



AN BORD PLEANÁLA	
TIME _____	BY _____
26 MAR 2019	
LTR DATED _____	FROM _____
PL _____	

An Bord Pleanála (ABP) Oral Hearing
Irish Water Greater Dublin Drainage

Application reference ABP 301908-18

Evidence given by Maurice Mullen on behalf of self, Eileen Cantwell and Nikki Gilliland
Also speaking on behalf of Low Rock Swimmers, Malahide & Leinster Open Sea Swimming

Thank you for the opportunity to make this oral submission. We are active year-round swimmers in the Malahide, Portmarnock and Howth areas. We are part of the local Low Rock, Malahide sea swimming community, most of whom swim daily, ranging in age from 20 years old to the mid-80s. We are speaking on behalf of this group. There are several such informal local swimming groups dotted along the north Dublin coastline.



Participants in Low Rock Sea Swim July 18

We also compete in open sea swimming competitions, of which some 36 races take place annually across the summer months, about a third of which take place from north City and County beaches (appended). These races are organised by Leinster Open Sea Swimming, and we are also speaking on behalf of this group today.

Participation in sea swimming for health and lifestyle reasons has been on the increase in recent years. In Low Rock, Malahide, there can be between 50 and 100 regular swimmers during the winter period, with a multiple of this number from the early summer onwards.

The number of swimmers competing in the sea races has also seen a significant upsurge, a trend that is expected to continue. In the 2018 *Low Rock Race* there was a total of 352 competitors, up from 241 in 2015 (46% increase). In the 2018 *Island Swim* there were 179 competitors compared with 94 in 2015 (90% increase).

Importantly, the *Island Swim* takes place from Ireland's Eye to Balcadden Bay in Howth, with the swimmers following a course that takes them within 2 kilometres of the proposed waste discharge diffuser and well within the reach of the anticipated plume dispersal area.



Swimmers off Low Rock Aug 18

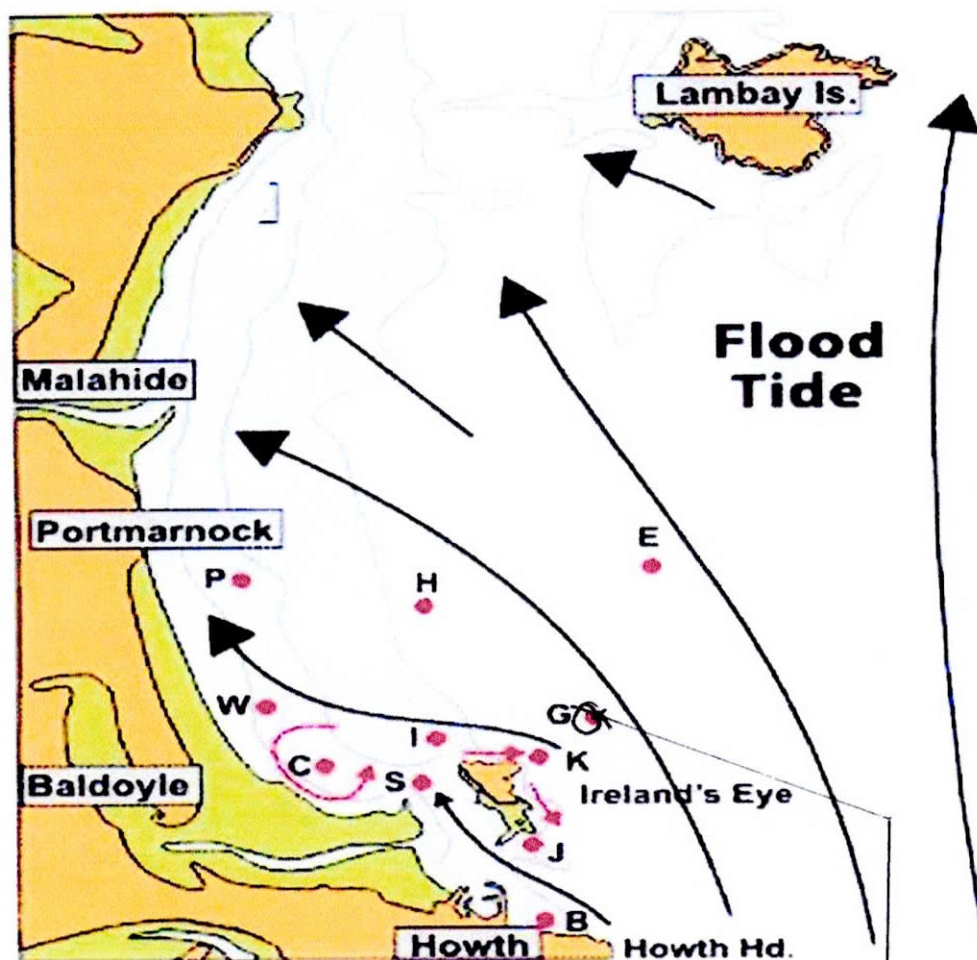
The races can take swimmers 500 to 750 metres off shore. Longer distance swimmers, accompanied by boat, regularly traverse open waters, variously between Howth, Ireland's Eye, Sutton, Malahide, Rush and Lambay Island.



