

## **APPENDIX H**

### **STAKEHOLDER SUBMISSIONS (REDACTED)**

Received  
SWOZS  
16.06.11



Fingal County Council Comhairle Contae Fhine Gall

Greater Dublin Drainage Project Manager

c/o RPS Group,

West Pier Business Campus,

Dun Laoghaire,

Co. Dublin.

15/06/11

**Submission to the Greater Dublin Drainage Initiative Consultative Phase**

It is my considered opinion that locating a Regional Wastewater Treatment Plant

In the Portrane/Donabate area is totally inappropriate.

Locating such a facility on the peninsula will have catastrophic consequences for the Rogerstown Estuary and particularly the Bird Life.

It should be noted that Rogerstown Estuary is a National Heritage Area, a Wetland site of International Importance under the Ramsar Convention and a Special Protection Area.

I believe this site if chosen would be in conflict with the EU Birds Directive (Council Directive 79/409/EEC) also the EU Habitats Directive (92/43/EEC).

The community of Portrane/Donabate agreed to extend the waste water treatment plant in the area from 10,000pe to 67,000 people equivalent thereby taking the effluent from Rush/Lusk so the Nimby factor does not apply.

Apart from the forgoing, the negative impact such a large facility would have on local Community living is immeasurable. It will have a devastating effect on recreational and leisure pursuits, tourism, leave an intolerable mark on the landscape, destroy a high amenity area, create major congestion, destroy a beautiful rural setting.

I urge that due regard will be given to the above and that you will take Portrane out of active consideration for this project.

Yours Sincerely,

[Redacted signature]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]



Recipient	Emma El. Saeed
Register No.	
RPS	4 JUL 2011
Project No.	
File Ref.	17
PM	

Name:

Address:

Date:

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

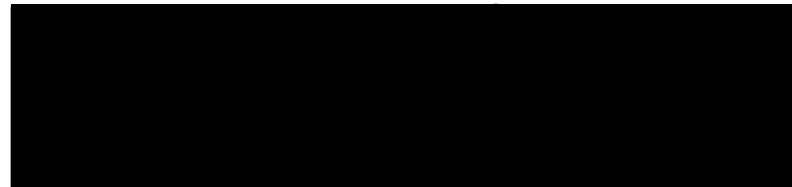
Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility.

Yours faithfully



.....

Name:  
Address:



Date: 4 July 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Recipient	<i>Environ. K. Doherty</i>
Register No.	
RPS	5 JUL 2011
Project No.	
File Ref.	<i>10</i>
PM	

Dear Sir/Madam,

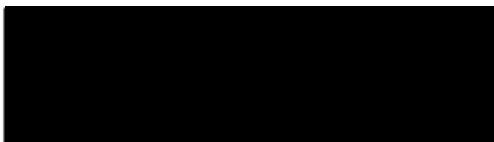
Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility.

Yours faithfully





Dear Sir or Madam

I object to the planning of a monster sewerage treatment plant in the Portrane area for the following reasons

1. The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
2. It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:  
In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the AC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. (For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).
3. The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4. A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.
5. Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
6. Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I would appreciate your reply/comments

Regards





Dear Sir or Madam

Object to the planning of a monster sewerage treatment plant in the Portrane area for the following reasons

1. The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2. It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the AC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. (For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3. The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4. A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.
5. Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
6. Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I would appreciate your reply/comments

Regards





Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin, Ireland

21<sup>st</sup> June 2011

	PM
	Site Ref.
	Project No.
24 JUN 2011	RPS
	Register No.
<i>[Signature]</i>	Recipient

Re: **Site assessment process to find a location for a monster sewage plant on the coast of North Dublin**

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

- 1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (SAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane
- 2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

*"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the SAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the SAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the SAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied."*

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/335/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000)

- 3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and "day-trippers" during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.
- 4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.
- 5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 85,000 PE plant to serve the needs of Portrane, Donabate, Rush and Eusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.
- 6) Any decision to locate the facility to the Portrane/Donabate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

  
Yours faithfully



  
21<sup>st</sup> June, 2011

Greater Dublin Drainage Project Manager,  
c/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire

Re: Proposed Monster Regional Water Treatment Plant at Portrane

Dear Sir or Madam,

We wish to outline our objection to the imposition of a Monster Sewage Treatment Plant on the Donabate peninsula on the following grounds:

Rogerstown Estuary – is a National Heritage Site, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention.

Rogerstown Estuary – is protected by EU Birds' Directive 79/409/EEC  
EU Habitats Directive 992/45/EEC

20% of the world's Brent Geese population nest in Rogerstown and is monitored by people from all over the world and is of vital importance to RSPB, Birdwatch Ireland and other bird watching enthusiasts.

Within a 10km radius of Portrane there are eight categories of SAC's (Special Areas of Conservation) SPA's (Special Protection Areas) in addition to NHA and RAMSAR Designations – SIGNED UP TO BY IRELAND!

Since Rogerstown Estuary is a mere 1.5km from the site of the proposed Monster Treatment Plant the impact on this well-protected area of Scientific importance would have a detrimental affect on the whole peninsula and be disastrous on environmental and ecological grounds.

There are 5 well-established prestigious Golf Clubs - (Corballis, Beaverstown, The Island, Balcarrick and Donabate) that are used by people from all around the East Coast, 4 of which are adjacent to the site of the proposed Treatment Plant. What chance then for the enjoyment of a Golf outing with the odious smell of sewage wafting around the place, on one's clothes and in one's nostrils?

Newbridge House and Park, again used by people from all around the north county.

Recipient	Emma-EL
Register No.	8
<b>RPS</b>	22 JUN 2011
Project No.	
File Ref.	
PM	

*Blue Flag beaches and a scenic Coastal Walk upgraded and kept by Fingal County Council for the benefit of visitors and locals.*

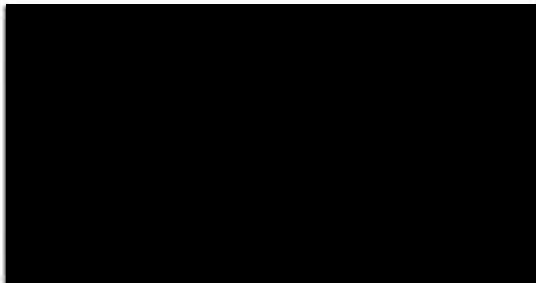
*These amenities are vitally important to our community for leisure, tourism and sporting prospects in these financially straitened times.*

*We have outlined above the many reasons why this monstrosity should not be imposed on our area and will support Fairshare in taking this case to the European Courts if necessary.*

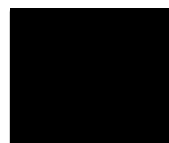
*Furthermore the proposal by Fingal County Council in 2007 to put a Soccer Academy in the Turvey Nature Reserve bordering on Rogerstown Estuary was rejected because of the impact this proposal would have on the area and once and for all proving the importance of the Estuary!*

*Having inspected the area outlined on the map at the Consultation meeting at Fingal County Council Offices, perhaps consideration should be given to the placing of this Monster Sewage Treatment Plant within the confines of Dublin Airport – 1000's of acres, after all London Heathrow Airport has such a Plant with a much greater PE capacity!!!!*

*Yours sincerely,*



Recipient	D. Davidson
Register No.	
RPS	24 JUN 2011
Project No.	
File Ref.	109
PM	



21<sup>st</sup> June, 2011

Greater Dublin Drainage Project Manager,  
c/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire

Re: Proposed Munster Regional Water Treatment Plant at Portrane

Dear Sir or Madam,

I wish to outline my objection to the imposition of a **Monster Sewage Treatment Plant** on the Donabate peninsula on the following grounds:

Rogerstown Estuary – is a National Heritage Site, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention.

