



Greater Dublin Drainage

Constraints Consultation Report

August 2011

RPS

TABLE OF CONTENTS

1	INTRODUCTION	1
	1.1 PROJECT BACKGROUND	1
2	CONSTRAINTS CONSULTATION (MAY – JUNE 2011)	3
	2.1 INTRODUCTION	3
	2.2 TERMS OF REFERENCE	3
	2.3 CONSULTATION GUIDELINES	3
	2.4 PUBLICISING THE CONSULTATION	4
	2.4.1 Media	4
	2.4.2 Information Service.....	7
	2.4.3 Online: Web and Social Media.....	8
	2.4.4 Promotion on County Council Websites	9
	2.4.5 Elected Member Letters and Emails	10
	2.4.6 Posters	10
	2.4.7 Open Days.....	11
3	FEEDBACK.....	12
	3.1 INTRODUCTION TO FEEDBACK	12
	3.2 FEEDBACK ON CONSULTATION PROCESS	12
	3.3 FEEDBACK ON STRATEGIC CONSIDERATIONS.....	13
	3.4 FEEDBACK ON SITE SELECTION PROCESS AND SUGGESTED LOCATIONS	14
	3.5 FEEDBACK ON PLANNING ISSUES	16
	3.6 FEEDBACK ON LEISURE, LOCAL AMENITY, AND VISUAL IMPACT	18
	3.7 FEEDBACK ON ECOLOGY AND LANDSCAPE DESIGNATIONS.....	19
	3.8 FEEDBACK ON SOCIAL AND ECONOMIC FACTORS	22
	3.9 FEEDBACK ON TECHNOLOGY, SIZE, AND CATCHMENT OF PLANT	23
	3.10 FEEDBACK ON LOCATION OF THE OUTFALL PIPE AND ORBITAL DRAIN	24
	3.11 FEEDBACK ON SLUDGE MANAGEMENT	24
	3.12 FEEDBACK ON CONSTRUCTION IMPACTS	25
	3.13 FEEDBACK ON HEALTH RISK AND NUISANCES	25
	3.14 FEEDBACK ON ENERGY USE AND REQUIREMENTS	26
	3.15 FEEDBACK ON GENERAL ISSUES.....	26
4	NEXT STEPS	28

LIST OF FIGURES

Figure 1.1: Project Road Map 2

Figure 2.1: Constraints Consultation Tweets 9

LIST OF TABLES

Table 2.1: Advertising 4

Table 2.2: Press Releases 5

Table 2.3: Media Coverage, April – June 2011 6

Table 2.4: Engagement Figures 8

Table 2.5: Open Day Details 11

APPENDICES

APPENDIX A	Advertisement / Poster
APPENDIX B	Press Releases
APPENDIX C	Elected Member Letter and Mailing List
APPENDIX D	Poster Mail Out
APPENDIX E	Open Day Displays
APPENDIX F	Facilitation Sheet
APPENDIX G	Acknowledgement Letter
APPENDIX H	Stakeholder Submissions (Redacted)

1 INTRODUCTION

1.1 PROJECT BACKGROUND

The Greater Dublin Drainage initiative aims to provide strategic drainage infrastructure that the Greater Dublin Area (GDA) requires to continue to develop, both socially and economically.

The GDA comprises two Regional Authority areas, the Mid-East Regional Authority, which includes Meath, Kildare, and Wicklow County Councils and the Dublin Regional Authority, which includes Dublin City Council and Dún Laoghaire-Rathdown, Fingal, and South Dublin County Councils.

To guide the future provision of wastewater infrastructure in the GDA, the Greater Dublin Strategic Drainage Study (GSDSDS) Final Strategy Report and its subsequent Strategic Environmental Assessment (SEA) were prepared in 2005 and 2008 respectively. These documents were prepared on behalf of the seven local authorities that form the GDA.

The Greater Dublin Drainage 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. While Wicklow County Council is part of the GDA and contributed to the preparation of the GSDSDS and SEA, it is not intended that the Greater Dublin Drainage project will take and treat wastewater from Wicklow County Council.

