

	Objection/Submission	Irish Water Comments
1	<p>FS007085 Public Submission 1</p> <p>Marine Policy and Development Department Housing, Planning and Local Government Newtown Road Wexford Co Wexford</p> <p><a href="mailto:foreshore@housing.gov.ie">Email: foreshore@housing.gov.ie</a></p> <p><b>OBSERVATION AND OBJECTION Ref: FS007085</b> <b>APPLICANT: IRISH WATER</b></p> <p><b>Re: Site Investigations, Roundstone Sewerage Scheme, Roundstone Bay, Co Galway.</b></p> <p><b>OBSERVATION:</b></p> <p>The writer remains disappointed and utterly suspicious by the manner in which Irish Water choose to utilise and otherwise force their role in the development of a proposed Roundstone Sewerage Treatment Plant.</p> <p>At the very outset Irish Water choose to wrongfoot the local community and local property owners in the area by purporting to conduct an open forum/information evening regarding their plans to develop this facility.</p> <p>Being on notice that many properties in the area are non-residential holiday homes, Irish Water has utterly failed in their duty, that is being on notice of the massive objections to the proposed development, to contact or otherwise to publish their intentions. Irish Water choose to advertise this application in the Connaught Tribune and the Irish Examiner. The latter newspaper can only be deemed as an obscure newspaper to this area of Connemara. Whilst Irish Water no doubt are acting within the confines of their guidelines, they are fully aware of the massive outcry of objection and choose to publish this Application with stealth.</p> <p><b>OBJECTION:</b></p> <p>I, the undersigned, object to the Application by Irish Water to obtain a licence to carry out site investigation on the foreshore pursuant to the 1933 Foreshore Act on the following grounds, not exclusive:</p>	
	<p>a) Failure to properly advertise the intentions of Irish Water and to clearly and transparently advertise the dimensions and full plans of the proposed scheme.</p>	<p>The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The details of the proposed Site Investigation (SI) works are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: <i>"The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water."</i> The outcome of the SI works is required to finalise the final design particulars of the terminal pumping station.</p>

2	b) This application for Foreshore Licence is premature. Irish Water is proceeding on the basis that they will, or are likely, to purchase the land and/or have a successful outcome with their proposal to compulsory purchase the lands on which this facility is now proposed. If Irish Water furnishes the excuse that time is of the essence, and there is no clear evidence of this, then surely another application should be made on an alternative site which has been clearly identified by the previous Engineers to the current Engineering Institution, Mott MacDonald Ireland Limited.	CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.
3	c) Irish Water should not outsource this application to Mott MacDonald Ireland Limited, an English company, particularly bearing in mind the impending Brexit conclusion. This expertise should be sourced in Ireland.	Mott MacDonald Ireland Ltd is an Irish Company.
4	d) The application being made by Irish Water again promotes secrecy as paragraph 1.5 requests that all information from these site investigation works should be retained only by Irish Water and their appointed agents. At a very minimum, any information obtained by these site investigations should be published and made available to all interested parties. Thus and accordingly the thrust of this application for secrecy should render this application null and void.	Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.
5	e) It is noted that the area of the foreshore is currently not directly accessible. No application is made through the Planning Authorities for a licence and/or planning permission, and they are required to obtain such, to open an entrance from the public roadway onto the foreshore. Thus and accordingly this application should be rendered null and void without making such application to the local Planning Authorities for access to the foreshore to include the opening of an entrance and all ancillary works including site lines, road safety aspects, all of which require planning permission.	As noted in the report for Screening for Appropriate Assessment, which was prepared and submitted as part of the application (FS007085), the proposed access will be via the existing opening in the stone wall adjacent to the northern slipway of the pier onto the raised green area, and from there can track down to the foreshore. Alternatively, the appropriate rig can be manoeuvred over the stone wall using wooden planks and into the green area in the event that the proposed rig cannot fit through the opening. Thus a new opening will not be required to enable the site investigation works.
6	f) The application should develop and publish all plans for the <i>“terminal pumping station at this location”</i> prior to making this application for site investigations. The application thus is premature. Full and complete disclosure of all the plans for the terminal pumping station should be made available to this authority before any consideration is made regarding the granting of this site investigation licence.	This foreshore application is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted.
7	g) It is clear that Irish Water have not developed an appropriate planning application to Galway County Council for the Roundstone Sewerage Scheme and all of the relevant drawings, plans, schemes and information should now be made available prior to this application, to allow for public scrutiny and assessment prior to the granting of this site investigation licence.	The outcome of the proposed site investigation works in the foreshore will help inform the final design and subsequent Planning Application for the Roundstone Sewerage Scheme.
8	h) It is clear that Irish Water/Galway County Council do not propose to involve the drawdown of European Union or State funding and thus and accordingly the costings should now be published as these materially reflect and affect the need for tax payers funding and before any site investigation works are undertaken, a clear and transparent costing for all stages should now be published.	<b>The option “No” was selected in error, as a Semi State company, Irish Water would like to take the opportunity to change this response to “Yes”</b>
9	i) As previously advised the alleged public information evening, 25.3.2019, was and remains utterly inadequate. Responses have not been provided to all comments and queries submitted as part of the public information evening, objections made to the CPO aspect of this claim have been rejected. It is utterly irresponsible of the Applicant to suggest at paragraph 4.3 that this aspect has been complied with.	Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a> . All email queries are actively monitored and responded to via this email address. CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala.

10	j) Irish Water should, as a preliminary issue, publish the report regarding the pre-planning meeting which was allegedly held with Galway County Council for this entire scheme on 16.3.2018. Holding this as a secret document is irresponsible. As a preliminary step the report of this meeting should be published and furnished to all known objectors to this scheme by Irish Water and/or Galway County Council.	Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.
11	k) There has been a complete failure on behalf of Irish Water to consider the impacts on property.	A Roundstone Pumping Stations Site Selection Report, document reference 386624-MMD-Ro-00-RP-1401, was submitted as a supporting document with application FS007085.
12	l) The documentations submitted have been, and remain, utterly incomplete and inadequate, and by suspicion, Irish Water remains vague with regard to the nature of the application. This vagueness needs to be clarified, particularly with matters referred to above.	A description of the proposed activity related to application FS007085 is provided in the application form. The supporting documents provide further assessments to clarify and support application FS007085. Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.
13	m) There is a complete failure on the applicant to consider the impact on the various amenities inter alia the fishing, agriculture, sailing and surfing and/or swimming. n) The effects of the site investigation and the subsequent development must be assessed at this stage. There is utterly no point in expending public funds in undertaking these investigations as a tool or as a support structure for Irish Water's proposal to compulsory purchase lands for the development of this facility. There is massive objection to this facility and its location. An alternative site has already been highlighted yet Irish Water, in breach of their responsibilities to their responsibilities to the local community, utterly ignore their duties and responsibilities and attempting to proceed now to apply for a Site Investigation Licence is putting the cart before the horse. At a minimum, Irish Water should complete the compulsory purchase stage before spending public money in undertaking this aspect of the development.	Due to the temporary nature of the activity described in section 1.2 of the application for FS007085, the impact on amenities is expected to be minimal.
14		See response to Item 2.
15	o) Adjacent landowners whose properties may be affected by these works have not been consulted. The alleged public information evening is and was a fallacy. Irish Water is and remains fully aware of this and to publish the utterances referred to at paragraph 4.3. and 4.5 of this application is and remains utterly erroneous and deceptive. Irish Water has always been made aware of this fact.	See response to Item 9. As indicated in section 4.5 of application FS007085, users of the adjacent pier may be temporarily affected and will be consulted as part of the works.
16	p) The writer now requests that Mr Jacques Barnard swear an appropriate Affidavit that he has fully investigated the conduct of the alleged public information evening in light of the objections that were raised regarding same.	This is noted
17	q) The Application fails to address the development of slurry that will be involved in this development. There is a complete absence of detail regarding the proper screening and there is a complete absence of stage 2 assessment which must be carried out.	The Report for Screening for Appropriate Assessment submitted for these site investigation works notes that there is no potential for significant effects on any of the identified SACs. This report also notes that any water required for the boreholes will be contained within the boreholes. In the event that a small amount of arisings emerge from the borehole, these will be within the footprint of the borehole rig (approximately 4m x 2m). Therefore a Stage 2 Assessment was not deemed necessary.
18	r) There is a complete absence of any engineering evidence, whether by ways of plans or schemes, to detail the safety involved in this site investigation, the dealing with slurry, the storage of same, the removal of same, the disposal of same, and thus and accordingly without any such drawings and/or appropriate layout plans it is impossible for the Department to analyse the potential impact of this development, equally it is impossible for members of the public to appropriately address their objections in this regard.	As noted in response to Item No.17, the Screening for Appropriate Assessment notes how water arising from the boreholes will be dealt with. As part of the procurement and appointment of a Contractor to undertake the proposed site investigations, the Contractor will be required to prepare and implement a Safety and Health Plan in advance of the works commencing. As part of this plan, the Contractor will also be required to prepare Method Statements and Risk Assessments and submit these to Irish Water for review and approval prior to undertaking the works.

19	s) Inadequate screening has been undertaken here. A proper screening for appropriate assessment will have to be undertaken in due course and it is not possible to do this until all drawings, appropriate layout plans, detailed description of works etc are undertaken and completed.	A Report for Screening for Appropriate Assessment has been completed for the proposed site investigation works which are the subject of this application only.
20	t) It is to be noted that Irish Water propose to put in a pumping station on the shoreline parallel to the public roadway, the R341. This will involve the installation of a pipeline which will be and remain obvious and visible. With regard to the installation of this pumping station, the WWTP itself must be considered, and to consider this at a stage two assessment is utterly unrealistic. This application accordingly is contrary to the Habitats Directive. As previously advised a stage two assessment is required.	As noted in response to Item No.17, the Screening for Appropriate Assessment completed for these site investigation works determines that there is no potential for significant effects on any of the identified SACs.
21	u) Irish Water has utterly failed to undertake appropriate screening for this development.	See response to Item 20.
22	v) Irish Water/Galway County Council should apply for Planning Permission first and thus and accordingly instigating an application for this site investigation licence is and remains utterly premature. Planning permission is required to create an access for all of the equipment that will be required, a road/track to be created on the shoreline, and even if on a temporary basis, it is clear that there will be a permanency involved with regard to the installation of various unnatural furniture, pipe work etc, which will remain permanently, and thus and accordingly planning permission application should now be made available before Applications for this Licence.	As the proposed site investigation works is within the foreshore, i.e. below the high water mark, statutory consent for the proposed site investigation works falls within the remit of the Foreshore Unit. It is not intended that new openings to the foreshore will be undertaken as part of the proposed site investigation works. The site investigation works are temporary in nature and do not involve the permanent installation of furniture or equipment.
23	w) No indication has been made and/or guidelines furnished with regard to noise levels and the implications thus for residents and indeed habitat pursuant to the Habitats Directive and the EIA Directive.	The impacts of noise and vibrations have been assessed as part of the Screening for Appropriate Assessment.
24	x) No attempt has been made to provide mitigating measures in this regard.	No mitigation measures are deemed necessary as part of the Screening for Appropriate Assessment
25	y) No details have been furnished with regard to waste disposal and the potential thus for water pollution.	See response to Item 20.
26	z) Suspicion is highlighted by the timing of this Application during a chronic Covid crisis, with the inability for this objector to visit the locality and to assess the contents of the application whilst on the ground.	IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.