Rogerstown Estuary – is protected by EU Birds' Directive 79/409/EEC  
EU Habitats Directive 92/43/EEC

20% of the world's Brent Geese population nest in Rogerstown and is monitored by people from all over the world and is of vital importance to RSPB, Birdwatch Ireland and other bird watching enthusiasts.

Within a 10km radius of Portrane there are eight categories of SAC's (Special Areas of Conservation) SPA's (Special Protection Areas) in addition to NHA and RAMSAR Designations – SIGNED UP TO BY IRELAND!

Since Rogerstown Estuary is a mere 1.5km from the site of the proposed **Monster Treatment Plant** the impact on this well-protected area of Scientific importance would have a detrimental affect on the whole peninsula and be disastrous on environmental and ecological grounds.

There are 5 well-established prestigious Golf Clubs - (Corballis, Beaverstown, The Island, Balcarrick and Donabate) that are used by people from all around the East Coast, 4 of which are adjacent to the site of the proposed Treatment Plant. What chance then for the enjoyment of a Golf outing with the dreadful smell of sewage wafting around the place, on one's clothes and in one's nostrils?

Newbridge House and Park, again used by people from all around the north county.

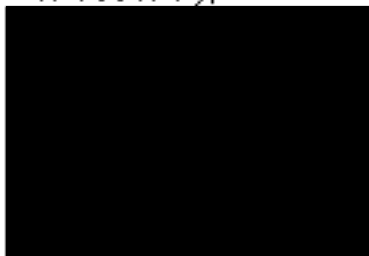
**Blue Flag beaches and a scenic Coastal Walk upgraded and kept by Fingal County Council for the benefit of visitors and locals.**

These amenities are vitally important to our community for leisure, tourism and sporting prospects in these financially straitened times.

We have outlined above the many reasons why this monstrosity should not be imposed on our area and will support Fairshare in taking this case to the European Courts if necessary.

Furthermore the proposal by Fingal County Council in 2007 to put a Soccer Academy in the Turvey Nature Reserve bordering on Rogerstown Estuary was rejected because of the impact this proposal would have on the area and once and for all proving the importance of the Estuary!

Yours sincerely,



Recipient	<i>J. Doherty</i>
Register No.	
RPS	24 JUN 2011
Project No.	
File Ref.	
PM	

22nd June, 2011

Greater Dublin Drainage Project Manager,  
c/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire

Re: Proposed Munster Regional Water Treatment Plant at Portrane

Dear Sir,

We wish to outline our objection to the imposition of a Munster Sewage Treatment Plant on the Portrane/Donabate peninsula for the following reasons -

Rogerstown Estuary - is a National Heritage Site, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention and is protected by EU Birds' Directive 79/409/EEC and EU Habitats Directive 92/43/EEC

20% of the world's Brent Geese population nest in Rogerstown and is monitored by people from all over the world and is of vital importance to RSPB, Birdwatch Ireland and other bird watching bodies.

As ardent Bird Watchers who do regular bird counts for Birdwatch Ireland, we feel that BBC Springwatch Website should be made aware of the proposed Munster Sewage Treatment Plant and of the potential of this to destroy a world-renowned Bird Sanctuary. Springwatch constantly highlight the routes taken by Brent Geese on their migratory travels from Greenland, Iceland and Canada to Strangford Lough, Rogerstown Estuary and along the East Coast of Ireland.

Within a 10km radius of Portrane there are eight categories of SAC's (Special Areas of Conservation) SPA's (Special Protection Areas) in addition to NHA and RAMSAR Designations.

Because Rogerstown Estuary is a mere 1.5km from the site of the proposed Munster Treatment Plant the impact on this well protected area of Scientific importance would have a detrimental affect on the whole peninsula and be disastrous on environmental and ecological grounds.

Furthermore the proposal by Fingal County Council in 2007 to put a Soccer Academy in the Turvey Nature Reserve bordering on Rogerstown Estuary was rejected because of the impact this proposal would have on the area and once and for all proving the importance of the Estuary!

*We are very concerned about the impact this proposed Monster Sewage Treatment Plant would have on the many leisure, environmental and ecological asset which we the residents of the peninsula value and enjoy all year round.*

*Having lived in this area for the past 40 years we are not prepared to accede to a massive annihilation of our much appreciated environment and will support the Fairshare Group in their efforts to oppose the imposition of this monstrosity in Portrane..*

*We trust that our concerns will get your considered attention.*

*Yours sincerely,*







Recipient	
Register No.	
<b>RPS</b>	22 JUN 2011
Project No.	
File Ref.	
PM	

Greater Dublin Drainage Project Manager,  
C/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire

20<sup>th</sup> June 2011

Re: Proposed Monster Regional Water Treatment Plant at Portrane

Dear Sir or Madam,

On behalf of the [REDACTED] we wish to state that we are opposed to the imposition of the proposed massive Sewage Treatment Plant on the Portrane /Donabate peninsula because it is blatantly unfair and unconstitutional to even consider imposing such a huge plant on a small area that has so many amenities – sporting, leisure and environmental.

Rogerstown Estuary – is a National Heritage Site, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention.

Rogerstown Estuary – is protected by EU Birds' Directive 79/409/EEC  
EU Habitats Directive 92/43/EEC

20% of the world's Brent Geese population nest in Rogerstown and is monitored by people from all over the world and is of vital importance to RSPB, Birdwatch Ireland and other bird watching enthusiasts. BBC Springwatch Website is being informed of the proposed annihilation of a world-renowned Bird Sanctuary because they constantly feature the routes taken by Brent Geese on their migratory travels from Greenland, Iceland and Canada to Strangford Lough, Rogerstown Estuary and along the East Coast of Ireland.

*You must also be aware that within a 10km radius of Purtrane there are eight categories of SAC's (Special Areas of Conservation) SPA's (Special Protection Areas) in addition to NHA and RAMSAR Designations -- SIGNED UP TO BY IRELAND!*

*Since Rogerstown Estuary is a mere 1.5km from the site of the proposed Monster Treatment Plant the impact on this well protected area of Scientific importance would have a detrimental affect on the whole peninsula and be disastrous on environmental and ecological grounds*

*There are 5 well-established prestigious Golf Clubs - (Corballis, Beaverstown, The Island, Balcarrick and Donabate) that are used by people from all around the East Coast, 4 of which are adjacent to the site of the proposed Treatment Plant. What chance then for the enjoyment of a Golf outing with the dreadful smell of sewage wafting around the place, on one's clothes and in one's nostrils?*

*Newbridge House and Park, again used by people from all around the north county.*

*Blue Flag beaches and a scenic Coastal Walk upgraded and kept by Fingal County Council for the benefit of visitors and locals*

*These amenities are vitally important to our community for leisure, tourism and sporting prospects in these financially straitened times*

*We have outlined above the many reasons why this monstrosity should not be imposed on our area and will affiliate with Fairshare in taking this case to the European Courts if necessary.*

*Furthermore the proposal by Fingal County Council in 2007 to put a Soccer Academy in the Turvey Nature Reserve bordering on Rogerstown Estuary was rejected because of the impact this proposal would have on the area and once and for all confirming the importance of the Estuary!*

*Yours sincerely,*





To: info@regionalcouncil.ie  
 cc:  
 Subject: Sewage Plant Comments Residents Group

Recipient	<i>James Donohue</i>
Register No.	
RPS	13 JUN 2011
Project No.	
File Ref.	<i>12</i>
PM	

Dear Sir/Madam

We are submitting the following comments on behalf of the [redacted] a copy of which will be sent in the post also. Included with the hard copy will be a copy of letter dated April 2007 addressed to Fingal County Council opposing the siting of a monster sewage site at Portrane. The comments contained therein are as valid today in 2011 as they were in 2007.

