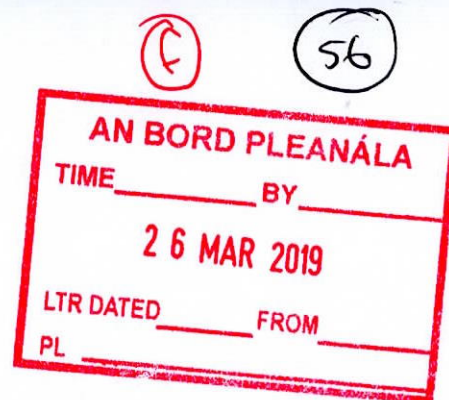


Greater Dublin Drainage Planning Application ABP 301098

Oral Hearing Presentation 26th March 2019



The Environmental Impact Assessment and Hydrodynamic Reports have focussed on the differences between just two sites instead of broadening the scope to assess the benefit of moving the outfall further offshore.

The tidal models neglect to take account of significant external influences such as an Easterly wind on the surface.

Time of day has not been reported for the dye release tests and it is clear that they were nearly all done on the ebb tide, rather than the flood tide that would carry effluent towards the shore.

It is a simple fact that concentrated effluent would in effect be bioprocessed in coastal water which is used for recreation.

The reports confirm that dilution and mixing of effluent would be effected in the large area West of the line from Lambay to the Nose of Howth and that the plume will rise towards the surface within this area. This area is not an ocean waste, distant from any human activity and available without consequence as a biochemical reactor. On the contrary, the sea west of this line is a recreational area which is constantly in use by countless boats, dinghies and canoes. Given the opportunity, the occupants of these boats also frequently swim and dive from their craft. The health of these people would be seriously jeopardised by the inevitable concentrations of effluent. This is also an area where large amounts of razor clams are harvested for human consumption.

The old outflow from the Nose of Howth was known to have been responsible for regular severe contamination of these recreational waters, all the way NorthWest to Portmarnock, Malahide and beyond. The proposed new outfall is precisely in the same tidal stream and the consequence can only be that history would repeat itself.

By moving the outfall a few kilometres further East, the mixing and dispersal can be delivered to a strong North-South flow at almost double the depth and thereby completely avoid contamination of the coastal zone.

Arthur O'Kelly