27	<p>aa) This application to the Department of Housing, Planning and Local Government will necessarily implicate the authority in the completely inadequate application and undertaking and conduct of affairs now being pursued by Irish Water. At a minimum Irish Water are trying to bully the owners of the lands on which the proposed structure intends to be constructed, in circumstances where complete objection is taken to its siting there and the procedures and steps being taken by Irish Water are and remain highly suspect, open to criticism and indeed challenge. The authority thus will be implicated in such challenges and in contemplating granting this licence will be seen to support the inadequacy of Irish Water’s proposals in developing a sewerage treatment plant at this site. Further the Housing Authority will be deemed implicit in supporting the development of this proposed facility without first addressing the use of public funds when it is clear that Irish Water have not been able to confirm the location of th GalwayUWW@water.ie. ject to which any application must have regard involves a large number of landowners whose lands are affected by the carrying out of the works for construction of the WWTP, construction and layout of pipes leading to the WWTP an</p>	See response to Item 2.
	<p><b>IN CONCLUSION:</b></p> <p>The Department should refuse this licence, at a minimum it being premature, and should not countenance Irish Water’s application until Irish Water can convince all of the relevant authorities including the planning authorities, the environmental authorities and, if necessary, the High and Supreme Courts as to the integrity of their application to site this facility at the location being suggested by them.</p> <p>Please accept this Observation and Objection as being a preliminary and/or intermediate objection, and should Irish Water revisit this application, then the writer reserves the right to make further amendments and/or additions to this objection.</p> <p>Your earliest attention would oblige.</p>	
Objection/Submission	Irish Water Comments	
<p>FS007085 Public Submission 2</p> <p>Marine Policy and Development Department Housing, Planning and Local Government, Newtown Road Wexford Co Wexford</p> <p><a href="mailto:foreshore@housing.gov.ie">Email: foreshore@housing.gov.ie</a></p> <p><b>OBSERVATION AND OBJECTION</b> <b>Ref: FS007085</b> <b>APPLICANT: IRISH WATER</b></p> <p><b>Re: Site Investigations, Roundstone Sewerage Scheme, Roundstone Bay, Co Galway.</b> <b>OBSERVATION:</b></p>		

The writer remains disappointed and utterly suspicious by the manner in which Irish Water choose to utilise and otherwise force their role in the development of a proposed Roundstone Sewerage Treatment Plant.

At the very outset Irish Water choose to wrongfoot the local community and local property owners in the area by purporting to conduct an open forum/information evening regarding their plans to develop this facility.

Being on notice that many properties in the area are non-residential holiday homes, Irish Water has utterly failed in their duty, that is being on notice of the massive objections to the proposed development, to contact or otherwise to publish their intentions. Irish Water choose to advertise this application in the Connaught Tribune and the Irish Examiner. The latter newspaper can only be deemed as an obscure newspaper to this area of Connemara. Whilst Irish Water no doubt are acting within the confines of their guidelines, they are fully aware of the massive outcry of objection and choose to publish this Application with stealth.

**OBJECTION:**

I, the undersigned, object to the Application by Irish Water to obtain a licence to carry out site investigation on the foreshore pursuant to the 1933 Foreshore Act on the following grounds, not exclusive:

1	a) Failure to properly advertise the intentions of Irish Water and to clearly and transparently advertise the dimensions and full plans of the proposed scheme.	The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The details of the proposed Site Investigation (SI) works are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: <i>"The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water."</i> The outcome of the SI works is required to finalise the final design particulars of the terminal pumping station.
2	b) This application for Foreshore Licence is premature. Irish Water is proceeding on the basis that they will, or are likely, to purchase the land and/or have a successful outcome with their proposal to compulsory purchase the lands on which this facility is now proposed. If Irish Water furnishes the excuse that time is of the essence, and there is no clear evidence of this, then surely another application should be made on an alternative site which has been clearly identified by the previous Engineers to the current Engineering Institution, Mott MacDonald Ireland Limited.	CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.
3	c) Irish Water should not outsource this application to Mott MacDonald Ireland Limited, an English company, particularly bearing in mind the impending Brexit conclusion. This expertise should be sourced in Ireland.	Mott MacDonald Ireland Ltd is an Irish Company.
4	d) The application being made by Irish Water again promotes secrecy as paragraph 1.5 requests that all information from these site investigation works should be retained only by Irish Water and their appointed agents. At a very minimum, any information obtained by these site investigations should be published and made available to all interested parties. Thus and accordingly the thrust of this application for secrecy should render this application null and void.	Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.



5	<p>e) It is noted that the area of the foreshore is currently not directly accessible. No application is made through the Planning Authorities for a licence and/or planning permission, and they are required to obtain such, to open an entrance from the public roadway onto the foreshore. Thus and accordingly this application should be rendered null and void without making such application to the local Planning Authorities for access to the foreshore to include the opening of an entrance and all ancillary works including site lines, road safety aspects, all of which require planning permission.</p>	<p>As noted in the report for Screening for Appropriate Assessment, which was prepared and submitted as part of the application (FS007085), the proposed access will be via the existing opening in the stone wall adjacent to the northern slipway of the pier onto the raised green area, and from these can track down to the foreshore. Alternatively, the appropriate rig can be manoeuvred over the stone wall using wooden planks and into the green area in the event that the proposed rig cannot fit through the opening. Thus a new opening will not be required to enable the site investigation works.</p>
6	<p>f) The application should develop and publish all plans for the “<i>terminal pumping station at this location</i>” prior to making this application for site investigations. The application thus is premature. Full and complete disclosure of all the plans for the terminal pumping station should be made available to this authority before any consideration is made regarding the granting of this site investigation licence.</p>	<p>This foreshore application is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted.</p>
7	<p>g) It is clear that Irish Water have not developed an appropriate planning application to Galway County Council for the Roundstone Sewerage Scheme and all of the relevant drawings, plans, schemes and information should now be made available prior to this application, to allow for public scrutiny and assessment prior to the granting of this site investigation licence.</p>	<p>The outcome of the proposed site investigation works in the foreshore will help inform the final design and subsequent Planning Application for the Roundstone Sewerage Scheme.</p>
8	<p>h) It is clear that Irish Water/Galway County Council do not propose to involved the drawdown of European Union or State funding and thus and accordingly the costings should now be published as these materially reflect and affect the need for tax payers funding and before any site investigation works are undertaken, a clear and transparent costing for all stages should now be published.</p>	<p><b>The option “No” was selected in error, as a Semi State company, Irish Water would like to take the opportunity to change this response to “Yes”</b></p>
9	<p>i) As previously advised the alleged public information evening, 25.3.2019, was and remains utterly inadequate. Responses have not been provided to all comments and queries submitted as part of the public information evening, objections made to the CPO aspect of this claim have been rejected. It is utterly irresponsible of the Applicant to suggest at paragraph 4.3 that this aspect has been complied with.</p>	<p>Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a>. All email queries are actively monitored and responded to via this email address. CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala.</p>
10	<p>j) Irish Water should, as a preliminary issue, publish the report regarding the pre-planning meeting which was allegedly held with Galway County Council for this entire scheme on 16.3.2018. Holding this as a secret document is irresponsible. As a preliminary step the report of this meeting should be published and furnished to all known objectors to this scheme by Irish Water and/or Galway County Council.</p>	<p>Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.</p>
11	<p>k) There has been a complete failure on behalf of Irish Water to consider the impacts on property.</p>	<p>A Roundstone Pumping Stations Site Selection Report, document reference 386624-MMD-Ro-00-RP-1401, was submitted as a supporting document with application FS007085.</p>
12	<p>l) The documentations submitted have been, and remain, utterly incomplete and inadequate, and by suspicion, Irish Water remains vague with regard to the nature of the application. This vagueness needs to be clarified, particularly with matters referred to above.</p>	<p>A description of the proposed activity related to application FS007085 is provided in the application form. The supporting documents provide further assessments to clarify and support application FS007085. Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.</p>
13	<p>m) There is a complete failure on the applicant to consider the impact on the various amenities inter alia the fishing, agriculture, sailing and surfing and/or swimming.</p>	<p>Due to the temporary nature of the activity described in section 1.2 of the application for FS007085, the impact on amenities is expected to be minimal.</p>

14	<p>n) The effects of the site investigation and the subsequent development must be assessed at this stage. There is utterly no point in expending public funds in undertaking these investigations as a tool or as a support structure for Irish Water's proposal to compulsory purchase lands for the development of this facility. There is massive objection to this facility and its location. An alternative site has already been highlighted yet Irish Water, in breach of their responsibilities to their responsibilities to the local community, utterly ignore their duties and responsibilities and attempting to proceed now to apply for a Site Investigation Licence is putting the cart before the horse. At a minimum, Irish Water should complete the compulsory purchase stage before spending public money in undertaking this aspect of the development.</p>	See response to Item 2.
15	<p>o) Adjacent landowners whose properties may be affected by these works have not been consulted. The alleged public information evening is and was a fallacy. Irish Water is and remains fully aware of this and to publish the utterances referred to at paragraph 4.3. and 4.5 of this application is and remains utterly erroneous and deceptive. Irish Water has always been made aware of this fact.</p>	See response to Item 9. As indicated in section 4.5 of application FS007085, users of the adjacent pier may be temporarily affected and will be consulted as part of the works.
16	<p>p) The writer now requests that Mr Jacques Barnard swear an appropriate Affidavit that he has fully investigated the conduct of the alleged public information evening in light of the objections that were raised regarding same.</p>	This is noted
17	<p>q) The Application fails to address the development of slurry that will be involved in this development. There is a complete absence of detail regarding the proper screening and there is a complete absence of stage 2 assessment which must be carried out.</p>	The Report for Screening for Appropriate Assessment submitted for these site investigation works notes that there is no potential for significant effects on any of the identified SACs. This report also notes that any water required for the boreholes will be contained within the boreholes. In the event that a small amount of arisings emerge from the borehole, these will be within the footprint of the borehole rig (approximately 4m x 2m). Therefore a Stage 2 Assessment was not deemed necessary.
18	<p>r) There is a complete absence of any engineering evidence, whether by ways of plans or schemes, to detail the safety involved in this site investigation, the dealing with slurry, the storage of same, the removal of same, the disposal of same, and thus and accordingly without any such drawings and/or appropriate layout plans it is impossible for the Department to analyse the potential impact of this development, equally it is impossible for members of the public to appropriately address their objections in this regard.</p>	As noted in response to Item No.17, the Screening for Appropriate Assessment notes how water arising from the boreholes will be dealt with. As part of the procurement and appointment of a Contractor to undertake the proposed site investigations, the Contractor will be required to prepare and implement a Safety and Health Plan in advance of the works commencing. As part of this plan, the Contractor will also be required to prepare Method Statements and Risk Assessments and submit these to Irish Water for review and approval prior to undertaking the works.
19	<p>s) Inadequate screening has been undertaken here. A proper screening for appropriate assessment will have to be undertaken in due course and it is not possible to do this until all drawings, appropriate layout plans, detailed description of works etc are undertaken and completed.</p>	A Report for Screening for Appropriate Assessment has been completed for the proposed site investigation works which are the subject of this application only.
20	<p>t) It is to be noted that Irish Water propose to put in a pumping station on the shoreline parallel to the public roadway, the R341. This will involve the installation of a pipeline which will be and remain obvious and visible. With regard to the installation of this pumping station, the WWTP itself must be considered, and to consider this at a stage two assessment is utterly unrealistic. This application accordingly is contrary to the Habitats Directive. As previously advised a stage two assessment is required.</p>	As noted in response to Item No.17, the Screening for Appropriate Assessment completed for these site investigation works determines that there is no potential for significant effects on any of the identified SACs.
21	<p>u) Irish Water has utterly failed to undertake appropriate screening for this development.</p>	See response to Item 20.



