



Darragh O'Brien TD

working with

Cllr Eoghan O'Brien



26th March 2019

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An Bord Pleanála
Ballroom Suite
Hotel Riu Plaza
The Gresham Dublin
23 O'Connell Street
Dublin

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Submission to Oral Hearing for the Greater Dublin Drainage Project at Clonsaugh, Co. Dublin ABP-301098.

Both Cllr Eoghan O'Brien and I strongly opposed to the design of the Greater Dublin Drainage Project proposed Waste Water Treatment Plant (WWTP) at Clonsaugh, Co. Dublin and this is our third submission regarding this matter since this process first began.

We are opposed to the Waste Water Treatment Plant on the following grounds;

1. Location:

We are opposed to the construction of a massive 500,000 PE Waste Water Treatment Plant, 4 times the size of Croke Park, directly adjacent to densely populated area of Clonsaugh and the outfall of this plant which will be approx. 1km from Ireland's Eye and less than 4km from the velvet Strand, Portmarnock.

A 300m or 500m separation distance to receptors are wholly inadequate for such a large plant.

2. Odours:

There will be odour originating from the WWTP regardless of the odour suppression measures proposed in the design of the project. Inadequate design maintenance and operation of the plant will give rise to increased odour problems.

It is also deeply concerning that residents in Clonsaugh and the surrounding communities will not have fresh air due to these odour issues.

3. Design & Build:

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 its 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:

There has been recent experience of raw sewerage being discharged into the Sea when procedures and systems fail in a WWTP. This has occurred at a smaller WWTP in Balbriggan and of course the most recent example at Ringsend Wastewater Treatment Plant just last month on Saturday 23rd of February when tonnes of raw sewage were spilled into Dublin Bay.

It is estimated by Irish Water that 100 cubic metres of activated sludge was discharged into Dublin Bay in just a 20 minute period. Procedures and systems previously failed at this WWTP during Storm Brian in October 2017 as well.

The proposed pipeline outflow for The Greater Dublin Drainage Project enters the sea at an area called the Codlings just off Ireland's Eye, where fish spawn.

Should the proposed Clonsaugh plant discharge raw sewage into the Sea this can only result in detrimental environmental effects on SAC, SPA, designated shellfish waters of the Dublin coastline, result in an environmental disaster and will have catastrophic effects on our coastline. Along the course of the pipeline, flora and fauna will also be impacted by such a large scale project.

5. Treatment Process:

According to Article 1 of the Urban Waste Water Treatment Directive 91/271/EEC "The Directive concerns the collection, treatment and discharge of urban waste water and treatment and discharge of waste water from certain industrial sectors; The objective of the Directive is to protect the environment from the adverse effects of the abovementioned waste water discharges".

Article 4(1) of this directive provides that "Member States shall ensure that urban waste water entering collecting systems shall before discharge be subject to secondary treatment or an equivalent treatment".

However Article 5(2) specifies that "Member States shall ensure that urban waste water entering collecting systems shall before discharge into sensitive areas be subject to more stringent treatment than that described in Article 4..."

Initially plans for this proposed WWTP would only be treated to minimum secondary level treatment as outline in Article 4(1) the Urban Waste Water Treatment Directive 91/271/EEC. We welcome the announcement by Ciarán O'Keeffe, Senior waste consultant for Irish Water, that ultraviolet light treatment will now be added to the treatment to all

effluent discharges. We believe this to be a direct result from the over 14,000 objections An Bord Pleanála received regarding this proposed project.

Local residents are still extremely concerned that pharmaceutical residues and hazardous substances in even UV treated water will flow out of outfall into Dublin Bay.

We are insisting that this proposed WWTP must treat all wastewater at tertiary level should this project go ahead.

6. Disruption of the Local Environment:

Baldoyle Bay is of high conservation importance, with an internationally important population of Brent Geese and nationally important populations of a further seven species.