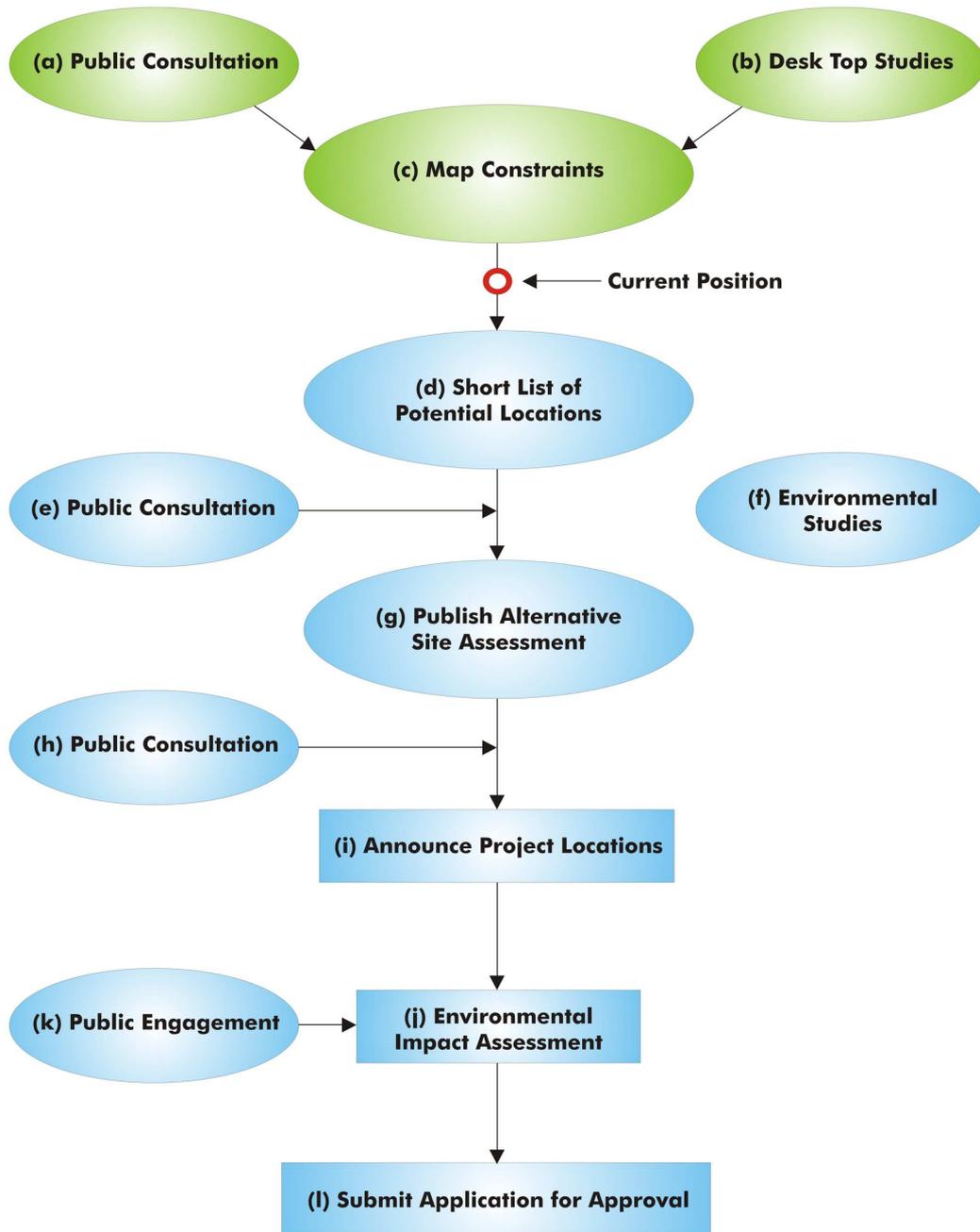
The Greater Dublin Drainage initiative involves the provision of:

- A new wastewater treatment works;
- A marine outfall; and
- A new drainage network in the northern part of the GDA.

Greater Dublin Drainage is about providing sustainable wastewater treatment for the Dublin region. Wastewater treatment and drainage infrastructure is essential to meet societal requirements for health and safety, the prevention of environmental pollution, and future economic development. Wastewater, if inadequately treated, can result in significant adverse health implications for the region.

As the project develops there will be a number of public consultation opportunities (Figure 1.1). This report sets out the activities and feedback associated with the first phase, the Constraints Consultation, and is marked as (a) on the Road Map.

Figure 1.1: Project Road Map



2 CONSTRAINTS CONSULTATION (MAY – JUNE 2011)

2.1 INTRODUCTION

Early engagement with stakeholders is an important aspect of infrastructure development.

At critical points in the development of Greater Dublin Drainage, Fingal County Council will seek specific feedback from members of the public and organisations to assist them in shaping the project. The first of these opportunities involved the identification of constraints. Constraints are those features or designations, such as protected areas, in the landscape that might make an area unsuitable as a location for the project. This is a very important part of the development of the project and offers an opportunity for early engagement with the general public and interested groups and organisations.

2.2 TERMS OF REFERENCE

The four week consultation ran from the 30th May to the 24th June 2011 and views were sought on the following questions:

1. What regional or locally important constraints should Fingal County Council consider in the identification of sites for the drainage system, treatment plant, and marine outfall?
2. What concerns or potential issues do you consider important that Fingal County Council should address during this alternative site identification phase?
3. How would you like to be involved and communicated with as the project progresses?
4. Are there any other points that are relevant that you would like Fingal County Council to consider?

2.3 CONSULTATION GUIDELINES

As part of the Constraints Consultation, Fingal County Council aimed to ensure that all engagement with the stakeholders:

- Was open and transparent;
- Demonstrated the stage of the project development;

- Identified the scope of influence stakeholders have; and
- Detailed how the stakeholder feedback will be managed and utilised.

2.4 PUBLICISING THE CONSULTATION

2.4.1 Media

Since the earliest stages of the project's development, the media have been used to help promote awareness of the project and to ensure as many interested stakeholders as possible are aware of the consultation.

2.4.1.1 Advertising

As part of the process of ensuring a wide number of people were aware of the consultation process, Fingal County Council placed advertisements in local newspapers. The advertisement advised interested stakeholders of the consultation, including opportunities for engagement. A copy of the advertisement can be found in Appendix A.

The advertisement was placed in the following newspapers (Table 2.1).