22	<p>v) Irish Water/Galway County Council should apply for Planning Permission first and thus and accordingly instigating an application for this site investigation licence is and remains utterly premature. Planning permission is required to create an access for all of the equipment that will be required, a road/track to be created on the shoreline, and even if on a temporary basis, it is clear that there will be a permanency involved with regard to the installation of various unnatural furniture, pipe work etc, which will remain permanently, and thus and accordingly planning permission application should now be made available before Applications for this Licence.</p>	<p>As the proposed site investigation works is within the foreshore, i.e. below the high water mark, statutory consent for the proposed site investigation works falls within the remit of the Foreshore Unit. It is not intended that new openings to the foreshore will be undertaken as part of the proposed site investigation works. The site investigation works are temporary in nature and do not involve the permanent installation of furniture or equipment.</p>
23	<p>w) No indication has been made and/or guidelines furnished with regard to noise levels and the implications thus for residents and indeed habitat pursuant to the Habitats Directive and the EIA Directive.</p>	<p>The impacts of noise and vibrations have been assessed as part of the Screening for Appropriate Assessment.</p>
24	<p>x) No attempt has been made to provide mitigating measures in this regard.</p>	<p>No mitigation measures are deemed necessary as part of the Screening for Appropriate Assessment</p>
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26	<p>z) Suspicion is highlighted by the timing of this Application during a chronic Covid crisis, with the inability for this objector to visit the locality and to assess the contents of the application whilst on the ground.</p>	<p>IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.</p>
27	<p>aa) This application to the Department of Housing, Planning and Local Government will necessarily implicate the authority in the completely inadequate application and undertaking and conduct of affairs now being pursued by Irish Water. At a minimum Irish Water are trying to bully the owners of the lands on which the proposed structure intends to be constructed, in circumstances where complete objection is taken to its siting there and the procedures and steps being taken by Irish Water are and remain highly suspect, open to criticism and indeed challenge. The authority thus will be implicated in such challenges and in contemplating granting this licence will be seen to support the inadequacy of Irish Water's proposals in developing a sewerage treatment plant at this site. Further the Housing Authority will be deemed implicit in supporting the development of this proposed facility without first addressing the use of public funds when it is clear that Irish Water have not been able to confirm the location of the required. "W@water.ie. ial for cumulative or incombination effects on any European Sites".ber of landowners whose lands are affected by the carrying out of the works for construction of the WWTP, construction and layout of pipes leading to the WWTP an</p>	<p>See response to Item 2.</p>
<p><b>IN CONCLUSION:</b></p> <p>The Department should refuse this licence, at a minimum it being premature, and should not countenance Irish Water's application until Irish Water can convince all of the relevant authorities including the planning authorities, the environmental authorities and, if necessary, the High and Supreme Courts as to the integrity of their application to site this facility at the location being suggested by them.</p>		

Please accept this Observation and Objection as being a preliminary and/or intermediate objection, and should Irish Water revisit this application, then the writer reserves the right to make further amendments and/or additions to this objection.

Your earliest attention would oblige.

Objection/Submission	Irish Water Comments
<div>FS007085 Public Submission 3</div> <div>Marine Policy and Development Department Housing, Planning and Local Government, Newtown Road Wexford Co Wexford</div> <div><a href="mailto:foreshore@housing.gov.ie">Email: foreshore@housing.gov.ie</a></div> <div><b>OBSERVATION AND OBJECTION</b> <b>Ref: FS007085</b> <b>APPLICANT: IRISH WATER</b></div> <div><b>Re: Site Investigations, Roundstone Sewerage Scheme, Roundstone Bay, Co Galway.</b> <b>OBSERVATION:</b></div> <div>The writer remains disappointed and utterly suspicious by the manner in which Irish Water choose to utilise and otherwise force their role in the development of a proposed Roundstone Sewerage Treatment Plant.</div> <div>At the very outset Irish Water choose to wrongfoot the local community and local property owners in the area by purporting to conduct an open forum/information evening regarding their plans to develop this facility.</div> <div>Being on notice that many properties in the area are non-residential holiday homes, Irish Water has utterly failed in their duty, that is being on notice of the massive objections to the proposed development, to contact or otherwise to publish their intentions. Irish Water choose to advertise this application in the Connaught Tribune and the Irish Examiner. The latter newspaper can only be deemed as an obscure newspaper to this area of Connemara. Whilst Irish Water no doubt are acting within the confines of their guidelines, they are fully aware of the massive outcry of objection and choose to publish this Application with stealth.</div> <div><b>OBJECTION:</b></div> <div>I, the undersigned, object to the Application by Irish Water to obtain a licence to carry out site investigation on the foreshore pursuant to the 1933 Foreshore Act on the following grounds, not exclusive:</div>	

1	a) Failure to properly advertise the intentions of Irish Water and to clearly and transparently advertise the dimensions and full plans of the proposed scheme.	<p>The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The details of the proposed Site Investigation (SI) works are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: <i>"The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water."</i></p> <p>The outcome of the SI works is required to finalise the final design particulars of the terminal pumping station.</p>
2	b) This application for Foreshore Licence is premature. Irish Water is proceeding on the basis that they will, or are likely, to purchase the land and/or have a successful outcome with their proposal to compulsory purchase the lands on which this facility is now proposed. If Irish Water furnishes the excuse that time is of the essence, and there is no clear evidence of this, then surely another application should be made on an alternative site which has been clearly identified by the previous Engineers to the current Engineering Institution, Mott MacDonald Ireland Limited.	CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.
3	c) Irish Water should not outsource this application to Mott MacDonald Ireland Limited, an English company, particularly bearing in mind the impending Brexit conclusion. This expertise should be sourced in Ireland.	Mott MacDonald Ireland Ltd is an Irish Company.
4	d) The application being made by Irish Water again promotes secrecy as paragraph 1.5 requests that all information from these site investigation works should be retained only by Irish Water and their appointed agents. At a very minimum, any information obtained by these site investigations should be published and made available to all interested parties. Thus and accordingly the thrust of this application for secrecy should render this application null and void.	Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.
5	e) It is noted that the area of the foreshore is currently not directly accessible. No application is made through the Planning Authorities for a licence and/or planning permission, and they are required to obtain such, to open an entrance from the public roadway onto the foreshore. Thus and accordingly this application should be rendered null and void without making such application to the local Planning Authorities for access to the foreshore to include the opening of an entrance and all ancillary works including site lines, road safety aspects, all of which require planning permission.	As noted in the report for Screening for Appropriate Assessment, which was prepared and submitted as part of the application (FS007085), the proposed access will be via the existing opening in the stone wall adjacent to the northern slipway of the pier onto the raised green area, and from there can track down to the foreshore. Alternatively, the appropriate rig can be manoeuvred over the stone wall using wooden planks and into the green area in the event that the proposed rig cannot fit through the opening. Thus a new opening will not be required to enable the site investigation works.
6	f) The application should develop and publish all plans for the <i>"terminal pumping station at this location"</i> prior to making this application for site investigations. The application thus is premature. Full and complete disclosure of all the plans for the terminal pumping station should be made available to this authority before any consideration is made regarding the granting of this site investigation licence.	This foreshore application is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted.
7	g) It is clear that Irish Water have not developed an appropriate planning application to Galway County Council for the Roundstone Sewerage Scheme and all of the relevant drawings, plans, schemes and information should now be made available prior to this application, to allow for public scrutiny and assessment prior to the granting of this site investigation licence.	The outcome of the proposed site investigation works in the foreshore will help inform the final design and subsequent Planning Application for the Roundstone Sewerage Scheme.
8	h) It is clear that Irish Water/Galway County Council do not propose to involved the drawdown of European Union or State funding and thus and accordingly the costings should now be published as these materially reflect and affect the need for tax payers funding and before any site investigation works are undertaken, a clear and transparent costing for all stages should now be published.	<b>The option "No" was selected in error, as a Semi State company, Irish Water would like to take the opportunity to change this response to "Yes"</b>

9	i) As previously advised the alleged public information evening, 25.3.2019, was and remains utterly inadequate. Responses have not been provided to all comments and queries submitted as part of the public information evening, objections made to the CPO aspect of this claim have been rejected. It is utterly irresponsible of the Applicant to suggest at paragraph 4.3 that this aspect has been complied with.	Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a> . All email queries are actively monitored and responded to via this email address. CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala.
10	j) Irish Water should, as a preliminary issue, publish the report regarding the pre-planning meeting which was allegedly held with Galway County Council for this entire scheme on 16.3.2018. Holding this as a secret document is irresponsible. As a preliminary step the report of this meeting should be published and furnished to all known objectors to this scheme by Irish Water and/or Galway County Council.	Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.
11	k) There has been a complete failure on behalf of Irish Water to consider the impacts on property.	A Roundstone Pumping Stations Site Selection Report, document reference 386624-MMD-Ro-00-RP-1401, was submitted as a supporting document with application FS007085.
12	l) The documentations submitted have been, and remain, utterly incomplete and inadequate, and by suspicion, Irish Water remains vague with regard to the nature of the application. This vagueness needs to be clarified, particularly with matters referred to above.	A description of the proposed activity related to application FS007085 is provided in the application form. The supporting documents provide further assessments to clarify and support application FS007085. Project Engagement is actively ongoing through the project email address: GalwayUWW@water.ie. Information requests can continue to be made through this communication channel.
13	m) There is a complete failure on the applicant to consider the impact on the various amenities inter alia the fishing, agriculture, sailing and surfing and/or swimming.	Due to the temporary nature of the activity described in section 1.2 of the application for FS007085, the impact on amenities is expected to be minimal.
14	n) The effects of the site investigation and the subsequent development must be assessed at this stage. There is utterly no point in expending public funds in undertaking these investigations as a tool or as a support structure for Irish Water's proposal to compulsory purchase lands for the development of this facility. There is massive objection to this facility and its location. An alternative site has already been highlighted yet Irish Water, in breach of their responsibilities to their responsibilities to the local community, utterly ignore their duties and responsibilities and attempting to proceed now to apply for a Site Investigation Licence is putting the cart before the horse. At a minimum, Irish Water should complete the compulsory purchase stage before spending public money in undertaking this aspect of the development.	See response to Item 2.
15	o) Adjacent landowners whose properties may be affected by these works have not been consulted. The alleged public information evening is and was a fallacy. Irish Water is and remains fully aware of this and to publish the utterances referred to at paragraph 4.3. and 4.5 of this application is and remains utterly erroneous and deceptive. Irish Water has always been made aware of this fact.	See response to Item 9. As indicated in section 4.5 of application FS007085, users of the adjacent pier may be temporarily affected and will be consulted as part of the works.
16	p) The writer now requests that Mr Jacques Barnard swear an appropriate Affidavit that he has fully investigated the conduct of the alleged public information evening in light of the objections that were raised regarding same.	This is noted
17	q) The Application fails to address the development of slurry that will be involved in this development. There is a complete absence of detail regarding the proper screening and there is a complete absence of stage 2 assessment which must be carried out.	The Report for Screening for Appropriate Assessment submitted for these site investigation works notes that there is no potential for significant effects on any of the identified SACs. This report also notes that any water required for the boreholes will be contained within the boreholes. In the event that a small amount of arisings emerge from the borehole, these will be within the footprint of the borehole rig (approximately 4m x 2m). Therefore a Stage 2 Assessment was not deemed necessary.

