



Catherine McMahon
69 St Anne's Square
Portmarnock
Co. Dublin

Date: 11 June 2024

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility
Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

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D01 V902	D01 V902

06 June 2024

Re. ABP 312131 Greater Dublin Drainage Project, Remittal Application.

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
07 JUN 2024	
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This is a further submission regarding the Greater Dublin Drainage Project from Catherine McMahon of 69 St. Anne's Square, Portmarnock. I am representing myself, The Velvet Strand Concerned Sea Swimmers and Beach Users, and Betty Ennis and Alvis Crawford and others. Since the GDDP was lodged back in 2018 our swimming community has expanded and the benefits of sea swimming are now being enjoyed by many all around the coast of Ireland. We strongly object to the Greater Dublin Drainage Project. It is an outdated project and the waste water situation of Dublin needs to be revisited. Both Meath and Kildare have land and resources to cater for their own wastewater requirements. The proposed WWTP site and proposed Marine Outfall area are not suitable sites for wastewater treatment, storage and disposal. It is not up to us to propose alternatives or solve the waste water issues that face Uisce Eireann. Our active involvement in the public consultation and planning process does not mean we consent, accept or embrace the proposed GDDP. Engaging with the process is the only way we can have input. We ask the Board to refuse this remittal application. This submission should be read in conjunction with our previous written submissions and video, of 2018 – 2022.

Below we highlight a few issues with the most recent information submitted,

- We were notified by the Uisce Eireann, formally Irish Water, by email from the greaterdublindrainage@water.ie address, that An Bord Pleanala was inviting us to make a submission or objection on the further information submitted by Uisce Eireann on the remittal application of the GDDP. Only people who had signed up to this email address for updates on the GDDP received the notification of this invite. The majority of people who previously made submissions or objections but who did not sign up to the email address, do not know that the project is now back with An Bord Pleanala. We are aware that there were two newspaper notices but unless people bought a paper on 7th May 2024, they would be depending on word of mouth for information as no site notices were erected to alert them of the remittal. There has been no public consultation at this stage of the remittal application.
- In the updated EIAR, Uisce Eireann have informed us that more information is to follow in a Response to Submissions Report, as a follow on to our submissions of September 2022. I raised this issue with ABP by email as the whole procedure is getting very confusing. We are now making another submission based on an updated EIAR and revised NIS, that addresses those submissions raised that could be addressed in the EIAR. No list of submissions that were addressed in the EIAR, was included with the further information from Uisce Eireann, so we don't know which or whose submissions were addressed. As we have not been notified by ABP about this Report and the process that is to follow, we request an Oral Hearing for this remittal application. We don't know whether to re-submit the September 2022 submission again at this stage. As there has been no communication from ABP notifying us that the remittal application is now open for submissions, we have also not been notified by ABP as regards the Response to Submissions Report.
- Many of the drawings in this remittal are years old and date back to the Greater Dublin Drainage Scheme, as can be seen on drawings, No's 32102902 – 2119 to 2139. The IGSL Ground Investigations Report is for the Greater Dublin Drainage Scheme. In the Causeway Geotech Report in its description of site, it is the Greater Dublin Regional Drainage Scheme. The APEX Reports, (Geophysical Investigations) are also the Greater Dublin Regional

Drainage Scheme. In Appendix A18.2 Ground Investigation Location Drawings, the drawings are dated 2010/revised in 2015. These drawings are numbered 32102902 – 2100 to 2109 and 32102902 -210. These drawings date back to the GDD Scheme when there was a proposed twin riser pipe diversion from the North Fringe Sewer to Clonshaugh via the Grange pumping station. The numbers on these drawings are the same as the planning stage GDDP drawings submitted. The OCEMP also uses GDDS when referencing pipeline diameters. This is very misleading. When Uisce Eireann were provided with the opportunity to revise and update the application these older and outdated drawings and reports should have been removed or updated. The GDDP and The GDDS are not the same. The Board Order of 301908 also stated the GDDS, in place of the GDDP.

