



Submission

Submitter:	Mrs Sabrina Joyce-Kemper
Organisation Name:	Individuals and Wild Irish Defence CLG
Submission Title:	Public notice issue & Other
Submission Reference No.:	S011481
Submission Received:	23 January 2024

Application

Applicant:	Uisce Éireann
Reg. No.:	D0034-02

See below for Submission details.

Attachments are displayed on the following page(s).

Inspector Aimie Cranch
Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford

Date: 23rd January 2024

Re: Licence Application Reference No: D0034-02

Dear Ms Cranch,

On Wednesday 17th of January 2024 a Catherine McMahon was in An Bord Pleanála to view an casefile involving Uisce Eireann. A letter on the case file from the EPA made reference to a licence review for the Greater Dublin Area Agglomeration and had a reference D0034-02 on it.

We had been awaiting the review of this file as it impacts three An Bord Pleanála appeals that we have made that are live at present, we were shocked to find out that a review was in train.

We have contacted another association and people who we knew would be interested in making submissions and none were aware that Uisce Eireann had submitted the initial application in May with a number of Unsolicited Information submissions shoring up information missing from the original application received as recently as the 22nd of January 2024.

The application is substantial and will require some time to go through. We wish to raise this issue in relation to notice / public consultation being deficient and hope to make a submission as soon as we can on this application.

However even without reviewing most of the file, we have concerns about calibration of modelling, failure to include Doldrum Bay discharge and other CSO's in worst case scenario (combined approach) modelling. Failure to include discharge locations, as newly identified in unsolicited information received by EPA on the 22nd of January 2024. Failure to identify a raw sewage discharge (from a wastewater misconnection to surface water in a housing estate proximate to St. Dominics High School) that discharges raw sewage onto Sutton Strand, current capacity issues, reliance on outdated biodiversity surveys that were used in (and predate) a 2018 planning application. The NIS and EIAR cannot be complete and capable of informing an AA, EIA and WFD assessment.

We would recommend that robust public consultation is ensured going forward in relation to this WWDL application.

Yours Sincerely

Sabrina Joyce-Kemper & Catherine McMahon as individuals
Sabrina Joyce-Kemper on behalf of Wild Irish Defence CLG