

Our Ref: ABP-301908-18

PA Reg Ref:

Your Ref: Friends of Bascadden Bay



Friends of Bascadden Bay
C/o Marie Ó'Li
Montebello
Asgard Road
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 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.

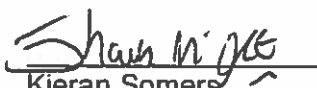
The Board will revert to you in due course with regard to the matter.

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

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Submission from
Friends of Balscadden Bay
to
An Bord Pleanála

AN BORD PLEANÁLA	
Received:	17/8/18
Fee:	€50 Cash.
Receipt No:	

Application under s.37E of the Planning and Development
Act (as amended) for a Sewage Treatment Plan in
Clonsaugh and an Effluent Outfall near Ireland's Eye

17th August 2018

While we are eager to make our submission short and to the point, we will first set out the background of the wonderful amenity we aim to protect and explain the plans we have for the beach, so that you understand our concerns about the proposed outfall.

1. Location - Where is Balscadden Bay?

Balscadden Bay is an area in Howth that lies at the Southern end of the East Pier. It is a small quiet safe swimming area that is situated within a few minutes' walk of Howth village.



AN BORD PLEANÁLA	
TIME	16.45
BY	HAND
17 AUG 2018	
LTR DATE	FROM AG
PL	LOG: 007720-18

It is accessed off the east side of Balscadden Road opposite the site of the former Edros Community Centre.

Access is via concrete steps (approx. 60 in total). The beach is of shingle, stone and sand and extends in length to approx. 150 metres. The remains of a small concrete jetty and boat winch (from a former water skiing club) and an extensive concrete platform/walkway with the remains of an old boat / storage shed and shelter area is still evident there.

Years ago Balscadden Beach was a hive of activity in the community for locals swimming there, children learning to swim, lifesaving classes for young adults, and for fishermen earning their living. It was a place that was used daily and enjoyed by locals and visitors alike.

FOBB understands from anecdotal evidence that Dublin Corporation maintained the Rights of Way during those times.

Further up Balscadden Road, under Kilrock House, access to Fitzers Swimming area has deteriorated due to a number of landslides. It too was traditionally a wonderful location and people would swim back and forth from Balscadden Beach.

II. FOBB - Friends of Balscadden Bay

Friends of Balscadden Bay is a volunteer group of concerned locals who want to see this beautiful amenity improved and preserved for the enjoyment of all the local people and visitors to the area to enjoy. The beach continues to be used daily by swimmers, and non-swimmers who just love to go there to relax, walk on the beach or early in the morning to watch the sunrise.

FOBB see Balscadden Bay as the "gem" in the heart of Howth. It still remains a beautiful, picturesque, quiet and safe swimming area, but over the years has become less attractive. Its usage declined mainly due to the poor Right of Way (the condition of the steps which are very steep and difficult to use).

The situation in relation to the usage of the beach has changed significantly in recent years. The completion of the Dublin Bay Wastewater Treatment Project has now ensured a huge enhancement in the water quality. At our request Fingal County Council has started testing the water and the results on every occasion have been 'not just 'Excellent' (which is <100 MPN E.coli /100ml) but always <10 MPN E.coli / 100ml.

FOBB organises an Annual Community Swim and BBQ on the beach every August and occasionally other once-off events. There is also an Annual Christmas Day Swim at Balscadden that has been in existence long before FOBB existed but has now become so popular that it possibly is the largest attended Christmas day swim on Dublin's northside!

The number of people using the beach throughout the summer has increased substantially with a significant proportion of the tourists visiting Howth being delighted to spend some time on our beautiful beach.

III. FOBB's Vision for the Bay

3.1 Universal Access:

The immediate removal of the inappropriate Fence/Gate at the entry point to the Right of Way to the beach as it contravenes the SAAO conditions.

