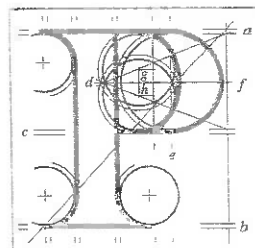


Our Ref: ABP-301908-18
P.A.Reg.Ref:

Your Ref:



An
Bord
Pleanála

Sabrina Joyce Kemper
23 Portmarnock Crescent
Portmarnock
Co. Dublin

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 & Newtown, Fingal County & Dublin

Dear Madam,

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.

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.

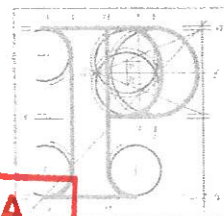
Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-873 7107

PA09.LTR



Our Ref: ABP-301908-18



An
Bord
Pleanála

AN BORD PLEANÁLA	
LDG-	009286-18
ABP-	
18 OCT 2018	
Fee: €	fee paid 17.05.18 Type: S
Time:	12.02 By: Hand

Sabrina Joyce Kemper
23 Portmarnock Crescent
Portmarnock
County Dublin

Date: 23 August 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 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.

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,

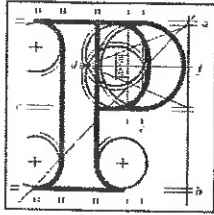
Kieran Somers
Executive Officer
Direct Line: 01-873 7107

18 OCT 2018

LTR DATED _____ FROM _____

LDG- _____

ABP- _____



An
Bord
Pleanála

Admháil ar an bhFail

Acknowledgement of Receipt

Uimh. Aitheantais Lóisteála:

Lodgement ID: LDG-007622-18

Ainm an chustaiméara: Name of Customer:	Sabrina Joyce Kemper
Gníomhaire: Agent:	
Cineál Lóisteála: Lodgement type:	Observation / Submission
Iarratas ar éisteacht ó bhéal Oral Hearing Request:	No
Modh Lóisteála: Lodgement method:	In Person
Íocaíocht Faighte: Payment received:	€50.00
Uimhir Thagartha Íocaíochta: Payment Reference Number:	PD-005380-18
Modh Íocaíochta: Payment Method:	Card Reader
Lóisteáil Faighte: Lodgement Received:	17/08/2018 11:56
Faighte ag: Received by:	Aoife Duffy

SID Submission by: Sabrina Joyce-Kemper
23 Portmarnock Crescent
Portmarnock
Co. Dublin.

AN BORD PLEANÁLA

18 OCT 2018

LTR DATED _____ FROM _____

LDG- _____

ABP- _____

SID Submission in reference to: 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: PL06F.301908

In light of the documents added at a later date and further to my previous submission (receipt attached) in relation to the above planning application, I wish to make the following points in opposition to the Development;

A). Tides.

In these documents the applicant states that they took information from Howth Yacht club into consideration when establishing tidal movements. However, the very basic information contained in the hydrology documents is at odds with the tidal maps that Howth yacht club have produced for sailors for navigation purposes. Which are laid out at Fig. 1, Fig 2, Fig 3 and Fig 4. These tidal maps (available on Howth yacht club website) very clearly show that the waters where the effluent will exit the outfall via the diffuser will be swept directly into Portmarnock beach (designated and protected bathing waters) Fig 2. on the flood Tide. This raises significant concerns about the impact that the operational phase of the project will have on sensitive waters and protected Habitats. In light of this tidal information it can be considered certain that an untreated release of effluent due to a technical issue at the plant or heavy rain surge will carry a large nutrient load into these waters and altering the habitat via contamination and eutrophication.

Flood Tide: These maps (Figs 1 and 2) clearly show that during the Flood Tide, effluent will be swept into the very shallow bathing waters of Portmarnock beach and Baldoyle Bay. The waters closer to Irelands Eye also stay circling the outfall location to the left of point K and get trapped in the shallow waters between SAC/ SPA of Irelands Eye and the SAC/ SPA of Baldoyle Estuary.