Table 2.1: Advertising

Date	Newspaper
02.06.11	Blanchardstown Gazette
02.06.11	Castleknock Gazette
02.06.11	Malahide Gazette
02.06.11	Swords Gazette
07.06.11	Fingal Independent

2.4.1.2 Press Releases

In order to raise awareness of the consultation process and to ensure members of the public were aware of the opportunities to engage, a number of press releases were issued. The press releases listed in Table 2.2 were issued to national and local media.

Table 2.2: Press Releases

Date	Title
12.04.11	Greater Dublin Drainage Launches – Fingal County Council to Consult Widely on New Wastewater Infrastructure
25.05.11	Fingal County Council Offers People the Earliest Opportunity to Feed into the First Step to Determine the Best Locations for Vital New Drainage and Wastewater Treatment Infrastructure
13.06.11	Update on Open Days for Greater Dublin Drainage

Copies of each press release can be found in Appendix B.

2.4.1.3 Media Briefing

A media briefing was held on May 25th, 2011 at the Fingal County Council Offices in Swords.

The main purpose of the briefing was to inform the journalists about the project in order to help ensure media coverage to promote the Constraints Consultation. Two journalists attending from the following newspapers:

- Fingal Independent
- North County Leader

2.4.1.4 Resultant Media Coverage

As a result of the extensive public relations efforts to secure coverage, 21 print articles have been published about the project. The details of the coverage can be found in Table 2.3.

Table 2.3: Media Coverage, April – June 2011

Date	Publication	Title
18.04.11	Irish Times	Plans for Sewage Plant Reinstated
19.04.11	Fingal Independent	Development will Grind to a Halt Without Plant
19.04.11	Fingal Independent	Cllr. Claims Coastal Site Not Suitable
10.05.11	Fingal Independent	Fairshare to Oppose any Bid to put Sewage Plant in Town
17.05.11	Fingal Independent	Consultants Hired to Handle the Press will net €360,00
17.05.11	Fingal Independent	Group Slams Use of 'Spin Doctors'
30.05.11	Irish Independent	Community in Bid to Halt Sewage Plant
31.05.11	Fingal Independent	Search for Site of New Treatment Plant Begin
31.05.11	Fingal Independent	Action Group Vows to Oppose Treatment Plant Once Again
31.05.11	Fingal Independent	Facility will be Built on Site in Fingal
31.05.11	Fingal Independent	Six Sites to be Shortlisted once Consultation Process Concludes
31.05.11	Fingal Independent	Development will be Restricted Unless Treatment Plant Proceeds
03.06.11	Castleknock Gazette	Seeking Wastewater and Drainage Views
09.06.11	Swords Gazette	Seeking Wastewater and Drainage Views
14.06.11	Fingal Independent	Group Steps Up Campaign Against Wastewater Plant
14.06.11	Fingal Independent	Public Consultation Process Continues
16.06.11	Swords Gazette	Fingal Residents to have a Say in New Plant Location
16.06.11	Swords Gazette	Public Views Invited on Drainage Project
16.06.11	Malahide Gazette	Seeking Wastewater and Drainage Views
16.06.11	Malahide Gazette	Open Days for Water Treatment Plant
21.06.11	Fingal Independent	First Steps Taken to Select Site for Wastewater Plant

2.4.1.5 Online Coverage

A number of websites issued information or published materials about the project and the Constraints Consultation on their websites. Although this was done on their own accord and not as a result of a request by Fingal County Council, it is important to note the awareness of the project was heightened as a result of these online posts. The websites that posted information include the following:

- www.benzinga.com
- www.theconstructionindex.co.uk
- www.donabateportrane.com
- www.fairshare.ie
- www.finance.yahoo.com
- www.fingalindependent.ie
- www.twitter.com
- www.waterwastemanagementbusinessreview.com

2.4.2 Information Service

From the outset of the project, an information service for engaging with stakeholders has been in place. The information service includes:

- Lo-call phone line: 1890.44.55.67
- Email service: info@greaterdublindrainage.ie
- Postal service: Greater Dublin Drainage Project Manager, c/o RPS Group, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland

Stakeholders have utilised these methods of engagement throughout the consultation process. Full details of the feedback from the engagement can be found in Section 3. All feedback received through these methods has been considered as part of this report.

Table 2.4 details the amount of engagement that has occurred during the Constraints Consultation.

Table 2.4: Engagement Figures

Method	Numbers
Emails	89 individuals or groups emailed the project; in total, 135 emails have been received.
Letters	1,015 postal items were received.
Open Days	59 people attended.
Phone	6 calls were received.

2.4.3 Online: Web and Social Media

2.4.3.1 Website

A dedicated project website can be found at www.greaterdublindrainage.com. The project website is updated regularly. On the website, interested stakeholders can sign up to the project mailing list, access all relevant reports and documents, including press releases, and review project information and frequently asked questions.

2.4.3.2 Twitter

Fingal County Council has a popular Twitter page with over 1,500 followers and this account has been used to promote the consultation on Greater Dublin Drainage. Thus far, three “tweets” have been issued by the Fingal Twitter account. The tweets can be seen in Figure 2.1.

