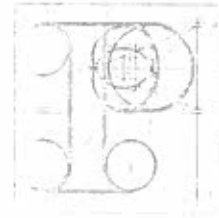


Our Ref: ABP-301908-18

PA Reg Ref:

Your Ref: Portmarnock Community Association



An
Bord
Pleanála

Pat Suttle
11 Portmarnock Grove
Portmarnock
Co. Dublin

Date: 17 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.

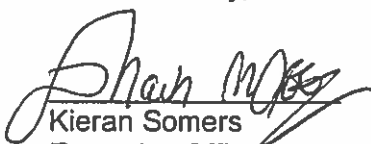
The Board will revert to you in due course with regard to the matter.

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

Portmarnock Community Association



AN BORD PLEANÁLA	
Received:	16/8/18
Fee:	€50 Cash
Receipt No:	

c/o 11 Portmarnock Grove, Portmarnock, Co. Dublin D13 V8Y9

15th August 2018

AN BORD PLEANÁLA	
TIME	16:52 BY MND
16 AUG 2018	
LTR DATER	FROM X/O
PL	489.007566-18

Submission /Observation to An Bord Pleanala

Greater Dublin Drainage Waste Water Treatment Plant, Clonshaugh, Dublin

Application PL06F.301908

Introduction

Portmarnock Community Association are in favour of water treatment projects -

- i. That will protect the health of the population
- ii. Whose aim is to protect our flora and fauna and promote biodiversity both on land and in the marine environment
- iii. That will protect vulnerable landscapes such as Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas(including proposed NHAs) and the Dublin Bay Biosphere
- iv. That will allow the agricultural areas adjacent to the proposed plant continue in food production of high quality that can be Bord Bia approved
- v. That will allow unhindered use of adjacent areas currently zoned for residential, industrial, business and amenity use without having to endure noxious odours, noise or other discomforts
- vi. That do not generate excessive traffic or odours on adjacent roads and communities. We understand that there will be transport from the site of sludge to the Regional Biosolids Centre at Kilshane Cross. We made a submission favouring the Kilshane Cross site during an Irish Water consultation previously
- vii. That will not result in the rezoning of adjacent areas currently designated for agriculture to any other use. This is critical for the long term use of the site for waste water treatment and the prevention of development under the flightpath at Dublin Airport. The Bord will need to include directives to Fingal County Council to protect the current land designations in the event of a grant of planning permission.

- viii. That will not result in an increase in bird numbers especially gulls that generate noise and would be hazardous to aircraft using the nearby runway
- ix. That will not generate an increase in rodents or invertebrates that would be commonly found have been found at older sewage treatment plants

Background

Ireland is now among the wealthiest countries in the world. As a nation we should be leading the way in the development of water treatment facilities that are of the highest quality. We can no longer be making do with low standards facilities that inevitably will have to be upgraded at great cost in the not too distant future.

This facility should be an example of best practice

Concerns of Portmarnock Community Association

1. The beach at Portmarnock (The Velvet Strand) is one of only four beaches in Ireland that have both Blue and Green Flags. This is a credit to both the team of workers at Fingal County Council and local residents who undertake a major beach clean every fortnight. Individual residents are also on the beach on a daily basis collecting litter and monitoring the condition of the beach.
Portmarnock Beach is the only beach with a Blue Flag on the coast from Dublin City up to Balbriggan on the northern boundary of Fingal.
It is critical that the current status of the beach is maintained so that residents in Fingal and the north of Dublin City have a beach on which it is safe to swim
We are concerned that the outfall water from the plant could have deleterious effects on the water quality at our beaches
2. The beach is used on a daily basis by swimmers. We need to be reassured that testing and sampling of the status of the water is undertaken on a regular basis for nutrient enrichment, elements that would not normally be found in significant quantities in seawater (e.g. lead) and bacterial contamination (Total Coliforms, E. coli). Monitoring of algal growth should also be undertaken. The monitoring points should be at –
 - a. The outlet point from the plant
 - b. The outfall near Ireland's Eye
 - c. The beach
3. While we favour the spreading of dried sludge on land for crops. We are concerned that elements found in sewage which are not normally found in local soils may build up to levels that will be deleterious to the long term growing of crops. The land should also be tested for those elements mentioned above and those that are found in sewage which may have deleterious effects on the environment when levels rise to the point where groundwater is and subsoil is being contaminated e.g. Phosphorus and Nitrogen
4. That there is robust risk analysis undertaken in the event of :
 - i. Power failure: in the event that there is a loss of power from the National Grid that there is sufficient backup generation capacity on site. The standby generators to be located in an area not subject to flooding
 - ii. Heavy Rainfall Events: The records at the Dublin Airport weather station are available. The records will show the maximum rainfall that has fallen in any continuous one - four day period over the past 80 years. We are concerned that the

plant will have sufficient capacity to cope with the volumes of water and sewage passing through the plant during such events without the need to allow untreated material exit the plant.