Two rivers run into the estuary one of which is the Sluice River. The Sluice River Marsh is a relatively intact freshwater marsh, a habitat that is now rare in Co Dublin.

7. Cost Benefit Analysis:

No cost benefit analysis has been produced for the Clonsaugh site during the site selection process.

Sean Laffey, Head of Asset Management in Irish Water, stated on Wednesday 20th March at beginning of these oral hearings that that the projected budget for the Greater Dublin Drainage Project is in the region of €500 million yet I have been unable to verify this as I received no answer to the Parliamentary Questions that I have submitted to the Minister for Housing, Planning & Local Government.

8. Impact on the Local Community:

Properties in the area will be devalued should this proposed WWTP proceed and begin construction. This is grossly unfair to families who have invested in this area through house purchases, investment in local businesses, farms and the hospitality trade.

A large number of constituents have contacted us to raise their serious concerns regarding the inevitable large increase of traffic congestion in the area during the construction of the WWTP and then the operation stage of this plant. This densely populated area of Clonsaugh already suffers from traffic congestion and the addition of a massive WWTP plant will only further exacerbate this problem as 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, which also contribute to odour problems in the area. Irish water has also informed us that sludge trucks will be coming to this Clonsaugh site from other WWTP from North Kildare, Meath and all over Fingal as well once it is operational.

The burden of treating sewage from the GDSDS area on the Clonsaugh, Portmarnock, Malahide and wider coastal communities is an unfair burden.

We have been very consistent in our opposition to the project and we still favour a network of local wastewater treatment plants rather than a single giant sewage plant, as proposed in the Greater Dublin Drainage Project.

It has yet to be proven to us that this Monster WWTP is needed as Irish Water is investing more than €400 million in the staged upgrading of Ringsend Wastewater Treatment Plant to allow the wastewater of an additional "400,000 population equivalent" to be processed on the site. Other plants in Fingal are also not at full capacity, examples of these include Swords, Malahide, Balbriggan and Barnageeragh.

During a meeting which I held last year with the senior management team in Irish Water they confirmed to me that this proposal is not their main priority. Their focus is now on the upgrading of the Ringsend plant.

9. 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.

10. Detrimental Impact on Tourism in Dublin Coastal Areas:

WWTP have in the last 7 years caused serious environmental problems when they failed and discharged raw sewage into receiving waters.

The proposed plant and outfall will be located in close proximity to Ireland's Eye, Howth fishing community and the Velvet Strand, Portmarnock. The Velvet Strand is the only beach on the east coast of Ireland to have both a Blue and Green flag and only of two such beaches in the whole country.

A discharge of raw sewage similar to one that occurred at Ringsend Wastewater Treatment Plant just last month would have a detrimental effect not only on the Velvet Strand but on the reputation of this stretch of coastline as a whole.

This area is also one of the most visited coastal tourist destination area on the east coast of Ireland and negative publicity this plant will receive will affect the already vulnerable tourism, sea fishing and water recreation industries in the area and they will suffer the consequences. It is unlikely that the EIA will adequately address such issues.

11. Baldoyle Estuary:

Baldoyle Bay was first declared a Statutory Nature Reserve in 1988 and the inner estuarine section is a Statutory Nature Reserve and is also designated as a wetland of international importance under the Ramsar Convention. The site is a candidate Special Area of Conservation under the E.U. Habitats Directive. Dublin Bay Biosphere is also the world's only marine biosphere in a capital city region and was designated by UNESCO in 2015.

While we welcome Ciarán O'Keeffe, Senior waste consultant for Irish Water, announcement that ultraviolet light treatment will now be added to the treatment to all effluent discharges at the proposed WWTP local residents and conservations have grave concerns of possible

contamination of this habitat should the WWTP systems and procedures fail similar to other WWTP failures in Galway, Limerick, Cork and Balbriggan.

12. Dublin Airport Visual Impact:

Millions of air passengers use Dublin Airport every year. This proposed plant will be within the airport flight path and safety zone.

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