In addition we would like to make the following comments:

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May 2008, Section F/332/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane/Rush peninsulas are willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland. In Rush we have lived with the blight that is Ballyally Dump - one of the largest landfills in Ireland serving the whole of the Dublin area. Originally opened in 1971 the licence for the operation of the dump was extended a number of times, despite commitments and assurances of its closure which finally happened in 2009. We now have a mountain of 34 years waste to blot our landscape for the future generations.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principle, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Goose population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I would ask you to take all of the above into account when considering your response and we look forward to hearing from you in due course. Please acknowledge safe receipt of this mail

Yours sincerely



[REDACTED]

[REDACTED]

[REDACTED]

30 April, 2007

Dear [REDACTED],

**Draft Scoping Report on the Strategic Environmental Assessment (SEA) of the Greater Dublin Strategic Drainage Study (GDSDS)**

I wish to advise that this letter is submitted on behalf of the [REDACTED]. We originally submitted an opposition to the original proposal by Fingal County Council to build a Regional Waste Water Treatment plant in Portrane in 2005. This opposition represented up to 1,000 residents and households from the Rush area, not necessarily in the Rogerstown area and was put together at short notice. We are putting this submission forward on the behalf of all of the people whom we represented the last time.

We have lived with the blight that is [REDACTED] Dump for far too long - one of the largest landfills in Ireland serving the whole of the Dublin area. Originally opened in 1971 the licence for the operation of the dump has been extended a number of times, despite commitments and assurances of its closure. We are now looking forward to its closure in 2009. We can then look to restore Rogerstown Estuary to its former beauty. It is not right that after having to put up with this blot on the landscape for over 34 years, that we now face a development that will have a severe impact on Donabate, Portrane and Rush.

The obvious point of reference here is the example of the Ringsend Waste Water Treatment facility. It is well documented that the plant in Ringsend has caused nothing but problems since its establishment. There has been a significant impact on the landscape, the seascape, for example, the gulls who will be feeding off the sewage. There have even been complaints to the EU Commission such is the severe impact it is having on the local communities in the area. So after taking most of Dublin's waste for so many years, how can we be targeted again to accept and treat sewage from all of these other areas. This is not a case of NIMBYism (Not in my back yard) because Ballyally is already in our back yard (for over 34 years).

In relation to the SEA we would like to make comments under the following headings:

**1. Environmental Consideration**

Rush and the neighbouring areas of Donabate, Portrane and Malahide are environmentally sensitive areas. It makes no sense to locate such a plant in such an area. Further, it appears that the SEA consultants have decided not to look at the specific environmental impact of locating such a plant at Portrane and its effect on the neighbouring areas.

We agree with our neighbours that an SEA, by law and by definition, must look at "likely significant effects on the environment" of the plan or programme, according to the relevant EU Directive and the Statutory Instruments transposing it into Irish law. Indeed, the Scoping report says (para 1.2): "The main objective of the SEA Directive is to 'provide for a high level of protection for the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.'" We therefore believe that the proposed process would be fatally flawed unless the study scope is significantly changed.

#### **Environmental issues MUST be considered because:**

- Table 6.1 of the Draft Scoping Report does not mention environmental issues which are key to the Rush, Donabate/Portrane and Malahide areas;
- Rogerstown Estuary is a National Heritage area and is an internationally significant Special Protection Area and a Wetland Site of International Importance under the RAMSAR Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.
- The Rush North and South beaches along with Rogerstown estuary are widely utilised by our community and thousands of visitors. We have very active sailing, diving and kitesurfing clubs which use all our marine facilities on a regular basis. This activity and all these people will be adversely affected by the proposed development.
- Broadmeadow Estuary is a Special Protection Area;
- The beaches of Portrane, Donabate and Malahide have achieved Blue Flag status.

It is imperative that all these issues must be specifically considered in the SEA. These environmental classifications would be at severe risk by a major works located at Portrane. It is essential that such issues are given proper consideration.

#### **Blue Flag Beaches threatened**

A regional sewage treatment plant at Portrane threatens the Blue Flag status of Donabate, Portrane and Malahide beaches. A study by Aqua-Fact International Services Ltd, a Galway-based research firm, has examined the potential impact of the effluent from the facility on water quality along the coastline. Aqua-Fact estimated that the new facility would emit effluent containing harmful faecal coliforms, which would contaminate sea water. Using computer modelling, the report has predicted that the contamination levels in Portrane and Donabate would be in excess of that allowed for Blue Flag status. "It is likely that these beaches would lose their blue flag status as a result of the proposed discharge", the report said. It also said contaminated water during the spring tide could threaten water quality at Malahide.

The report concluded that the three beaches at Malahide, Portrane and Donabate all risked losing their Blue Flag status if the sewage plant goes ahead.

#### **Natural Habitats Directive**

The consultants who are conducting the SEA need to have regard to Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

Article 6 (3) states:

3. Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

## **EU Birds Directive**

The EU Birds Directive – Council Directive 79/409/EEC of 2 April 1979 mandates member states to conserve, maintain or restore the biotopes and habitats of birds by creating protection zones, maintaining the habitats; maintaining Special Protection Areas in favourable conservation status; restoring destroyed biotopes; and creating biotopes. Crucially, the Birds Directive dictates that member states follow the procedure outlined in Article 6 of the Habitats Directive for carrying out appropriate assessments of environmental impacts on SPAs. A proper SEA must have regard to this.

### **A proper SEA must consider health**

The public health implications of the proposed plant at Portrane must be considered if the SEA is to be carried out properly. This is because the siting of a regional sewage plant at Portrane poses major risks to public health from flies and mosquitoes. Broadmeadow Estuary and its tributaries are already notorious breeding grounds for mosquitoes, known locally as the "Marshide Mosquito".

The building of a massive sewage plant would lead to an explosion in the population of mosquitoes, flies and other nuisance insects. They would be attracted by the nutrient-rich water found in clarifiers, sedimentation areas and treatment basins etc. This situation would cause a health risk to residents and visitors to the area. Two acute, inflammatory viral diseases (St Louis Encephalitis and West Nile Virus Encephalitis) are transmitted via the bite of infected mosquitoes. Infected mosquitoes carry viruses in their salivary glands and infect susceptible birds during blood-feeding. Encephalitis can be severe for infants, the elderly and those who are immuno-compromised.