Figure 2.1: Constraints Consultation Tweets

2.4.4 Promotion on County Council Websites

In order to further promote the consultation all of the authorities in the Greater Dublin Area were asked to update their website. Fingal, Kildare, Meath, and South Dublin County Councils updated their websites to announce the Constraints Consultation. The following text was posted:

"Fingal County Council has launched a non-statutory public consultation on Greater Dublin Drainage, running until June 24th.

Fingal County Council would like to engage with all stakeholders and are seeking feedback on what issues or concerns should be taken into account in determining the locations of the three elements of the Greater Dublin Drainage project.

More information can be found at www.greaterdublindrainage.ie."

2.4.5 Elected Member Letters and Emails

In order to promote the consultation widely, elected members were sent letters and emails announcing the Constraints Consultation and asking them to forward on the information about the consultation to interested stakeholders or groups in their area. Confirmation that this request was carried out was received from a number of elected representatives. An email was issued on May 25th, 2011 to coincide with the media briefing and a follow up letter was sent on May 26th, 2011 to the following GDA elected representatives:

- County Councillors
- MEPs
- Senators
- TDs

The text of both the email and letter was the same; a copy of the letter and the mailing list can be found in Appendix C.

2.4.6 Posters

Posters (which was the same as the advertisement) promoting the consultation and announcement letters were issued to the GDA Local Authorities, libraries, and Citizen Information Centres (CICs)*, and the community centres in Fingal. The two cover letter templates and the mailing lists can be found in Appendix D.

The posters and letters for libraries were sent to the head libraries and the main Local Authority buildings in all seven GDA counties. The librarians then distributed the posters to the individual libraries, as this is the librarian's preferred method of distributing information for display in their libraries. The Communications Officers in the Local Authorities were asked to hang the posters in a public area of their building. All posters were issued on May 26th, 2011.

The posters and cover letter for the CICs in the GDA and community centres in Fingal were issued on May 27th, 2011.

* Although CICs do not display material, the promotional poster for the consultation was issued to them for information.

Follow up calls to many recipients were made to ensure display material was visible to the public for the duration of the consultation.

2.4.7 Open Days

In order to provide an opportunity for interested stakeholders to engage with the project team and to discuss any issues or concerns that they have about the project and to provide feedback on the constraints, four Open Days were held in the general project area.

The details of the Open Days can be found in Table 2.5.

Table 2.5: Open Day Details

Date	Time	Location	Attendees
07.06.11	2:00 – 7:00	Fingal County Council Offices, Swords	22
08.06.11	2:00 – 7:00	Fingal County Council Offices, Blanchardstown	14
14.06.11	2:00 – 7:00	Balbriggan Town Hall & Library, Balbriggan	7
16.06.11	2:00 – 7:00	Fingal County Council Offices, Swords	16
Total Attendees			59

A series of displays were available at each Open Day for the public to review, including a map of the study area (Appendix E). The project team, which included staff from Fingal County Council, RPS Group, and Jacobs/Tobin Consulting Engineers, met with attendees and facilitated discussions using a facilitation sheet (Appendix F). The facilitation sheet asked attendees to consider the questions that were raised in the consultation terms of reference (Section 2.2). Stakeholders were invited to provide feedback and mark prominent locations / suggested sites on the study area map. These locations and the feedback provided are summarised in section three of the report.

The displays were erected in advance and left in-situ for the duration of the consultation following the event.

3 FEEDBACK

3.1 INTRODUCTION TO FEEDBACK

Each and every submission received by the Greater Dublin Drainage Team was acknowledged and logged (Appendix G). All submissions were then compiled and reviewed in *their entirety* by the project team¹. While much of the feedback has originated from the Portrane / Donabate areas and specifically relates to the features of that area, they raise principles and issues that also apply across the whole North County Dublin region, not just in Portrane and Donabate, and will be considered as such.

Many of the submissions reiterated similar issues, illustrating the strength of feeling and concern about the project. While not all of the issues directly relate to constraints they are all relevant to the project. Not all of the questions raised by members of the public can be answered at this early stage but as the details of the project are confirmed those questions can subsequently be addressed.

The following section is a compilation of the issues raised. Some of the issues are quoted directly from submissions but others are an amalgamation of issues raised by a number of submissions. Everything included in the section below is taken directly from stakeholder feedback. ***This, together with the full log of submissions, will be reviewed by the Project Team as part of the project development.***

3.2 FEEDBACK ON CONSULTATION PROCESS

- The consultation was not meaningful.
- Events should have been held on Saturdays or later than 7:00 p.m. to allow for people coming home from work.
- There was no consultation in development of GDSDS.
- Information leaflets should be displayed where foot fall is high, i.e. Super Valu.
- Information provided was misleading, especially in relation to the need for the project and how various national reports (i.e. the National Spatial Strategy) support the need for the project.

¹ *As this is a non-statutory consultation all personal data of the individuals who made submissions is being held in accordance with the Data Protection Act, 2003.*

- The consultation contravened the Aarhus Convention.
- There should have been more widespread advertising of the consultation using national media.

3.3 FEEDBACK ON STRATEGIC CONSIDERATIONS

A number of high level strategic issues have also been raised that need to be considered at this point in the project. These issues relate to the nature of the facility and how it is being developed as a solution to the issues in Greater Dublin.

