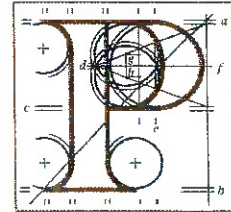


Our Ref: ABP-301908-18



An  
Bord  
Pleanála

Michelle Burnett and Conor O'Malley  
99 St Annes Square,  
Portmarnock  
Co. Dublin

Date: 8th 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 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. 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 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

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<b>AN BORD PLEANÁLA</b>	
LDG-	009310-18
ABP-	
17 OCT 2018 <sup>208</sup>	
Fee: € 50	Type: PMA
Time:	By: Reg Post

16<sup>th</sup> 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**

**Case reference: ABP301908-18**

To whom it may concern,

The proposed sewage plant mentioned above is now in the final phase of planning. I confirm that we strongly object to the above proposed project and location. We enclose the fee of €50.00 with this letter.

The objections are listed below:

1. **Location:** of a massive 70,00 PE WWTP adjacent to densely populated areas, 300m or 500m separation distance to receptors are wholly inadequate for such a large plant. The proposed plant will serve no purpose to the Clonshaugh area – it is being built to service Co. Meath and surrounding areas.
2. **Odours:** There will be odour originating regardless of the odour suppression measures taken by the design. Inadequate design maintenance and operation of the plant will give rise to increased odour problems.
3. **Design/Build:** and potentially operate nature of the contract for this project. Recent history has proven that this is a flawed model. One example of this would be the odour problems at Ringsend treatment plant which presented after it's opening. Delays and disputes arose due to the structure of the procurement. Meanwhile the adjacent residents were left with the sickening odour problems.
4. **Environmental risk:** Recent experience of a smaller WWTP in Balbriggan has shown that raw sewage will be discharged when procedures and systems fail. Should the proposed Clonshaugh plant discharge raw sewage to sea, this can only result in detrimental environmental effects on SAC, SPA, designated shellfish waters of the Dublin Coastline.  
Over 3,600 litres of waste will be deposited from the plant every second – even the highest and most expensive standard of equipment and machinery can fail which will lead to massive leaks into the community risking the health of the residents.

As the treatment of sewage in the proposed sewage treatment plant would only be to secondary standard, the water and marine life in the Portmarnock and Howth areas are at risk. As Portmarnock's Velvet Strand has a consistent blue flag and excellent bathing water quality, secondary standard is not acceptable for this environment.

Also the chemicals used to mask odours from treatment plans are of concern for the environment, marine life, wildlife, and the human population.

It is of great concern that Irish Water failed to submit sections of the Environmental Impact Assessment to date. These include:

- Report on the Geophysical Investigation for GDD Scheme Offshore Portmarnock.
- Report on the Geophysical Investigation for the GDDP Portmarnock Golf Course, Dublin.
- Greater Dublin Drainage Offshore Site Investigation of Outfall Pipeline.
- Greater Dublin Drainage Scheme – Sub Bottom Analysis.
- Greater Dublin Drainage Scheme – Hydrographic Survey Report GEO13\_GDD.

Despite this, it appears that the works for this project have already begun; this warrants an explanation to the public.

5. **Disruption of the local Environment:** Local wildlife such as hunting birds and other animals will be impacted by such a large scale WWTP. The area is a migration flight path for Brent Geese and this will cease if the plant goes ahead. Portmarnock is the only blue flag beach and certain landmarks in Baldoyle are protected by the EU.  
The pathway to the Southern end of Portmarnock's Velvet Strand beach, used by locals, visitors and tourists every day will be disrupted and this natural area behind the sand dunes will be destroyed. This is unacceptable in this irreplaceable nature reserve area.
6. **Impact on local community:** Properties will be devalued should this proposed WWTP proceed. This is grossly unfair to families who have invested in this area through house purchases, investments in local businesses, farms and the hospitality trade. There will be dozens of large lorry movements daily during the construction and operation of this plant. The first screening of the sewage and sludge would need to be transported by road, contributing to odour problems. The burden of treating sewage from the GDSs are on the Clonsaugh, Portmarnock and wider coastal communities is an unfair burden. A company in the UK will also build and maintain the plant should it go ahead – there is no plans to employ local people. Clonsaugh is a highly populated area with a lot of unemployment.
7. **Proposed location of the WWTP on prime agricultural land:** This WWTP is proposed to compulsory purchase approximately 1/3 of a productive family farm. Large regional infrastructure such as this should be located on land of poorer value and at least 5km away from densely populated areas.
8. **Detrimental impact on tourism in Dublin Coastal Areas:** WWTP have previously caused seriously environmental problems when they failed and

discharged raw sewage into receiving waters. This plant will receive negative publicity and the already vulnerable tourism, sea fishing and water recreation industries will suffer the consequences. It is unlikely that the EIA will adequately address such issues.

9. **Visual Impact:** Millions of air passengers use Dublin Airport – in 2017, 29.6 million passengers came through Dublin Airport to visit Ireland. Their first and last site and reminder of Dublin will not be of a green natural countryside, but of a huge unsightly stinking sewage plant. This is not a viable tourism selling point of the Emerald Isle.

We ask that An Bord Pleanála review this proposal again in light of the issues and concerns highlighted.

Yours sincerely,

  
Michelle Burnett and Conor O'Malley, 99 St Anne's Square, Portmarnock, Co Dublin.