## **2. Impact of Failure to Deliver**

The key risk associated with this strategy is not that the implementations of a specific scenario will result in an environmentally damaging solution but rather that failure to implement the selected solution in either scope or time would:

- Require the curtailment of necessary development (housing, industry etc) so as to avoid further overloading of existing facilities.
- Result in a very significant reduction in receiving water quality, as already overloaded facilities are connected to further developments, to avoid curtailing construction activity in the Greater Dublin Area

The economic as well as the environmental costs of those effects would be enormous.

The Ringsend waste water treatment plant is already operating at 113% of design capacity, due to the wholly unpredictable growth in new housing completion since the

capacity of that plant was decided. This situation will get worse. Thus selecting any solution with a long lead time before any substantial incremental additional treatment capacity is delivered is an extremely high risk strategy. It is only necessary to reflect on the current situation in Galway to recognise the risks associated with such a strategy.

The adoption of a scenario requiring the development of a single 850,000 PE plant at Portrane which requires 'the construction of a major sewer, constructed predominantly in tunnel, with a number of pumping interfaces' must be recognised as very high risk due to its exposure to

- Requiring the approval of multiple Local Authorities
- Planning risk and delay viz M3, Ringsend incinerator, Corrib gas field
- Changes in the exchequer position in the period prior to its completion

While the adoption of a solution involving a number of smaller plants might fail to deliver 100% of the required additional capacity in the required time, such a solution

- Has a much higher probability of delivering significant capacity increments within the overall projected timeframe.
- Would most probably deliver a lower cost solution, when interest charges during construction are factored in.
- Would most certainly result in lower fees to consultants.

We therefore conclude that the Targets/assessment criteria proposed for Flexibility and Deliverability and Planning Risk in Table 6.1 on p 26 of the Report are inappropriate and selected to produce solutions with maximum engineering and consultancy input.

### 3. Traffic Nuisance

Sludge is the big issue with sewage treatment works. A big sewage plant still produces tonnes and tonnes of sludge. A massive regional sewage plant at Portrane will produce 30 trucks of sludge a day – that is more than one an hour, 24 hours a day, 365 days a year. This figure was advised by Donabate Parish Council based on a briefing by Fingal County Council engineers who advised on the number of sludge truck movements that would be generated by the 65,000 PE plant currently planned. They extrapolated this figure to get the sludge traffic volumes for an 850,000 PE plant. In Rush we do not have the luxury of a large community centre such as in Donabate and residents of Rush regularly travel to Donabate to use the facilities there – gymnastics, karate, etc plus the 5 golf courses – any impact on traffic will have an impact on our ability to continue to use the facilities in Donabate.

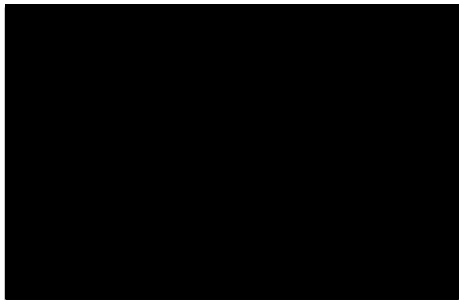
### Conclusion

We are wholly opposed to the idea of locating a single massive plant of this kind anywhere. The experiences in Kingsenc, on our own doorstep and that in Mogden, in London have demonstrated that the risks and environmental effect are enormous on the communities involved. As we have pointed out above, the risks associated with the single plant solution are far greater than a multiple plant solution – and the economic and environmental cost of failure to deliver a solution in time would be enormous.



Further, to contemplate building a single large plant in an environmentally sensitive area suggests that the authorities concerned have not thought this issue through. The omission of specific environmental factors relating to the proposed site from the Scoping study suggests that the authorities may plan to ride roughshod over the whole environmental protection process, thus making the SEA a "sham". We intend to support our neighbours in Donabate and ensure that this issue is raised at a national and legal level if necessary if the correct due process is not followed.

Yours sincerely,



Name: [Redacted]

Address: [Redacted]

Email: [Redacted]

Date: 23.06.2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: info@greaterdublindrainage.ie

Recipient	J. Davidson
Register No.	
RPS	24 JUN 2011
Project No.	
File Ref.	13
PM	

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSD3) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,  
[Redacted Signature]

RPS,  
Greater Dublin Drainage Project Manager,  
C/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire,  
Co. Dublin.

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

[Redacted]	
Recipient	<i>Doann Deirdre</i>
Register No.	
RPS	23 JUN 2011
Project No.	
File Ref.	14
PM	

21<sup>st</sup> June 2011

Dear Sir/Madam,

We wish to have the comments below taken into account as part of Fingal County Council's "Early Consultation Opportunity" on the Greater Dublin Drainage initiative.

We believe the approach being taken, as described on the Greater Dublin Drainage website, is fundamentally flawed. The website states:

*The initiative involves the provision of a new wastewater treatment works, a marine outfall and new drainage network in the northern part of the Greater Dublin Area.*

This clearly indicates that the approach of having a single "monster" treatment plant on the Fingal coastline is predetermined. The proposed location to facilitate a marine outfall appears to be based on the pretext that sewage can be treated to a lesser quality; this is unacceptable. Failure of a single "monster" plant is likely to be catastrophic. The location of a single "monster" treatment plant in any community will engender strenuous opposition; experience shows that smaller localised plants are accepted by reasonable people. For all these reasons, we are against the imposition of the proposed "monster" plant on any community.

Notwithstanding these comments, Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Some 20% of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

We would strongly urge you to reconsider the approach being taken and to ensure that the environmentally sensitive area of Portrane is not endangered by any proposal.

Yours faithfully,

[Redacted Signature]

[Redacted Signature]

Name: [Redacted]  
Address: [Redacted]  
Email: [Redacted]

Date: 23 June 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin.

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Recipient	<i>S. Daudon</i>
Register No.	
RPS	7 JUN 2011
Project No.	
File Ref.	17
PM	

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,

[Redacted Signature]

Recipient	<i>J. Dougan</i>
Register No.	
RPS	24 JUN 2011
Project No.	
File Ref.	3
P/A	

Name:  
Address:

Email:

Date: *23 June 2011*

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

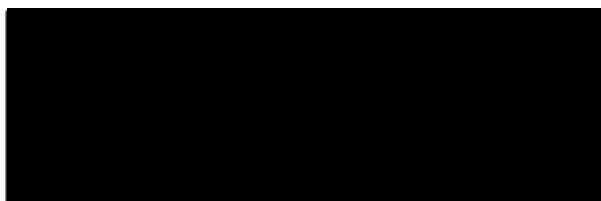
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

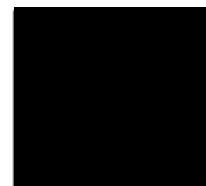
A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



Recipient	<i>James O'Sullivan</i>
Register No.	
RPS	23 JUN 2011
Project No.	
File Ref.	<i>16</i>
PM	



21<sup>st</sup> June 2011

RPS  
Greater Dublin Drainage Project Manager  
C/O RSP Group  
West Pier Business Campus  
Dún Laoghaire  
Co. Duólin

Dear Sir/Madam,

Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

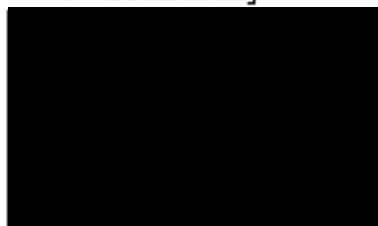
Rogerstown estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is:

1. **A National Heritage Area**
2. **A Special Protection Area**
3. **A Wetland Site of International Importance under the Ramsar Convention.**
4. **It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.**

Some 20 % of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility and take the young people of Demebate into consideration.

