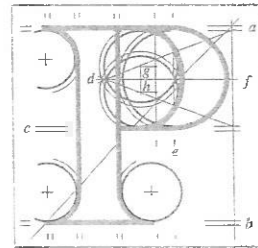


Our Ref: ABP-301908-18  
P.A.Reg.Ref:

Your Ref:



An  
Bord  
Pleanála

Dr. Alex Mc Donnell  
Kildara  
Mc Creadies Lane  
Dublin Road  
Malahide  
Co. Dublin

9th November 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 & Newtown, Fingal County & Dublin

Dear Sir,

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.

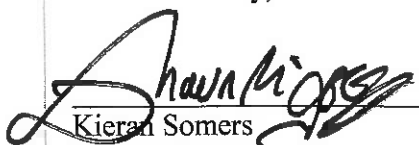
The Board will revert to you in due course in respect of this matter.

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 Dublin City Council and 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](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: 01-873 7107

PA09.LTR





Dr Alex McDonnell

Kildara

Mc Creadies Lane

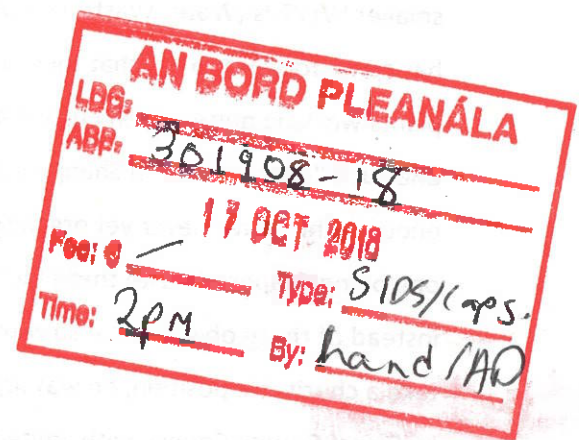
Dublin Road

Malahide

Co. Dublin

K36 YE12

018452641



The Secretary

An Bord Pleanála

64 Marlborough Street,

Dublin 1

**Re: Strategic Infrastructure Development**

**Planning Application for the development of the Greater Dublin Drainage project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility located in County Fingal and Dublin City**

**Applicant: Irish Water**

**ABP Ref -ABP-301908-18**

Dear Sir/Madam,

Irish Water have yet again proven themselves incompetent by failing to follow the simplest of planning permission procedures in omitting appendices and other particulars from their Environmental Impact Assessment Report, which is notably pertinent to issues of special areas of conservation and public health risk. If they're incapable of following basic rules in submitting a planning application, how can they be trusted to build and run an unnecessarily large sewage treatment plant? Let's take a look at

some of their other past blunders. Fifty per cent of their eleven thousand plants have failed to meet EU standards in relation to waste collection. They are responsible for an ongoing lack of maintenance at plants with twenty-four of them having no maintenance plan at all. They are also responsible for raw sewage that has been released into the environment from forty-four urban areas. The EPA is suing Irish Water for delays in upgrades and the European Court of Justice is bringing Ireland to court regarding delays in Compliance dating back to 2005. And yet, we are supposed to just imagine that they will construct and manage an oversized sewage plant located near three major population centres?

Furthermore, as an apparently ardent supporter of Irish, Councillor McDonagh's frankly unprofessional and prima donna theatrics at the Fingal County Council Meeting of Howth/Malahide Area Committee on Wednesday, 5<sup>th</sup> September 2018, provides further reason to be sceptical. His erroneous opinion that smaller WWTPs (Water Waste Treatment Plants), belong in a magical fantasy world and that no engineer has come forward to say that they will work, is annihilated by the fact that there are a multitude of such plants working quite well in Europe and in Ireland. In fact, Irish Water organised trips for citizens to visit one such "Magic plant" in Shanganagh, Bray to demonstrate their impressive functionality. Yet strangely enough, they have never yet organised a trip to the Ringsend plant, which is of a comparable size to the one being proposed. With these facts in mind, perhaps he is the one living in a magical dream world instead of those objectors he so contemptuously dismissed at the aforementioned meeting. Of course to take a charitable position, he was arguing from unreliable information, when the proposal was voted in by Fingal County Council with limited detail prior to his tenure. This obfuscation of information is among one of the myriad of reasons why over 13,500 observations were lodged against it and subsequently ignored, leading to this current dispute. Furthermore, to move away from the realm of fantasy economics, the Clonsaugh plant is expected to cost 1.2 billion yet if we were to build ten smaller plants at tertiary level, in accordance with EU directives, the cost would be 300 million in total. In addition, the discharge from smaller plants only require dilution when secondary treatment is used.

To wit, deep seated public opposition to this unfeasible, costly and dangerous project combined with Irish Water's extensive track record of profound incompetence, which borders on sublime farce, should indicate the decision to be made on this planning application.

Yours Faithfully



**Alex McDonnell, PhD, MSc, BA**