18	r) There is a complete absence of any engineering evidence, whether by ways of plans or schemes, to detail the safety involved in this site investigation, the dealing with slurry, the storage of same, the removal of same, the disposal of same, and thus and accordingly without any such drawings and/or appropriate layout plans it is impossible for the Department to analyse the potential impact of this development, equally it is impossible for members of the public to appropriately address their objections in this regard.	As noted in response to Item No.17, the Screening for Appropriate Assessment notes how water arising from the boreholes will be dealt with. As part of the procurement and appointment of a Contractor to undertake the proposed site investigations, the Contractor will be required to prepare and implement a Safety and Health Plan in advance of the works commencing. As part of this plan, the Contractor will also be required to prepare Method Statements and Risk Assessments and submit these to Irish Water for review and approval prior to undertaking the works.
19	s) Inadequate screening has been undertaken here. A proper screening for appropriate assessment will have to be undertaken in due course and it is not possible to do this until all drawings, appropriate layout plans, detailed description of works etc are undertaken and completed.	A Report for Screening for Appropriate Assessment has been completed for the proposed site investigation works which are the subject of this application only.
20	t) It is to be noted that Irish Water propose to put in a pumping station on the shoreline parallel to the public roadway, the R341. This will involve the installation of a pipeline which will be and remain obvious and visible. With regard to the installation of this pumping station, the WWTP itself must be considered, and to consider this at a stage two assessment is utterly unrealistic. This application accordingly is contrary to the Habitats Directive. As previously advised a stage two assessment is required.	As noted in response to Item No.17, the Screening for Appropriate Assessment completed for these site investigation works determines that there is no potential for significant effects on any of the identified SACs.
21	u) Irish Water has utterly failed to undertake appropriate screening for this development.	See response to Item 20.
22	v) Irish Water/Galway County Council should apply for Planning Permission first and thus and accordingly instigating an application for this site investigation licence is and remains utterly premature. Planning permission is required to create an access for all of the equipment that will be required, a road/track to be created on the shoreline, and even if on a temporary basis, it is clear that there will be a permanency involved with regard to the installation of various unnatural furniture, pipe work etc, which will remain permanently, and thus and accordingly planning permission application should now be made available before Applications for this Licence.	As the proposed site investigation works is within the foreshore, i.e. below the high water mark, statutory consent for the proposed site investigation works falls within the remit of the Foreshore Unit. It is not intended that new openings to the foreshore will be undertaken as part of the proposed site investigation works. The site investigation works are temporary in nature and do not involve the permanent installation of furniture or equipment.
23	w) No indication has been made and/or guidelines furnished with regard to noise levels and the implications thus for residents and indeed habitat pursuant to the Habitats Directive and the EIA Directive.	The impacts of noise and vibrations have been assessed as part of the Screening for Appropriate Assessment.
24	x) No attempt has been made to provide mitigating measures in this regard.	No mitigation measures are deemed necessary as part of the Screening for Appropriate Assessment
25	y) No details have been furnished with regard to waste disposal and the potential thus for water pollution.	See response to Item 20.
26	z) Suspicion is highlighted by the timing of this Application during a chronic Covid crisis, with the inability for this objector to visit the locality and to assess the contents of the application whilst on the ground.	IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.



27	<p>aa) This application to the Department of Housing, Planning and Local Government will necessarily implicate the authority in the completely inadequate application and undertaking and conduct of affairs now being pursued by Irish Water. At a minimum Irish Water are trying to bully the owners of the lands on which the proposed structure intends to be constructed, in circumstances where complete objection is taken to its siting there and the procedures and steps being taken by Irish Water are and remain highly suspect, open to criticism and indeed challenge. The authority thus will be implicated in such challenges and in contemplating granting this licence will be seen to support the inadequacy of Irish Water’s proposals in developing a sewerage treatment plant at this site. Further the Housing Authority will be deemed implicit in supporting the development of this proposed facility without first addressing the use of public funds when it is clear that Irish Water have not been able to confirm the location of th GalwayUWW@water.ie. ject to which any application must have regard involves a large number of landowners whose lands are affected by the carrying out of the works for construction of the WWTP, construction and layout of pipes leading to the WWTP an</p>	See response to Item 2.
	<p><b>IN CONCLUSION:</b></p> <p>The Department should refuse this licence, at a minimum it being premature, and should not countenance Irish Water’s application until Irish Water can convince all of the relevant authorities including the planning authorities, the environmental authorities and, if necessary, the High and Supreme Courts as to the integrity of their application to site this facility at the location being suggested by them.</p> <p>Please accept this Observation and Objection as being a preliminary and/or intermediate objection, and should Irish Water revisit this application, then the writer reserves the right to make further amendments and/or additions to this objection.</p> <p>Your earliest attention would oblige.</p>	
Objection/Submission	Irish Water Comments	
<p>FS007085 Public Submission 4</p> <p>23rd June 2020 Marine Policy and Development Department, Housing, Planning and Local Government, Newtown Road Wexford County Wexford <a href="mailto:foreshore@housing.gov.ie">Email: foreshore@housing.gov.ie</a></p> <p><b>OBSERVATION AND OBJECTION Ref: FS007085</b></p> <p><b>APPLICANT: IRISH WATER</b></p> <p>Re: Site Investigations, Roundstone Sewerage Scheme, Roundstone Bay, Co Galway.</p>		

	<p>Dear Sir/Madam,</p> <p>I am an owner/occupier of a property adjacent, with interest and ownership of road frontage which services pertaining to this proposed licence will affect. I am most concerned about the environmental effects of the proposed works, and the apparent lack of protection of the existing habitat. I wish to object to this foreshore licence in the strongest terms. In this letter I shall also make some observations on the scheme.</p>	
1	<p>a. Any attempt by Irish Water to suggest that the selection of this site involved public consultation is and remains erroneous as per 4.3 and 4.5 of the application form. Whilst Department for Housing, Planning and Local Government is not obliged to embark on an enquiry into the appropriateness of the process of Consultation carried out by the Applicant, the Department must take into consideration that any such suggestion made by the Applicant is erroneous, no such properly advertised and appropriate consultation was entered into. A cursory once-off meeting, in March 2019, giving only a few days' notice was held in the village hall. There was no provision of any maps, drawings, paperwork or plans. No detail of the actual treatment plant and how less toxic the discharge into the sea will be was provided. It is a denial of due process to say in the application response to 4.3 when there was so little information provided: "Responses have been provided to all comments/queries submitted as part of the Public Infoequired."W@water</p>	<p>Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a>. All email queries are actively monitored and responded to via this email address. CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.</p>
2	<p>2</p> <p>Follow up calls and emails to Galway CC and Irish Water seeking further information and discussion went unanswered for a period of six months – I can provide documentary evidence of same if required. I procured the Roundstone site selection document and drawings from another local resident. There has been no interaction with adjacent landowners that I know of.</p> <p>The foreshore licence was published in the Connacht Tribune, a wonderful weekly newspaper published on a Thursday. Due to Covid I was unable to purchase a copy in the local shop. The foreshore licence was not published in the online version of the newspaper. The application was also published in the Irish Examiner print version, which I was also unable to purchase due to Covid, again the application was not published in the online version of the newspaper. I should draw attention to the fact that daily circulation of Irish Examiner is 25,000 predominantly in the Munster region – it is not a local newspaper to those in the West of Ireland.</p>	<p>The Public Notice for the Foreshore Licence for the proposed SI Works was included in both the hard copy and the digital edition of the Connacht Tribune. A copy of the digital edition of the Connacht Tribune containing the public notice can be made available if required.</p>
3	<p>b. Environmental Impacts</p> <p>(i) The applicant has answered No to 5.5, and thus 5.6-5.9</p> <p>"Will the proposal have any potential environmental impacts? If yes, please describe" There will likely be substantial slurry from the drilling. As per page 5 of the Report for Screening for Appropriate Assessment, the drilling will require 3000-5000 litres of water.</p> <p>"The majority of this water will be absorbed into the ground surrounding the borehole. There may be a small amount of arisings from the borehole, however these will be contained within the works area. The works will take place at low tide. As such, there is no potential for these arisings to enter the coastal waters.</p> <p>"</p> <p>If these works are taking place below the high water mark at low tide and there is large ingress of slurry how does the applicant plan to mop up the slurry before the area is inundated by the incoming tide – indeed the area of drilling is only dry for a few hours over the low tide.</p>	<p>The Screening for Appropriate Assessment details how the containment of water (where required for drilling purposes) will be within the coreholes, and where arisings occur these will be contained within the works area.</p>

