wildlife and protected areas.

3.14 ENERGY

Some stakeholders queried the efficiency and sustainability of the proposed WwTP.

3.15 FLOODING AND STORM EVENTS

Concerns and queries were raised by several stakeholders in relation to the potential impact of large rainfall and storm events, as well as lightning and flooding on the facility and surrounding environment.

3.16 GEOLOGY, HYDROGEOLOGY AND HYDROLOGY

Concerns and queries were raised in relation to hydraulic analysis, the impacts to soils and waters in the event of a leak, malfunction or breakdown amongst others.

3.17 HUMAN HEALTH

Concerns were raised in relation to the potential impacts on human health, which focused on the potential impact of adverse odours, effluent and the potential for contaminants in these emissions.

3.18 LANDSCAPE AND VISUAL IMPACT

While some submissions recognised that the buildings that make up a wastewater treatment plant are modest and generally low risk in scale, many stakeholders were concerned that the plant would be visually obtrusive due to its proposed size. However, it was often felt that a high quality and well-considered landscape scheme would mitigate against this.

3.19 LEAKS, MALFUNCTION AND BREAKDOWN

Concerns were raised in relation to the risk of a leak, malfunction or breakdown of the facility. Concerns that the risk of such an event is greater given the size of the proposed plant. Queries were raised in relation to the potential impact of such an event on human beings and the surrounding WwTP and outfall locations.

3.20 MATERIAL ASSETS

A large number of submissions raised the issue of property devaluation in areas around the plant, pipeline route and outfall as a concern.

3.21 NEED FOR ONE LARGE FACILITY

Some stakeholders recognised the need for a new WwTP and welcomed the Greater Dublin Drainage project team's work in progressing development, however many submissions raised concerns regarding the requirement for the project and the proposed size of the WwTP. Some stakeholders suggested it would be preferable to have numerous smaller plants.

3.22 NOISE AND VIBRATION

Noise and vibration during the construction and operational phases were raised as concerns.

3.23 NUISANCE

The potential for the proposed WwTP and outfall to attract rats and flies were raised as concerns.

3.24 OUTFALL

The potential impact the construction of the outfall at the proposed location and effluent from the outfall on the surrounding environment were raised as concerns. Concerns were also raised in relation to the extent and location of the proposed pipeline.

3.25 PLANNING AND DEVELOPMENT

Concerns were raised in relation to the planning process, the potential impacts on future development in the area and zoning around the proposed plant, pipeline route and outfall location.

3.26 PROPOSED DEVELOPMENT

Concerns and queries were raised in relation to the title of the project, the timeline for construction, the size and capacity of the proposed plant, the pipeline route, the size of the pumping tanks, the level of treatment, and the proposed technology to be used.

3.27 PROXIMITY TO SENSITIVE RECEPTORS

The proximity to sensitive receptors was raised in many submissions as many stakeholders stated that the proposed WwTP will be located too close to residents, industry, hotels, schools, hospitals and other local amenities.

3.28 REGULATION, MONITORING AND LIABILITY

Some submissions raised queries in relation to proposed monitoring locations and frequency; emission limits and standards; legislative requirements, regulation and liability.

3.29 SITE SELECTION

While some stakeholders recognised the site selection process was "thorough, impartial and independent", others suggested the site was selected for political reasons or its close proximity to the Dublin City Council area. Queries were also raised in relation to the studies carried out as part of the site selection process as well as the proposed siting of the pipeline route and pumping stations.

3.30 SLUDGE MANAGEMENT

A number of queries arose regarding the management and transport of sludge generated from the treatment process.

3.31 STANDARDS

The use of European standards applicable today and the relevance of such post 2020 and post 2040 were queried. It was suggested that Ireland should be leaders in the field of wastewater treatment and the use of tertiary treatment was often cited in this regard.

3.32 TOURISM

The potential impact on tourism resulting from potential visual impacts and odours from the facility were also raised as concerns by numerous stakeholders.

3.33 TRAFFIC AND TRANSPORT

Increases in traffic volumes, health and safety, the potential overburdening of the existing road network, and the potential impact on the surrounding environment were raised as concerns.

3.34 WATER

The quality of the effluent was raised as a concern by stakeholders in relation to the potential impacts on coastal waters, bathing waters, groundwater, surface waters and drinking water.

4.0 NEXT STEPS

All relevant issues raised during the public consultation process and summarised in this report will be considered by the technical team in preparing the Environmental Impact Statement (EIS). A Consultation Response Report will be contained within the appendices of the EIS.

Further consultation will be undertaken by An Bord Pleanála as part of the assessment process following lodgment of the planning application to An Bord Pleanála in 2014. This will provide an additional opportunity for interested stakeholders and members of the public to participate and to provide input to the project.

To view or download the full version of the report: *Public Consultation Report on the Issues to be considered in the Environmental Impact Statement* visit <http://www.greaterdublindrainage.com/project-reports/>