- To add to the confusion there is also a Greater Dublin Drainage Study, referred to by Dave Walsh, ex Chairperson ABP in his verifying affidavit, in the judicial review of 301908, and a Greater Dublin Drainage Strategy. The planning application is for the Greater Dublin Drainage Project.
- There is a failure to assess works being carried out at either end of the marine outfall simultaneously, both for sediment dispersal and noise.
- Proposed windfarms export cables along or close to the marine outfall have not been cumulatively assessed, eg Sunrise offshore windfarm, Leinster Offshore Windfarm.
- If the marine outfall pipeline has flanged openings for diffusers, then it should be known how many diffusers are required well in advance. Modelling at proposed operational stage should have been assessed more thoroughly.
- If a trapezoidal trench is proposed for the dredged section of the marine outfall, how wide is the top of the trench. According to the EIAR only the depth and width at the bottom have been assessed. 5m x 5m
- Traffic – the three junctions in the Portmarnock area have not been assessed properly. The survey was carried out in November 2022. It fails to take in to account a seasonal adjustment for summer beach users / day trippers traffic. Also, Junction 8 R123 Moyne Road / R106 Coast Road now has traffic lights. It is stated in the report that it will be over capacity in 2024. It does not mention there are traffic lights at that junction now. Junction 9 R106 Coast Road and Golf Links Road, now has the extra traffic attached to Lidl. Junction 10 R106 Coast Road and Station Road, no longer has a mini roundabout which facilitated the flow of traffic, it is now pedestrianised on Station Road and Coast Road, and has traffic lights at the junction. These measures have all contributed to the slowing down of the traffic flow.
- Has the ASP option been selected as the preferred treatment at the WWTP? As no updated drawings have been submitted for the other two options we assume this is the case. Does this indicate the GDDP is now at design stage?
- The words ‘embedded in the design’ appear throughout the EIAR. As we don’t know and the board doesn’t either what is embedded in the design, the whole application should be refused on this point alone.
- Frogs have not been assessed at any of the relevant sites. They are mentioned in the EIAR but no assessment was ever carried out.

- A 4.5m diameter outfall marine pipeline was discussed at the Oral Hearing as an alternative outfall pipeline. We can find no mention of this anywhere in the EIAR and it should have been part of the public consultation stage at ASA. When was this dismissed as an alternative?
- It states in the EIAR that there is no major fault at Portmanock. But fails to identify any faults that aren't major.

I attach an excel sheet where we attempted to compile a list of all surveys for the GDDS / GDDP. We didn't look at every chapter only the ones relative to our objections. It gives an indication of the updated surveys, that were carried out. It serves to highlight the lack of updated surveys. Can the Board please request a list of all surveys related to the GDDS/GDDP.

Trusting this to be in order.

Catherine McMahon

Catherine McMahon

A handwritten flourish or signature mark consisting of a long, sweeping horizontal line with a small upward hook at the end.

3231 Cathleen McMahon

Sheet1

Chapter	Description	Comments	Survey	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Chapter 6	Population																	
Chapter 7	Human Health																	
Chapter 8	Marine Water Quality																	
		MarCon 2011 Alternative Site Assess Numerical Modelling Report GP201103_doc001_04	Hydrographic		cant locate survey													
		MarCon 2012	Hydrographic		July and August													
		MarCon 2013 Alternative Site Assess Numerical Modelling Report Near Field Dilution and Mixing GP201103_doc003_02					can't locate survey											
		MarCon 2015	Hydrographic, ADCP and Dye, transport model,					March April and June										
2023		INTERTEK 2023 referenced but not included in EIAR																
Chapter 9	Biodiversity Marine																2023	
		Desktop Study																
	Geomorphology	Geomorphology Bathymetric GSI Techworks	Outfall pipeline route				Feb and March											
		Causeway Geotech 2015 Sidescan sonar, boreholes, Vibrocores. Report 2016	Outfall pipeline route					October										
		Irish Hydrodata 2015 echo sounder, sidescan sonar, magnetometer, oinger sub bottom profiler,	Outfall pipeline route					August										
2023		Benthic Solutions Ltd. Camera survey to access possible habitat changes from those previously described and presented	Outfall pipeline route														5/6 January	
	Marine Benthos and Sediments	Marine Benthos and Sediments Benthic Solutions. (Surveys included an assessment of macroinvertebrates and habitat types and some water quality profiling and sampling)	Dublin bay and Skerries 29 sampling locations, other possible outfall locations			August												
		Benthic Solutions Ltd.	Water Quality 3 sampling locations Repeat of 2012			December												
		Benthic Solutions Ltd.	8 sampling locations along proposed outfall route. Repeat			July												
		Benthic Solutions Ltd.	8 sampling locations along proposed outfall route. Repeat assessment							August								
2023		Benthic Solutions Ltd. Primary Objective – Camera survey to access possible habitat changes from those previously described and presented															5/6 January	
	Water Quality Profiling and Sampling	Water Quality Profiling and Sampling Carried out as part of Benthic Solutions				August, December	July			August								Additional surveys will be carried out to further verify the data already held
	Fish and Shellfish	Fish and Shellfish Aquatic Services Unit (ASU) from UCC.	Beam Trawl 4 lines, and Beach seine 4 locations to investigate juvenile fish near outfall route						September	September								
	Dog Whelk	Dog Whelk (SFPA) and RPS	9 locations along outfall area. 50 whelk pots each. Dog whelk in this area not previously surveyed						September									