4	<p>(ii)As per page 6 of the Report for Screening for Appropriate Assessment</p> <p>“Barham (2018) present a typical time history of underwater noise measured at approximately 50m from a rotary drilling operation in Northern Ireland. At 50m from the operation the sound pressure varied from 127 to 133dB re 1µPa RMS, with an average of 130dB re 1µPa RMS. The study also notes that at 830m the underwater noise levels were largely below background noise levels. It is of note that the rig referenced in this study is much larger than the rig to be used on site in Roundstone and so is likely to have a greater impact in terms of noise and vibration emissions than is expected at Roundstone. “</p> <p>The noise impact describes an underwater comparison, which is invalid in this case as the drilling is to take place at low tide. This makes their answers to 5.5-5.9 invalid and wrong.</p>	<p>The Screening for Appropriate Assessment for the proposed SI Works, and the EIA Screening submitted as part of the application, both conclude that the proposed works do not have the potential for significant effects.</p>
5	<p>a. The attached EIA report</p> <p>The report is incomplete, Schedule 7 takes into account pollution and nuisances – there has been no assessment in this case for the proposed Waste Water Treatment Plant. There are three existing outfalls, a reasonable assumption is that a third of the raw sewerage is currently entering the sea through each. The proposed WWTP will reduce the oxygen demand from the sewerage by 20%, and remove up to 50% of the solids from the waste. These numbers are progress of sorts.</p> <p>However, ALL of the effluent will not be pumped into the bay further inshore. The northern part 3 of the bay will receive a much larger amount of raw effluent as a result of the new scheme. I dispute this is good use of taxpayers money, what cannot be denied is the large scale state sponsored environmental damage that will occur.</p>	<p>It is the objective of Irish Water to intercept the raw sewage from the existing networks and then pump it via three new pumping stations towards a new modern wastewater treatment plant (WWTP) prior to discharge into the sea. The WWTP will be designed to ensure that the water quality standards set down by regulatory bodies will be achieved, as outlined within European and National legislation. Furthermore, cleaner coastal waters will enhance the amenity value of Roundstone, while the investment in the sewage system will promote and facilitate socioeconomic development.</p>
6	<p>There is an existing sewerage works further south in the village in need of upgrade, at sea level which requires much less ongoing energy to operate. This is detailed in the attached reports on page 10 of the Report for Screening for Appropriate Assessment</p> <p>“One planning application of note was made for a WWTP upgrade to the south of the works area (Planning no: 191902). No decision has been made to date in relation to these works. The works proposed consist of an upgrade and replacement of existing tanks located approximately 1km to the south of the borehole location. They are set back from the shoreline. The upgrade works are small scale and short term in nature. As such, there is no potential for cumulative or in-combination effects as a result of the proposed works. “</p>	<p>Planning Ref 191902 relates to an IDA Ireland planning application for a specialist suppliers design treatment system. The IDA waste water network is separate from the Irish Water sewer network in Roundstone. Planning Ref 191902 was referenced on page 10 of the Report for Screening for Appropriate Assessment (Roundstone Sewerage Scheme - Foreshore - SI Works) in the context of an "Assessment of Significant Effects" and as part of the characteristics of "Cumulative and In-combinations Effects". Within this context, Table 2.2 found that there is no potential for significant effects caused by cumulative or in-combination effects. The reference to the IDA Ireland site is therefore not relevant to Foreshore SI Application FS007085.</p>
7	<p>I must also draw attention to the fact that the applicant has submitted an incomplete version of the site selection survey, it does not include the financial specifics of the three sites that were assessed. The difference in costings was very small. The scoring criteria for the site selection were also non- standard and were weighted differently from the site selection surveys that I have scrutinised for other similar projects. Indeed it is different to that which was used nearby in Carraroe, County Galway. This brings into question the impartiality of the decision making process of those bodies involved. I would be delighted to supply documentary evidence if required to prove these allegations. I note the defamation notice on the Department’s website in relation to this objection.</p>	<p>The Roundstone Pumping Stations Site selection Report (Document reference 386624-MMD-Ro-00-RP-1401) was issued to the Foreshore Section of the Department of Housing, Planning and Local Government as part of the FS 007085 Pre-application Consultation Request Form Submission for SI in Roundstone, Co. Galway. Application FS007085 is currently a matter for the Foreshore Section.</p>
Objection/Submission		Irish Water Comments
FS007085 Public Submission 5		
REF.FS007085.APPLICANT IRISH WATER.		
RE.SITE INVESTIGATIONS .ROUNDSTONE SEWERAGE SCHEME ,ROUNDSTONE BAY COUNTY GALWAY		

1	<p>1 object to the application by Irish Water to obtain a licence to carry out site investigations on the foreshore pursuant to the 1933 foreshore act on the following grounds.</p> <p>as a local resident owner of property with road frontage foreshore over which services are pertinent to this development will affect me and the welfare of the environment. protection of the habitat and the illegality of the architectural layout of the main entrance to the village of Roundstone .</p>	<p>It is the objective of Irish Water to intercept the raw sewage from the existing networks and then pump it via three new pumping stations towards a new modern wastewater treatment plant (WWTP) prior to discharge into the sea. The WWTP will be designed to ensure that the water quality standards set down by regulatory bodies will be achieved, as outlined within European and National legislation. Furthermore, cleaner coastal waters will enhance the amenity value of Roundstone, while the investment in the sewage system will promote and facilitate socioeconomic development.</p>
2	<p>2 .</p> <p>this is a large development and a primarily treatment plant. there is well documented intermittent breakdown of facilities which can lead to very bad odour issues which applies to the main treatment plant .pumping stations and outfall as proof . we only have to look at Clifden town sewerage our nearest town to us only 20 km away they have issues with bad smells, noise and the lost their blue flag status.</p>	<p>See response to Item 1.</p>
3	<p>3.</p> <p>at the moment there are 3 separate outfalls putting sewerage into the sea at different points .these will be unified and will be then following limited treatment by discharge into the sea in shallow water with limited tidal flow at the north end of village.the effluent which is still very bad toxic will be washed back into the village center and harbour..</p>	<p>See response to Item 1.</p>
4	<p>4.</p> <p>the selection of this site is contrary to the environment in its location and destroy the beautiful entrance to Roundstone both visually and will have a negative impact on this area and its wildlife and shellfish.</p>	<p>The Roundstone Pumping Stations Site selection Report (Document reference 386624-MMD-Ro-00-RP-1401) was issued to the Foreshore Section of the Department of Housing, Planning and Local Government as part of the FS 007085 Pre-application Consultation Request Form Submission for SI in Roundstone, Co. Galway. Application FS007085 is currently a matter for the Foreshore Section.</p>
5	<p>5 this site will cause a public nuisance the prevailing winds blowing bad odours into the village of Roundstone the proposed terminal pumping station and outfall would be a significant eyesore to the foreshore and should not be visible in such a beautiful landscape. the outfall should be at the south side of the village into deeper water and away from the village .</p> <p>in conclusion .</p> <p>the department should refuse this licence as it would destroy the village .</p>	<p>See response to Item 1.</p>
Objection/Submission		Irish Water Comments
FS007085 Public Submission 6		
To whom it concerns,		

1	<p>I wish to register our objection to the above application.</p> <p>Our main concern is the Applicant's complete lack of consultation and information towards the community of Roundstone.</p> <p>The so called public information meeting last year was anything but that. A total lack of information, such as proper drawings, maps, layout plans, never mind works description and initial access details. The whole process appears to be shrouded in secrecy and not helped by the underhand behaviour regarding site notices and newspaper posts.</p>	<p>Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a>. All email queries are actively monitored and responded to via this email address. Information requests can continue to be made through this communication channel.</p>
2	<p>Before any more unnecessary public money is wasted, I believe that the Applicant doesn't even own the site, we would welcome some open discussion or public hearing to discuss same.</p> <p>Please acknowledge receipt of this email,</p>	<p>The Roundstone Pumping Stations Site selection Report (Document reference 386624-MMD-Ro-00-RP-1401) was issued to the Foreshore Section of the Department of Housing, Planning and Local Government as part of the FS 007085 Pre-application Consultation Request Form Submission for SI in Roundstone, Co. Galway. Application FS007085 is currently a matter for the Foreshore Section.</p>
Objection/Submission		Irish Water Comments
FS007085 Public Submission 7		
Marine Policy and Development, Department of Housing, Planning and Local Government, Newtown Road, Wexford. Co Wexford foreshore@housing.gov.ie 23/6/20		
Reference FS007085		
Application by Irish Water, site investigations for sewerage scheme, Roundstone Bay, Co Galway.		
1	<p>I ..., as a property owner at ... located in the field immediately adjacent to the proposed location of the waste water treatment plant (WWTP) at the north end of village of Roundstone in Connemara, object in the strongest terms to the foreshore works proposed. Irish waters clandestine approach to the planning of this WWTP has lacked any subtlety with the only objective of getting the facility through without any engagement with the surrounding property owners. My own property is at most within 50m of the proposed location of the primary plant.</p>	<p>Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a>. All email queries are actively monitored and responded to via this email address. Information requests can continue to be made through this communication channel. CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala.</p>



2	<p>Irish water engaged Motsons engineers to select a suitable site for the WWTP. Five sites were considered in their report. It is very clear that the scoring system used was primarily based on economics and provided very limited weighting to the local habitat, potential for odours or noise at the primary WWTP site and also that of the 3 additional pumps planned for the foreshore (terminal), the pier and at the north end of the village. Of the five sites assessed by Motsons, at least three would have very limited impact on the environs and one in particular to the north of the village at shoreline is remote from any private dwellings and closer to the deeper sea.</p>	<p>CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala.</p>
3	<p>This foreshore works application is being sought in tandem with a controversial CPO application process for the location of the WWTP. This foreshore application was raised during the Covid 19 lockdown period limiting local residents ability to engage with the process. This, at a unique time in Irish history when all public services are at best functioning in a very limited fashion. Notification for this foreshore works application consisted of two notices in regional publications namely, the Connaught tribune and the examiner, the latter newspaper is not even available to purchase in the village of Roundstone. As a consequence, a number of property owners from other parts of the country would not be privy to such publications yet another indication of Irish waters non transparent approach. Further, there are no site notices visible at the planned site of works and I am reliably informed by a local fisherman whose residence is directly across the road from the planned foreshore works, that no local notices for the foreshore works were posted at any stage.</p>	<p>The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The public consultation process as part of this application required public notices to be advertised in a local newspaper, and a national newspaper only. The erection of site notices is not a requirement as part of this process. It is noted that CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.</p>
4	<p>I am aware that the CPO process for the primary WWTP site is being actively challenged by the land owners family. It beggars belief that public funds are being spent in this way before a site has been acquired.</p>	<p>CPO case number ABP-306355-20 is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.</p>
5	<p>The plant proposed is the most basic type "primary" of WWT facility, with the treated water discharged back into the sea in a very tidal part of the bay adjacent to the harbour of Roundstone, clearly visible at low tide and across the road from local housing. It is my understanding that even at best, the treated water being discharged back into the sea at the foreshore will still have a high level of particulate conglomerates estimated at up to 90%, posing a significant risk to the local habitat.</p>	<p>It is the objective of Irish Water to intercept the raw sewage from the existing networks and then pump it via three new pumping stations towards a new modern wastewater treatment plant (WWTP) prior to discharge into the sea. The WWTP will be designed to ensure that the water quality standards set down by regulatory bodies will be achieved, as outlined within European and National legislation. Furthermore, cleaner coastal waters will enhance the amenity value of Roundstone, while the investment in the sewage system will promote and facilitate socioeconomic development.</p>
6	<p>Roundstone is a small very picturesque village in Connemara, centred around a beautiful harbour on the western way with a backdrop of the twelve Bens and a very significant tourist amenity. The risk to this amenity of a basic primary type WWTP situated in the environs of the north end of the village with three pump stations (foreshore, pier, and to south of village) is very real. The applicants may be aware that there has been significant problems with a similar WWTP in the adjacent larger town of Clifden with complaints of odours, pump noise and pollution of the adjacent sea water requiring closure of the adjacent beach on a regular basis. Such a problem should it occur in Roundstone would be devastating to the village and its residents with a very real threat to the local tourist industry.</p>	<p>Foreshore application FS007085 is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted.</p>

