

Our Ref: ABP-301908-18



Donna Cooney
Dublin Bay North Green Party
Clontarf Area Rep.
4 Victoria Road
Clontarf
Dublin 3

Date: 16th 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
Executive Officer
Direct Line: 01-873 7107

Strategic Infrastructure Development Section

An Bord Pleanála

64 Marlborough Street Dublin 1

D01 V902

13/08/2018

Irish Water Limited¹

Greater Dublin Drainage Project

AN BORD PLEANÁLA	
TIME	12.35 BY hand
14 AUG 2018	
LTR DATE	FROM CC
PL	LDG-007470-18

AN BORD PLEANÁLA	
Received:	14-08-18
Fee:	€50 card
Receipt No:	

Route of outfall pipes:

The proposed outfall pipeline route will consist of a land based section (Clonshagh to Baldoyle), a marine section (Baldoyle to Ireland's Eye) and a multiport marine diffuser. The proposed outfall pipeline route (land based section) will commence at the proposed WwTP and will be routed in an easterly direction towards the coast between Baldoyle and Portmarnock. The lands along the length of the proposed outfall pipeline route (land based section) are generally open fields and agriculture is the main land use pattern. There are no environmentally designated sites within the proposed outfall pipeline route (land based section). The route across Baldoyle estuary which is a particularly important biosphere with salt marches and it would be extremely sensitive to damage by pollution or by physical disturbance in pipe laying. I would propose an alternative route would be the best protection for the estuary; it is a rare habitat of protected flora and fauna.

The proposed outfall pipeline route (marine section) will commence at the R106 Coast Road, north of Baldoyle, and will be routed in a north-easterly direction across Baldoyle Estuary to the public car park immediately north of Portmarnock Golf Club, where it will turn in an easterly direction and will terminate approximately 1km north-east of Ireland's Eye.

The proposed multiport marine diffuser will be located on the final section of the proposed outfall pipeline route (marine section) and will consist of a number of vertical risers from the proposed outfall pipeline (marine section).

Water quality under EU bathing water directive

I would question the water quality models, assumptions and conclusions in the EIS

How can increasing discharge of secondary treated sewage to the marine not have a negative effect of water quality.

Stated in EIS: *The proposed outfall pipeline route does not discharge to, or impinge on, any Nutrient Sensitive Waters. Therefore, implementation of nitrogen and/or phosphorus reduction measures are not required.*

I would not agree the marine water environment is not nutrient sensitive.

Replace proposed secondary treatment with tertiary treatment: In the interest of best practice the sewage treatment should be tertiary using UV treatment.

Natura Impact Statement

Project should be subject to Appropriate Assessment (AA) Screening and, where necessary, AA as per Article 6.3 of the Habitats Directive.

The Proposed Project has been assessed to consider whether there are likely significant impacts from the Proposed Project on European Sites. Likely significant impacts could not be excluded for Baldoyle Bay SPA and Baldoyle Bay SAC, Rockabill to Dalkey Island SAC and Lambay Island SAC and Ireland's Eye SPA. Therefore, AA is required to conclude whether adverse impacts upon the integrity of these European Sites will occur.

The NIS found that Density estimates of harbour porpoise were high compared to coastal sites elsewhere in Ireland, and emphasizes the importance of this site for this species as these were some of the highest densities for this species recorded in Ireland to date.

Harbour porpoises and grey seals are both listed on Annex II of the Habitats Directive and are thus entitled to strict protection, including their habitats. Extreme care must be taken to ensure the proposed development does not degrade this habitat or cause undue disturbance to marine mammals. Concerns that proposed mitigating measures will not protect marine mammals from noise from pile driving and dredging. Recommend no pile driving at night or when conditions prevent sighting of harbour porpoise or other marine animals. Explore the use of a remote controlled/robotic sail boat with sonar to identify marine animals in the vicinity.

Recommend larger exclusion zone around Irelands Eye; pile activity to minimum and in the season when least sightings. Alternative location for out-pipe route not fully explored.

Human health and well-being:

A bad odour cannot be ignored and can have a significant effect on the health and mental well-being of humans.

This is a major concern in the locality with over 3500 houses and school, hospitals in the vicinity which includes a hospice for people in the last weeks and days of their life.

Smell/Odour control:

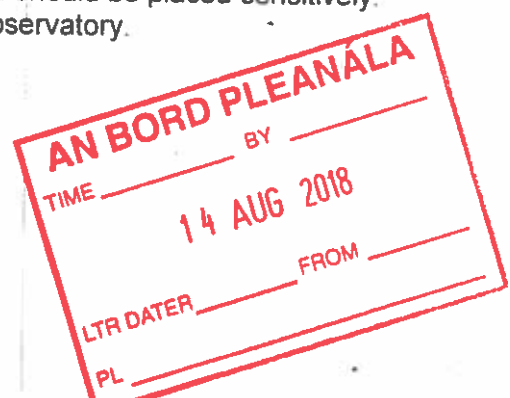
The use of a carbon bed filter using activated carbon both in the sewage plant and on the air vents that are used along the pipe and vent placement as removed as possible from people. Noise from the generator at the pump station, other alternative back up energy solutions need to be explored, solar panels with batteries.

Light pollution:

The lights at the sewage plant may cause light pollution and should be placed sensitively. Also no lights should be placed that could affect Dunsink observatory.

Donna Cooney

Dublin Bay North Green Party



Clontarf Area Rep.

4, Victoria Road Clontarf

Dublin 3

Request an oral hearing

Note: Public consultation was in
2011 huge public interest
in large project.

AN BORD PLEANÁLA

TIME _____ BY _____

14 AUG 2018

LTR DATE _____ FROM _____

PL _____