- All the talk is of wastewater treatment, surely the talk should be of USED water treatment. The time has come to think outside the box and see what alternative there is to dumping all of our used water, treated or otherwise, into the sea. In this day and age it astonishes me that nobody has apparently considered harvesting this treated water and putting it back into the potable water system. It would certainly make economic sense to spend money on a suitable plant in Fingal instead of investing in piping water across from the River Shannon.
- The water supply for Dublin must be looked at in parallel with wastewater treatment. If one looks at wastewater treatment only one will get a different logical solution than if one deals with wastewater supply and wastewater treatment.
- Singapore is a leading example of how water supply and treatment are looked at in parallel. This is what Dublin should be looking to implement, especially with the likely climate changes that are occurring.
- It is tempting to go for the cheaper option in the current economic climate but, long-term it would be a disaster.
- The project should be developing small facilities rather than one large facility,
- Do not see the need for a big plant that will take the waste from Wicklow or Meath, for instance.
- When water metering is introduced and rainfall drops due to climate change, how will that affect the need for the project?

3.4 FEEDBACK ON SITE SELECTION PROCESS AND SUGGESTED LOCATIONS

A number of specific locations were suggested for consideration by the project team. In addition, a number of specific constraints were identified for consideration in the short-listing process.

- Portrane and Donabate are not suitable locations for the development.
- Dublin Airport red zone could be considered; Heathrow Airport has a wastewater treatment plant within its confines, as has Barcelona. So why not Dublin Airport? The site does not have to be coastal.
- The proposed Dart from Clongriffin to Dublin Airport could include a discharge pipe for the treated waste to the coast.
- Site the plant at the disused airport in Gormanstown.
- Inland sites should be considered, such as at the Nevitt site for a new landfill.
- Bremore in Balbriggan is not even included in the study area but, it should be considered as there will be a port developed there. It could be a site for the plant and the outfall.
- There is no reason why a wastewater treatment plant and outfall must be sited together.
- It should not be located on low lying land that could flood due to global warming and sea level rise. This rules out Portrane and Donabate.
- With regards to selecting the site, best possible practise, rather than minimum standards, should be applied. It is cheaper to do it right initially rather than have to rectify shortcomings and failings, as happened in Ringsend.
- The closed Turvey Golf Course should be considered.
- The plant should be located well away from communities, families, amenities, and protected areas of conservation.
- Should be placed away from urban areas or places of natural significance.
- It should be placed away from a growing community, like Portrane.

- It should be located as near as practical to main and projected population centres.
- It is easier to rule out areas than rule them in.
- Changing the nature of an area to industrialisation should be considered in the site selection process.
- Portrane is an area that is absorbing the problems of Leinster, i.e. prisons and social housing. Portrane can take no more.
- Should be located at the centre of the catchment to reduce energy consumption.
- It would be a terrible thing to have near people.
- Put it out of site, out of mind – Lambay Island.
- Place the wastewater treatment plant inland and pump to the sea.
- It should not be located on low-lying land at could flood due to global warming and sea level rise. Reason: preservation of infrastructure.
- It should be located near a location that has existing road and power infrastructure. Reason: minimise need for road infrastructure.
- It should be located as near as practical to main and projected main population centres. Reason: reduce cost of new pipe infrastructure.
- It needs to be located in a place that will not be developed for residential purposes. Reason: maximise return on investment.
- It should be located in an area that does not already have a regional sewage plant. Reason: fair share of pain as well as benefits.
- Its location should not be determined by where we have located wastewater treatment plants in the past. Reason: untreated wastewater MUST be pumped in pipes, but treated water, if not re-used, can flow via gravity or existing rivers.

3.5 FEEDBACK ON PLANNING ISSUES

- It is believed that the previous naming of Portrane as a suitable site a few years back compromises the fairness of the current process, leading to a feeling of pre-determination or pre-selection of the outcome.
- All of the sites of special interest as identified in the County Development Plan should be excluded as a location for consideration.
- There should be a consistent application of the Precautionary Principle; Fingal County Council has already acted responsibly to protect Rogerstown Estuary by applying the precautionary principle in relation to a proposal to site a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report: *"It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied."*

It would be inconsistent of the Competent Authorities if they did not apply the Precautionary Principle and exclude Portrane as a possible site due to its close proximity to so many Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

- The National Parks and Wildlife Service (NPWS) have yet to publish the conservation plan for the Rogerstown Estuary as stated on their website. When published, this plan may contain an as-of-yet unidentified constraint. This imminent conservation plan (and indeed other similar plans) need to be identified and factored into the decision making process.
- The precautionary principle as enshrined in the EU Habitats Directive should be applied to all proposed developments regardless of nature, which are adjacent or bordering any Natura 2000 sites (SACs and SPAs).

