Our Ref: ABP-301908-18

An Bord Pleanála

Peter Coyle
8 Burrow Court
Portmarnock
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 Sir,

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.

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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Peter Coyle,
8 Burrow Court,
Portmarnock,
Co Dublin.

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

10 October 2018

Applicant: **Irish Water**
Project: **Greater Dublin Drainage Project**
Bord Pleanála Ref.: **PL06F.301908**

A Chara,

As a former Fingal County Councillor representing the Malahide/Howth Electoral Area from 1994 up until May 2013, I was directly involved in the early consultations relating to the Greater Dublin Drainage Project. I wish to provide my Observation to the plan now before An Bord Pleanála.

The early consultations involved Sites Assessment and Route Selection and went through a number of Phases. It has been my view that the process was not carried out properly, that the designated site and proposed outfall route was pre-chosen, and most of the 'public consultation' was a mere academic exercise.

Proposed route of outfall

There are many factors that could affect the location of the outfall route, including : Special Areas of Conservation (SAC)' (designated under the EU Habitats Directive (92/43/EEC)) and Special Protection Areas (SPA) (under the EU Birds Directive (79/409/EEC)), Natural Heritage Areas (NHA), Ramsar Convention on Wetlands and Coastal Water Quality and Bathing Beaches.

The key issue that the GDD Project 'considered' from its first phases was **Designated Shellfish Waters**. They stated:
"*Article 5 of the Shellfish Directive (2006/113/EC) and section 6 of the Quality of shellfish Waters Regulations (S.I. No. 268 of 2006) requires the development of Pollution Reduction Programmes (PRPs) for designated shellfish areas in order to support shellfish life and growth and to contribute to the high quality of directly edible shellfish products.*"
and
"*Neither of the two proposed marine outfall areas are located in designated shellfish waters, although hydrodynamic modelling of outfall plume dispersion would have to identify the presence of far-field effects once the final proposed outfall location has been established. The neighbouring shellfish designated areas are that of Malahide and Balbriggan/Skerries.*"

Hence the concentration became totally focussed on the areas outside the 'designated' shellfish waters (even though outfalls already exist into these waters from smaller treatment plants!).The recommendation presented by the GDD project is shown in Fig.1.

In response to the public consultation (Phase 2), a number of submissions (including my own) were made highlighting that the mapped shellfish areas were totally out of date. The most popular shellfishing was carried out off Portmarnock's Velvet Strand. Fig 2 is just one photograph (September 2015) of the typical on-going fishing that has been taking place for a few years. The improved water quality (after the closure of the old Howth outfall), has made this area the most popular fishing area on the Fingal coastline for razor and cockle shellfish. This was enhanced with the best consistent water quality results of the County Dublin coast at the Velvet Strand. The Department of Fisheries never updated their maps to reflect this situation. The proposed route for the outfall is through the centre of the popular shellfishing area.

In response to the issue raised, the GDD project team acknowledged the points raised and stated:
"***From information gathered at the first public consultation, the Project Team are aware of the presence of shellfish along the full length of coastline within the study area. As a result, and as noted above, the effluent discharged from the proposed Regional WwTP will be required to comply with the requirements of the relevant Quality of Shellfish Waters Regulations***".

Having acknowledged this point the GDD project team should have stepped back, and formally examined and reported on other potential viable outfalls along the Fingal coast Nowhere in following reports were there any references made to this issue. Verbal responses at various public consultations were given stating that the original proposed outfall routes were the only viable and best ones available!

Going back to the original point made in my submission, the issue is proven…. "**the designated site and proposed outfall route were pre-chosen, and most of the 'public consultation' was a mere academic exercise**"

