

**Uimhir Thagarta Uathúil:** FIN-C532-3

**Údar:** Ian Lennon

**Stádas:** Submitted

**Aighneacht:** Issues With SEA Document

**Comhairliúchán:**

Proposed Material Alterations to the Draft Fingal Development  
Plan 2023-2029

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## Strategic Environmental Assessment (SEA) Report

**Caibidil:** ENVIRONMENTAL REPORTS » Strategic Environmental Assessment (SEA)  
Report

**Select, where provided, the reference for the amendment on which you wish to comment , or for flood maps, the drawing ref number:**

Strategic Environmental  
Assessment

Dear Development Plan Team,

I am making an observation in relation to the *Strategic Environmental Assessment (SEA) Report*, by *Brady Shipman Martin*.

During Stage 2, I made a submission under FIN-C453-105 highlighting that the Irish Water Infrastructure capacity figures provided in the *SEA Report* were incorrect. (Please see submission here: <https://consult.fingal.ie/en/submission/fin-c453-105>).

**Here is an extract of that submission:**

Dear Dev Plan Team,

This submission is in relation to the SEA prepared for the Draft Fingal County Development Plan 2023-2029.

On page 152 (PDF Page 151) of the SEA Report, **Table 5.7: Wastewater Treatment Plants Serving Fingal**, the agglomeration P.E. for Naul is listed as 347 P.E. & the agglomeration P.E. for Garristown is listed as 320 P.E. These figures relate to the loading figures of the Certificate of Authorisation (COA) applications to the EPA in 2009. The loading of both plants has increased significantly over the past 13 years, these figures need to be updated.

In the attached *National Certificate of Authorisation Programme (NCAP) Site Assessment Report A0110: Garristown 1*, 2018, page 3, the Population Equivalent (P.E.) of Garristown was noted as 487 P.E. This may now be closer to c.500P.E. owing to the level of development in Garristown since the report was undertaken in 2018. The figure in **Table 5.7** for the Garristown Agglomeration should be updated to **487 P.E.** at minimum. I recommend Irish Water are contacted for an updated loading P.E. figure to inform the figure for Garristown Agglom. in **Table 5.7** prior to the publication of the final SEA.

In the attached *National Certificate of Authorisation Programme (NCAP) Site Assessment Report A0103: Naul*, 2018, page 3, the Population Equivalent (P.E.) of Naul was noted as 594 P.E. On page 11 of the Wastewater Discharge Application (WWDA) Form for Naul WWTP, under section *B.2.4 Capacity of the waste water works*, the Agglomeration

Loading figure for Naul is **674** P.E. The figure in **Table 5.7** for the Naul Agglomeration should be updated to **674** P.E. (See page 11 of: [https://epawebapp.epa.ie/licences/lic\\_eDMS/090151b2807f28d4.pdf](https://epawebapp.epa.ie/licences/lic_eDMS/090151b2807f28d4.pdf)).

I recommend Irish Water are contacted for updated loading P.E. figures for each of the plants contained in **Table 5.7** prior to the publication of the final SEA. It is important that the correct Agglomeration P.E. figures are included in the SEA report prior to final publication.

Kind regards, Ian

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The issue concerning the loading figures ('Agglomeration PE') seems to have gone unaddressed from the previous submission (FIN-C453-105) made on the matter during Stage 2 of the Draft Development Plan Process.

On page 155 of the SEA Report under this current stage, *Table 5.7: Wastewater Treatment Plants Serving Fingal* - The incorrect figures of Agglomeration P.E. are again listed for Naul and Garristown. The issue with this is that the SEA Document, which supports the rest of the Draft Fingal County Development Plan 2023-2029, contains an under declaration of the true Agglomeration P.E. figures for Naul and Garristown. The figures shown in Table 5.7 of the SEA Report are from 2009 (13 years ago), the Naul WWTP is now in fact overloaded and the reality is not reflected in the documents supporting the Draft Plan.

Attached are copies of the National Certificate of Authorisation (NCAP) Reports from 2018 and the proposed WWDL for the Naul WWTP by Irish Water which outlines the loading figures last December. These figures should be updated in order to firm up the assessments supporting the Draft Plan.

Kind regards,

Ian Lennon

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**Ceangaltáin:**

FIN-C532-3-81085 - Record\_2 (3).pdf

FIN-C532-3-81086 - Record\_1 (2).pdf

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