- The Fingal County Council Biodiversity Action Plan 2010 – 2015 states that “the buffer zones around the designated sites shall be developed as multi-functional landscapes. The agricultural land-use shall be maintained and, where appropriate, combined with nature conservation targets and low intensity recreational use. A regional sewage treatment plant does not fall within this descriptive category. How buffer zones are identified, sized and placed on the map is a key part of the site selection phase. They should be large enough to comply with the County Biodiversity Action Plan.
- There is currently a considerable amount of infrastructure in the Fingal area and the siting of the next major piece of infrastructure should take account of where all of these are located. The negative history that communities have had to endure should be considered and the project should be located away from existing infrastructure. Examples given include: Balleally Landfill, EirGrid East-West Interconnector, Gas Pipeline to Scotland, existing sewage treatment works, and treatment works under construction.
- Validity of data relied on for the planning application: The Greater Dublin Strategic Drainage Study (GDSDS) is nearly seven years old so the strategic rationale for the need for the project may no longer be justifiable; in addition to this it should be noted that other national government decisions on infrastructure are being reworked to suit latest census figures.
- The continued redevelopment of Rogerstown Park was heralded at the time as visionary. This re-development is slowly happening and the plan is being currently being implemented. How will the objectives of the development plans for Rogerstown be taken into account?
- The plant should not be located near residents or near residential zoned lands that may be developed in future.
- The Local Area Plan for Portrane and Donabate needs to be considered in the context of identifying constraints.
- During the original project [SEA] to determine the type of wastewater treatment process to be adopted by the Regional Authority of the 15 options considered, Portrane was identified as the location of choice in seven of these. Portrane was also the only site identified in the process. This illustrates a clear bias.
- EirGrid did not disturb the ecosystems of the Rogerstown Estuary and the same principle should be followed by Fingal County Council. The estuary was a planning risk for EirGrid and could have jeopardised the entire project. The same applies for this project.

- Portrane is clearly unsuitable as a site for a major infrastructural project especially a wastewater treatment plant of this scale. There are a total of eight Special Areas of Conservation (cSAC) or SPAs within a 10km radius of Portrane. In order to comply with the requirements of the European Commission Birds Directive (Council Directive 79/409/EEC) and the Habitats Directive (992/45/EEC) it is imperative that Portrane is not selected as a site for a major wastewater treatment plant and therefore should be excluded from this ASA.

3.6 FEEDBACK ON LEISURE, LOCAL AMENITY, AND VISUAL IMPACT

- Any impact on local and natural amenities would have a detrimental effect on local groups that use these amenities, in particular the Sea Scouts in Donabate.
- Stakeholders who run businesses facilitating adventure sports and recreational, outdoor and water-based activities are concerned that the plant and or outfall will impact their livelihood.
- As a keen sea angler this project will devastate local marine life; the impact of the project on local fishing activity needs to be considered at the earliest stage of development. How will the project affect shore fishing? Currently some outfalls are attracting fish to the surface.
- There is concern about the natural amenity of the cliff walk which runs along the coast from Tower Bay, Portrane to the Martello Tower at Donabate being compromised or denied to the thousands of people who use it extensively.
- Visual impacts in a very beautiful tranquil part of the county (Portrane and Donabate) have the potential to deny this heritage to future generations.
- Only two beaches in north county Dublin have been awarded Blue Flags. These Flags are valuable to the local community and also the local tourist industry. The impact of losing them needs to be considered in the siting process.
- Portrane and Donabate are used as a place for recreation and leisure ie Newbridge Park and this and other areas like them need to be identified and a buffer zone placed around them.
- Places of leisure and recreation have a commercial value that supports families etc. If the plant impacts this how will that be taken into account?
- There is a proposed cycleway from Malahide to Donabate and the project should not interfere with that.

- Use of shoreline by locals and non locals for leisure and the importance of this for well being and educational purposes needs to be considered.

3.7 FEEDBACK ON ECOLOGY AND LANDSCAPE DESIGNATIONS

There are many issues raised regarding the varied, unique, and highly valued ecology of North County Dublin and, in particular, the designations that particular habitats and coastal areas have received. While the submissions received only list a small amount of these areas, the recommendations to ensure appropriate buffer zones are placed around protected areas applies equally through out the region. Specific reference was made to Roseate Terns and also Brent Geese, but the same level of care needs to be applied to all listed species in the area of North County Dublin irrespective of whether or not they were named specifically in submissions.

- Wetland areas are very sensitive environmentally; changes in drainage, water levels, or pollution can destroy the habitats for the flora and fauna that reside there. This needs to be an over-riding consideration in the identification of the short list of sites.
- The existing ecosystem in Rogerstown Estuary is very fragile and is already struggling against the effect of the landfill heavy metal contaminants leaching into the estuarine waters. Rogerstown Estuary is one of only 45 sites designated as wetlands of international importance under the Ramsar Convention; siting a regional sewerage treatment plant will compromise that status.
- The development of this project would constitute a threat to flora and fauna, so the specific designations need to be taken into account.
- Other specific issues regarding Portrane / Donabate include:
 - Loss or disturbance to habitats during construction and operation;
 - The risk to water quality during construction works;
 - Risk to water quality during operation of scheme; and
 - Disturbance to birds during construction and operation of plant.

- Species mentioned in submissions for particular attention:
 - Roseate Tern
 - Brent Geese; 20% of the world's Brent Geese nest in Rogerstown
 - Harbour Porpoise
 - Shellfish in Dublin Bay

Designated Areas

There are a number of cSACs or SPAs within a 10km radius of Portrane, making it unsuitable as a location for the facility.

Details of cSACs and SPA/Ramsar sites within a 10km radius (approximately) of Portrane include the following:

Rogerstown Estuary SPA (code 04015)

This site extends from the Newhaggard Bridge to the seaward side of Portrane. The SPA is a fine example of an estuarine system, providing both feeding and roosting areas for a range of wintering waterfowl. Rogerstown Estuary SPA site is of high conservation importance, with an internationally important population of Brent Geese and nationally important populations of a further 10 species.

