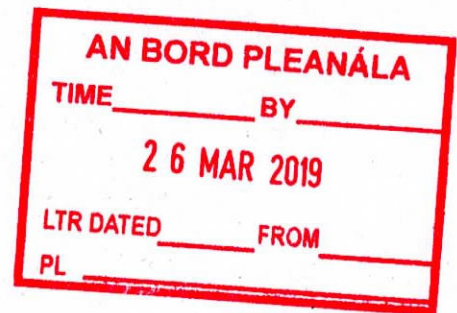


An Bord Pleanála Oral Hearing**Ref. ABP – 301908-18****Greater Dublin Drainage Project****26th March 2019****Submission by Portmarnock Community Association**

1. Society generates the waste water so it is the responsibility of society to clean all hazardous material that could cause problems in the near or distant future from that water before it is reintroduced into the environment
2. Society through legislation introduced into the Dáil has delegated that duty to Irish Water
3. The guiding principle in environmental management is the same as the direction we were all given by our parents as we left the table after a meal "Clean Up After Yourself"
4. The principle of treating wastewater is accepted by everybody
5. The scale of the development is a matter of some controversy. The principle in deciding on scale has to be based on the ongoing cost of upgrades and the introduction of new technology to the plant once it is built and operational.

In general, upgrading a small number of large plants is invariably much cheaper than upgrading a large number of small plants.

At present we have a very large number of drinking water extraction plants in Ireland. In contrast Northern Ireland has a small number of plants catering for the majority of their population. As a result the cost of upgrading the plants in Northern Ireland is modest whereas the cost of upgrading plants in the Republic is prohibitive.

6. **Sludge Disposal /Use**

The principle of spreading biosolids on land is a prudent method of recycling

- i. The times at which the biosolids can be spread should be based on Soil Moisture Deficit figures rather than on arbitrary dates. Many of the soils in Fingal, West Dublin and Co. Meath are heavy textured (high percentages of clay and silt) and can only cope with low precipitation in many months of the year. Spreading biosolids in many of the calendar months in Dublin could be hazardous and lead to runoff into streams and rivers
- ii. Constant analysis of the biosolids and the receiving land will be necessary to ensure that rises in the concentration of elements not normally found in high amounts in the soils does not occur.
- iii. The fate of such elements, if not already known should be thoroughly investigated – i.e. Weakly adsorbed on organic matter or clay minerals, strongly adsorbed or absorbed into crystalline structure in clays, downward movement to the watertable etc
- iv. The tests should be undertaken by outside independent laboratories on a number of occasions each year by the EPA. Independent laboratories should only have contracts of c. 5 years to ensure their long-term independence. The results should be published in an accessible form by both the EPA and Irish Water

7. Incorporation of New Techniques and Technology

The results of this hearing and the decision on the application will, we all hope, be made promptly in 2019 or early 2020. It is likely that the plant will be operational in 2026/2027. The rate of change in techniques and technology could result in a situation where the grant of permission is for a plant that is a long way short of best current practice as a result of innovations that have occurred between the grant of permission and actual construction of the various elements of the project. The grant should include terminology in the conditions that will allow ABP to require the incorporation of innovations in water treatment that occur in the interim that can be incorporated into the plant and the project in general. Changes in EU legislation/directives/regulations that will result in changes that should be incorporated into the plant should be included in the specification for the plant now. We know how long it takes matters to pass through the system in the Commission and Parliament so a trawl at this point in time should pick up all the issues.

8. UV Treatment

The incorporation of UV treatment of treated water exiting the plant is to be welcomed. This will remove one of the concerns of residents and especially swimmers. However, from a very short trawl of the literature it appears that the effectiveness of UV treatment is very much affected by the levels of suspended solids. It is important therefore to ensure sufficient settlement in the secondary treatment is achieved before the UV will be effective.

9. Testing

Testing by Irish Water and the EPA at –

- i. The point of exit of wastewater from the plant
- ii. At the Outfall north of Ireland's Eye,

is critical to ensure that the plant is working efficiently. It is important that the taking and analysis of a percentage of the samples is undertaken independently by the EPA. It would not be acceptable that the EPA would be totally dependant on results from Irish Water.

10. Effects on Flora and Fauna

Appropriate surveys of the flora and fauna in the area of the outfall off Ireland's Eye and in the Baldoyle Bay SAC should be undertaken in 2024/2025 (as close in time as is sensible to the commissioning of the plant). Regular updates of the survey should be undertaken to monitor any changes

11. Green and Blue Flags for the Velvet Strand Portmarnock

The village of Portmarnock is justifiably proud of the fact that our beach is one of only four beaches in the country that have achieved the standards required to be awarded both the Blue and Green flags.

This means that our beach is safe for swimmers.

It is the only beach in Fingal and indeed the only beach in Dublin with such status.

In 2018 I would estimate that we had in excess of 500,000 visitors

Winter, Spring, Summer, Autumn – the seasons do not matter – we have swimmers in Portmarnock all year round

What we do not want is an announcement that our beach is contaminated – this is too important for Portmarnock, Fingal and Dublin. In other words, this is important to 40% of the Irish population – not forgetting the thousands of tourists and golfers that visit our village.

12. Tertiary Treatment

The only way to ensure that the quality of the water is such as to not cause any contamination of our sea, our beach and our community is tertiary treatment. We are a wealthy country – let's do the right thing. We do not want second rate - we deserve and can afford the best

13. Clonshaugh Rd.

This road is now one of the main arteries from Artane and Coolock to Dublin Airport. It is one the connecting roads from The Baskin, Kinsealy and Portmarnock to the M50. It is also home to the AUL soccer complex which is one of the largest pitch complexes in the country. This road needs the following before the commencement of construction –

- i. Road Widening
- ii. Footpath and Cycleway from the Clayton Hotel to the Stockhole Lane.

14. ABP will be adjudicating on this application. ABP has a reputation for making decisions without fear or favour. They are to be commended for this.

The EPA will be granting the operating licence for the plant on completion of construction. I believe that the EPA are an excellent organisation but are more vulnerable to outside influence and interference. This is not a criticism of the EPA – it just does not have the protections in place that ABP have.

I would therefore request that in the event of a grant of permission that the protection of the environment and local populations be incorporated in conditions of the grant rather than in details of an operating licence

Pat Suttle

24/03/19