7	<p>Thus the lack of documentation outlining the proposed foreshore works (Reference FS007085), the lack of transparency, communication, and engagement by Irish water with the local private residents, the lack of a habitat report, the relatively scant documentation provided by Irish Water for the proposed foreshore works leaves me with no alternative but to object to this application.</p>	<p>Foreshore application FS007085 is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station at the existing northern outfall. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted. Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a>. All email queries are actively monitored and responded to via this email address. Information requests can continue to be made through this communication channel.</p>
	Objection/Submission	Irish Water Comments
	<p>FS007085 Public Submission 8</p> <p><b>From:</b>  <b>Sent:</b> 24 June 2020 19:16  <b>To:</b> foreshore &lt;foreshore@housing.gov.ie&gt;  <b>Subject:</b> Objection to site Investigation to Foreshore</p>	
1	<p>I wish to object to the treatment plant on the Foreshore as it will be at my frontdoor. If it's going to smell anything like the Clifden plant, it will blowing into my house. Please reconsider.</p>	<p>Foreshore application FS007085 is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station at the existing northern outfall, which currently discharges untreated waste water into the sea. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted. It is the objective of Irish Water to intercept the raw sewage from the existing networks and then pump it via three new pumping stations towards a new modern wastewater treatment plant (WWTP) prior to discharge into the sea. The WWTP will be designed to ensure that the water quality standards set down by regulatory bodies will be achieved, as outlined within European and National legislation. Furthermore, cleaner coastal waters will enhance the amenity value of Roundstone, while the investment in the sewage system will promote and facilitate socioeconomic development.</p>
	Objection/Submission	Irish Water Comments
	<p>FS007085 Public Submission 9</p> <p>Marine Policy and Development,</p>	

	<p>Department of Housing, Planning and Local Government, Newtown Road, Wexford. Co Wexford foreshore@housing.gov.ie 23/06/2020 Reference FS007085</p> <p>Application by Irish Water, site investigations for sewerage scheme, Roundstone Bay, Co Galway.</p>	
1	<p>My name is [redacted] and I am the owner of the [redacted]. I live there at present. The property is on the sea side of the road and I am concerned about the proposed foreshore licence being sought, mainly because of the subsequent works proposed by Irish Water, in the townlands of Roundstone and in particular the water treatment plant and offtake arrangements proposed.</p>	<p>Foreshore application FS007085 is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station at the existing northern outfall, which currently discharges untreated waste water into the sea. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted. It is the objective of Irish Water to intercept the raw sewage from the existing networks and then pump it via three new pumping stations towards a new modern wastewater treatment plant (WWTP) prior to discharge into the sea. The WWTP will be designed to ensure that the water quality standards set down by regulatory bodies will be achieved, as outlined within European and National legislation. Furthermore, cleaner coastal waters will enhance the amenity value of Roundstone, while the investment in the sewage system will promote and facilitate socioeconomic development.</p>
2	<p>Irish Water engaged Motsons engineers to select a suitable site for the WWTP. Five sites were considered in their report. It is clear that the scoring system used was primarily based on economics and provided very limited weighting to the local habitat, potential for odours or noise at the primary WWTP site and also that of the 3 additional pumps planned for the foreshore (terminal), the pier and at the north end of the village. Five sites were assessed by Motsons, at least three of which would have very limited impact on the environs and one in particular to the north of the village at shoreline is remote from any dwellings and closer to the deeper sea.</p>	<p>As noted above, Foreshore application FS007085 is for the undertaking of the proposed site investigations works only. CPO case number ABP-306355-20, which includes a proposed site for the WWTP, is currently a matter before An Bord Pleanála.</p>

3	<p>Roundstone is a small, picturesque village in Connemara, centred around the beautiful harbour on the Western Way with a backdrop of the twelve bens and is a significant tourist amenity. The risk to the amenity of a basic primary type WWTP and the three proposed station pumps (foreshore, pier, and to south of village) is real. The applicants may be aware that there has been significant problems with a similar WWTP in the adjacent larger town of Clifden, with complaints of odours, pump noise and pollution of the sea water requiring closure of the adjacent beach on a regular basis. Such a problem should it occur in Roundstone would be devastating to the village and its residents with a very real threat to the local tourist industry. I suggest Irish Water consider a different location for the treatment and offtake closer to open ocean.</p> <p>I am, therefore, objecting to the application for a foreshore licence. Yours sincerely</p>	<p>Foreshore application FS007085 is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted.</p>
Objection/Submission		Irish Water Comments
<p>FS007085 Public Submission 10</p> <p>By E-mail Only: foreshore@housing.gov.ie Marine Policy and Development, Department of Housing, Planning and Local Government, Newtown Road, Wexford. Co Wexford. 26 June 2020</p> <p>Re: Reference FS007085 Application by Irish Water, site investigations for sewerage scheme, Roundstone Bay, Co Galway Our client:</p> <p>Dear Sirs, We act as solicitors for ... deceased of No 6, Rossmore Park Templeogue, Dublin 6 W who own lands which are proposed to be directly impacted by the proposed Roundstone sewerage scheme.</p> <p>We object on our clients behalf to the application by Irish Water to seek a licence to carry out site investigations on the Foreshore pursuant to the Foreshore Act 1933 on a number of grounds;</p> <ol style="list-style-type: none"><li>1. The failure of the application to consider impacts on property.</li><li>2. Failure of the application to comply with Irish domestic law.</li><li>3. Failure of the application to comply with EU law.</li><li>4. The opaque nature of the application and the inadequate documents submitted, and the procedures followed.</li><li>5. The failure of the application to consider the impact on amenities.</li></ol> <p>Description of the works and drawing</p>		

1	<p>From this application it is evident that effects cannot be ruled out and as a result Irish Water is proceeding on an entirely flawed basis. There is a proposal to take out cores, and there will be significant quantities of slurry, which will be viscous and there are no proposals how to control or contain that. If it is proposed to leave it on the shoreline that would contaminate the waters at hightide. Accordingly, this requires an Appropriate Assessment and the screening undertaken for this application is not adequate.</p>	<p>The Report for Screening for Appropriate Assessment, Roundstone Sewerage Scheme - Foreshore - SI Works, 25 March 2020 (submitted as a supporting document with application FS007085) details how the containment of water (where required for drilling purposes) will be within the coreholes, and where arisings occur these will be contained within the works area.</p>
2	<p>The application does not identify or detail the effects this will have as a result of the waste in particular arising from the works and due to the lack of control, it is inevitable that there will be contamination. As such;</p> <ol style="list-style-type: none"> <li>1. Proper screening must be carried out in respect of the scheme.</li> <li>2. A stage 2 Assessment must be carried out.</li> </ol>	<p>See response to Item No.1. The screening carried out for the SI works determined that there is no potential for significant effects, thus a Stage 2 assessment is deemed not required.</p>
3	<p>What is being proposed must be properly described and there is a total failure to do so here. No sections are included with the application and there are no designs of the works proposed, there are no details of the scheme works and absent those it is not possible to do any proper analysis.</p> <p>What are the constituents in respect of slurry/arisings?</p> <p>Where will it be stored during operations?</p> <p>What are the arrangements for removal and where will it be disposed of?</p> <p>What is the access layout plan, how will Irish Water get on to the lands and what route is it proposing to take?</p>	<p>The Screening for Appropriate Assesment for the SI works details the proposed SI works and how they will be undertaken, including details on how the works area will be accessed.</p>
4	<p>The application has none of the following;</p> <ol style="list-style-type: none"> <li>1 Drawings</li> <li>2. Sections</li> <li>3. Proper layout plans</li> <li>4. A detailed description of the works.</li> <li>5. Details of proposed access arrangements including details of the entrance and the process involved in installing rigs.</li> </ol> <p>It is impossible therefore to analyse the potential impact of this development in the absence of any of these details. When that is done it may be possible to carry out a proper screening for the purposes of the Habitats Directive 92/43 EEC. In the absence of that one cannot carry out such a survey or analysis.</p>	<p>The details of the proposed Site Investigation (SI) works (FS007085) are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: "The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water." Drawings of the proposed SI works, including co ordinates, were included with the application (MMD-386624-C-DR-03-XX-1400 and MMD-386624-C-DR-03-XX-1402). Further details are included in the Screening for Appropriate Assessment as noted in response to item 3 above. The outcome of the SI works is required to finalise the final design particulars and drawings of the terminal pumping station.</p>
5	<p>92/43/EEC</p> <p>When the scheme is properly detailed, contrary to what is done, a proper screening for Appropriate Assessment will have to be done. It is not possible to do this until all the elements set out above are in place, and currently the screening undertaken is not adequate or appropriate in compliance with its obligations.</p>	<p>This statement is not relevant to Foreshore SI Application.</p>



	<p>Aspects of the works listed include:</p> <ul style="list-style-type: none"> <li>• A terminal pumping station on the shoreline parallel to the R341 at the point of the existing network outfall No 1.</li> <li>• A pumping station within the central pier which will include a new pump sump, along with a small rising main to transfer the flows from network 2 to network 1 and on to the terminal pumping station. A pumping station with an open are south of Marine Terrace. Approx. 60 m of the connecting pipework will be installed to connect adjacent properties and the flows from network 3 to the pumping station.</li> </ul>	
6	<ul style="list-style-type: none"> <li>• Approx., 415 m of new rising mains will be installed within the road curtilage to transfer flows from the existing outfalls to the new Waste Water Treatment Plant (“WWTP”). All flows will be conveyed by gravity from network 1 to the proposed terminal pumping station.</li> <li>• Repair the existing outfall No 1. This will require a maximum of 70 m of pipeline. Following the interception and diversion of the networks to the WWTP, the final effluent from the WWTP will be discharged form this outfall.</li> <li>• The remaining two outfalls will be kept as emergency overflows for the new pumping stations.</li> </ul>	See response to item 7 below.
7	<p>Even this is not adequate, as it really it concerns the pumping station. Instead all of the above aspects of the scheme together with the pumping station and the WWTP itself must be considered and it is necessary to apply a proper test under Habitats Directive and it is perverse to consider that a stage 2 Assessment is not required. The application accordingly is not in accordance with the Habitats Directive, had a proper analysis been undertaken, it is inevitable that a stage 2 Assessment will be required. The application must be considered in conjunction with other plans and projects. The obligation, which Irish Water has not done, is to consider this with other plans and projects, in particular it has not considered this development with the Wastewater Treatment Plant and with the outfall.</p>	<p>See responses to items 1 and 2 above. Table 2.2 of The Screening for Appropriate Assessment for the SI works examined the potential for Cumulative and In-combination Effects, which includes reference to the proposed works as part of the Roundstone Sewerage Scheme. The report notes the following: "The Untreated Agglomeration Study has identified a number of areas around Galway which are currently discharging untreated wastewater. Roundstone is one such location. Ultimately plans for a new Wastewater Treatment Plant and associated pumping stations and pipelines will be submitted to Galway County Council to seek planning permission. The ground investigation works are being carried out in order to inform the detailed design of a pumping station. As such, the boreholes will be completed prior to the construction of the WWTP and associated infrastructure. In addition, the WWTP project will be subject to its own environmental assessment. Given the timing of the works, and the nature and scale of the proposed boreholes, there is no potential for cumulative or incombination effects on any European Sites".</p>
	2014/52/EU EIA Directive	
8	<p>Irish Water does not appear to have carried out a screening for this. While it applies schedule 7 of the Planning and Development Regulations and references the cumulation with other proposed developments, it does not deal at all with the WWTP itself in the screening and to conduct a screening for an EIA assessment without any consideration of the principal project is completely inappropriate. On page 2 of the EIA screening report, this is deemed to be a subthreshold development for an EIA and is likely to have a significant effect and there is a procedure for doing that in schedule 7. Irish Water however does not appear to have done that exercise at all in respect of this development. When one looks at the characteristics of the development, there are no details of the development. Equally of significance is the cumulative effect of other developments and in particular the WWTP itself and Irish Water has not done that.</p>	<p>See response to Item 7 above. It is also noted that an EIA Screening Report (04 October 2019) was submitted with application FS007085 as a supporting document. This EIA Screening Report nothed that <i>"It is concluded that impacts associated with the construction and operation of the proposed development are not considered to be significant in the context of Directive 2014/52/EU nor Schedule 7 of the Planning and Development Regulations 2001 to 2017, as amended. The proposed Roundstone wastewater treatment plant and associated pumping stations (i.e. Roundstone Sewerage Scheme) are not considered significant in the context of Schedule 7 evaluation criteria to the extent that an EIA is required."</i></p>
	Planning Permission	