																		Additional surveys will be carried out to further verify the data already held
	Plankton	Plankton Same time as water sampling in 2012				No date												
	Baldoye Estuary Walkover	Baldoye Estuary Walkover Benthic Solutions Ltd. Appointed Faith Wilson Ecologist					November											
2022		RPS exp. Ecologist ??	Proposed project boundary														14 th November 2022	
	Reef Survey Ireland's Eye and Rockabill to Dalkey SAC	Reef Survey Ireland's Eye and R to D SAC. MERC (2010, 2012a, 2012b).	Intertidal and subtidal surveys R to D SAC	no date	no date													
		Benthic Solutions Ltd. RPS	Phase 1 based on video inspection by BSL in May 2015 ? Phase 2 intertidal walkover, subtidal transects															
		Benthic Solutions Ltd. And Aquatic Survey Monitoring Ltd. RPS	Phase 2 intertidal walkover, subtidal transects with Dive survey 4 transects															
2023		Benthic Solutions Ltd. RPS	Drop down camera along 4 transects of sublittoral reefs Ireland's Eye														5/6 January	
2023		ASML and MERC, Benthic Solutions Ltd and RPS	Repeat 4 Transects Dive survey. Only surveyed sublittoral at Ireland's Eye.														30/31 March	
	Harbour Porpoise, Marine Mammals	Harbour Porpoise Techworks IWDG Consulting	Techworks deployed 3 PAMs							From March								
		IWDG Consulting	Land based							From March								
		IWDG Consulting	Boat based							From April								
2021		IWDG Harbour Porpoise R to D 2021 referenced but not included in EIAR	3 rd party extensive monitoring															
	Ambient Noise	Ambient Noise University of Catalonia and Techworks.	Asses 1. a recording from a buoy mounted recorder close to the diffuser area. Assess 2 modelling							30 July to 1 Sept								
	Underwater Noise Modelling	Quiet Oceans											2017					
	Sediment Chemistry					2012	2013		2015									Additional surveys will be carried out to further verify the data already held
Chapter 10 Biodiversity Marine Ornithology																		
	Estuarine Ornithological	Wetland Walkover Survey data Dr. Rob Iredale								December	12 months	Jan – May	Mar – Dec	Jan – Mar				
	Coastal and Marine	Vantage point Surveys	Velvet Strand and Ireland's Eye							December	12 months	Jan – July	Mar – Dec	Jan – Mar				
	Auk Fledging	Boat based surveys	Ireland's Eye									July	July					
2020-2023	Estuarine Ornithological	Wetland Walkover Survey													From Sept	To August From November	To March From October	To June
2020-2023	Coastal and Marine	Vantage point Surveys	Velvet Strand and Ireland's Eye												From August	To July		Jan, May, June
		Various spotters. Cian Cardiff UE survey included with this. Birds in Sluice lands counted. NO boat based surveys. RPS																