We are in discussion with Fingal Co Co and other stakeholders about the provision of a universal access to the beach, to facilitate in particular elderly, wheelchair users and buggies. This could be either a boardwalk from the East Pier to the beach, which will be a simple and attractive manifestation of the Right of Way to the beach, or a reworking of the steps to include a ramped access. Engineers' reports have already been produced.

3.2 Cleanliness:

The beach needs to be maintained to an acceptable level of cleanliness to allow residents and visitors to enjoy the amenity on a daily basis.

A cleanliness regime could include:

- 3- 4 user friendly bins on the beach that can be emptied easily
- The installation of a number of recycling bins at the top of the steps.

- An awareness campaign assisted by FOBB to encourage users of the beach to recycle and dispose of their litter properly.

FOBB carries out clean ups of the beach area when required and are delighted that the beach area is now included in the CE scheme and is being cleaned on a regular basis.

3.3

Improvement Programme:

In conjunction with the various stakeholders, an improvement programme to include:

- Install 2 lifebuoy steel frames to hold lifebuoys permanently. Rebuild the existing jetty and install a ladder on it.
- Remove all debris and clear cement platform.
- Install a floating pontoon in the bay during the summer months.
- Build a storage shed or install a storage container on the platform to store swimming and lifesaving equipment. FOBB wish to see the beach life-guarded during the summer months with swimming and lifesaving classes reintroduced for the benefit of the community.
- Right of Way to Fitzer's swimming area further along Balcadden Road to be reinstated and maintained, so swimmers can have access to the rock to dive from to swim back to the beach.
- A ladder and diving board to be installed at Fitzer's.

3.4 Signage:

Develop an agreed approach to signage to and from the beach including:

Install a sign for Balcadden Beach at junction of Harbour Rd., and Abbey St., and also a pedestrian sign for the beach on Abbey St., where the entrance is to the Martello Tower. This is a short cut from the village to the beach for mothers with buggies and older people and has always been the preferred pedestrian way to the beach.

3.5 Blue Flag:

With the redirection of the sewage from the Sewage Outfall on the Nose of Howth the water quality in the bay has improved immensely and as a result FOBB would now genuinely aspire in the coming years to reaching a standard of cleanliness and management that would qualify for a Blue Flag. We are delighted that Fingal County Council recently adopted a policy objective of obtaining a Blue Flag for Balcadden.

VI Our concern about the proposed effluent outfall at Ireland's Eye.

Despite requests from our local representatives, we have not been consulted by Irish Water in relation to their proposed outfall.

Our beach used to be polluted by the sewage outfall at the Nose of Howth. We appreciate that this outfall will be treated to a secondary treatment standard and will be cleaner in microbiological terms than the raw sewage which used to be carried into Balcadden Bay. However, cleaner than the significant pollution we remember, and which drove the public away from the beach, is certainly not an acceptable standard. We insist that our beach retains its excellent water quality. We understand that the proposed new sewage treatment plant will not have any tertiary treatment to reduce the pathogen risk.

We have looked at the information supplied by Irish Water. It does not reassure us. While our water is currently at <10 MPN /100ml, Irish Water's model doesn't consider any concentrations lower than 250 MPN/100ml. This is inexplicable. We believe that the EIA Directive obliges An Bord Pleanála to know what impact the outfall will have on the water we swim in and we understand that the Board has the

necessary power to obtain this information.

We hope that you do obtain this information and we would be eager to comment on it if it is received.

We do not know why this outfall is not being put further out to sea. There is nothing in the documentation which considers that obvious option.


Finally, we do not trust Irish Water. For the entirety of its existence it has illegally discharged raw sewage into Doldrum Bay on the other side of Howth and it continues to defy the EPA who seem to be unwilling to enforce the law.

V. Conclusion

We trust our sincerity and enthusiasm for the betterment of Balscadden Beach as a public amenity is evident from this report. We urge you to ensure that a full assessment is carried out of the impact of the proposed outfall. We are available to give any further information.

We enclose the €50 fee.



 Marie Ó Laoi
Chairperson
Friends of Balscadden Beach
Montebello,
Asgard Road,
Howth,
Co. Dublin