9	<p>This application involves the carrying out of works, it is development and requires planning permission. The development is on land that is contiguous to the functional area of Galway County Council and therefore requires to be the subject matter of a planning application before any works are carried out. Because of the inadequate details in the application, our client doesn't know precisely where access is going to be located and the site that is identified makes no provision for access from the public road or where that access is going to be. It will be necessary to create an access for the drilling equipment, it will be necessary that a road/track will be created and that will be used over the period of the development. Obviously in the absence of these details, it is not possible or appropriate to raise any issue in respect of that until those details are provided.</p> <p>There will, in planning terms, however, be very serious issues arising including the following:</p>	<p>As the proposed site investigation works is within the foreshore, i.e. below the high water mark, statutory consent for the proposed site investigation works falls within the remit of the Foreshore Section of the Department of Housing, Planning and Local Government. It is not intended that new openings to the foreshore will be undertaken as part of the proposed site investigation works. The site investigation works are temporary in nature and do not involve the permanent installation of furniture or equipment. Access will be as described in the Screening for Appropriate Assessment for the SI works.</p>
10	<p><b>Traffic Safety</b></p> <p>Access for a road where there are serious hazards by virtue of the road alignment which is seriously substandard in terms of width and its vertical alignment.</p> <p>There is a continuous white line and the movement of vehicles associated with this will create a very serious hazard for persons using the road.</p>	<p>As part of the procurement and appointment of a Contractor to undertake the proposed site investigations, the Contractor will be required to prepare and implement a Safety and Health Plan in advance of the works commencing. As part of this plan, the Contractor will also be required to prepare Method Statements and Risk Assessments and submit these to Irish Water for review and approval prior to undertaking the works.</p>
11	<p><b>Impact on Residential and Environmental Amenity.</b></p> <p>In addition there will be issues in respect of residential and environmental amenity with core samples being taken out at 3 separate locations but no indications are given in respect of noise levels which are very significant, which has implications for residents and Habitats pursuant to the EIA Directive and the Habitats Directive and again no mitigation measures are provided.</p>	<p>See response to item 8 above. As noted above, the SI works are temporary in nature and do not involve the permanent installation of furniture or equipment.</p>
12	<p><b>Waste Disposal</b></p> <p>There will be extraction of rock, creation of slurry/arising and significant dispersion of that waste in the absence of any proposals to contain it on the site in a manner that won't create the potential for water pollution. There will be hydrocarbons and also human activity on the foreshore.</p>	<p>See response to Item No.1. The rock cores will be placed in a core-box and removed from site for testing. The potential for hydrocarbons spills and potential effects are assessed as part of the Screening for Appropriate Assessment.</p>
13	<p><b>Vibrations</b></p> <p>The impact of vibrations arising from the drilling and the level of vibrations are not provided nor as a consequence are any details provided of a significant effect from this for the purposes of the Habitats Directive, the EIA Directive, the Planning Acts and residential amenity.</p>	<p>The potential for noise and vibration effects are assessed as part of the Screening for Appropriate Assessment for the SI works.</p>
14	<p><b>Procedural</b></p> <p>To publish Notices in the Examiner which is a newspaper which does not circulate in the area also is not appropriate. We are instructed that it is not possible to but the Examiner newspaper in Ireland. Fundamentally we are instructed that there is no site notice erected in respect of the proposed foreshore works.</p>	<p>The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The public consultation process as part of this application required public notices to be advertised in a local newspaper, and a national newspaper only. The erection of site notices is not a requirement as part of this process.</p>
15	<p>The application was made during the period when there were significant restrictions due to Covid 19 and the capacity to engage in the process during this period was seriously limited.</p> <p>The applicant was aware of that and still made the application during this lockdown period and therefore frustrated my and indeed other residents' engagement in the process.</p>	<p>IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.</p>
16	<p>The date prescribed, namely the 27 June period, which includes a period for inspection, reference and which includes up to the Saturday the 27 June for the making submissions, is impossible and therefore there is an error on the face of the record.</p>	<p>See response to Item No.14.</p>

17	<p>In summary, in relation to planning, no further consideration should be given to this application until the planning application which is required has been made and completed and is granted.</p> <p>Conclusion</p> <p>When proper details become available for planning, EIA, AA and appropriate details are furnished we will be making a submission on our client's behalf but obviously no such submission is possible in light of the inadequacies of the application.</p> <p>This preliminary objection goes to the heart of the application and we request that this is treated as a preliminary objection pursuant and we would request that you would notify us in respect if such preliminary objection and to indicate your confirmation that in this regard requirements to 92/43 EEC and 2014/52/ EU and planning issues and the basis of the planning application details have not been complied with.</p> <p>In the event that you fail to do this or in the event that you proceed to determine the application, you might please note that we reserve our client's right to take whatever proceedings that may be advised in respect of this development.</p> <p>This is part of a WWTP which must be dealt with as an integrated project and where the only consent that is sought from the Minister for of Housing, Planning and Local Government but where there are other landowners whose consent is required ,such as me ,and which consent has not been obtained. Such consent is necessary in respect of this project in respect of access. The overall project to which any application must have regard involves a large number of landowners whose lands are affected by the carrying out of the works for construction of the WWTP, construction and layout of pipes leading to the WWTP and outfall of pipes leading from the WWTP and it is a fundamental objection that in the context of the EIA Directive and in the context of the Habitats Directive and in the context of the Planning and Development Act ( as amended), that the consent of only one landowner is being sought and that the remaining landowners are being ignored/excluded and that the scheme is being adopted in a piecemeal and inappropriate manner and the Department should not facilitate such discrimination and in such an unfair and unequal manner .As you will note this is only a preliminary objection and in light of this you might please further let us know if you intend to consider this invalid application further in view of the issues outlined above and if you provide such confirmation that you consider treating the application as valid then a further and more detailed objection will be made.</p> <p>We await hearing from you.</p>	See response to Item No.9.
	<b>Objection/Submission</b>	<b>Irish Water Comments</b>
	<p>FS007085 Public Submission 11</p> <p>25th June 2020</p> <p>Marine Policy and Development Department Housing, Planning and Local Government, Newtown Road Wexford Co Wexford</p> <p>Email: foreshore@housing.gov.ie</p>	

Observation and Objection

Reference FS007085

Application by Irish Water for licence to investigate the foreshore for a sewage treatment scheme in Roundstone Bay, Co Galway

I am writing to object to the application by Irish Water for a Foreshore Licence to carry out site investigations in Roundstone, Co. Galway in my capacity as an occupier of a property, for more than 24 years, which is directly adjacent to the proposed sewage treatment plant which necessitates these investigations. This application is an essential element of the wider plan by Irish Water and Galway County Council to develop this sewage treatment plant in the village of Roundstone.

1

Therefore, this application for a Foreshore Licence must be judged in context, as part of an overall plan by Irish Water for a sewage treatment plant for the area and not as something separate and apart. As currently proposed it stands to negatively change the face of this village and inevitably the lives of people who live or visit there. Irish Water propose to compulsory purchase the proposed land on which the sewage treatment plant is to be built, but have not done so yet, along with many other essential permissions that have not yet been sought. It seems that the foundations for this total plan are not yet in place.

The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The details of the proposed Site Investigation (SI) works are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: *"The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water."* The outcome of the SI works is required to finalise the final design particulars of the terminal pumping station. CPO case number ABP-306355-20, which includes a proposed WWTP site, is currently a matter before An Bord Pleanála. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.

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• Part of my objection is that the rule of law is not being adhered to, in particular Irish domestic law and EU law. This includes planning laws, and the preliminary details essential to obligatory screening under the Habitats Directives. The application lacks significant information, such as a detailed description of the works proposed and the impact the Irish Water interventions will have on the area, the environment, the residents and visitors from the drilling, dredging and drainage.

The details of the proposed Site Investigation (SI) works (FS007085) are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: "The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water." Drawings of the proposed SI works, including coordinates, were included with the application (MMD-386624-C-DR-03-XX-1400 and MMD-386624-C-DR-03-XX-1402). Further details are included in the Report for Screening for Appropriate Assessment, Roundstone Sewerage Scheme - Foreshore - SI Works, 25 March 2020 (submitted as a supporting document with application FS007085). The outcome of the SI works is required to finalise the final design particulars and drawings of the terminal pumping station.