Chapter 11	Biodiversity Terrestrial and Freshwater Aquatic																	
		Desktop Study																
		Field Survey																
	Who	Terrestrial Habitats				July and August	March and Sept		April, May, August		August							
		Bats RPS Karen Banks, Greenleaf Ecology 2017 and B. Keeley, Wildlife Surveys Ireland				June and August	Sept and Oct		June, Aug, Sept		May to Sept							
	Who	Mammals Badger and Otter				From Nov, Dec	To Jan Feb		From	To	Aug, Sept							
	Who	Farmland Birds Breeding				June	April and June		April and July		April and July							
	Who	Farmland Birds Wintering						From	To From	To From	To							
		Newt 3 locations, RPS. Nicholas Veale, Independent and Adam McClure RPS. Ecologist and James McCrory. Coldwinters, Ballymun and Toberbunny. No newt Ballymun. Frogs mentioned in survey but that is all.							May and June		May and June							
	Who	Freshwater Habitat Assessment, Macroinvertebrates, and in-stream flora. Tolka, Santry, Mayne and Cuckoo fresh water sampling points.				July			June		June							
	No dates or expert only between May and Sept	Macroinvertebrates and in-stream flora																
	No info	Protected Freshwater Species, Salmonoid, Lamprey and White clawed Crayfish Habitat quality																
	Who	Other Freshwater Taxa, 2 minute kick and stone wash				July			June		June							
		Freshwater Flora							June		June							
		Compound 10 Botanical Survey. T. Ryle and RPS.								May								
2022		Terrestrial Habitats Walkover around compounds														October and November		
2019 and 2023		Invasive Alien Plant Species									9-10 September						5 th May	
2020 and 2021		Bats Walked Transect Survey									September	May to September						
2021		Bats Static Detector										April to August						
2022		Bat Roost Assessment Trees														October to November		
2022		Bat Roost Aerial Assessment Trees														November to December		
2020 and 2023		Mammals Badger Daylight. No Otter survey here. Was incorporated into freshwater below									28 and 29 October						17 to 19 April	
2021 and 2023		Farmland Birds Breeding										April to May					April to June	
2022 and 2023		Farmland Birds Wintering														October to November	February to March	
2021 and 2023		Newt 3 locations, Coldwinters, Ballymun and Toberbunny. Night with torch. No newt Ballymun. Frogs no mention.										April and May					April and May	
2021 and 2023	All freshwater surveyed together and summarised. Along with Otters but only at watercourse crossings.	Freshwater Habitat Assessment, Macroinvertebrates, and in-stream flora. Tolka, Santry, Mayne and Cuckoo fresh water sampling points.										1 and 2 September					12 and 13 June	
	Ditto	Protected Freshwater Species, Salmonoid, Lamprey and White clawed Crayfish Habitat quality																
	Ditto	Other Freshwater Taxa, 2 minute kick and stone wash																
	Ditto	Freshwater Flora																
Chapter 12	Landscape and Visual																	
Chapter 13	Traffic and Transportation																	
2022		Update in November 2022. New traffic lights at junction 10 not assessed. This junction was over capacity at time of survey. The Lidl traffic at Junction 9 was not assessed. Traffic lights at Junction 8 R106/R1223 Moynr Road not assessed. No seasonal adjustment for summer beach traffic.														November		
Chapter 14	Air Quality Odour and Climate																	

Chapter 15	Noise and Vibration																	
Chapter 16	Archaeology and Cultural Heritage																	
Chapter 17	Hydrology and Hydrogeology																	
		Desktop Study																
		GDDS Phase 1 Ground Investigation (ARUP 2013)					Early 2013											
	This report is incl. Twice in the 2018 EIAR. It is addressed to Bord Gais. Various companies had input re testing of samples. Finishes at Compound 9 with the deepest BH.	Causeway Geotech Phase 2 Site Investigative Programme. Terrestrial Investigation Matthew Gilbert. Dated April 2015. for Tobins.							From 24 November	To 12 February								
		Apex Geophysics Ltd GDDS Offshore Portmarnock								1 st December 2015								
Chapter 18	Soils and Geology																	
		Desk Study																
		Windshield Survey					February											
		IGSL (see ARUP Above)					January to May											
		ABCO/Causeway Geotech (offshore)								30 July to 22 August								
		Additional Land based								30 September to October								
		Techworks Marine and Apex Geophysics (offshore) Phase 1					No date											
		Apex Geophysics Ltd								No date								
2019		Eoin Wyse OH Response to Baldoyle Bay query by SJK																
Chapter 19	Agronomy																	
Chapter 20	Waste																	
Chapter 21	Material Assets																	
Chapter 22	Risks of Major Accidents and Disasters																	
2019 and 2023		Mitigation measures in the event of Risk F which is discharge of untreated sewage to sea. With the proposed mitigation measures it is unlikely and limited Embedded design measures											Oral Hearing update Brief of Evidence by COK.				EIAR 2018 measures still stand. Unlikely	
2023		Gas Explosion due to biogas at WWTP .Risk H No mitigation measure in EIAR 2018															Nio mitigation measure in 2023 EIAR. Very unlikely but serious if it does occur	
Chapter 23	Cumulative Impacts and Interactions																	
		Cut off points											15 th March				31 st July	
		BRDS tie in of proposed GDDP																
		Dublin Array RWE assessed																
		Sunrise offshore windfarm not assessed																
		Leinster offshore windfarm not assessed																
Chapter 24	Summary of Mitigation Measures																	
		Compound 10 Fixed dune habitat amendment to 2018 EIAR?															Compound 10	
Chapter 25	Summary of Residual Impacts																	