



Portmarnock Beach Committee
c/o Angela O'Flynn Bury
Clean Coast Group
71 Wendell Ave
Portmarnock
Co. Dublin

Date: 03 October 2022

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 recent 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 with regard to the 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 Fingal County Council 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,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

PA04

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Eimear Reilly

From: Eimear Reilly
Sent: Friday 30 September 2022 10:43
To: Angela
Subject: RE: ABP-312131-21, response from Portmarnock Beach Committee

Hi Angela

Thank you for your email. Please be advised that your submission will be deemed invalid if you do not provide a postal address by return email by 5:30p.m. today, 30th September 2022.

Kind regards

Eimear

-----Original Message-----

From: Angela <angelaoflynn@gmail.com>
Sent: Thursday 29 September 2022 15:24
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: ABP-312131-21, response from Portmarnock Beach Committee

Dear Ms.Reilly

Thank you for this opportunity to provide general observations on application by Irish Water ABP - 312131-21.

Our overall observation relates to the lack of FIELD experiments relating to Environmental Impact Surveys in all aspects of the entire proposed GDDS project. Such EIS surveys should be carried out by properly qualified Scientists employed by The Environmental Protection Agency (EPA)

The recently enacted legislation requiring County Councils to have legal responsibility relating to the Marine Coastline, now require a thoroughly new investigation into all Marine aspects of this project, as follows. :

*. The proposed strategy of DREDGE and FILL across Portmarnock Velvet Strand is totally inappropriate for a Blue Flag Beach. Changes to sand deposition patterns and to tidal channels on the sand spit will likely result in the destruction of the beach, as happened when RPS carried out dredge & fill in the Blue Lagoon in nearby Sutton Strand in 2008. Desk Top submissions are entirely inadequate relating to such a vital matter of public recreation as Portmarnock Beach.

*. The entire Irish Water Submission for the Oral Hearing in March 2019 was based on plans for the treatment plant in Clonsbaugh to contain Primary and Secondary Treatment only. There were no plans submitted for Tertiary Treatment until the Thursday prior to the commencement of the Oral Hearing. Thus, members of the public and interested bodies had no opportunity to assess the effectiveness of tertiary treatment, due to lack of such plans.

It should be noted that recent studies by the EPA in 2022 found that Covid virus has been detected in the receiving water of 48 Irish WWT Plants.

Obviously, detailed proposals, overseen by Scientists from the EPA, for up to date methodologies on how to deal with viruses such as Covid, CPE, polio, prions, plasmids, phages, must be published, relating to how these organisms will be dealt with, especially how these organisms respond to saline receiving waters. Experts in the public domain should then be provided an opportunity to respond to these proposals.

*. Recent Bathymetric Studies of the Sand Banks of Kish, Shelley Banks and Coastline of Fingal County Council, have shown the dynamic and moving sand bank off Ireland's Eye, the proposed location of the outfall pipeline.

The Bathymetric Desk Top Model of the proposed outfall pipe is no longer valid, since the deep dip in sand at that location has shifted, and has moved northward in 2022. Luckily, that location was not enforced,

since the dynamic shifts in sand depth along this entire sand bank require any proposed outfall pipe to be located many kilometres further out to sea.

*. Howth Fishermen are extremely worried about a pipeline off Ireland's Eye. The EPA should work hand in hand with the fishermen relating to any consequences from the proposed outfall pipeline, regarding catch size, fish & shellfish eggs, nets etc.

Thank you for this opportunity to respond, Yours faithfully Angela O'Flynn Bury.

Portmarnock Beach Committee.

Sent from my iPad