Finish to Aer Longus Sea Races at Portmarnock Beach, June 18

Irish Water discharge at sea proposals threaten our pristine waters

The waters off North County Dublin are of a very high standard. I attach the results of water sampling in four swimming locations in close proximity, which we undertook 10 days ago. The findings confirm the ^{Velvet Strand} ~~pristine water~~ quality. They show readings for Presumptive Coliforms and Escherichia at ^{Low Rock} ~~Low Rock~~ to be over twice those of the other 3 test locations, illustrating the potential for irregular dispersal patterns in an area known for complex tidal movements. In addition, in the light of the prevailing drift of the flood tides in the area, see Howth Yacht Club and Irish Water modelled charts, effluent will drift shoreward towards Portmarnock, Malahide and adjacent coastal areas.



HOWTH YACHT CLUB CHART, SHOWING FLOOD TIDE DIRECTION

APPROX SITE OF OUTFALL PROPOSED GDD SEWER

Any waste water discharging requiring dispersion, even if within the Water Framework Directive parameters, represents an unnecessary and undesirable diminution of water quality.

Why swimmers remain concerned

We recognise the importance of developing appropriate waste water treatment in Dublin. The solutions adopted must be based on best international practice, including taking a longer-term view of the undesirability of discharging at sea and, critically, swimmers and bathers must have confidence in the solutions adopted.

Thus far, Irish Water's application for planning permission, including their additional commitment to undertake ultra violet treatment of waste before discharge, pays insufficient regard to the concerns of swimmers and bathers. Swimmers are aware of the impacts of even minor breaches in the sewage system on the water quality here; we can literally taste the poor water quality when swimming. We have experienced several accidental releases in the area in the recent past, resulting in official advice to desist from swimming. In truth, it is impossible to guard 100% against accidents, despite the best intentions of Irish Water. Only the elimination of discharges to sea will enable swimmers to have full confidence in the system.

Our Recommendations to An Bord Pleanála (ABP)

We ask ABP to conclude the following

1. **That the practice of discharging any waste to sea is an unacceptable policy in the context of positioning Ireland as a genuinely environmentally friendly and responsible country.** ABP should note in particular
 - a. The requirements of the Water Framework legislation should be regarded as the minimum acceptable water quality standards, and not thresholds below which discharging can take place.
 - b. The Greater Dublin Drainage project should be a national flagship undertaking in which operation practices set national standards for best practice for decades to come.
2. **That, without prejudice to our first recommendation, if it is the decision of ABP to allow discharging to sea, then ABP should insist on full tertiary processing of all waste material from the waste facility destined for discharge into the sea.** ABP should note that this is the only solution which
 - a. Addresses wider potential negative environmental impacts.
 - b. Lessens the potential for damage from any unintentional or accidental discharges.
 - c. Will give the minimum necessary assurances to swimmers and bathers.

Thank you for giving us the opportunity to present our case to you today, and we would be pleased to answer any questions.