Yours faithfully



Recipient	<i>John Deegan</i>
Register No.	
RPS	23 JUN 2011
Project No.	
File Ref.	5
1/11	



21<sup>st</sup> June 2011

RPS  
Greater Dublin Drainage Project Manager  
C/O RSP Group  
West Pier Business Campus  
Dún Laoghaire  
Co. Dublin

Dear Sir/Madam,

Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is:

1. **A National Heritage Area**
2. **A Special Protection Area**
3. **A Wetland Site of International Importance under the Ramsar Convention.**
4. **It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.**

Some 20 % of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility and take the young people of Donabate into consideration.

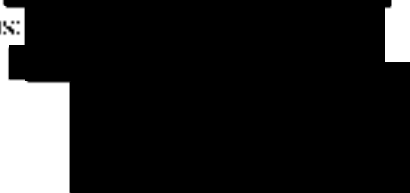
Yours faithfully



Name:



Address:



Email:



Date:

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

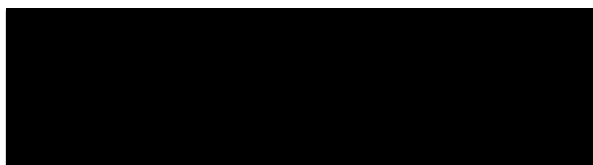
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was **already recommended** in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SAC) or Special Protection Areas (SPA) within a 10km radius of Portrane.

Yours truly,



Received	10km
Register No.	\\
<b>RPS</b>	27 JUN 2011
Project No.	
File Ref.	
PM	



Name:

Address:

Email:

Date:

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

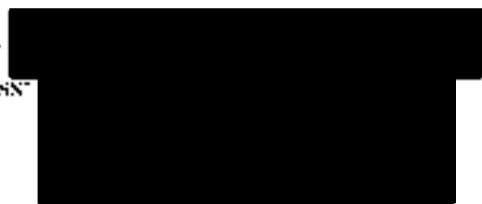
A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (sSPA) within a 10km radius of Portrane.

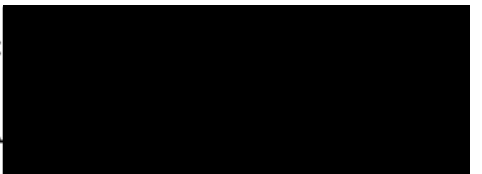
Yours truly,

Recipient	SPAs within a 10km radius of Portrane
Register No.	10
<b>RPS</b>	27 JUN 2011
Project No.	
File Ref.	
PM	

Name:  
Address:



Email:



Date: 26<sup>th</sup> JUN 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

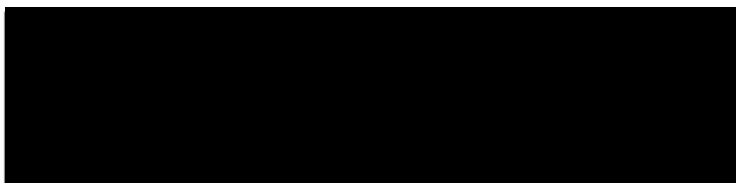
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. *Co. Wick - 6*

Yours truly,



Register No.	17
<b>RPS</b>	27 JUN 2011
Project No.	
File Ref.	
PM	

Name:  
Address:



Date: 23/06/2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

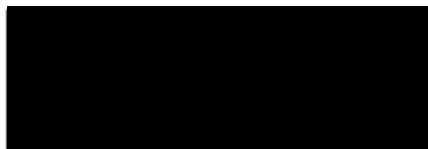
Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility.

Yours faithfully



Recipient	Emma El Sha
Register No.	21
RPS	28 JUN 2011
Project No.	
File Ref.	
PAR	

Name:

Address:

Email:

Date:

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

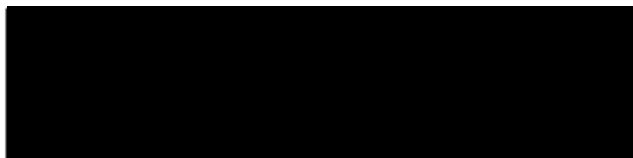
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



Recipient	Emma El-Sahn
Register No.	12
RPS	28 000 000
Project No.	
File Ref.	
PM	

Name: [Redacted]  
Address: [Redacted]  
Email: [Redacted]

Date: 23/6/2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: info@greaterdubindrainage.ie

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,

[Redacted Signature]

Recipient	EMHGA EL-Sidon
Register No.	10
RPS	28 JUN 2011
Project No.	
File Ref.	
PM	

02/02/2011

Name: [Redacted]  
Address: [Redacted]

Email: [Redacted]

Date:

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly, [Redacted Signature]

Recipient	202 Emma-El Solan
Register No.	22
<b>RPS</b>	28 JUN 2011
Project No.	
File Ref.	
PM	

Name: [Redacted]  
Address: [Redacted]  
Email: [Redacted]

Date: 24<sup>th</sup> June 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: info@greaterdublindrainage.ie

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donsdale/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too high a planning risk.

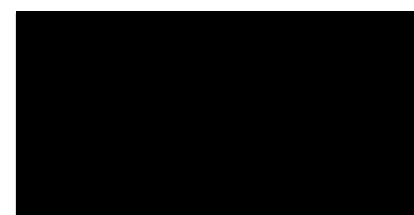
Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,

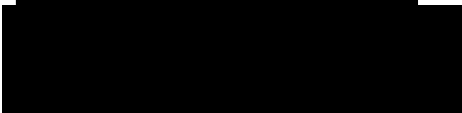
[Redacted Signature]

Recipient	Emma El-Sahn
Register No.	8
<b>RPS</b>	28 JUN 2011
Project No.	
File Ref.	
PAL	

Name:  
Address:



Email:



Date: 27 | 6 | 11

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



Recipient	EMMA EL-SHERPI
Register No.	13
RPS	29 JUN 2011
Project No.	
File Ref.	
PM	



Name:  
Address:

Email:

Date: 22/6/11

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdubindrainage.ie](mailto:info@greaterdubindrainage.ie)

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

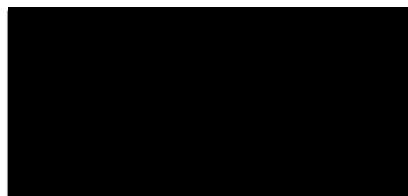
The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

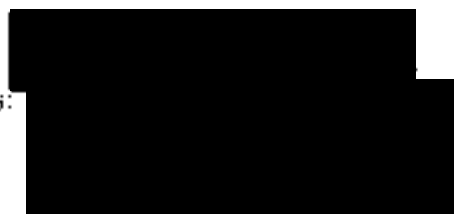
Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SAC) or Special Protection Areas (SPA) within a 10km radius of Portrane.

