Our Ref: ABP-301908-18



Catherine McMahon 69 St Anne's Square Portmarnock Co. Dublin

Date: 27th 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 Madam

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.

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 7 Executive Officer Direct Line: 01-873 7107

Teil Glao Áitiúil Facs Láithreán Gréasáin Ríomhphost Tel LoCall Fax Website Email (01) 858 8100 1890 275 175 (01) 872 2684 www.pleanala.ie bord@pleanala.ie

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The Secretary An Bord Pleanala 64 Marlborough Street Dublin 1 Velvet Strand Sea Swimmers & Beach Users C/o 69 St. Afme Schare PLEANALA Portmarnocky Co. Dublin. BY

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Re. Strategic Infrastructure Development Planning Application for the development of the Greater Dublin Drainage 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

Applicant: Irish Water

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Dear Sir/Madam

We wish to make a submission in relation to the above mentioned planning application. We are a group of regular all year round swimmers who swim primarily at the Velvet Strand Portmarnock. On occasion we swim off High Rock which is north of Portmarnock beach heading towards Malahide. There are other year round swimming groups along Malahide / Portmarnock coastline – The Low Rock swimmers, High Rock swimmers and Portmarnock South End swimmers. € 50 fee enclosed.

It is with horror and distress that we reviewed this application. As none of us are environmental scientists or marine biologists we can only make this submission in layman terms.

• Portmarnock is the jewel in the crown of Fingal County Council. Climate change is bringing hotter summers, as is evident this year, which leads to tens of thousands of people flocking to the beach. It is a natural amenity that we are blessed to have on our doorstep and as locals it is our job to protect and enhance this environment for future generations. It is a vital part of our community, central to the identity of the area. If this project is given permission in what state will Portmarnock beach be in 5, 10 or even 20 years time?

What commitments are Irish Water prepared to make to keep our beach in the condition it is in today?

Are Irish Water planning to outsource the management of the plant, associated works, pipeline and outfall?

The Velvet Strand has attained Blue Flag status for many years and is the only beach this year to have attained Blue and Green Flag standard on the east coast of Ireland.. This means we not only have excellent water quality but community participation in achieving these honours. Our Blue Flag is something we are very proud of and we liaise with Fingal County Council throughout the year carrying out clean-ups etc and alerting them to issues which could affect our Blue Flag status. There is no denying a Blue Flag is good for tourism and people will travel to and holiday at beaches with Blue Flag status. This year our swimming group travelled to Achill to swim at its 5 Blue Flag beaches. It seems stupid and short sighted to locate the pipeline and outflow for a sewage plant in close proximity to such a valuable environmental and social natural resource.

What is the rational in placing the outflow so close to this Blue Flag beach? Why not 10km, 20km from beach?

Maybe we missed it, but we didn't see any mention in the application of how people are going to be affected by the above proposal. Looking at the bigger picture, this issue is not just about Portmarnock but about all communities along the course of the proposed pipeline. People's lives are going to be affected in a negative way and no regard seems to have been given to this. We enclose a copy of our book Portmarnock Uncovered as part of our submission as this best illustrates how much Portmarnock beach is used and enjoyed, not just by us but by the larger community of Dublin, along with tourists, sport clubs, water sport enthusiasts, dog walkers, horse riders, schools and Summer projects, to name but a few. The Summer Projects are groups of children, many from inner city areas or suburban areas who are brought to Portmarnock by community leaders to experience the wonder of the Velvet Strand.

Why was a study not carried out to investigate the effect this project will have on beach users who come from all over Ireland and all parts of the World?

Another concern of ours is the proposal indicates sewage will only be treated to secondary standard. No matter where an overflow/outflow pipe is located, tertiary standard with more stringent treatments are the only options if our government is serious about meeting EU standards, directives and regulations going forward. The fact that tertiary treatment has not been proposed must be questioned as it will be too late to do anything later if an environmental disaster occurs. As year round swimmers who submerge ourselves daily in the sea water off Portmarnock we want to be sure that we are not ingesting anything that could affect our health. Sea swimming is more than a recreational activity for the thousands who brave the waters throughout the year. It is a physical, mental and emotional therapy that is a lifeline for many. All our lives will be radically changed if bathing water quality is not to the high standard we are used to and have a right to.