Rogerstown Estuary candidate Special Area of Conservation (code 0208)

Extent of site is similar to the SPA. Site is specifically selected for Estuaries and Tidal mudflats, three types of salt marsh (Atlantic, Mediterranean, and Salicornia mud), as well as various dune types.

Rogerstown Estuary is a relatively small, narrow estuary separated from the sea by a sand and shingle bar. The estuary is divided into two distinct parts by a causeway and narrow bridge, built in the 1840s to carry the Dublin-Belfast railway line. The estuary drains almost completely at low tide.

The intertidal flats of the outer estuary are mainly of sands, with soft muds in the north-west sector and along the southern shore. Associated with these muds are stands of the alien cordgrass *Spartina anglica*. Green algae (mainly *Enteromorpha* spp. and *Ulva lactuca*) are widespread and form dense mats in the more sheltered areas.

The area of intertidal flats in the inner estuary is reduced as a result of the local authority refuse landfill on the north shore. The sediments here are mostly muds, which are very soft in places. Cordgrass is widespread in parts and in summer dense green algal mats grow on the muds. In the extreme inner part, the estuary narrows to a tidal river.

Salt marshes fringe parts of the estuary, especially the southern shores and parts of the outer sand spit. Common plant species of the salt marsh include sea rush *Juncus maritimus*, sea purslane *Halimione portulacoides*, and common salt marsh-grass *Puccinellia maritima*. Low sand hills occur on the outer spit.

Rogerstown has long been known as an important site for wintering water birds. Detailed winter counts commenced in the late 1980s and continue today as part of the Irish Wetland Bird Survey (I-WeBS) coordinated by BirdWatch Ireland. For counting purposes the estuary is divided into 23 subsites. In the most recent published review (Crowe, 2005), the site is listed of international importance for its population of light-bellied Brent Geese, and also because it regularly supports in excess of 20,000 water birds. It is nationally important for a further 16 species. Most of the birds commute on a daily basis between the inner and outer estuaries, usually in response to tidal state or disturbance.

This site qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting a population of European importance of Golden Plover, a species listed on Annex I of the Directive.

The site also qualifies under Article 4.2 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the migratory species, Brent Geese.

Broadmeadow/Swords Estuary SPA (code 04025)

This site extends from the Broadmeadow River (just below M1) to eastwards of Malahide village. The Broadmeadow/Swords Estuary SPA is a fine example of an estuarine system, providing both feeding and roosting areas for a range of wintering waterfowl. The lagoonal nature of the inner estuary is of particular value as it increases the diversity of birds which occur. The site is of high conservation importance, with an internationally important population of Brent Geese and nationally important populations of a further 12 species.

Malahide Estuary candidate Special Area of Conservation (code 0205)

Similar in extent to the SPA and of importance for a range of estuarine habitats which are listed on Annex I of the Habitats Directive. These include various types of sand dune and salt marsh habitats.

Baldoyle Bay SPA (04016) (and Ramsar site)

Baldoyle Bay extends from just below Portmarnock village to the West Pier at Howth, Co. Dublin. It is a tidal estuarine bay protected from the open sea by a large sand-dune system. Two small rivers, the Mayne and the Sluice, flow into the inner part of the estuary.

Baldoyle Bay is of high ornithological importance for wintering waterfowl, providing good quality feeding areas and roost sites for an excellent diversity of waterfowl species. It supports an internationally important population of Pale-bellied Brent Geese, and has a further seven species with nationally important populations.

Baldoyle Bay cSAC (0199)

The cSAC site is similar in extent to the SPA and is of importance for a range of estuarine habitats which are listed on Annex I of the Habitats Directive. These include estuarine mud flats and various types of salt marsh habitats.

Lambay Island SPA (040) and cSAC (0204)

This large island, situated c.5 km offshore, is an internationally important site for breeding seabirds. The site is also designated as a cSAC for the Annex I habitat sea cliffs and for a breeding population of grey seal (Annex II species).

3.8 FEEDBACK ON SOCIAL AND ECONOMIC FACTORS

- Boost to local business in the summer due to day trippers and tourists would be under threat in Portrane and Donabate if the plant was sited there.
- Population predictions are out of date and will not allow for the plant to be 'right sized.'
- The importance of a clean environment to tourism economic activity can not be underestimated. A wastewater treatment will damage that.

- Value of local environment for educational purposes should also be considered.
- In these challenging times need to ensure things that are free (parks, beaches, and sports grounds) are protected.

3.9 FEEDBACK ON TECHNOLOGY, SIZE, AND CATCHMENT OF PLANT

- The team should review recent advances in anaerobic digestion at low temperatures which have enormous potential to deliver eco-friendly and net energy positive treatments of domestic sewage.
- Why would Fingal County Council agree to build a monster plant to take waste from councils that do not have existing transparency in their waste management process?
- Swords Treatment Works was allowed to run for six weeks with malfunctioning sludge pumps before it was acknowledged. How do we know the technology will be right?
- Ringsend is state of the art plant but the odour issues impacted the local community and their quality of life. This needs to be considered.
- 'All' Dublin treatment plant means that Fingal is taking other peoples' waste. The catchment area is too large.
- Population predictions are out of date and will not allow for the plant to be 'right sized.'
- Storm water should be separated out from wastewater in order to reduce the amount of water needing treatment and therefore the need for large wastewater treatment plants.
- The competence of operator is key. There is no confidence that the operator will get it right 100% of the time, so the inevitability of odours and spills need to be taken into account. Therefore siting the plant near protected or sensitive areas is not feasible.
- Has water harvesting from the site been considered?
- Tertiary treatment should be part of the plant.
- What if the pumps break down? This needs to be considered in the siting process.