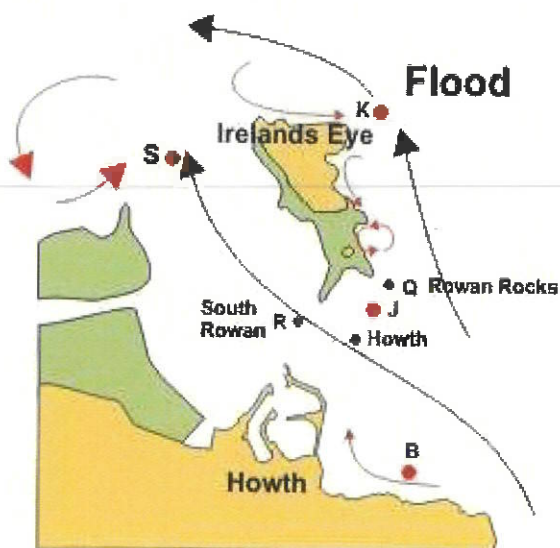


Figure 1.

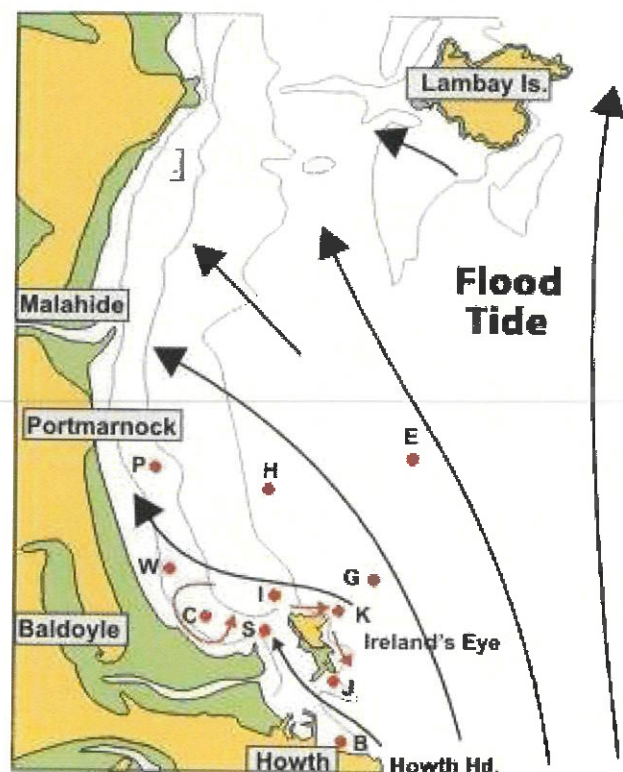


Figure 2.

The Ebb Tide:

Figs. 3 and 4 show how the Ebb tide pushes the effluent back towards the SPA on Irelands Eye and around Howth Head into Dublin Bay Biosphere.

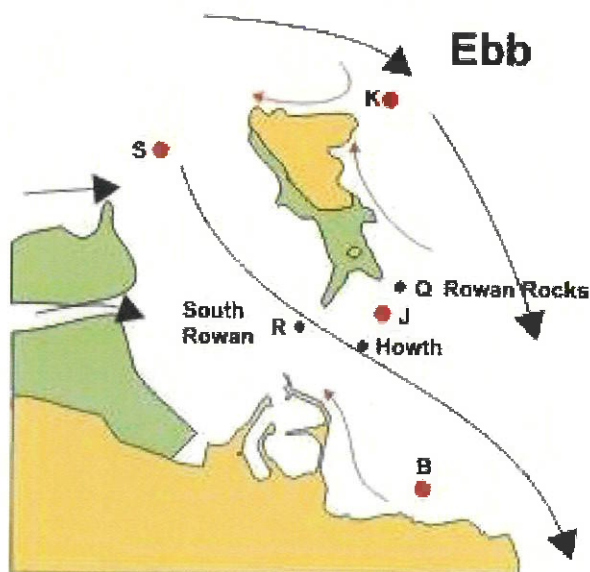


Figure 3.