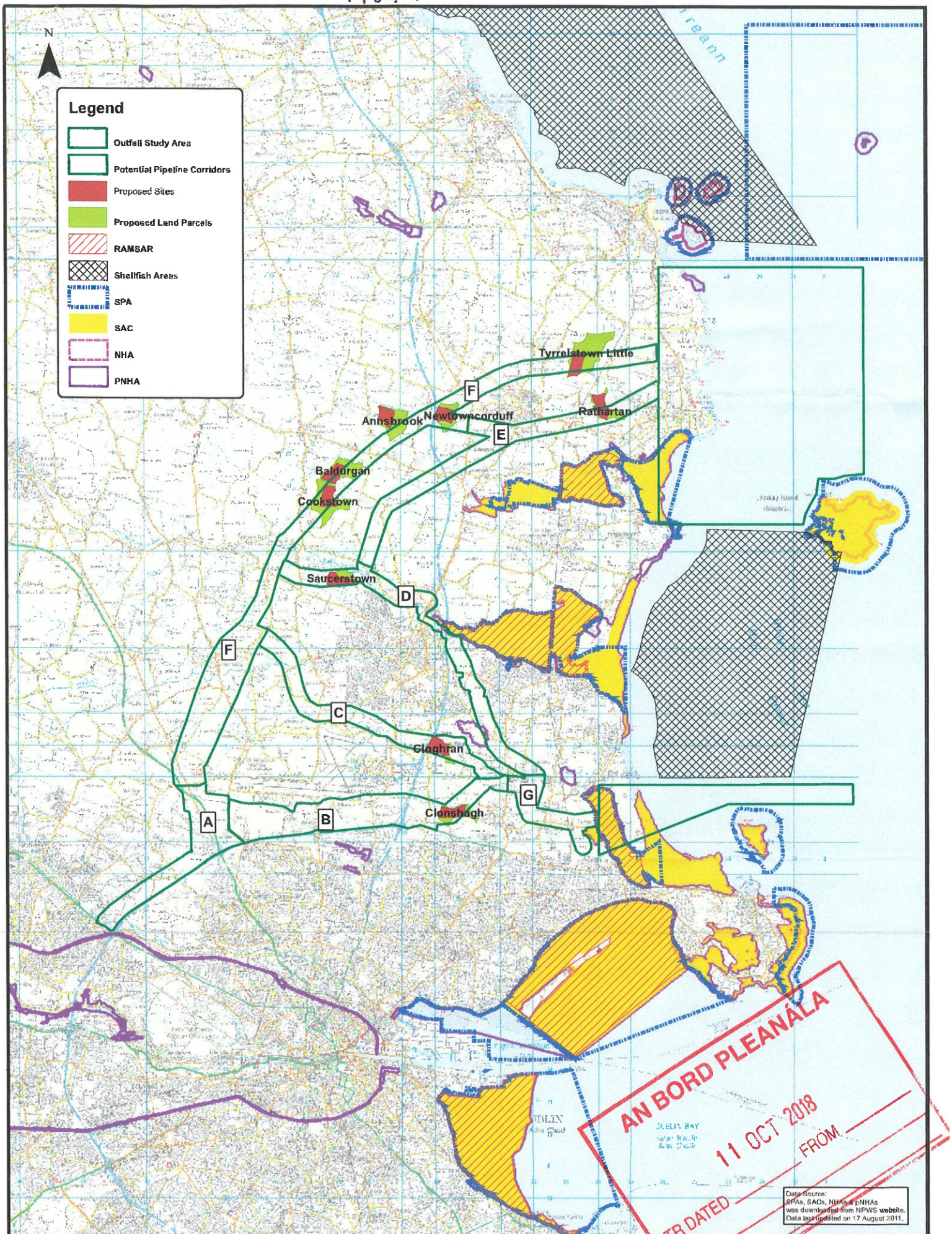
The only possible surprise in the overall proposal is that the Baldoyle racecourse lands were not re-submitted as the site for the proposed treatment plant (as per the 1980's planning application). This site (although very convenient to the North Fringe Sewer), is now close to a larger population. Clonshaugh was chosen because it is on a flight path, and in theory at a distance from large populations.

If An Bord Pleanála decides to grant Planning Permission for the project, I recommend the following issues be included for consideration in the Planning Conditions:

- **Tertiary Treatment**. International standards of treatment have continued to rise over the years. The top quality treatment should be imposed in this case.

- **Proper odour control** of the plant, not just of the sewerage treatment, but also the sludge treatment (which was a serious problem with the Ringsend plant for years)

FIG. 1



Title

Figure 5.2 Designated Sites

Project

Specialist Ecology Services GDD

Client

Comhairle Contae Fhine Gall

RPS

West Pier Business Campus,
Dun Laoghaire,
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Issue Details	
Drawn By: BD	Project No. MDE1048
Checked By: EL	File Ref: MDE1048Arc000D003
Approved By: XXX	
Scale: 1: 150,000 @ A3	Drawing No. Rev:
Date: 15/10/2012	Arc000 D02

