

Our Ref: ABP-301908-18



Charles Heasman
6 Mourne Drive
Skerries
County Dublin

Date: 21st 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.

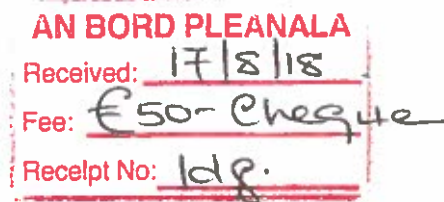
If you have any queries in the meantime, please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-873 7107

An Bord Pleanála
64, Marlborough Street
Dublin 1

Charles Heasman
6, Mourne Drive
Skerries
County Dublin



16th August 2018

Re. Greater Dublin Drainage Project, Ref no 06F.PCO152

Dear Sirs,

I am submitting this objection on the instructions of the North East Razor Fishermen's Association, a body representing the interests of some 70 fishing vessels currently fishing for razor clams on the East Coast of Ireland.

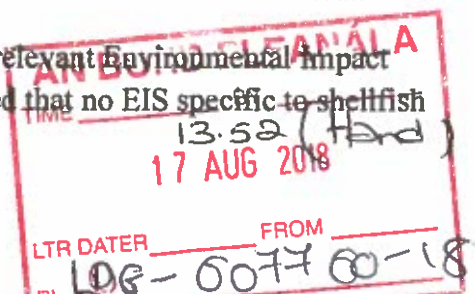
The razor clam fishery is of vital importance to the East Coast inshore fleet, not only providing much needed employment for the families involved and sustaining local maritime communities but also supplying a multi million euro export market for Ireland.

There are four designated shellfish production areas on the East Coast, one of which is the Malahide production area, and the outfall for the proposed scheme will fall right in the middle of same. Like all the production areas, Malahide is regularly tested and monitored by the Sea Fisheries Protection Authority and is currently of 'A' status, meaning that razor clams are fit for the live (and most lucrative) export market. Should this change, the fishery will be seriously devalued and the consequences will be disastrous for all involved.

We have previously been given verbal assurances at a meeting with the project engineers that the outfall will not impact the fishery, but we nonetheless have grave concerns. Paramount among these are the possibility of storm surges leading to untreated run off and, worse, potential high levels of pollutants due to the lack of tertiary treatment in the proposed scheme.

At present the latter does not present a problem, if only (and presumably) because waste water is currently discharged in smaller quantities up and down the coast thus diluting the effect. Our concern is that if all the waste from the Greater Dublin area is discharged into one spot, the middle of a shellfish production bed, the result might be very different. Given that the catchment area includes all of the industrial sites of Dublin this is a serious threat.

At our meeting the project engineers assured us that the relevant Environmental Impact Studies had been done, but on closer questioning admitted that no EIS specific to shellfish



had been carried out. Given the well known propensity of shellfish, particularly filter feeding bivalve molluscs such as razor clams, to absorb toxins where present this is a serious oversight. We would therefore propose that such a survey should be carried out before construction begins and would further request written confirmation of the results of the survey.

I would like to end by saying that this association is not against the much needed improvements to our wastewater systems; on the contrary we welcome same, clean seas are in everybody's interest, ours more so than most. It would only be a pity to undertake such an ambitious project and get it wrong.

Yours sincerely,



AN BORD FLEANNALA	
TIME _____	BY _____
17 AUG 2018	
LTR DATER _____	FROM _____
PL _____	