Can you assure us that there will be nothing in the discharge that could affect the health of anyone who swims, paddles or even plays on the sand or in the rock pools? Can Irish Water ensure that all people will be able to continue to safely use the sea and beach?

What studies have been done to assess health issues that could arise from sea contamination?

- As this proposed infrastructure development has not been highlighted enough in the media many people and businesses do not know anything about the GDDP. Site notices have only been erected at the southern end of Portmarnock beach which is a quieter section of beach and frequented mainly by locals. Summer beach visitors usually go to the northern end of the beach and would not have seen the site notice. We ask that a decision is put on hold until this issue is discussed in the media, giving all residents of Dublin and the wider area the opportunity to have a say.
- We question the wisdom of the whole project and going back to when the GDDP was proposed many years ago with a proposal of 6 sites, we made a submission on behalf of our group. At that time all sites proposed had an outfall at sea.

Have other alternatives to sea dumping been investigated? Have successful solutions to sewage treatment in other Countries been researched?

- The proposed outfall flows directly into a Special Area of Conservation. Again the logic of locating the outfall here must be questioned.
- What precautions are Irish Water proposing to take to ensure that there is no loss of water quality at the dredging/dredge and fill of the seabed stage?
- Have Irish Water come up with a Plan B if all fails and there is a plant breakdown or electric power cut?
- Is the plant to be monitored remotely?
- What procedures are in place if untreated or partially treated sewage is discharged?
- What is the lifeline of the pipe?

• How often is maintenance work to the pipeline and outfall to be carried out? Is the outfall to be monitored daily?

Weather plays a big part in what washes up on our beach. Normal sea motion will bring in seaweed, jellyfish, pumphouse plastics (if there has been an overflow) and dumped plastics. When we have easterly winds we have an added amount of debris. Our concern is that effluent from the proposed outfall will end up on the beach. The recent storms – The Beast from the East, Ophelia, etc caused devastation to our coastline. Huge numbers of shellfish and starfish, along with seaweed and plastics, were churned up from the seabed and washed up along the beach. Sand was washed out exposing the rock bed. Sandhills were broken down and devastated. The beach was like a disaster zone. Climate change is happening. We are experiencing more adverse weather conditions, more, and stronger, easterly winds, higher and stronger waves and swells.

What effect could adverse weather have on the proposed discharge from the outfall? What effect could our normal weather and tidal conditions have on the proposed discharge from the outfall?

Our fear is that it will all end up on the beach. How can Irish Water guarantee that it won't and how can they guarantee this into the future?

• In light of the appalling record Ireland has with its inability to meet EU

Environmental Standards and Directives in many fields, and most recently at the Ringsend Waste water Treatment plant, can Irish Water assure us and the Irish people that this particular project can commit from the outset to attaining and maintaining the highest EU standards, regulations and directives?

Catherine McMahon Catherine McMahon

17 August 2018

On behalf of the Velvet Strand sea swimmers and all those who have engaged with us on this topic.

Signatures attached Portmarnock Uncovered Book attached.

Planning Application for the development of the Greater Dublin Drainage 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

Applicant: Irish Water

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Applicant: Irish Water

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Objection to -Planning Application for the development of the Greater Dublin Drainage 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

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Portmarnock Uncovered is a collection of articles that Catherine McMahon & Betty Ennis wrote over a nine year period starting in 2004. The initial article was written as a space filler for the local parish newsletter, called *Progress*. It turned into a regular monthly article based on what the pair got up to, who they met, environmental issues, planning issues and a lot of other stuff. Ten years later they were still sharing their lives with the people of Portmarnock through their writing.



They both went through life changing experiences in 2012 that inspired them to put this book together. It started off as a small book of memories for their children and grandchildren but it quickly took on a life of its own.

Whilst this book is a history of Catherine & Betty, it is also a recent history of Portmarnock, the people who live there and the wider community. The photographs in the book will bring a smile to your face and help recall nostalgic moments and memories of people and events which are already a part of history.



Front cover photo courtesy Gerry Dunne Back cover photo courtesy Mary Norris