Appendix

1. 2018 Leinster Open Sea Swimming Programme
2. Results of water testing in Malahide and Portmarnock on 18 March 2019
3. Map of Test locations
4. Calendar of Leinster Open Sea Events
5. Original *Siba*

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Chemical Analysis Laboratories Ltd Confidential Report W24228

Report Number	W24228
Invoice Number	24228
Laboratory Number(s)	58044-58047
Your Order Number	
Number of Samples	4
Sample Description	Sea Water Samples. Received 19/03/19
Date Reported	22/03/19

Sample I. D.	Test	Result	Units
Sea Water Sample A Received 19/03/19 Laboratory No. 58044	Presumptive Coliforms	19	cfu/100ml
	Presumptive Escherichia coli	19	cfu/100ml
	Presumptive Enterococci	15	cfu/100ml
	Confirmed Coliforms	19	cfu/100ml
	Confirmed Escherichia coli	6	cfu/100ml
	Confirmed Enterococci	9	cfu/100ml

Signed:
Dan Duff, M.Sc.
Laboratory Manager.

Signed:
F. J. Bloomfield, Ph.D.
Scientific Director

Note: Any services by CAL Ltd. are provided strictly subject to the limitations of liability as stated overleaf and this Report is issued solely on that basis.

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Date Reported	22/03/19

Sample L. D.	Test	Result	Units
Sea Water Sample B Received 19/03/19 Laboratory No. 58045	Presumptive Coliforms	7	cfu/100ml
	Presumptive Escherichia coli	7	cfu/100ml
	Presumptive Enterococci	0	cfu/100ml
	Confirmed Coliforms	7	cfu/100ml
	Confirmed Escherichia coli	0	cfu/100ml

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Number of Samples	4
Sample Description	Sea Water Samples. Received 19/03/19
Date Reported	22/03/19

Sample I. D.	Test	Result	Units
Sea Water Sample C Received 19/03/19 Laboratory No. 58046	Presumptive Coliforms	7	cfu/100ml
	Presumptive Escherichia coli	7	cfu/100ml
	Presumptive Enterococci	0	cfu/100ml
	Confirmed Coliforms	7	cfu/100ml
	Confirmed Escherichia coli	1	cfu/100ml

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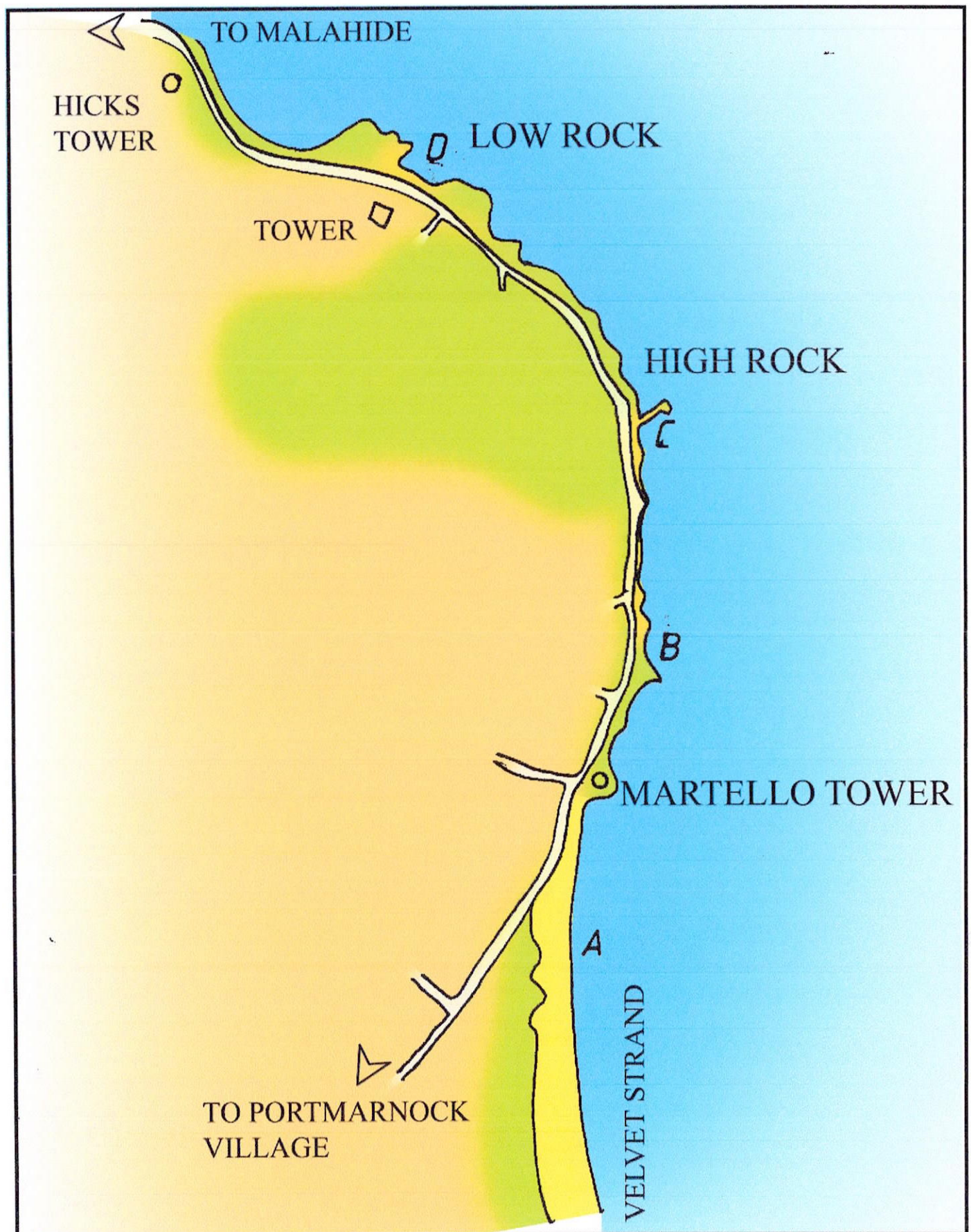
Report Number	W24228
Invoice Number	24228
Laboratory Number(s)	58044-58047
Your Order Number	
Number of Samples	4
Sample Description	Sea Water Samples. Received 19/03/19
Date Reported	22/03/19

