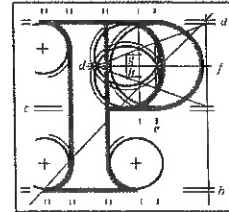


Our Ref: ABP-301908-18



An  
Bord  
Pleanála

Corina Johnston  
Donabate/Portrane Community Council  
67 The Links  
Donabate  
Co. Dublin

Date: 16th October 2018

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 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. A receipt for the fee lodged is enclosed.

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 Dublin City 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](http://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,

Kieran Somers  
Executive Officer  
Direct Line: 01-8737107

Encls. PA04

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64 Marlborough Street  
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The Secretary  
An Bord Pleanála  
64 Marlborough Street  
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<b>AN BORD PLEANÁLA</b>	
IDG- 008800-18	
ABP-	
08 OCT 2018 CC.	
Fee: € 50	Type: cheque.
Time:	By: Post.

Donabate/Portrane Community Council  
67 The Links  
Donabate  
Fingal

4<sup>th</sup> October 2018

A chara

**Re: Submission on Clonsaugh Greater Dublin Drainage (GDD) project  
PL06F.301908**

#### **Background of observations elsewhere.**

At the mouth of Waterford Harbour between Hook Head and Dunmore East, a sludge dredger comes downstream and makes regular visits to deposit sludge into the sea. Three rivers, The Barrow, Nore and Suir form a confluence and exit at this location into the open sea. Here there are strong tidal currents exiting out to sea from the force of this confluence. It was observed that Red-throated Divers (*Gavia stellata*) and Great Northern Divers (*Gavia immer*) did not stay up the estuary, despite their food supply being present in that location. It was clear that the tidal currents were too strong and the divers went to nearby Ballyteigue Bay for the night (Lovatt 2014). Local fishermen from Slade Harbour, Hook Head have observed that the currents can push water out to five or six miles at times. It is therefore reasonable to assume that the dumped sludge is dispersed out into the seas.

At the nose of Howth Head, there is a sewage outflow and when waters are discharged there is a clear water discolouration. Gulls are principally attracted by the smell, water movements and perhaps opportunist feeding if available. Portmarnock beach is only four kilometres from the outside of adjacent Ireland's Eye close to this outflow. Severe easterly gales are known to cause deposits of large amounts of sea-weed, molluscs and other marine life on the Portmarnock beach (Lovatt et al 1985.) as well as litter including toilet waste material at that time. It must be considered that with such storms and an ever increasing turbulent winter weather pattern, sewage outflows will be shore driven. A bit further up the coastline at Portrane, there has been severe sand dune erosion in the past five years, demonstrating a changing climatic pattern.

#### **The proposed outflow**

The proposed outflow is a short distance from Ireland's Eye, an island juts off shore from Howth Harbour. This island supports seven nationally important breeding seabirds and a total of 11 breeding seabirds (Merne & Madden 2000). There is an increasing Gannet population (Newton et al 2015). Seabirds from this island have been observed feeding in the immediate vicinity and nearby. There are also nationally important seabirds breeding on Lambay Island a little to the northeast of the proposed outflow.

It is clear the proposed outflow pipe is not sufficiently far enough from the coast to suitably eject its contents into the wider Irish Sea. Ireland has been subjected to stormy climatic conditions in recent years, and commentary from meteorological experts say this will continue into the future. It would be a grave error to cut costs to deliver an outflow pipe that is insufficiently inadequate to deliver its

contents well away from the coastline. The pipeline should be at least ten kilometres from the coast to reduce pollution from waste waters from the proposed pipe outflow coming onshore. It is important that there is a sufficient sea current to carry away the water outflow to the open seas and well away from the east coast.

#### **Blue flag beaches in north County Dublin/Fingal.**

Dollymount beach lost its blue flag since the operation of the Ringsend Water Treatment Plant. The Rush south beach has lost its blue flag status and also Portrane beach. In fact there was only one blue flag beach anywhere in north Dublin/Fingal in 2018.

Irish Water and the Environmental Protection Agency need to show that they are in a position to address the current issue of water pollution before embarking on a further development of a further sewage water outflow off Ireland's Eye.

Ireland is currently failing European water quality standards from water effluent outflows in many locations. It is clearly sensible to address these issues before embarking on another seriously problematic pollution problem.

#### **Example of an organism that will likely enter the outflow pipe.**

In an HSE information document for a patient carrying CPE (gut bug). VERSION 1; January 2018, developed by the HSE HCA/AMR implementation team, the following is stated.

A hospital will try to make such a person have their own room and toilet and shower, or else try to share with another patient who also has the CPE bug. Hospital staff will use gloves more than for other patients and sometimes wear full surgical gown and long sleeves. Patients with CPE should not share food, newspapers etc.

#### **Recreation**

In past decades the beaches in north Dublin and County were full of people enjoying the sands and sea for paddling and swimming. That is not the case today due to pollution issues.

Howth, Malahide and Rogerstown all have sailing clubs with well over 100 boats on the sea in summer weekends and competitions taking place. The sailing activities are substantially around Ireland's Eye out to and around Lambay Island for youth training. Kayaking has become more popular and scuba diving activities take place at Lambay Island. To have any sewage outflow just past Ireland's Eye would lead to a deterioration of water quality in a zone used for water based recreational activities.

We cannot emphasise enough the resulting potential problems with the proximity of a monster sewage outflow too close to the coast as is proposed in the plan. The outflow should be at least two kilometres further out to sea than Lambay Island. Consideration might be given to a two pronged piping at 45 degree angles at the last two kilometres to give greater dispersal. Gas pipelines are crossing substantially greater distances in Europe under the sea, so the technology is there to achieve a longer pipeline.

We ask that our observations are taken into consideration. Cheque for 50 Euros enclosed.

Corina Johnston

*JK Lovatt pp Corina Johnston*

Secretary

Donabte/Portrane Community Council

References.

Lovatt J.K., Madden. B. & O'Donnell. M.1985. The birds of Portmarnock Sand Dune System and Baldoyle Estuary in Irish East Coast Bird Report.

Merne O.J. & Madden B. 2000. Breeding Seabirds of Ireland's Eye, Co. Dublin. *Irish Birds Vol 6. Number 4.*

Lovatt.J.K. 2014. Large movemnets of Red-throated Divers *Gavia stellata* and Great Northern Divers *Gavia immer* at Hook Head, Co. Wexford and Waterford Harbour, and probable association with Sprats *Sprattus sprattus*. *Irish Birds Vol. 10. Number 1.*

Newton, S. F., Harris, M.P. & Murray, S. 2015. Census of Gannet *Morus bassamus* colonies in Ireland in 2013-2014. *Irish Birds Vol 10. Number 2.*

AN BORD PLEANÁLA

08 OCT 2018

LTR DATED \_\_\_\_\_ FROM \_\_\_\_\_

LDG- \_\_\_\_\_

ABP- \_\_\_\_\_