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FIG. 2

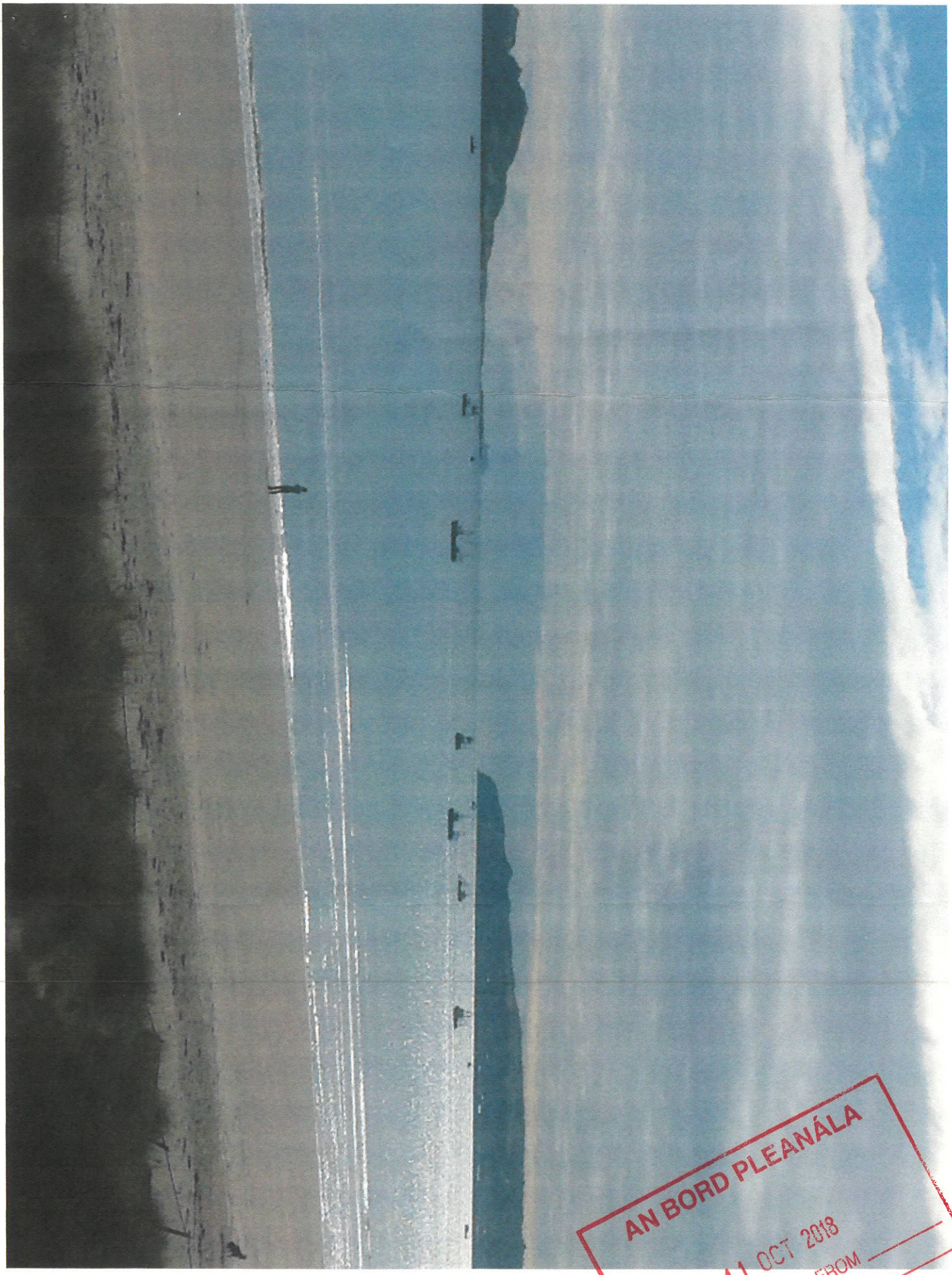

FIG. 2

- **Community benefits**. The local community need to be offered local facilities.
    - Some local houses in the area (including some on Baskin Lane) are not linked into the public sewerage system. A local scheme to assist these should be included, with a possible link into the Cloghran/Stockhole Lane Drainage Scheme.
    - Funding should be provided for local community projects.
    - A local liaison committee should be set up

- **Protection of Baldoyle Estuary, Portmarnock dunes, the Velvet Strand and bathing water**
    - A local liaison committee should be established, to monitor the project into the future.

I hope that An Bord Pleanála will take on board the issues that I have raised.

Yours Sincerely,

Peter Coyle

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Peter Coyle

€50 Cheque is attached