3	<ul style="list-style-type: none"><li>I attended a meeting on 25th March 2019 in the hall in Roundstone hosted by Irish Water on the proposed sewage treatment plant which was intended to provide information to all who attended. This was a superficial meeting simply informing people of what had already been decided on location and type of plant. It would be completely incorrect to suggest that this was a consultation process. The use of several information points within the room with a member of Irish Water at each one ensured that the information provided was fragmented, not comprehensive and there was no proper public sharing of information. Many questions were not answered, particularly in relation to the specific suitability of the particular site or alternative sites and the necessity to build the plant in a particular location.</li></ul>	Project Engagement is actively ongoing through the dedicated project email address: GalwayUWW@water.ie. This email address was provided on the Information Brochure which was made available at the Public Information Evening. A link to this email address is also available via the dedicated project webpage: <a href="https://www.water.ie/projects-plans/roundstone-sewerage-schem/">https://www.water.ie/projects-plans/roundstone-sewerage-schem/</a> . All email queries are actively monitored and responded to via this email address.
4	<ul style="list-style-type: none"><li>More recently, the required publication by Irish Water of their intention to seek a Foreshore Licence was a newspaper not usually available locally. It might be construed as cynical by Irish Water to have published this during the emergency of the Covid lockdown, when access to information was severely limited for everyone.</li></ul>	The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The public consultation process as part of this application required public notices to be advertised in a local newspaper, and a national newspaper only. IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.
5	<ul style="list-style-type: none"><li>The work is to take place, as far as can be ascertained, on a very narrow section of the main road to the village from the Galway side. There are many issues regarding the safety of road users, as well as information on access to the site, although none of this is available to the public.</li></ul>	The Screening for Appropriate Assessment for the SI works as submitted with the application details the proposed SI works and how they will be undertaken, including details on how the works area will be accessed. As part of the procurement and appointment of a Contractor to undertake the proposed site investigations, the Contractor will be required to prepare and implement a Safety and Health Plan in advance of the works commencing. As part of this plan, the Contractor will also be required to prepare Method Statements and Risk Assessments and submit these to Irish Water for review and approval prior to undertaking the works.
6	<ul style="list-style-type: none"><li>Due to the lack of information it is not clear how this work will affect the residents from the perspective of noise and vibrations from the drilling. The residents living directly opposite this foreshore area stand to be seriously impacted but the failure to provide important details leaves them in a very difficult position.</li></ul> <p>I trust these observations and objections will be taken into account as a preliminary response to the proposals by Irish Water</p>	The impacts of noise and vibrations have been assessed as part of the Screening for Appropriate Assessment.
Objection/Submission		Irish Water Comments
FS007085 Public Submission 12		
Dear Minister,		



1	I am calling for the Foreshore licensing consultation to be extended, and aligned with planning for the proposed Wastewater treatment plant.	<p>The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The details of the proposed Site Investigation (SI) works are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: <i>"The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water."</i></p> <p>The outcome of the SI works is required to finalise the final design particulars of the terminal pumping station. CPO case number ABP-306355-20, which includes a proposed WWTP site, is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.</p>
2	Due to COVID19, public meetings have essentially not been possible and consultation of local councillors and the community has been severely restricted.	<p>IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.</p>
	The planning application process has also been extended to take account of this.	
3	It has not been possible to co-ordinate with Roundstone residents to consult on the proposal and properly consider alternatives. Hence I am asking for an extension, of the order of 6 weeks.	See response to item 2 above.
4	The Foreshore application has a number of deficiencies: of the three existing outflows from Roundstone, the inner-most has been chosen despite being very shallow and within the inner bay. The outer outflow would be deeper, within faster and more consistent, less tidal currents.	Foreshore application FS007085 is for the undertaking of the proposed site investigations works only.
5	The planned treatment plan appears to be in contravention of the Development plan, being within 100m of residential buildings. If the full plans were available this would be clearer.	See response to item 1 above.
6	The plan appears to be chosen on the grounds of cost, despite these weaknesses. In particular it is claimed that a preferred alternate site at the other end of the village would be too expensive, requiring the digging of the main street through the village causing disruption. This is disputed by residents as the road is under-used in winter-time, when it work could easily be done.	See response to item 1 above.

7	<p>The potential for odours from the proposed site is a significant risk when the village is highly dependent on tourism for business. This is only expected to grow as the Wild Atlantic Way becomes more popular, and the Connemara Greenway is completed. This investment will lead to tourists using Roundstone as "a loop", proceeding one way on the Greenway, taking in the coastline and village on a return journey. The risks of a cheap, poor choice for treatment plant are too high.</p>	<p>It is the objective of Irish Water to intercept the raw sewage from the existing networks and then pump it via three new pumping stations towards a new modern wastewater treatment plant (WWTP) prior to discharge into the sea. The WWTP will be designed to ensure that the water quality standards set down by regulatory bodies will be achieved, as outlined within European and National legislation. Furthermore, cleaner coastal waters will enhance the amenity value of Roundstone, while the investment in the sewage system will promote and facilitate socioeconomic development.</p>
8	<p>All involved want to see a Treatment plant proceed as quickly as possible, but the Planning process for the treatment plant and CPO have not yet begun. Both foreshore and planning can and should proceed in sync as they depend on each other. Extending the foreshore process should hence not delay the development.</p>	<p>This foreshore application is for the undertaking of the proposed site investigations works only. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted.</p>

	Objection/Submission	Irish Water Comments
	<p>FS007085 Public Submission 13</p> <p>Marine Policy and Development Department Housing, Planning and Local Government Newtown Road Wexford Co Wexford</p> <p>26th June 2020</p> <p>OBSERVATION AND OBJECTION Ref: FS007085 APPLICANT IRISH WATER</p> <p>Re: Site Investigations, Roundstone Sewerage Scheme</p> <p>A Chara,</p> <p>We wish to object to the proposed application by Irish Water to install a sewerage scheme in Roundstone. We object to the application to obtain a licence to carry out a site investigation on the foreshore pursuant to the 1933 Foreshore Act.</p> <p>Your department should refuse this licence for the following reasons:</p>	
1	<p>1) The proposed site is clearly unsuitable and amongst the worst possible for a sewerage system in the local area which will unnecessarily and permanently destroy Roundstone Bay</p>	<p>The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The details of the proposed Site Investigation (SI) works are provided on the application form and in the appropriate supporting documents provided. Section 1.1 of the application form states that: <i>"The SI works form part of the preliminary investigations to help inform the detail design of the Roundstone Sewerage Scheme which is being advanced by Irish Water."</i> The outcome of the SI works is required to finalise the final design particulars of the terminal pumping station. CPO case number ABP-306355-20, which includes a proposed WWTP site, is currently a matter before An Bord Pleanala. The Foreshore SI Application FS007085 is a matter for the Foreshore Section of the Department of Housing, Planning and Local Government. These two statutory processes are not sequential.</p>
2	<p>2) Irish Water has clearly displayed a lack of openness in the planning process and has not provided clear details on the safety and the environmental and economic impact of this scheme</p>	<p>IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.</p>

3	3) The activities of Irish Water to date suggests a deliberate and/or negligent avoidance of the required public consultation process on a highly sensitive and long-lasting issue	See reponse to item 2 above.
4	4) Irish Water has not adequately assessed alternative sites of which there are many in a low population density area which opens onto the Atlantic Ocean.	A Roundstone Pumping Stations Site Selection Report, document reference 386624-MMD-Ro-00-RP-1401, was submitted as a supporting document with application FS007085.
5	The Roundstone Sewerage Scheme is in principle welcomed by the local residents. Roundstone and the surrounding area has a low population density and being adjacent the Atlantic Ocean is a tourist attraction along the Wild Atlantic Way. Therefore, it is wholly unreasonable that Irish Water proposes to pump sewage directly into Roundstone Bay, in the most densely populated part of the area and possibly destroying water access for the many fishing and leisure activities undertaken in the area. Upon reviewing the proposed plans, it has been widely argued that they have the worst possible site for the otherwise desirable Sewerage Scheme. Irreversibly destroying one of Ireland's most picturesque waterways is outright wrong and accordingly should not be allowed to proceed.	It is the objective of Irish Water to intercept the raw sewage from the existing networks and then pump it via three new pumping stations towards a new modern wastewater treatment plant (WWTP) prior to discharge into the sea. The WWTP will be designed to ensure that the water quality standards set down by regulatory bodies will be achieved, as outlined within European and National legislation. Furthermore, cleaner coastal waters will enhance the amenity value of Roundstone, while the investment in the sewage system will promote and facilitate socioeconomic development.
6	We feel that Irish Water has not made adequate efforts to inform both the full time and temporary local residents of its plans. This is clearly evidenced by the manner in which it advertised their proposal: in The Irish Examiner. It is undisputable that this is an entirely inappropriate means of communication. If the intention was to fully inform the local people, then using this newspaper is a questionable choice designed to fulfill their statutory obligation whilst minimizing the disclosure to the affected people.	The public consultation process as part of the Foreshore SI application required public notices to be advertised in a local newspaper, and a national newspaper. The public notices were advertised in the Connacht Tribune (local) and the Irish Examiner (national)
7	The manner in which Irish water purported to carry out a public consultation process was at best unprofessional and negligent which has naturally caused considerable dissatisfaction locally. The public information evening was poorly advertised and as a consequence was poorly attended. The poor attendance does not reflect a lack of interest, but a clear lack of effective communication by Irish Water. The conduct at this public information evening should be fully investigated and is widely regarded as merely a box ticking process by those in attendance.	The Public Consultation notices for application FS007085 was advertised in line with the provisions of the Foreshore Act and in liaison with the Foreshore Unit. The public consultation process as part of this application required public notices to be advertised in a local newspaper, and a national newspaper only. IW's Pre-Application Consultation Request form was submitted to the Foreshore Section of the Department of Housing, Planning and Local Government on 02nd December 2019. The sequential processes relating to this application was therefore initiated before the global COVID pandemic. Details and particulars on the Site Location Map and Foreshore Licence Map, submitted with application FS007085, confirms the location and position of the proposed boreholes. Imagery of the surrounding locality is available free of charge on various online digital platforms. In the interest of ongoing project engagement, information requests (including photographs) can continue to be made through the project email address GalwayUWW@water.ie.
8	Irish Water has failed to conduct a comprehensive assessment of the impact on the various local amenities which are integral to the livelihoods of the residents of the area. To risk the public health and the availability of amenities such as fishing, swimming, and boating seems to display a total disregard for the local community who depend heavily on these amenities for their economic survival.	Due to the temporary nature of the activity described in section 1.2 of the application for FS007085, the impact on amenities is expected to be minimal.

9	<p>There is a marked paucity of scientific and engineering input in the proposed plans. It is also evident that Irish Water have not submitted an appropriate planning application to Galway County Council for this scheme. Comprehensive plans should be furnished detailing the safety of the scheme with regard to its location and how the storage and disposal of sewerage will be dealt with.</p>	<p>As the proposed site investigation works are to be undertaken within the foreshore, i.e. below the high water mark, permission to undertake the proposed site investigation works falls within the remit of the Foreshore Unit, thus a planning application is not required for undertaking the proposed site investigations. The data from the site investigation works is required to inform the final design of the proposed terminal pumping station. Separate foreshore lease and planning applications will be required for the terminal pumping station, within which all details and plans will be submitted.</p>
10	<p>The environmental and ecological impact of this development should be clearly detailed to allow your department and the general public to assess it. Such information is not in the public domain and it would be wrong to grant a site investigation license without having some form of proper public engagement and endorsement.</p>	<p>The Report for Screening for Appropriate Assessment, Roundstone Sewerage Scheme - Foreshore - SI Works, 25 March 2020 (submitted as a supporting document with application FS007085) details how the containment of water (where required for drilling purposes) will be within the coreholes, and where arisings occur these will be contained within the works area. It is also noted that an EIA Screening Report (04 October 2019) was submitted with application FS007085 as a supporting document. This EIA Screening Report noted that "It is concluded that impacts associated with the construction and operation of the proposed development are not considered to be significant in the context of Directive 2014/52/EU nor Schedule 7 of the Planning and Development Regulations 2001 to 2017, as amended. The proposed Roundstone wastewater treatment plant and associated pumping stations (i.e. Roundstone Sewerage Scheme) are not considered significant in the context of Schedule 7 evaluation criteria to the extent that an EIA is required."</p>
11	<p>There is significant public anxiety about this facility and its location. An alternative potentially suitable site has already been highlighted however, it appears that Irish Water is in breach of its statutory duty by not investigating this site appropriately.</p>	<p>See reponse to item 1 above.</p>
	<p>Please accept this preliminary objection and for the sake of good order we reserve the right to make further additions as required.</p>	