

An Bord Pleanála Oral Hearing

Additional submission

by

Philip Swan

My Name is Philip Swan and I represent the Face book Page, Portmarnock Drainage Awareness, we over 940 supporters & followers. I set up the page in 2013 as an immediate response to first hearing about this monster sewage plant and not in 2011 as those in Irish water would wish the board to believe. The Page was set up to inform people in Portmarnock about the proposed monster sewage plant.

I along with 83 other households have also lived for over 40 years less than 100 meters from Baldoyle estuary and I have spent 40 years watching the tides ebb and flow on a daily basis.

Since being involved with this project in 2013 both myself and others have realised 2 main points

- 1. A new sewage system may be needed at some stage**
- 2. The proposed project has the potential to wipe out the velvet strand in Portmarnock, Baldoyle estuary SAC, Ireland's eye SAC and Howth Harbour.**

Because we were never asked, I will tell you what we want, and this has always been said from day one, we want smaller plants built to the best standard available. It always surprises me how Ireland were the first with the smoking ban & the plastic bag tax yet fall way behind when it comes to dealing with our waste in a proper sustainable manner especially in our nation's capital.

Instead of building a monster sewage plant that nobody wants, beside a highly populated area, to discharge beside a largely protected area, beneath a flight path that welcomes millions of tourists every year just to enhance some ego in

Irish water, why not build smaller plants that can be shut down and contained if there is a malfunction. Portlaoise upgraded their plant to tertiary level and it was very welcomed, sustainable and something to be proud of, why can't our nation's capital do the same considering we will be processing most of the nation waste in a coastline area of less than 20km.

What we were told was that Irish water had explored every avenue and had chosen the best possible solution and located it in the best possible place, yes perhaps as a fee-paying desk exercise it looked good, but when in 2011 it hit 11,000 plus objections from the people in Portrane and surrounding areas. Irish Water then changed to the southern site beside Clonsaugh, a highly populated community, and to add insult to injury this massive sewage plant would discharge right beside several SAC's that are protected by law and a short distance from the jewel in the Fingal crown Portmarnock's velvet strand which holds the only blue flag in our capital if not the east coast. These locations were not chosen because they were the best but were only chosen because at the time, they presented the least resistance in relation to public observations.

For some reason those effected on the Northern site seemed to have been notified about the plant and were able to submit observations even before most of us at the southern site heard about it.

I would also like to see the extensive research into building new smaller plants, surely this information would be readily available after what I can only image a huge amount of man hours was billed to produce the same amount of drawings and reports that were done for the larger plants to make a fair and accurate comparison.

We were also told after the public consultation in 2013 that Irish water would prepare and submit the application in 2014, but when they met with a further 13000 plus objections from those of us at the southern site it was delayed by another 4 years.

I would also like to note that even though the correct term was observations during the public consultation period in 2013 the majority of the 13000 observations made by members of the public were submitted with the intention of being objections. I would ask that the board strongly consider these submissions as most people were under the impression that not only did

these objections matter but that it was a closed case considering we did not hear any more about it until 2018.

It has also been stated that all relevant stake holders were contacted and are in favour of the plant, but as seen already this week, this does not seem to be the case. I would also like to note that had Irish water met and listened to the majority of stakeholders and by that I don't mean other government bodies but the general public that this plant effects the most, if that was the case we would not be sitting here today, and a number of smaller plants would have permission granted already.

The recent failure in Ringsend was just one of many to happen since this project started and yet Irish Water still don't seem to know how to deal with plant malfunction and yet they are still given the job to build a monster sewage plant. The report into this malfunction suggests that it was partially treated sewage and caused no real treat. But someone is missing the point here and that is, even though upgrade works have been carried out to the Ringsend plant under the watchful eye of Irish water, a Malfunction happened, not a near miss situation but a malfunction where something that was not supposed to happen, happened.

