

Our Ref: ABP-301908-18



Peadar Farrell
49 Foxfield Avenue
Raheny
Dublin 5

Date: 23 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.

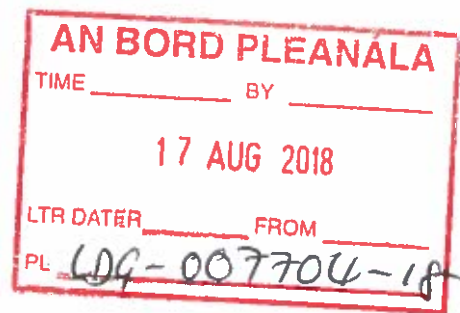
If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-873 7107

49 Foxfield Avenue
Raheny,
Dublin 5

16th August 2018.



REF: Greater Dublin Drainage Project **Case reference: PL06F.301908**

I wish to object to the granting of permission for the Greater Dublin Drainage Project.

Set out below are my objections to the project.



1-0 General objections.

The sea outfall for the entire liquid discharge from this plant is within 5Km of the outfall from the Ringsend sewage plant. The Ringsend plant is also new and "state of the art" but is regularly not working properly with "no swim" notices a regular feature on all the adjacent Dublin beaches during the summer months. There is no reason to believe that this plant will be any different, it's a feature of sewage plants that from time to time they malfunction. The loading of contaminants from both plants should be read as one due to their close proximity.

During a malfunction we the public are only made aware by issued "no swim" notices, but the proposed plant is set to discharge into a special protected area the Rockabill to Dalkey SAC. Such discharges will affect both the protected reefs and the harbour porpoise that we are supposed to be protecting.

There are many reasons for the malfunction of sewage plants, one of the main ones is shock loads arriving at the plant pushing out material that is in the plant before it has time to be treated. In Dublin the storm water is combined with the public sewer and this water also arrives at the sewage plants. I have noted

that the "no swim" notices follow periods of heavy summer rain which is a relatively new feature of our weather.

While much is written about the great efforts at public consultation I believe that it's virtually impossible for members of the public to have the time or technical knowledge to read and understand the many 1000s of pages of detail with this submission.

I believe that this submission is maybe double the size it needs to be with much repetition of facts. I suspect its made purposely long, over detailed and complex to flummox the public.

In virtually every application to ABP where there is a Marine element the argument about the amount of marine pollution, disturbance and water quality is always "proven" by computer modelling. There is Marine work going on constantly around our shore, real time monitoring would be more appropriate, has anyone ever seen modelling failing to prove their case?

The sea floor excavation and associated plumes in the water column, the disruption of the marine creatures especially the Porpoise in the SAC (that was set up to protect them) cannot be taken in isolation. Exactly the same excavation and disruption is taking place a few Kilometres away with the dredging/deepening of a channel into Dublin bay. The amazing solution to this disruption of the Porpoise offered by the "experts" the Irish whale and dolphin group (IWDG) for this project and the Dublin Port project is that the noise of the dredgers and barges will scare the porpoise away. With 2 projects running concurrently the porpoise would soon be running short of waters to escape to.

Once ABP give permission for such a plant that's the end of the matter for the general public, it could be the worst treatment plant on earth but we have then to live with it.

2-0 Detailed objection points:

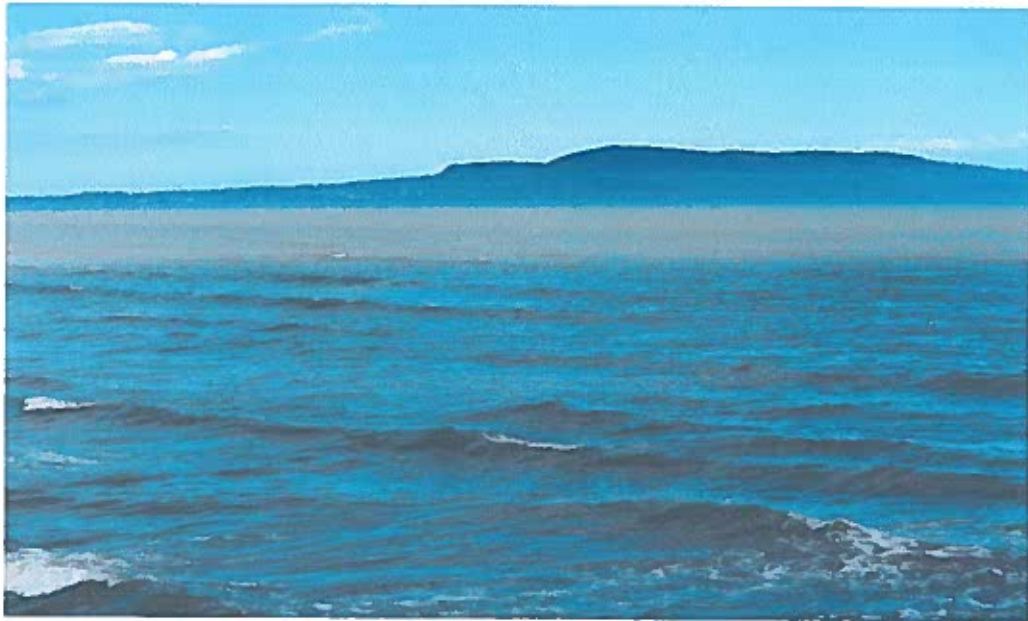
- 2-1 Storage pre-treatment: There is way insufficient early storage capacity designed to cater for "shock "loads arriving at the plant and causing untreated sewage being flushed out to sea.
- 2-2 Sea outfall: No details are given as to how they propose to dispose of the excavated materials from the micro tunnelled section of the outfall from chainage 0,0m to 2000m. No details of storage (pre-disposal) of this material at either end of the shaft are given. How do they propose to prevent leeching from these spoil heaps?
- 2-3 Micro tunnel: Its stated that the micro tunnelling will not be disruptive to wild life but they manage to omit details of the traffic of materials and staff to the shafts, craneage lowering down materials, Bentonite, pipes and removing excavated material. Trucks drawing away the excavation about 6,283 cm that is about 1200 truckloads. The micro tunnel is a major operation of one-year duration. This area is so important that it is covered by Baldoyle SPA, Baldoyle SAC and Irelands Eye SAC with another 6 European sites within a few Kilometres. They have not considered in any detail the amount of heavy duty work involved here.
- 2-4 The Sea outfall 4 Kilometres long: The proposed outfall pipe is to be buried into a trench which it is planned to be excavated out from the beach at Portmarnock out to within 1 Km of Irelands eye. The trench to be 5 Mt deep and with sloping sides, probably an average width of 7m and a length of 4,000m. The volume of material to be excavated is 140,000 cm with a weight of around quarter of a million tons. The following is omitted from the documents, all sea bed marine life for the extent of that excavation will be wiped out/killed during the excavation works. The excavated material will be excavated out onto a barge only later to be dropped back down through the water column adjacent to the pipe trench. All marine life under the dropped material will be wiped out also.

- 2-5 Plume from Sea Bed excavation: On page 66 of the NIS a diagram of the dirt plume from the excavation is shown. This diagram is simply not true, in the tidal current the plume will flow South on the ebbing tide and the plume as shown will flow North on the filling tide.
- 2-6 The water depth from a few 100meters from Portmarnock beach is very shallow. The planned connection and floatation of the outfall pipe is over simplified as the depth for marine vessels simply is not there near the shoreline except at the top of the tide. I expect there to be a lot of churning up of the foreshore with land-based plant in this operation and much greater disruption than that stated.
- 2-7 Marine Diffuser: A photo of a dalek like outfall diffuser is shown with small diameter outlets. They appear to be totally insufficient to allow the volume of liquid to discharge. Is there more detailing to be done on the discharge / diffuser area?

3-0 Natura 2000 sites:

All the local protected sites are listed out and, in the NIS, it states that there will be no impact from the sediment plumes and from the work of dredgers and barges.

This is simply untrue, exactly the same was stated in the Dublin Port application for the Alexander Basin Project (ABP) to A Bord Pleanala. This year (2018) following the dredging and dumping at sea last winter scuba diving could not commence in Dublin bay until May and we witnessed the worse Spring sea water state ever.



I took this photograph on May 5th 2018 at Dollymount.

As a diver I see first-hand that the computer modelling done in this type of application are just incorrect.



I took this photograph in January 2018 at Sandycove. The sea water condition in my view is due to the dredging and dumping done by Dublin Port, An Bord Pleanála allowed this project to proceed.

So, I request that you turn down this project application on the grounds that the entire project will have a detrimental effect on the protected environment of the Irish sea.

A handwritten signature in black ink, appearing to read 'P. Farrell', with a horizontal line drawn underneath the signature.

PEADAR FARRELL peadar.farl@gmail.com

16 – 8 – 2018.