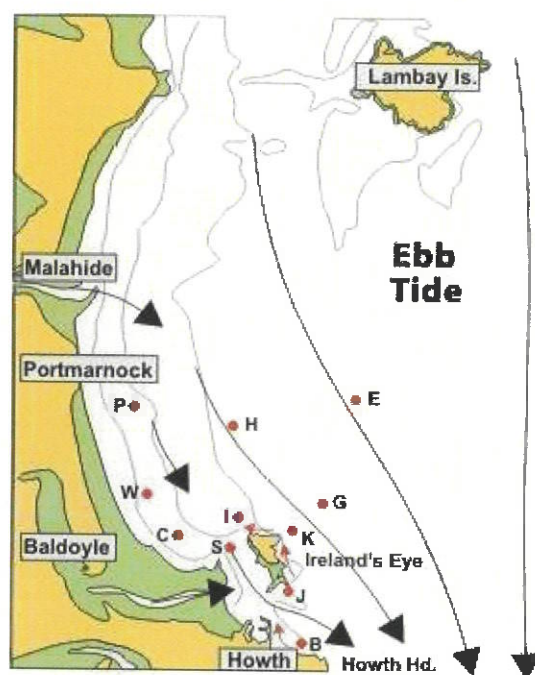


Figure 4.

B). Further In Combination Impacts as per Habitats Directive Article 6:

The EIAR and NIS fail to consider several in combination projects which will impact on the integrity of the many protected site in the area.

B1. Dublin Port Masterplan 2040. The master plan clearly states that due to sediments and contaminants escaping into the marine environment (dredging, emergency tank flushing of Cargo and passenger ferry's) that all 17 SAC/ SPA European sites would be affected, they clearly state that they cannot discount the adverse effects on the integrity of these sites and cannot suggest mitigation as despite the certainty of impacts no investigations have yet been enacted. Section 4.2.1 states the following:

"4.2.1 Water Quality and Habitat Deterioration The Screening for appropriate assessment report concluded that LSEs as a consequence of suspended sediments and/or contaminants escaping into the marine environment during marine engineering construction works could not be discounted for all 17 no European sites considered. All of the SACs considered in the screening assessment are hydrologically linked to the marine waters of Dublin Port where marine engineering construction works might occur. Some of those SACs are also designated SPAs for their intertidal wetlands. Other SPAs are designated for breeding seabird colonies which rely upon these marine waters to obtain their prey. As a hydrological pathway of effect exists, these risks cannot be discounted. It therefore follows that the risk of suspended sediments and / or contaminants escaping into the marine environment leading to a deterioration of wetland, marine and coastal habitats with respect to their water quality and favourable conservation status (which are listed as QIs or SCIs for European sites) cannot be discounted. In assessing the risk at this second (appropriate assessment) stage, further evaluation and analysis must be undertaken to characterise the impacts that may occur, and to apply measures to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects to determine whether or not Adverse Effects on the Integrity of a Site (AEIS) will occur.

AN BORD PLEANÁLA

18 OCT 2018

LTR DATED _____ FROM _____

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B2. Doldrum Bay outfall.

Although the Doldrum Bay outfall which historically released untreated sewage into the sea at Howth, has been diverted to Ringsend, in the event of a storm/ Rain surge this outfall can be opened and untreated effluent re-routed through it to the sea in order to take pressure off the Ringsend plant. In the event of a heavy rainfall event, this untreated sewage would add to the impact of the GDD outfalls untreated sewage on the European sites on the North Dublin Coast. This has not been acknowledged as an additional Impact.

C. Loss of Habitat:

The application does acknowledge that the construction of the two tunnelling compounds will result in direct loss of habitat, but states that as it is only temporary (18 plus months) that it will have no adverse effect on the protected species of birds that feed and roost on the site. I wish to point out that the life cycle of these species ranges from 3-7 years on average and that in terms of that life cycle 18 months to two years would be a significant portion of a protected bird species lifespan and would very certainly result in avoidance behaviour that would not be reversible.