We also saw a different malfunction happen in a much smaller plant in Balbriggan that caused raw untreated sewage to be discharged into the sea, resulting in all the beaches in Fingal to be closed for a period of 2 to 4 weeks, and was only discovered by a man walking his dog that put a call into Fingal. Malfunctions did happen, do happen will happen and Irish water building a pipe with a design discharge of 78000 litres per hour is not only reckless but a complete disregard for the area they propose to operate in, which happens to be protected under European Law. 78000 litres of untreated sewage per hour if released even over a short period will have nothing more than catastrophic effect on our environment. With the extremely sensitive area surrounding the outfall pipe we cannot permit this, we cannot take the chance. Nor will anyone person when it fails be held accountable and for that reason alone it should be stopped dead in its tracks.

Those involved in the implementation of this project from day one at every opportunity have tried to convince us that there would be no smells, no pollution and no failure. They even arranged trips to a much smaller plant in Bray, but we know what smaller plants look like we have more than a dozen

scattered around us, and with the proper treatment we welcome more of them, but not a monster sewage plant.

When they held an open day in 2013 at Fingal office the engineer who headed up the project was unable to answer the basic questions put to him. Surely an engineer involved in such an enormous project would be able to instantly quote the capacity of the pipe along with other relevant details asked of him at the time. But then again how could he when it wasn't even fully designed which is evident from the recent tender document on e-tenders looking for a company to design, build, test & commission the proposed orbital sewer. The closing date for this tender has been extended to the 28th March 2019.

How can any of the information in relation to the orbital sewer contained in the Environmental impact statement be at all relevant when it's not even designed or even have a capable design team selected? I thought this had been designed by a team of experts already in place during the past 4 years, but it appears not to be the case. This is most likely the reason we still have not received proper costing on the project. All we have received are vague costings ranging from €500million to €1.4 billion which has a familiar sound and a lot of scope for error.

Can I also ask if the outfall pipe from Baldoyle bay to Ireland's Eye is included in this tender for the orbital sewer? If this is the case, then most of the documents contained within the environmental impact statement report are based only on unknowns and are irrelevant and misleading.

I would also ask if the proposed sewage plant is out for public tender or will it be put out for public tender and if so, does that also include Design, build, test and commission.

Last week a document was circulated from Irish water stating that they had researched plants all over the world and were satisfied this was "the best technology available" even though as we have been told from day one it is only being treated to secondary standard. Last week we were informed that the standard of treatment will be increased by adding a UV process, which is even better than the best already proposed. A knee jerk reaction to safeguard the granting of a permission. A knee jerk reaction is not something we can hang the future of our environment on, and surly this would require a further planning application as it was never detailed in the advertising required to make an application valid.

One of the plants that was researched was the Mudgen plant which was only upgraded in 2013 which begs the question how they could research a project of this magnitude, when the very same plant was only completed in the same year as the southern site was chosen. A simple Google search will show that while this plant was in its infancy it had a malfunction in relation to odours resulting in a court case being lost for the company that operates the plant. Let there be no question who will be paying the fines from Europe when the plant in Clonsaugh fails, as tax payers, everyone in this room.

I would also like to note that the Mudgen plant was originally built between 1931 and 1935 and the Ringsend plant was built in 1906 both in a time when the experts didn't have the same understanding about public health as we do today and as a result nobody had a problem building beside residents. To build a new plant on a green field site beside a highly populated area is setting us back easily a hundred years.

I would also add that the sites listed by Irish water as being researched are not located or discharging in or around sensitive sites that are protected by law, so there is no true comparison.

While attending the hearing last week I looked at some of the drawings on the wall around the room. Two in particular took my attention one showing the site plan of the proposed sewage plant that had all text "Future expansion" taken off the drawing and yet this was on the original application submitted. I also note that in section 21 of Ms Sarah Kiernan report that she states no further increased demand from proposed development and population growth in the area would have any effect, so why is there room for expansion. I would ask the board if in the unlikely event they do happen to grant permission that a condition of no future expansion be allowed. Irish water has reduced the loading on this application, they added UV treatment in the last week, all a ploy to get it through the planning process, then when the dust settles reapply for a larger plant at a later stage with the possible omission of UV treatment they recently added. If this does happen it makes a mockery of the whole planning system.

