

Our Ref: ABP-301908-18



Dr Alex McDonnell  
Kildara  
Mc Creadies Lane  
Dublin Road  
Malahide  
Co. Dublin

Date: 20th August 2018

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility  
Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City

Dear Sir

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Dublin City Council and Fingal County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

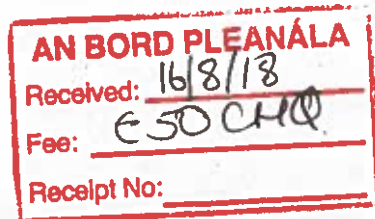
Yours faithfully,

  
Kieran Somers  
Executive Officer  
Direct Line: 01-873 7107

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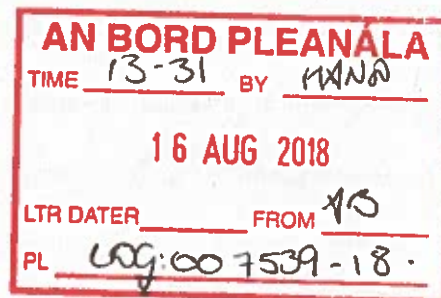
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Dr Alex McDonnell  
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The Secretary  
An Bord Pleanála  
64 Marlborough Street,  
Dublin 1



**Re:** Planning Application for the development of the Greater Dublin project, consisting of a New wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and Regional biosolids storage facility located in County Fingal and Dublin City.

Dear Sir/Madam,

The proposed plant presents a number of concerns and issues. Firstly, planning permission was soundly rejected during the consultation period by ways of non-statutory observations by residents of Malahide, Portmarnock and Howth in 2013. Surely, if the will of the people has spoken, why does it need to repeat itself yet again? Of course despite these 13,500 Plus objections, the motion to remove the sewerage plant was voted against by councillors such as Antony Lavin and Ted Leddy et al. Perhaps this time they will vote differently with the next election cycle in mind?

However, to get into the meat of the argument, the proposed plant engenders a significant pollution risk which is unacceptable. Given the well documented odour problems that have plagued the Ringsend plant and the fact that it failed to meet the EU waste water treatment directive standard, why should we expect things to be any different with such a track record of incompetence? Furthermore, the issue of size comes into play. The Ringsend plant was designed to service 1.7 million people yet ended up

treating the waste of 1.9 million, as Industry waste was predictably underestimated thereby leading to the noxious odour problem. This proposed plant is "meant" to service only 500,000 people yet based on prior evidence, there is significant reason to expect that similar problems will arise.

The proposed plant will only treat water to a secondary standard, rather than a tertiary one to future proof against environmental problems. This is simply unacceptable and courting catastrophe.

Furthermore, the likely potential of sewerage run off into the protected Baldoyle Bay Estuary and Ireland's Eye will be in breach of the EU habitat Directive. The threat to public health and the probability of the government withholding relevant information on this matter, which will come to light at some point as has been demonstrated countless times in the past, will constitute a humanitarian crime, not to mention a tragedy for those affected.

Given the issue of climate change and anomalous weather events such as this year's heat wave, the "Beast from the East" in March and so on, this proposed plant poses further "externalities" which would be the apex of foolishness to ignore. If weather events cause something to go wrong, or if indeed something does go wrong as a result of negligence or mismanagement (something we can reasonably expect from Irish Water based on prior experience), the environmental and public health costs will be enormous. Take for example, the failure in the smaller Balbriggan plant that went undetected for 24 hours and pumped raw sewage into the sea resulting in beaches being closed. If this happens with the new plant over a 24-hour period, we are looking at over 300,000 metric ton of raw sewage that will take years to correct based on other plants around the world that have also failed. This then leads into another issue about the lack of redundancy systems to compensate for potential critical plant failures. Surely a system of waste treatment plants, which can be individually isolated without causing detrimental environmental effects and strategically distributed to serve local areas, is the more logical and cost effective solution? To add insult to injury the proposed plant will be located near beaches which have Blue Flag status.

If anything this proposed plant is poorly thought out and is being rammed through the planning permission process due to a lack of foresight, imagination, intellect and wisdom as demonstrated by

Jarfe Chambers and her enablers such as Eoghan Murphy, who clearly is unaware of Tertiary standards or simply does not care (most likely the latter). Why should we then tolerate this level of incompetence from such individuals if it threatens our economic and environmental interests? Even on a purely cynical level, the public relations fallout for the current Fine Gael government will be immense. This proposed plan is born not only from an aforementioned lack of intellectual rigour, it is also a mule headed reactionary stance against the public, which therefore renders it worthless. That the aforementioned proposed plant has been soundly rejected again and again confronts us with the question as to whether the determination of Irish Water to follow this through constitutes an Ahab-esque obsession, which like Melville's titular character, will be met with disaster.

Yours Faithfully

*Alex McDonnell*

Alex McDonnell, PhD, MSc, BA