Sample I. D.	Test	Result	Units
Sea Water Sample D Received 19/03/19 Laboratory No. 58047	Presumptive Coliforms	8	cfu/100ml
	Presumptive Escherichia coli	8	cfu/100ml
	Presumptive Enterococci	2	cfu/100ml
	Confirmed Coliforms	7	cfu/100ml
	Confirmed Escherichia coli	2	cfu/100ml
	Confirmed Enterococci	2	cfu/100ml

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Map of Receiving Coastline Scale 1: 10, 000 approx



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Snámh Mara Laighean

Jones Engineering 2018 Leinster Open Sea Swim Series

Day	Date	Race & Location	Club	Contact	Mobile	Race	Men's	Ladies'	C	Q	P	W
Sat	26-May					1						
Sat	02-Jun	Seapoint, Dún Laoghaire	Glenalbyn Masters	Declan Culliton	0872795202	2	1.30pm	2.15pm		Y	Y	
Sun	03-Jun	Bobby Nolan Trophy Bull Wall Clontarf	Clontarf	Bobby Nolan	0857709799	3	2.10pm	2.55pm		Y	Y	Y
Mon	04-Jun	Siobhan McKenna - Killiney	Half Moon	Ronan Dalton	0868206666	4	3.00pm	3.45pm		Y	Y	Y
Sat	09-Jun	Gibney Cups, Killiney Beach	Guinness	Greg O'Dwyer	0868150208	5	10.30am	11.15am		Y	Y	
Sun	10-Jun	Low Rock Portmarnock	Phoenix	Annamarie Kendrick	0872821175	6	9.45am	10.15am		Y	Y	
Sat	16-Jun	Windsurfers' Pier Special Olympics, Seapoint	Garda SC	David Campbell	0876341312	7	12.10pm	1.00pm		Y	Y	
Sun	17-Jun	Killiney	Templeogue	Padriac Grey	0879506606	8	1.00pm	1.45pm		Y	Y	
Fri	22-Jun	NAC Masters Dublin Docklands	NAC Masters	John Farrell	0864089687	9	7.00pm	7.45pm		Y	Y	
Sat	23-Jun	Wicklow Mid Summer	Wicklow	John McCall	0879890181	10	4.00pm	4.45pm		Y	Y	Y
Sun	24-Jun	Tommy Cope, Bull Wall	North Dublin	Shay Cope	0868159691	11	10.00am	11.00am	Y	Y	Y	
Sat	30-Jun	Low Rock Portmarnock	Eastern Bay	Declan Proctor	0876521861	12	11.50am	12.40pm		Y	Y	
Sun	01-Jul	Half Moon Kilmartin Cup, Bray	Half Moon	Ronan Dalton	0868206666	13	1.00pm	1.45pm		Y	Y	
Sat	07-Jul	88th Island Swim Ireland's Eye to Howth	Leinster Open Sea	Brian Nolan	0862661981	14	6.00pm	6.00pm		Y	N	
Sun	08-Jul	Portmarnock Beach	Garda	David Campbell	0876341312	15	7.00pm	7.45pm		Y	Y	