Yours truly,

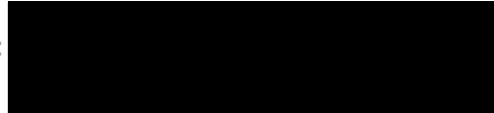
Recipient	Coimise - At-Sab
Register No.	10
<b>RPS</b>	29 JUN 2011
Project No.	
File Ref.	
PM	



Name:  
Address:



Email:



Date:

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin.

Email: info@greaterdublindrainage.ie

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Kogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



Recipient's	As within a 10km
Register No.	11
RPS	29 JUN 2011
Project No.	
File Ref.	
PM	

Recipient	Emma O'Sullivan
Register No.	
RPS	1 JUL 2011
Project No.	
File Ref.	1
PM	

Name:

Address:

Email:

Date: 30 June 2011

RPS  
 Greater Dublin Drainage Project Manager  
 C/o RPS Group,  
 West Pier Business Campus,  
 Dún Laoghaire,  
 Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,

[Redacted Signature]

---

**From:** [REDACTED]  
**Sent:** Friday, April 15, 2011 12:39 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Fairshare group opposes siting of regional WWTP in Portrane  
**Attachments:** Fairshare-submission-Dec 6.doc

# Fairshare

**Campaigning to stop a monster sewage plant being dumped on the Portrane/Donabate peninsula**

[REDACTED]

Friday, April 15, 2011

Mary Murphy  
Greater Dublin Drainage  
Dublin

Ms Murphy,

I am writing to you as the co-ordinator of the Fairshare campaign, based in the Portrane-Donabate are and set up to oppose the citing of the new regional sewage plant in Portrane.

As you are aware, the 2005 GSDSDS recommended that the wastewater treatment plant be located in Portrane.

Fairshare is against the imposition of a regional sewage treatment plant on the unique and ecologically sensitive Donabate/Portrane peninsula in North County Dublin.

Fairshare is neither unreasonable nor anti-development. The people of the Portrane/Donabate peninsula have agreed to take a 65,000PE sewage treatment plant to serve the needs of Portrane, Donabate, Rush and Lusk. Work is ongoing on the construction and pipe-laying for this plant at present, causing considerable disruption on the peninsula.

It is the strong and unanimous view of the community that a regional sewage treatment plant serving areas as distant as Meath, West Dublin and South Dublin is both unfair and unsustainable. The community is prepared to take its share and no more.

Please find attached a 2007 submission made as part of the Strategic Environmental Assessment into the 2005 GSDSDS document.

Please keep me informed of further developments and feel free to contact me.

Yours faithfully,

[REDACTED]



**Please think of the Environment before printing this email.**

\*\*\*\*\*

Private Confidential & Privileged

This Email and any files and attachments transmitted with it are confidential and/or privileged. They are intended solely for the use of the intended recipient. Any views and opinions expressed are those of the individual author/sender and are not necessarily shared or endorsed by [redacted] or any associated or related company. The content of this EMail and any file or attachment transmitted with it may have been changed or altered without the consent of the author. If you are not the intended recipient, please note that any review, dissemination, disclosure, alteration, printing, circulation or transmission of this Email and/or any file or attachment transmitted with it, is prohibited and may be unlawful. If you have received this Email or any file attachment transmitted with it in error, please notify

[redacted], by Emailing

[redacted] or contact :



This footnote also confirms that this email message has been swept by F-Secure for the presence of computer viruses.

\*\*\*\*\*

Registered in Ireland  
No: 153066

**Submission made under protest  
by  
Fairshare  
on the  
Draft Environmental Report  
for the  
SEA of the GSDS**

December 2007

## TABLE OF CONTENTS

Section	Page
1 INTRODUCTION	1
1.1 Fairshare	1
1.2 Grounds for objection	1
2 Failure of the competent authority to comply with statutory requirements regarding the geographical scope of the environmental report	2
2.1 EU and Irish law on SEAs	5
2.2 Geographical scope of programme not taken into account	6
3 Failure of competent authority to comply with statutory obligations regarding public participation in strategic environmental assessment process	
3.1 Factual errors in environmental report	7
3.2 Public consultation process meaningless	7
4 Failure of the competent authority to produce an environmental report of sufficient quality to meet the requirements of the regulations	8
4.1 Fairshare-commissioned reports not understood	8
5 Failure of the competent authority to accurately summarise the findings of a hydrodynamic study carried out by the UCD Centre for Water Resources Research	8
5.1 Inaccurate summary of original report	8
5.1.2 Modelling exercise not calibrated	9
5.1.3 'Difficult to predict'	9
5.2 Dubious conclusions drawn	10
5.3 Fairshare hydrodynamic study dismissed	10
5.4 Contradictory and inconsistent	11
6 Failure of the competent authority to reflect the at risk status of Broadmeadow Estuary when evaluating the suitability of Portrane for a discharge pipe from a regional WwTP	12
6.1 Risk assessment required by EU Directive	12
6.2 Rivers at risk	12
6.3 Estuaries at risk	12
6.4 Coastal waters	12
6.5 Transitional waters	12
6.6 Sensitive waters require better than secondary treatment	12
6.7 Neutral assessment hard to explain	13
7 Failure of the competent authority to recognise the existence of a number of protected species in the Donabate/Portrane area	13
7.1 Seals and rare plants	13
8 Failure of the competent authority to assess the 16 strategic drainage options using scientific, objective and consistent criteria	14
8.1 Assessment criteria subjective	14
8.2 Different standards for different areas	14
8.3 Some beaches are more equal than others	15
9 Failure of the competent authority to carry out a risk assessment before arriving at a preferred strategic drainage recommendation	15
9.1 Malfunction a major risk	15
9.2 Why a risk assessment is needed	15

10	Failure of the competent authority to assess the energy demands of the different strategic drainage options considered	16
10.1	Keeping energy consumption down	16
10.2	Economies of scale	17
10.3	Fuzzy thinking on emissions	17
11	Failure of the competent authority to conduct a cost-benefit analysis on the 16 strategic drainage options considered	18
11.1	Costings are contained in the GDSDS	18
12	Failure of the competent authority to include the elimination of inflow/infiltration/exfiltration as a strategic drainage option	18
12.1	Need for regional WwTP questioned	18
13	Failure of the competent authority to address water consumption issues	20
14	Failure of the competent authority to address the proximity Principle	21
14.1	Principle has been abandoned	21
15	Failure of the competent authority to avoid a bias towards a large treatment plant solution	22
15.1	Big not necessarily best	22
15.2	Diametrically opposite conclusions just as valid	23
16	Conclusion	24

## APPENDICES

Appendix 1: *Water Quality Report, Portrane, Co Dublin* prepared by Aqua-Fact International Services Ltd, Galway, Ireland.

Appendix 2: *Initial Review of Final Strategy Report & Draft Scoping Report for Strategic Environmental Assessment* prepared by Pick Everard, architects, consulting engineers, project managers, surveyors, of Leicester, England.

Appendix 3: *Report on Water Quality Modelling in Dublin from Bray to Balbriggan*, prepared by A. Dowley as part of the GDSDS, June 2004.

Appendix 4: *Energy Demand & Operational Cost Review, Greater Dublin Strategic Drainage Study for Fairshare*, 30 November 2007.

Appendix 5: *GDSDS - sludge production*, email from Mark Colby of Pick Everard to Fairshare, May 2007.



