

Our Ref: ABP-301908-18



Cian O Callaghan
5 Campbell Court
Main Street
Howth
Co. 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.

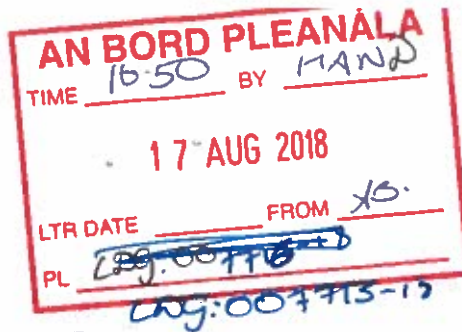
More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

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
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Submission Strategic Infrastructure Greater Dublin Drainage Project

Critical Infrastructure

This planning application to provide waste water infrastructure is of critical importance for the future development of the greater Dublin region. Without additional waste water treatment, we will not be able to construct homes that are badly needed and planning applications for industries providing jobs and much needed investment would have to be refused. However, it is equally important that the proposed Waste Water Treatment Plant and proposed outfall are constructed to the highest standard so that there are no negative impacts on local residents and our important coastal amenities.

Zero Odour Omission at Waste Water Treatment Plant

The plant should be built to the same standard as the waste water treatment plant at Shanganah near Killiney to ensure that there is a zero-odour omission policy. This will protect local residents in nearby communities of Darndale, Belcamp, Coolock, Riverside, Clonsaugh, Balgriffin and Belmayne.

Impact on Water Quality

The proposed waste water outfall is predicted at Flow to Full Treatment (FFT) level to have a slight impact on the receiving waters, local to the proposed outfall under the following headings:

- Dissolved Inorganic Nitrogen
- Molybdate Reactive Phosphorus

This is not acceptable, and the waste water should be subject to tertiary treatment to prevent this impact on local waters.

Furthermore, the modelling and maps produced as part of this Environmental Impact Statement are provided on a very small scale and do not provide any information about where and how the plume of effluent will move in the local area. This detailed information should be published, and members of the public should be given the opportunity to submit comment thereafter as part of this planning process.

There is significant use of the sea and bathing waters in close proximity to the proposed outfall especially at Balscadden Beach Howth and to a lesser extent at Ireland's Eye and at the designated bathing waters at Claremont Beach, Howth, Burrow Beach Sutton and the Velvet Strand, Portmarnock.

Impact on Balscadden Beach

It should be noted that the unanimous view for some time of the Howth-Malahide local electoral area councillors has been that Balscadden Beach should be a designated bathing water. This view has not been implemented by the Executive of Fingal County Council despite increased numbers using Balscadden beach on a daily basis throughout the year and significant numbers over the summer months. The impact of the proposed waterfall on water quality in these areas must be taken into consideration. The EIS does not provide specific information about potential impacts at Balscadden Beach.



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Blue Flag Status at Velvet Strand Portmarnock

The Blue Flag Status of the Velvet Strand, Portmarnock must not be compromised by the provision of a waste water outfall to the North East of Ireland's Eye. It is worrying that the blue flag status of Killiney Beach has been lost over the last two years which is located close to the outfall from the Shanganagh Waste Water Treatment Plant.

Location of proposed outfall 1 km from Ireland's Eye

The proposed outfall is to be located just one km north east of Ireland's Eye. This area is used for swimming. Annual organised events include the Howth Aquathon Series and the Leinster Open Sea Swim which has been running for 88 years. The outfall should be located significantly further to the East away from Ireland's Eye and the other waters used for bathing to protect this local amenity and to ensure a stronger dispersal of effluent in deeper waters away from the Coastline and waters used for swimming.

The modelling cited in the Environmental Impact Statement shows that the proposed location is preferable to other locations that were looked at to the West (closer to Portmarnock and the shore). However, there was no examination of locations further to the East.

A new Environmental Impact Statement which examines and compares the proposed outfall with alternative locations to the East and further away from Ireland's Eye and Balscadden Beach is required. This should be published and thereafter members of the public should be given an opportunity to comment.

Discharge of untreated waste water at Doldrum Bay Howth

A condition of any grant of planning permission for this proposed waste water treatment plant and outfall should be the connection of the untreated waste water at Doldrum Bay Howth to the main waste water treatment network. This continued pumping of untreated sewage directly into the sea should not be tolerated and the failure of Irish Water to carry out these works as they are required to do under the terms of the waste water discharge licence for the Waste Water Treatment Plant at Ringsend is unacceptable and undermines public confidence in waste water treatment.

Community Benefits Scheme

Given the level of economic deprivation in the adjacent areas of Darndale and Belcamp the Community Benefits Scheme that forms part of this application should be amended to better serve the local community, youth and sport organisations especially in these communities.