Sat	14-Jul	Killiney Beach	Dublin	Jennifer Murrin	0876548992	16	11.45am	12.30pm	Y	Y	Y	
Sun	15-Jul	Jim Kavangah Plunkett McAllister Bull Wall	North Dublin	Frank Cope	0861710113	17	12.30pm	1.15pm		Y	Y	
Fri	20-Jul	Wicklow MS	Wicklow	John McCall	0879890181	18	7.00pm	7.45pm		Y	Y	
Sat	21-Jul	Eddie Herron, John McCarthy, Blackrock	Sandy Cove	Kevin Healy	0866053151	19	7.00pm	8.00pm		Y	Y	
Sun	22-Jul	Tracie Lawlor Memorial Curracloe Wexford	Wexford Masters	Colin Wilson	0872670146	20	12.45pm	12.00pm		Y	Y	Y

Tuesday 24th Closing Date Dún Laoghaire Harbour Race

Sat	28-Jul	Grand Dublin Swim, Liffey	ILDSA	Stephen Millar	0871821938	21	1.00pm	2.00pm		Y	N	Y
Sun	29-Jul	Lough Lene, Collinstown, Westmeath	Meath Masters	Paul Gemochi	0866048902	22	1.00pm	1.50pm		Y	Y	

Collect Hats & Shirts Thursday 2nd August

Sat	04-Aug	Cyrril Duff Memorial Seapoint, Dún Laoghaire	Guinness	Larry Mooney	0872374524	23	4.10pm	5.00pm	Y	Y	Y	
Sun	05-Aug	88th Dún Laoghaire Harbour Race	Leinster Open Sea	Mary Drumm	0872865757	24	5.00pm	6.00pm		Y	Y	
Mon	06-Aug	International Orphan Aid - Low Rock	Guinness	Brian O'Dwyer	0868450772	25	6.15pm	7.00pm		Y	Y	
Wed	08-Aug	The Lianne Deasy Memorial, Killiney	Glenalbyn Masters	Mark Early	0868446443	26	7.00pm	7.45pm		Y	Y	
Sat	11-Aug	Aer Lingus Masters, Portrane	Aer Lingus	Peter Conway	0872744233	27	10.45am	11.30am	Y	Y	Y	Y
Sun	12-Aug	Caulfield Cups High Rock Portmarnock	St. Vincents	Ian Hutchenson	0878389958	28	11.20am	12.15pm		Y	Y	
Wed	15-Aug	Bob Bushell - Half Moon Club House South Wall	Half Moon	Ronan Dalton	0868206666	29	7.00pm	7.45pm		Y	Y	
Sat	18-Aug	Lough Dan Races 10k, 5k, 2.5k or Relay	Leinster Open Sea	Colm O'Neill	0866000967	30	10.00am	10.00am	Y	Y	N	
Sun	19-Aug	Wicklow Open	Wicklow	John McCall	0879890181	31	3.00pm	3.45pm		Y	Y	

Tuesday 21st Closing Date Jones Engineering 99th Dublin City Liffey Swim

Sat	25-Aug	Seapoint, Dún Laoghaire	Templeogue	Padriac Grey	0879506606	32	11.00am	11.45am		N	Y	
Sun	26-Aug	Greystones	Dublin SC	Ger Kennedy	0867329945	33	2.30pm	3.00pm		N	Y	

