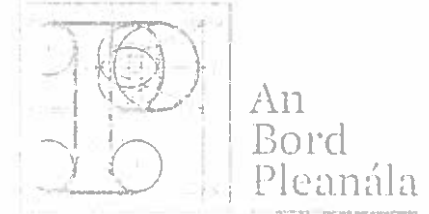


Our Ref: ABP-301908-18



Philip Swan  
8 Strandmill Avenue  
Portmarnock  
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](http://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

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

**AN BORD PLEANÁLA**  
 Received: 17/8/18  
 Fee: € 50 cash  
 Receipt No: \_\_\_\_\_

Philip Swan & Gretta Fahy  
 8 Strandmill Avenue,  
 Portmarnock,  
 Co. Dublin.

The Secretary  
 An Bord Pleanála  
 64 Marlborough Street  
 Dublin  
 16<sup>th</sup> August 2018

Planning reference: PL06F301908

**Re: Greater Dublin Drainage Project Consisting of a new wastewater treatment plant, Sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility.**

To whom it may concern,

Mr. Philip Swan and Ms. Gretta Fahy wish to make a formal objection/observation in relation to the above proposed development as listed below.

### Part 1 Flooding

Having lived in the Strandmill estate overlooking Baldoyle Bay for over 40 years I have observed all types of waste from feathers, to fishing nets to a rowing boat being washed up in the area of Baldoyle Bay adjacent to the Strandmill Estate and Strand Road Portmarnock.

When a person goes missing at sea in the area surrounding Howth, a search & rescue seems to be always carried out at Baldoyle Bay. This is because the rescue service has a first-hand local knowledge of the extremely complicated tides and currents surrounding Howth and leading into Baldoyle Bay. I have stated this to demonstrate the complexity of the tides entering Baldoyle Bay.

Under the Environmental protection agency (EPA) Waste water treatment manual 1997 addition the permitted suspended solids permitted to discharge into a water course is 35mg/L. Based on the design output of 3600L for the proposed plant that would equal 126000 mg per second.

126,000mg	per second
7,560,000mg	per minute
453,600,000	per hour

This is equal to 453.6 kg per hour

453.6 kg	per hour
2721 kg	per six hour rising tide (there are 2No rising tides per day)
5443.2 kg	per 24-hour period
1986768 kg	per year

**AN BORD PLEANÁLA**  
 TIME 2pm BY hand  
 17 AUG 2018  
 LTR DATER \_\_\_\_\_ FROM \_\_\_\_\_  
 PL \_\_\_\_\_

This equals 1986.76 metric ton per year based on incoming rising tides only (to visualise this imagine 200 No. large roll on type builder skips that hold 20metric ton).

If the Suspended solids are permitted to discharge into the sea during a rising tide, I fear that the Baldoyle Bay will silt up as the inlet channels over time will fill up by the excessive suspended solids, thus pushing up the existing high-water level.

As fresh water has a different density to salt water, the fresh water will float carrying the newly introduced suspended solids.

In the Past we have been refused house insurance because our house was deemed to be on a flood plane by the insurance company and as a result they wouldn't even quote us.

Fingal county council constructed a grassed mound between the Baldoyle Bay and the Golf Links road to stop flooding. However we still have localized flooding on the Golf links road and in particular at the sharp bend in the road between Strandmill and the Southern beach car park & close to the proposed compound where the proposed sewer will come above ground to form an inspection chamber.

It is also well documented the flooding caused at the Portmarnock roundabout and the sluice river. Every year this flooding causes obstructions to cars entering Portmarnock from the Station road and the Baldoyle road leading to Portmarnock.

With the addition of the recently built Portmarnock Bay housing estate and the other houses which have been granted permission this will add more strain on an already existing failed surface water system.

As part of the development documents, the flood risk analysis only refers to areas where construction is carried out and does not consider the areas surrounding these works that will be affected, which are Baldoyle Bay SPA and Baldoyle SAC both under EU Protection.

I would like to formally put on record the proposed risk of flooding if this goes ahead.

## **Part 2 Allotted response time to lodge objections**

Based on the size, complexity and sensitivity of the proposed sewage plant and based on the 13500 plus non statutory observations already made during the public consultation period in 2013 by local residents to whom this plant will effect directly it is unfair to expect those wishing to make observations to do so within the time allotted considering it took more than 4 years to prepare the planning application by a team of experts who were employed around the clock to do so. I would expect the fees charged for such consultations will reflect this and will be available for inspection under the freedom of information act as it is public money being spent.

It is also totally unfair to expect people who wish to make a comprehensive objection, to be able to do so considering the complexity of the text contained in the application, and the volume of pages which is well in excess of 6000 within the 5 weeks allotted time.

An Bord Pleanala has allowed it's bord a time frame of 6 months to make a decision, hardly a fair comparison.

The application was also lodged during the government summer holidays which is clearly a ploy to get a positive decision on behalf of Irish water during this time frame.