D: Flooding:

The areas where it is proposed the compounds will be built are subject to flooding. The Flood prediction maps in the event of a 0.1% AEP and 0.5% AEP are illustrated in Figs. 5 (31) and 6 (38). The maps are taken from the document: Irish Coastal Protection Strategy Phase 3 – North East Coast- Strategic Assessment of Coastal Flooding and Erosion Extents.

In both cases the area where the compounds will be, would be subject to flooding during a storm surge during high tide. In this event the compound which are extensive in size would become flooded. The compound shown in fig 7. Is a few feet below the car park and has flooded as recently as October 2014. Bentonite, solvents and hydrocarbons will be stored in these compounds. In the event of flooding these compounds present a huge risk to Baldoyle SAC and SPA again contravening Article 6 of the Habitats Directive.

Irish Coastal Protection Strategy
Phase 3 – North East Coast

Strategic Assessment of Coastal
Flooding and Erosion Extents

Irish Coastal Protection Strategy
Phase 3 – North East Coast

Strategic Assessment of Coastal
Flooding and Erosion Extents

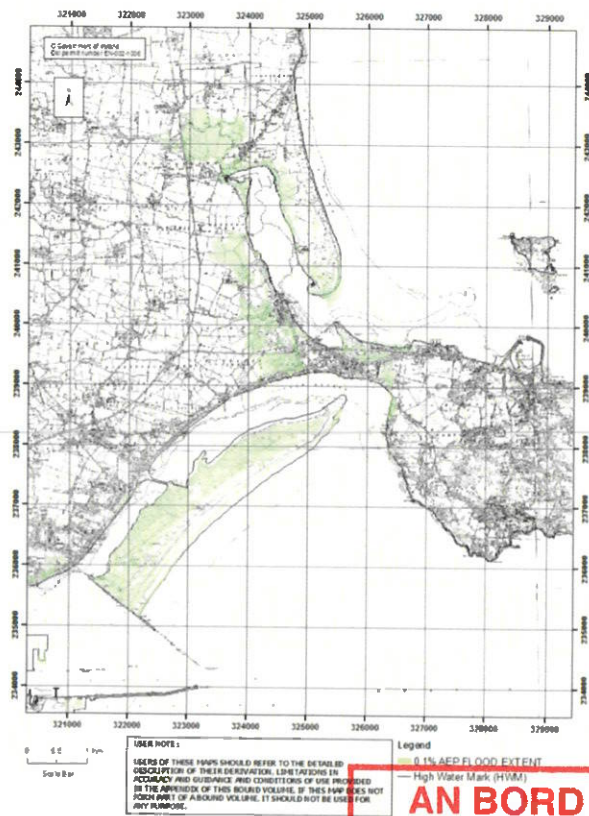


Figure 31: Portmarnock to Bull Island Predictive Flood Extent Map, 0.1% AEP

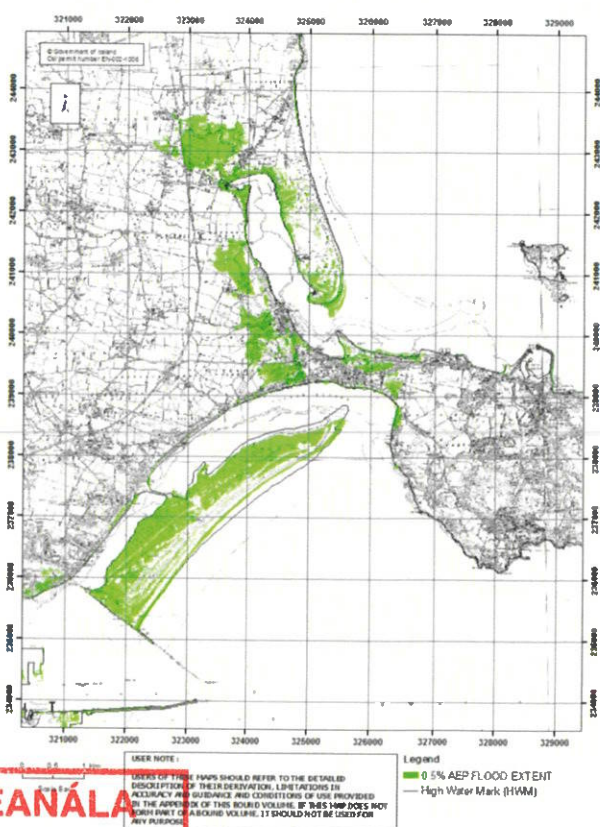


Figure 38: Portmarnock to Bull Island Predictive Flood Extent Map, 0.5% AEP

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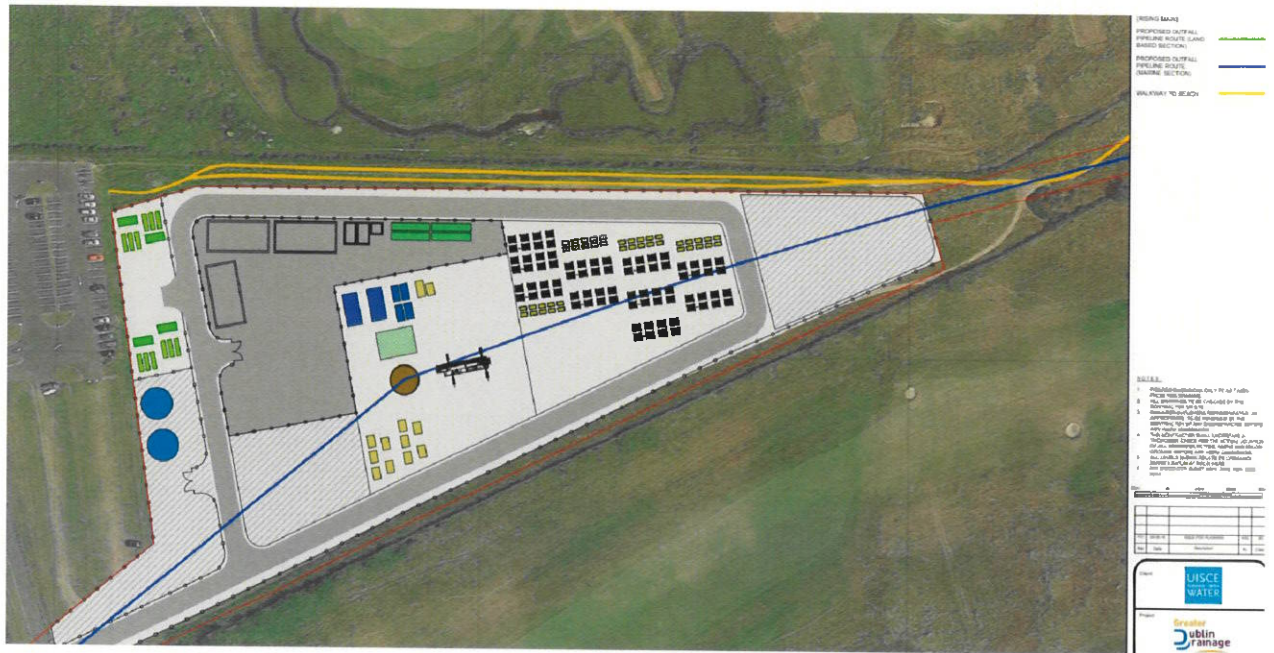


Figure 7. Construction compound resulting in direct Habitat Loss.

The Above points reiterate my previous submission by concluding that it contravenes articles 6.1, 6.2, and 6.3 of the Habitats direct and the 2011 Birds Directive.

Yours Sincerely

Sabrina Joyce-Kemper

AN BORD PLEANÁLA

18 OCT 2018

LTR DATED _____ FROM _____

LDG- _____

ABP- _____