Collect Hats & Shirts Thursday 30th August

Sat	01-Sep	Jones Engineering 99th Dublin City Liffey Swim	Leinster Open Sea	Brian Nolan	0862661981	34	3.00pm	4.00pm		N	Y	
Sat	08-Sep	Swim Ireland Swim for a Mile, Windsurfers	Leinster Open Sea	Carol Finlay	0868384346	35	10.00am	10.45am		N	N	Y
Sun	09-Sep	Wicklow 3k	Leinster Open Sea	Mary Aldridge	0868298403	36	12 noon	12 noon		N	N	Y
Sat	15-Sep	Arthur Dunne (Swimmer of the Year) Seapoint	Half Moon	Ronan Dalton	0868206666	37	3.00pm	3.45pm		N	Y	

All swimmers must register online to obtain a Race Numb <https://www.howdidiyou swim.com/register3.php>

- Entries for Island Race, Harbour, Lough Dan, Liffey, & Wicklow 3k are all online
- Q = Qualifier for Jones Engineering 99th Dublin City Liffey Swim and 88th Dún Laoghaire Harbour Race;
- P = Points Swimmer of the Year and Club of the Year Competition;
- C = Children's race (100 metres)
- Leinster Swimmers in the men's or ladies' races must be a member of a Swimming Club not Special members Swim Ireland.

Wetsuit Races:

- W = Wetsuits Race for Special Members
- Wetsuits are allowed and swimmers can be Special Members of Swim Ireland;
- Swimmers in the wetsuit races must register by Tuesday (New link will be published)
- Races not handicapped, all swimmers (men and ladies) start together, no points or prizes awarded.

Number of Competitors in Sea Swims

Comparison between 2018 and 2015 Seasons

Open Sea Race	Males 2018	Males 2015	Females 2018	Females 2015
<i>Low Rock Race</i>	215	170	137	71
<i>High Rock Race*</i>	151	182	81	95
<i>Island Swim**</i>	179	94		
<i>Liffey Swim</i>	338	266	179	116

* The lower number of swimmers in 2018 in this race was due to challenging sea conditions

** Island swim is a mixed gender swim. Figures given are for total number of swimmers

The secretary
An Bord Pleanála
64, Marlborough St
Dublin 1

Re: Current application ABP 301908-18

Applicant: Irish Water

Planning Application for the development of the Greater Dublin Drainage project, consisting of new Wastewater treatment plant, Sludge hub centre, Orbital sewer & Outfall pipeline & Regional Biosolids storage facility

Dear Sir/Ma'am

As some of the hundreds of swimmers, who regularly swim in waters off the Malahide coastline, from Low & High Rock (and who have up to now, enjoyed the healthy pastime of open water swimming all year long), as well as those elite swimmers who regularly train for challenges such as the English Channel, in the waters between Lambay & Low Rock, along the coast between the Velvet strand & Malahide, and to & from Irelands Eye, we wish to object to the above planning Application, Ref: ABP 301908-18

We enclose a cheque for the fee for inclusion as observers in the planning process- €50.00

We understand the proposed treatment is aimed to eventually discharge 13 million litres per hour, by 2050 taking sewage for 2.9 million people, from the East Midlands, as well as greater Dublin - the treatment proposed is secondary, only (not tertiary), as behoves a modern society.

As all year round swimmers, we are aware of the impacts of even minor breaches in the sewage system can have on the water quality here; we can literally taste the poor water quality when swimming & are acutely aware of even minor discharge issues, as they occur, up to now.

Therefore we are dismayed at the prospect of the discharge of particulate waste & basically treated sewage matter to further pollute the seas we swim in - discharge of this magnitude will close down our habitual swimming venues, & reduce the seas to dead media into which no swimmer can safely swim.

The waters of the Irelands Eye, Lambay & Malahide coastline are of pivotal importance as they also contain spawning grounds of some of our fish species

Therefore, we wish in particular to voice our repugnance to this threat to our coast, the sea life cycle, & to the SAC & SPOs around this section of the Fingal north fringe -

Yours Sincerely

Nicki Gilliland
12, Asgard Park
Howth

Maurice Mullen
82, Sonesta
Malahide

Eileen Cantwell
The Brook
Windgate Rd
Howth