During the public consultation period much of the information contained in the application was not available and questions were not answered, rather a request for an email address where information could be passed on. This was more than likely a ploy to collect names and demonstrate that they have interacted with the public, however as I write this, it is very clear that many people in the surrounding areas did not know anything about it.

RECEIVED  
BY  
17 AUG 2018  
LTR DATER \_\_\_\_\_ FROM \_\_\_\_\_  
PL \_\_\_\_\_

As a stakeholder who lodged a non-statutory observation along with some other 13500 people, we did not receive any correspondence from Irish Water, even though the applicant has stated that they have made contact with all stakeholders,

### Part 3 Local economy & tourism

During a public consultation in 2013 the questions was asked if the water being treated would be clear. I was told by the then county engineer in Fingal offices that the water would be grey in colour as it was only secondary treatment the very basic requirement from the EPA.

Based 3600L per second being discharged as outlined in the design of the outfall pipe this would equate to a plume a volume of almost 13000 metric ton per hour. (Visually this would equal 650No. 20-ton roll on builder's skips)

Unless the dilution of this plume is instant, and by that it is capable of dissolving faster than the speed of sound (343 meters per second) it will be visible from planes over head full of tourist landing in Dublin Airport. What kind of message does this send to tourist visiting our capital when the first thing they encounter is a massive plume of grey water followed by massive storage tanks less than 3Km from the airport.

If the proposed plant omits smells like that of a similar sized plant in Ringsend during the tourist season it will surely effect tourism.

If the plant does malfunction like other plants under the control of Irish water for periods of up to 24hours without being detected a potential 311 million tons of raw sewage could be pumped into the Irish sea. This would close all our beaches and totally close the fishing / tourist village of Howth which generates huge revenue for Fingal county.

The above malfunction would also wipe out all off the many special protection areas and specials areas of conservation not to mention the velvet strand that holds the much after "Blue Flag".

I am surprised that Fingal county council allowed this to go ahead as it jeopardises one of the few jewels in the Fingal county area, and as demonstrated this summer was enjoyed not only by the people of Portmarnock, but the whole of Dublin.

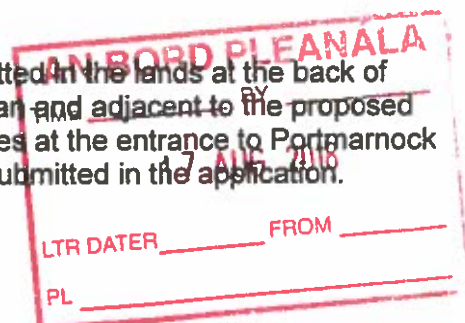
On a side note it seems strange that other beaches like Dollymount & Sandmount do not have a blue flag awarded, I can only suggest that this is because of the way Irish water as documented have mismanaged the Ringsend plant.

### Part 4 Wildlife

The point at the end of the Portmarnock velvet strand at the entrance to Baldoyle Bay is known by local anglers where Sea Bass *Dicentrarchus labrax* can be caught. This species of fish is protected by EU regulations since 1990. This feeding area based on the volume of waste and suspended solids could endanger this known feeding ground.

#### Bats Golf links road

Growing up in the Strandmill estate, Bats were often spotted in the lands at the back of Strandmill road in the land now owned by Jimmy Lonergan and adjacent to the proposed compound. Bats would have also been spotted in the trees at the entrance to Portmarnock Golf Club. This area was not covered in the Bat survey submitted in the application.



In recent years we have seen the introduction of little egrets to Baldoyle Bay, a welcomed addition, but rare enough as they are not a native Irish bird. I have seen Baldoyle Bay over the years develop into a beautiful conservation area mainly because it has been left untouched by man. I would hate to see this change because of the proposed plant, I already feel that the Baldoyle Bay is in danger with the increase housing supply in Portmarnock & Baldoyle along with the excessive noise from the increased planes flying directly overhead. It would seem pollution is coming at us from every angle.

#### **Part 5 Treatment levels & size**

The secondary treatment is not something we should be considering when designing a new processing plant, the basic level sought should be tertiary treatment.

The size of the plant is way to big and should be broken into smaller plants to spread the risk of disaster and isolate and malfunction. This would be the responsible way forward. It would also make it easier to trace contamination if it occurred.

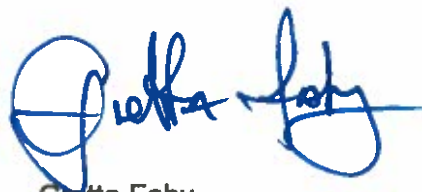
I think it is very unfair if not careless to build this plant near so many houses in the Clonsaugh areas not to mention only 2 miles from Beaumont Hospital, and right beside St. Michaels house and the Halting site on the R129.

This plant is the responsibility of Fingal County Council and they decided to place it right on it's county boarder knowing that Dublin City Councillors could not vote against it back in 2013 when they choose the site. As it was a Fingal county issue that would greatly effect Dublin city council residence it seems unfair if not illegal that those mostly effected had no say in the early decision process.

Yours Faithfully



Philip Swan



Gretta Fahy