- iii. Plant Breakdown: That there is sufficient storage on site and in the system to hold untreated sewage until such time as the breakdown can be repaired
 - iv. Labour Unrest: That there is a protocol in place to prevent the workforce closing the plant.
 - v. Outside Parties: That there is sufficiently robust legislation in place to prevent any outside group from causing the plant to cease operations
 - vi. Sabotage/Civil Unrest: That a system of security similar to that at power stations, major substations and telephone communication structures be put in place
 - vii. That there are regular staff drills to ensure remedial measures are quickly implemented in the event of the many potential interruptions to the proper running of the plant
5. That the site be landscaped to ensure:
Untreated sewage cannot exit the site
- i. The mounding be put in place to enclose the immediate area of the plant
 - ii. Mounding be put in place around the entire site to contain any contaminants
Note:
 - a. This will entail having an elevated level at the site entrance
 - b. Will entail the development of a staff safety protocol to ensure all staff can quickly access a point elevated above any potential flood levels on the site
 - iii. That robust screen planting of trees and shrubs (ideally native species) be planted on the site boundaries. To ensure that there is an all year-round visual barrier, evergreen native species such as Holly (*Ilex aquifolium*) should be included
6. That the highest standard of water treatment be undertaken at the plant.
- i. All primary and secondary treatment to be undertaken
 - ii. Removal of floating solids to reduce turbidity to a level similar or less than that of the receiving body of water
 - iii. Removal of nutrients (esp. Nitrogen and Phosphorus) and elements such as Lead from the water exiting the plant to levels that will ensure that the nutrient levels in the receiving water at a point 60 metres away from the outfall point near Irelands Eye do not increase
7. That all sludge carrying trucks to have trailers that will prevent the exit of liquids or odorous gases
8. The timely publication of all tests monitoring the operation of the plant is critical in gaining the confidence of local communities
Irish Water would publish all monitoring test results within two weeks of the sample being taken on a website dedicated to the Clonsaugh Plant.
We would be concerned that communities would become suspicious of changes in test levels as a result of smells, algal growth, elevated nutrient levels without the plant operator immediately signalling a problem – once such a situation arises all faith in the testing and monitoring would be lost forever
That all test results which show elevated levels be promptly put up on the website with accompanying descriptions of strategies to reduce levels
That the excuse of having to first pass on results to the EPA should not be used
9. That our high quality but vulnerable environment which includes –
- i. Baldoyle Bay Special Area of Conservation

- ii. Baldoyle Bay Special Protection Area
- iii. Sluice River Marsh (candidate site NHA)
- iv. Velvet Strand

are not damaged in any way by the operation of the proposed waste water treatment plant.

10. Portmarnock has four golf courses within it's bounds

Portmarnock Golf Club

Portmarnock Hotel and Golf Links

Portmarnock Pitch and Putt Club

Malahide Golf Club

The first two courses bound the Velvet Strand and are of national importance from a golfing and tourism viewpoint. We are concerned that the plant operators understand that the jobs on these golf courses and the hotels in the area are dependant on the fact that they are located in an area of natural beauty and in a pristine environment.

- 11. That a committee be established to include -**
Irish Water

That Irish Water and the plant operator would contribute to such environmental schemes as would be proposed by the committee to improve and enhance the environment from Clonshaugh to the outfall near Ireland's Eye

Conclusion

In conclusion we would be concerned that the plant would be operated to a Tertiary Treatment or similar standard which seems to be the case in the majority of new treatment plants being planned and constructed in Europe

The time for being adequate or working to the minimum standard is now gone

Pat Suttle

Chairperson

16th August 2018

Mobile: 087 2486287

Tel 01 – 8462443

Email: pat@ksagronomy.ie