

An Bord Pleanála Oral Hearing

Irish Water

Greater Dublin Drainage

CLOSING SUBMISSIONS

1. This is one of the most important infrastructural projects to come before the Board in recent decades.
2. Evidence has been given that population growth and increased commercial activity in the Greater Dublin Area means that the volume of wastewater generated is projected to increase by more than 50% over the next 30 years.
3. The need for this project was identified as far back as the Greater Dublin Strategic Drainage Study issued in 2005. It is required to ensure that there is adequate wastewater infrastructure to support the growth of communities and business in the Greater Dublin Area up to 2050.
4. The documentation and evidence put before the Board establishes that this project is the most environmentally, technically and economically beneficial solution that will deliver the long term wastewater treatment capacity required, once Ringsend (post upgrade) meets its maximum capacity by the mid 2020s.
5. The project will safeguard public health, protect and improve the environment, and facilitate the development and economic growth of the Dublin region.
6. The delivery of this project is a key strategic investment priority under the National Planning Framework and the National Development Plan 2018 – 2027, and receives strong support in national, regional and local policy documents including the Fingal Development Plan 2017 – 2023 and the Dublin City Development Plan 2016 – 2022.
7. While criticisms have been made about the siting of the waste water treatment plant at Clonshagh and the location of the marine outfall, the documentation and evidence before the Board establishes that these were chosen after a lengthy and robust site selection process, with considerable

stakeholder participation, which involved a consideration of all of relevant criteria including environmental impacts.

8. The alternative of a series of smaller waste water treatment plants which has been put forward by a number of observers was given detailed consideration and rejected on the basis that it would have major negative effects on biodiversity, flora and fauna and water bodies.
9. The project has also been the subject, over more than 7 years, of an extensive multi-phase public consultation process which was designed to, and has resulted in, engagement by all stakeholders and appropriate adjustments to the project in response.
10. Many of the issues raised by observers relate to marine ecology and ornithology. An enormous amount of documentation and data has been put before the Board as part of the application and in the course of the oral hearing which demonstrates that there has been a very detailed consideration of all potential impacts by a team of expert and experienced specialists. On the basis of that information, and the input at the hearing from the NPWS and Aebhín Cawley on behalf of Fingal County Council, the Board can be satisfied that it has before it all the information required to analyse any potential effects that the project may have on European sites, to reach the required complete, precise and definitive findings required for an Appropriate Assessment, and to conclude that this project, by itself or in combination with other plans or projects, will not adversely affect the integrity of any European site and that no reasonable scientific doubt remains as to the absence of the identified potential effects.
11. Another issue of understandable concern raised by a number of observers is that of odour. The documentation and evidence put forward by Irish Water demonstrates that this concern has been fully addressed as part of the design of the project from the outset, and that robust and effective measures have been put in place (such as covered tanks and odour controls units) to ensure that odour nuisance will not occur.
12. Other issues of concern raised by observers such impacts on human health and traffic impacts have also been comprehensively addressed.
13. In summary, this is the right project in the right place and I commend it to you, Inspector, and to the Board.

Declan McGrath SC
28 March 2019