## **1. INTRODUCTION**

### **1.1 Fairshare**

Fairshare is a single-issue campaign group dedicated to representing the people of Portrane, Donabate and the surrounding communities in opposing the imposition of a regional sewage treatment plant on the unique and ecologically sensitive Donabate/Portrane peninsula in North County Dublin.

Fairshare is neither unreasonable nor anti-development. The people of the Portrane/Donabate peninsula have agreed to take a 65,000PE sewage treatment plant to serve the needs of Portrane, Donabate, Rush and Lusk. However, it is the strong and unanimous view of the community that a regional sewage treatment plant serving areas as distant as Meath, West Dublin and South Dublin is both unfair and unsustainable. The community is prepared to take its share and no more.

### **1.2 Grounds for objection**

Fairshare notes Fingal County Council's (September 2007) *Draft Environmental Report for the Strategic Environmental Assessment of the Greater Dublin Strategic Drainage Study* prepared by Mott MacDonald Pettit Ltd in association with ERM Ltd. We refute the findings of this report and strongly object to the preferred strategic drainage option identified, on the following grounds:

1. Failure of the competent authority to comply with statutory requirements regarding the geographical scope of the environmental report.
2. Failure of the competent authority to comply with its statutory obligations regarding public participation in the strategic environmental assessment process.
3. Failure of the competent authority to produce an environmental report of sufficient quality to meet the requirements of the regulations.
4. Failure of the competent authority to accurately summarise the findings of a hydrodynamic study carried out by the UCD Centre for Water Resources Research.
5. Failure of the competent authority to recognise the at risk status of Broadmeadow Estuary when evaluating the suitability of Portrane for a discharge pipe from a regional WwTP.
6. Failure of the competent authority to recognise the existence of a number of protected species in the Donabate/Portrane area.
7. Failure of the competent authority to assess the 16 strategic drainage options using scientific, objective and consistent criteria.
8. Failure of the competent authority to carry out a risk assessment before arriving at a preferred strategic drainage recommendation.
9. Failure of the competent authority to assess the energy demands of the different strategic drainage options considered.
10. Failure of the competent authority to conduct a cost-benefit analysis on the 16 strategic drainage options considered.
11. Failure of the competent authority to include the elimination of inflow/infiltration/exfiltration as a strategic drainage option.
12. Failure of the competent authority to address water consumption issues.
13. Failure of the competent authority to address the proximity principle.

14. Failure of the competent authority to avoid a bias towards a large treatment plant solution. This is due to the failure of the competent authority to make objective, scientifically verifiable observations on the performance of large treatment works versus smaller WwTPs.

## **2. FAILURE OF THE COMPETENT AUTHORITY TO COMPLY WITH STATUTORY REQUIREMENTS REGARDING THE GEOGRAPHICAL SCOPE OF THE ENVIRONMENTAL REPORT**

### **2.1 EU and Irish law on SEAs**

The proper content and format of a strategic environmental assessment is clearly set out by both the EU Directive (Directive 2001/42/EC) and Irish law. Article 12(1) of the *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004* (S.I. No. 435 of 2004), states that:

Subject to sub-article (2), an environmental report under article 10 **shall identify, describe and evaluate the likely significant effects on the environment** of implementing the plan or programme, or modification to a plan or programme, and **reasonable alternatives taking account of the objectives and the geographical scope** of the plan or programme, or modification to a plan or programme, and for this purpose, the report shall-

...(c) contain the information specified in Schedule 2.

### **2.2 Geographical scope of the programme not taken into account**

The *Draft Environmental Report* of the SEA looks at 16 different strategy options for the future drainage of the Greater Dublin area, including a "do nothing" option. Six of the options involve the construction of a large treatment plant (between 450,000PE and 850,000PE) at Portrane, Co Dublin, and the pumping of raw sewage along a 22km orbital sewer. A further two options involve treatment of sewage in the areas where it is generated (i.e. outside North County Dublin) and the transporting of the treated effluent along 22km orbital sewer for outfall at Portrane.

Of the 16 options considered as part of the SEA process, seven of the options propose a large-scale, single plant as the solution to the drainage needs of the Greater Dublin Area. This single plant is recommended to be located in either Potrane (six of the options considered) or at an unspecified location in the Northern Greater Dublin area. The Greater Dublin Strategic Drainage Area consists of the local authorities of Dublin City, Fingal (North Dublin), South Dublin, Dun Laoghaire-Rathdown and the adjacent counties of Meath, Kildare and Wicklow.

The area covered by these seven local authorities is geographically large and contains vast tracts of undeveloped land, industrial areas and existing wastewater treatment plants (WwTPs). Yet, the *Draft Environmental Report* restricts its recommendation for the preferred strategic drainage option to the siting of an 850,000PE single, regional sewage plant at an unspecified location in the Northern Greater Dublin area.

Locations in parts of Dublin, other than the northern part, were not recommended for WwTP while Meath, Kildare and Wicklow were excluded from initial consideration by the SEA consultants as the location(s) for treatment works. Fairshare submits that the consideration of the location or locations of the treatment works should include the entire Greater Dublin (GDSDS) region and not just the Northern Greater Dublin area.

## **3. FAILURE OF THE COMPETENT AUTHORITY TO COMPLY WITH ITS STATUTORY OBLIGATIONS REGARDING PUBLIC PARTICIPATION IN THE STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS**

### **3.1 Factual errors in Environmental Report**

Fairshare lodged a valid submission, dated May 2007, to the competent authority, Fingal County Council. This submission was made in response to a notice under Article 11(1) of the *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004* (S.I. No. 435 of 2004), which invited submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report. Extending to 80 pages, the submission included two independent environmental reports prepared by internationally recognised consultancies, which were specially commissioned by Fairshare:

1. *Water Quality Report, Portrane, Co Dublin* prepared by Aqua-Fact International Services Ltd, Galway, Ireland (Appendix 1).
2. *Initial Review of Final Strategy Report & Draft Scoping Report for Strategic Environmental Assessment* prepared by Pick Everard, architects, consulting engineers, project managers, surveyors, of Leicester, England (Appendix 2).

Under Article 12(1) of the *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004* (S.I. No. 435 of 2004), the Environmental Report is required to:

(b) **take account of any submission or observation received** in response to a notice under article 11(1).

Serious factual errors in the *Environmental Report for the Strategic Environmental Assessment of the Greater Dublin Strategic Drainage Study* provide irrefutable evidence that the Fairshare submission has not been properly read by the competent authority or its contractors, proving beyond reasonable doubt that the Fairshare submission cannot have been taken into account.

Making the point that Broadmeadow Estuary is ecologically important, Section 5.1 of the May 2007 Fairshare submission clearly states that this estuary is also known as Swords or Malahide Estuary, as follows:

Broadmeadow Estuary (sometimes called Swords or Malahide Estuary) is about 3km from the proposed site.

However, the *Environmental Report* repeatedly lists Broadmeadow Estuary and Malahide Estuary as two separate and distinct water bodies when they are in fact alternative names for the same estuary. This error is consistent throughout the environmental report (see Section 6 – Selection of the Preferred Strategy: 6.3 Biodiversity, Flora and Fauna, pages 106 to 111; 6.4 Population and Human Health, pages 11 to 112; 6.5 Water, pages 113 to 114). The failure of the competent authority to comply with its statutory obligations regarding public participation is a serious procedural flaw which may warrant judicial review of the strategic environmental assessment process.