- What is the catchment area? Where will the waste come from? How will that be decided?
- Current wastewater treatment technologies are such that this approach is not the best option and smaller plants dealing with local populations waste should be the preferred option.

3.10 FEEDBACK ON LOCATION OF THE OUTFALL PIPE AND ORBITAL DRAIN

- Hydrological studies of the immediate area off the Portrane Peninsula indicate that a 'wash effect' exists and it needs to be considered in the context of siting the marine outfall.
- Tidal surges are an increasing occurrence and need to be considered.
- Unusual geology of the Irish sea basin off Portrane, which contains many glaciomarine facies within sub-glacial tunnel valleys, will inhibit the dispersal of treated effluent discharge
- Strong tidal movements in the area (e.g. collapse of the rail line at Malahide) should be taken into account.
- Sheer volume of waste being discharged will inevitably be washed back up into the Rogerstown and Malahide Estuaries and beaches from Howth, Portmarnock, and up to Rush and Skerries.
- The marine outfall should not be sited on the basis that the effluent can be treated to lesser quality.
- Climate change and increase in sea level and changes in tidal volumes and directions (tidal surges) need to be considered
- What about using the existing pipelines that are in the Bay, i.e. at Howth?
- What about placing the outfall pipe along the route of the rail spur line to the Dublin Airport?

3.11 FEEDBACK ON SLUDGE MANAGEMENT

- The Environmental Protection Agency (EPA) has raised concerns about the current lack of recording and accountability for the management and disposal of sludge. How will this be addressed?

- Transportation of product by road and the possibility of accidents and how that could impact sensitive eco-systems / protected areas and people should be considered.
- Where will the sludge go?

3.12 FEEDBACK ON CONSTRUCTION IMPACTS

While these issues relate to the construction phase, the impact that construction works can have on a locality is identified as a constraint.

- Local infrastructure in Portrane cannot cope with the construction of a 65K population equivalent (PE) plant. There are safety issues with school children walking to school; any other construction work is unsustainable.
- The surrounding infrastructure of Donabate and Portrane is not suitable for a plant of this size.
- Construction traffic: in Portrane the existing construction traffic is causing disruption and delays with one road in and one road out; the potential for accidents need to be taken into account.
- The Portrane Peninsula is already experiencing significant disturbances due to the 65K PE plant currently under construction. A larger plant would pose an unacceptable risk and cause the destruction of and disturbance to habitats and birds during construction and operation of such a plant.

3.13 FEEDBACK ON HEALTH RISK AND NUISANCES

- Odour is a major concern for stakeholders. Selecting a site that minimises odour impacts is key.
- How odours will impact property values is key.
- The possible health risk due to aerial endosphere bacteria is very high.
- The number of mosquitoes and biting insects is very high in the area of Portrane and could increase if a wastewater treatment plant is located there.
- General increase in pests associated with the project should be considered.

3.14 FEEDBACK ON ENERGY USE AND REQUIREMENTS

- Will any of the energy produced on site be used to run the plant?
- Could there be a symbiotic relationship with an industry that requires a heat input or district heating? How that will impact on climate change should be considered at this early stage.
- The energy required for pumping of untreated and treated effluent in and out of the plant should be considered. If less energy is required to pump treated effluent than untreated effluent then the distance from the source of the effluent to the plant should be shorter than the distance of the plant to the outfall. This means the plant should be located inland close to the potential development areas.
- Will the by-product / sludge be used as a fuel?

3.15 FEEDBACK ON GENERAL ISSUES

- Project finances and funding implications for Fingal County Council. Has the selection of North County Dublin as the study area for the project been financially motivated?
- Will the costs of land be considered in the constraints process or not?
- How, at this stage, will the security requirements of the built plant be taken into account?
- Did the council vote this in?
- Will the Department of the Environment, Heritage, and Local Government (DOEHLG) fund the “No” camp?
- Are maps up to date? Some apartments seem to be missing.
- How was the study area defined?

Full copies of the redacted written submissions can be found in Appendix H.² Stakeholders did make oral submissions on the phone and at open days and this information is captured as feedback in the report. However, only copies of the original written submissions are included in the Appendices.

² The total number of submissions in Appendix I does not equal the engagement figures in Section 2. Not all who engaged made a submission, as some stakeholders contacted the Project Team to request information or to confirm attendance at open days.

4 NEXT STEPS

The issues raised during the Constraints Consultation stage of public consultation will now be reviewed by the Project Team and will be considered as part of the wider development of the project, including the short-listing of specific sites for the project. Details of this consideration will form part of the information released during the next consultation phase. The next phase will focus on a short-list of sites and is likely to happen in September 2011.

Fingal County Council would like to thank all participants for their feedback and look forward to engaging with them on the future development of Greater Dublin Drainage.