Also the other drawing I refer to shows a pipe in a trench with a radius of probably 600mm which would be normal for a road side sewer, however the proposed sewer is somewhere between 1.8 and 2.4m in diameter, I feel that

this drawing in full view of this hearing is misleading in forming opinions of those attending and should be removed.

Under the EPA wastewater manual 1997 the permitted suspended solids allowed are 35g per litre, by my calculation and as submitted in my original objection, I calculated this as almost 2000 metric ton of suspended solids coming in on the on rising tides each year. I welcome any correction on this.

The Environmental impact statement report states that the plume will discharge well in advance before reaching land, however surely solids by their nature don't dissolve. My concerns are in relation to these solids silting up Baldoyle bay and while the modelling shows the area around the outfall pipe it does not seem to include any modelling from undissolved solids that have the potential to travel as far as Baldoyle bay on the north south moving tides.

I enclose some photographs of Portmarnock beach that I believe highlight my concerns.

Photo 1: modest amount of shells that would be normal on Portmarnock beach.

Photo 2: zoomed in photo to show ratio of razor shells to ordinary shells.

Photo 3: Reference photo in relation to Ireland's eye.

Photo 4: Entrance to Baldoyle Bay, across from Sutton Golf Course showing large objects washed in.

Photo 5: Entrance to Baldoyle Bay with similar quantity of shells to photo 1.

Photo 6: Inside Baldoyle bay looking back towards Portmarnock golf club showing a higher concentration of shells getting trapped inside the bay.

Photo 7: Zoomed in photo of razor shells that were washed back from the razor clam beds.

Photo 8: Further examples of large objects being washed in adjacent to Portmarnock golf club at Baldoyle bay.

Photo 7 shows razor shells that were more than likely harvested at the razor clam beds north of Baldoyle bay. Again I would like the board to compare

photo 1 to photo 7 in terms of quantity of razor shells and final location. I believe this proves that tidal movement brings a lot of debris into Baldoyle bay and the fact that it remains in place on a low tide would suggest that a large part of the 2000 metric ton produced each year would make its way back into Baldoyle bay and put it at a serious risk of silting up. If this bay does silt up not only does it put in danger the Baldoyle SAC it also has potential for flooding to occur towards Portmarnock village around the entrance roundabout to Portmarnock, an area Fingal county council are constantly battling with during high tides and storms. I can only imagine the 1000 plus houses proposed at St Marnocks Bay along with the potential silting up of Baldoyle estuary could possibly render the kingfisher green in Portmarnock village undesirable for the protected visiting Brent geese each year.

I would also like to record with An Bord Pleanála and Irish water that the present flood protection that was put in place by Fingal County Council located on the Golf Links road in Portmarnock is currently working, however if the proposed cycle way proceeds along this route resulting in adjustment to the bank along with possible silting up of the estuary this may not be the case. This could have the potential to endanger 83 existing houses along with it 300 plus residence some of which are old age pensioners, many of whom are young families.

I would also like to note that all your reports and modelling do not record what I see as I look out my front window 365 days per year for 40 years.

Unless the board can satisfy themselves 100 percent that this will not happen, I would strongly appeal to them to reject this ill thought out plan for a monster sewage plant that nobody wants.

Submission end.



Photo 1 modest amount of shells that would be normal on Portmarnock beach.



Photo 2: Zoomed in photo to show ratio of razor shells to ordinary shells.



Photo 3: Reference photo in relation to Ireland's eye.



Photo 4: Entrance to Baldoyle Bay, across from Sutton Golf Course showing large objects washed in.



Photo 5: Entrance to Baldoyle Bay with similar quantity of shells to photo 1



Photo 6: Inside Baldoyle bay looking back towards Portmarnock golf club showing a higher concentration of shells.



Photo 7: Zoomed in photo of razor shells.



Photo 8: Further examples of large objects being washed in adjacent to Portmarnock golf club at Baldoyle bay.