

(10) Bette Browne (10) (F)

Madam Inspector, my name is Bette Browne, and I wish to read this statement:
After an emergency discussion last night between community representatives in Clonsaugh, Malahide and Portmarnock I have been tasked with making the following statement.

1. On the opening day of the oral hearing into the Greater Dublin Drainage project Irish water unexpectedly announced that after additional consultation with experts they have made a last minute and significant decision to amend details of their application by adding an additional sewage treatment method namely UV treatment to the waste water treatment process.
2. In light of this significant development, I request that the oral hearing be dismissed or at the very least suspended to allow Irish Water to update their application to An Bord Pleanála to reflect this material change to the application. In the interest of justice, the general public and prescribed bodies should be entitled to make submissions on this material change to the application. The EIAR and NIS should now be updated to reflect this new treatment method and the advantages and disadvantages of the UV treatment need to be reviewed utilising proper methodology. No information on the proposed UV Treatment System has been supplied so it is impossible to determine if it will be effective or appropriate for this size of plant. With no information supplied in support of the process no determination can be made on how the addition of such treatment may impact on the operation capacity of the plant.
3. While the advantages of UV treatment are well known, there are also disadvantages such as Photoreactivation, where organisms can repair and reactivate. The success of UV treatment of waste water is not a one size fits all solution and is dependant on a number of factors including effluent quality before treatment. Such factors include the fact that low dosage of UV light may not inactivate some viruses, spores and cysts, the preventative maintenance programme necessary to control fouling of tubes, Turbid and Total Suspended Solids (TSS) can render UV disinfection ineffective as can other characteristics of wastewater such as metals (iron and manganese) and organic carbon.
4. All of these potential issues need to be examined, particularly in light of the concentration of SACs and SPAs in the vicinity of the outfall. If proper analysis of this new aspect of the planning application is not done then appropriate assessment criteria has not been met as there are no such conclusions capable of dispelling all reasonable doubt as to the adequacy of the information available, the assessment cannot be considered to be 'appropriate', within the meaning of Article 6(3) of the Habitats Directive.

We therefore request a dismissal of the proceedings or at the very least an adjournment pending the submission of additional information by Irish water under section 37F of the planning and development act 2000 and section 37E (1) of Planning and Development (Strategic No. 27.] Infrastructure) Act 2006 which states: An application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Board and shall be accompanied by an environmental impact statement in respect of the proposed development. (2) The Board may refuse to deal with any application made to it under this section where it considers that the application for permission or the environmental impact statement is inadequate or incomplete, having regard in particular to the permission regulations and any regulations made under section 177 or to any consultations held under section 37B.

Thank you, Madam Inspector.
21/03/19

Finally, Madam Inspector, we also wish to make the following request. Following a question by Cllr David Healy yesterday on the recording of the proceedings of this Oral Hearing, we wish to put on record that we are deeply concerned that there is no independent record of the proceedings and we request that such a record be posted daily by An Bord Pleanála before this hearing proceeds further. Thank you. 21/03/19