### **3.2 Public consultation process meaningless**

The failure of the consultants conducting the SEA to take into account the views of Fairshare has prompted the group to lodge a complaint with the EU Petitions Committee of the EU Parliament (the reference for the complaint is Petition No. 842/2007). This submission will also form part of the EU complaint from Fairshare. Also, because the submissions made by Fairshare up to now have been dismissed, this latest submission is being made under protest.

## **4. FAILURE OF THE COMPETENT AUTHORITY TO PRODUCE AN ENVIRONMENTAL REPORT OF SUFFICIENT QUALITY TO MEET THE REQUIREMENTS OF THE REGULATIONS**

#### **4.1 Fairshare-commissioned reports not understood**

Under Article 12(1) of the *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004* (S.I. No. 435 of 2004), the Environmental Report is required to:

(c) **be of sufficient quality** to meet the requirements of these Regulations.

However, the *Environmental Report* is clearly of insufficient quality to properly assess the likely significant effects of implementing the Greater Dublin Strategic Drainage Strategy.

Firstly, the serious geographical error discussed above suggests that the consultants engaged by Fingal County Council are not at all familiar with the north County Dublin coastline. Five of the eight original drainage options identified by the Greater Dublin Strategic Drainage Strategy include the development of a wastewater treatment plant at Portrane, which is very close to Broadmeadow Estuary (3km). Within this context, it is reasonable to assume that the *Environmental Report* should be very clear about the exact location and detailed ecological characteristics of Broadmeadow Estuary. However, the *Environmental Report* repeatedly lists Broadmeadow Estuary and Malahide Estuary as two separate and distinct water bodies when they are in fact alternative names for the same estuary. This error is consistent throughout the environmental report (see Section 6 – Selection of the Preferred Strategy: 6.3 Biodiversity, Flora and Fauna, pages 106 to 111; 6.4 Population and Human Health, pages 11 to 112; 6.5 Water, pages 113 to 114).

Further evidence that the *Environmental Report* is of insufficient quality to properly assess the likely significant effects of the programme is the consultants' total lack of understanding of environmental reports undertaken by the independent consultants of international renown engaged by Fairshare (discussed below).

These factors indicate that the consultants engaged by Fingal County Council were either not competent to undertake an environmental report or did not devote sufficient time and effort to producing a report of sufficiently high quality to meet the requirements of the regulations.

## **5. FAILURE OF THE COMPETENT AUTHORITY TO ACCURATELY SUMMARISE THE FINDINGS OF A HYDRODYNAMIC STUDY CARRIED OUT BY THE UCD CENTRE FOR WATER RESOURCES RESEARCH**

### **5.1 Inaccurate summary of original report**

The preferred strategic drainage strategy recommended in the *Draft Environmental Report* is to build an 850,000PE plant at an unidentified location in the North Dublin area and have a coastal outfall pipe at an unidentified location on the North Dublin coastline. The *Draft Environmental Report* states:

Subject to an appropriate outfall selection process with associated validity hydrodynamic modelling this scenario is considered Neutral.

(This neutral rating is arrived at under the Biodiversity, Flora and Fauna, See section 6.3, page 109; Population and Human Health, 6.4, pages 112 to 115; and Water, 6.5, on pages 114 to 116).

The *Draft Environmental Report* claims that a hydrodynamic modelling exercise done by the Centre for Water Resources Research (CWRR) in University College Dublin (UCD) shows the suitability of discharging treated wastewater into the Irish Sea at Portrane, and elsewhere along the North Dublin coast line.

The full title of this UCD report is not supplied in the *Draft Environmental Report*. Fairshare requested a copy of the original report from the consultants carrying out the SEA. It took three weeks for the consultants to produce the report. Originators of the draft Environmental Report Paul Kelly and Olan Howell told Fairshare they did not have the UCD report to hand. Mr Kelly told Fairshare the report had to be retrieved from storage at Fingal County Council's offices. It transpired the report is entitled

*Report on Water Quality Modelling in Dublin from Bray to Balbriggan*. It was prepared by A. Dowley in May 2001 as part of the Greater Dublin Strategic Drainage Study (GSDSDS).

On the topic of discharging into the Irish Sea at Portrane, the *Draft Environmental Report* states that the UCD water modelling study has

...identified the suitability of this approach subject to the appropriate necessary further investigations required related to bathymetric, hydrodynamic and water quality data.

(See Section 6.3, from pages 109 and Section 6.4, on page 114 of the *Draft Environmental Report* where this phraseology is repeated a number of times).

It should be noted that the Greater Dublin Strategic Drainage Study (GSDSDS), which was published in 2005, had initially summarised the Centre for Water Resources Research on which the assertion about the suitability of Portrane as the location for an outfall pipe is based (See Section 8.5 of the GSDSDS, under the heading Receiving Waters, on pages 79 and 80).

However, neither the GSDSDS nor the *Draft Environmental Report* accurately reflect the findings of *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* prepared by the Centre for Water Resources Research at UCD. This inaccurate interpretation of the report has led the consultants conducting the SEA to overstate the case for locating an outfall pipe at Portrane and/or somewhere else on the North Dublin coastline. Fairshare feels the summaries of the water quality modelling report in both the GSDSDS and the *Draft Environmental Report* are selective and unfaithful to the original. For this reason, we have included the *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* as part of our submission (See Appendix 3).

The *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* specifies a number of limitations on the modelling exercise not mentioned in the GSDSDS or the *Draft Environmental Report*. Here are two of the caveats listed in the report prepared by the Centre for Water Resources Research, but not mentioned in the *Draft Environmental Report*:

#### **5.1.2 Modelling exercise not calibrated**

Importantly, it states on page 98 of *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* that the

North Dublin model has not been calibrated or validated.

This is hugely significant as no confidence can be taken from any results of a modelling exercise which has not been benchmarked against other research/information. It is not that information is not readily to hand; the report admits in Section 7.9, on page 100, that there is “wealth of existing data for this costal zone”. A modelling exercise commissioned by Fairshare, carried out by Aqua-Fact International Services Ltd in March 2007, was calibrated.

#### **5.1.3 ‘Difficult to predict’**

Fairshare feels it is noteworthy that the author of *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* states on pages 98 that:

There is no bathymetric, hydrodynamic, or water quality data available for the Broadmeadow estuary or the Rogerstown estuary available to the modellers. There are no flows available for the contributing streams. It is therefore difficult to predict with any confidence the responses to increasing loads in these water *bodies*. [Our italics.]

The GSDSDS does acknowledge this point about the lack of data available for the Broadmeadow Estuary (but not Rogerstown). It goes on to state that “it is difficult to predict with any confidence the responses to increasing loads in this water *body*.” [Our italics.]

## **5.2 Dubious conclusions drawn**

The *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* in section 6.4 under the heading North Dublin Model looks at the impact of discharges from various existing sewage plants (looking at both current discharge volumes and additional discharge levels due to planned expansion of the WwTPs) on the North Dublin coastline. However, only at Portrane does it consider the impact on coastal waters of a large-scale plant. Under the heading Portrane Major Options in section 6.4.4, the report looks at two scenarios for Portrane – an outfall pipe discharging from a 168,192PE sewage plant and an outfall pipe discharging from a 624,617PE plant. No impacts from other discharge pipes associated with large-scale treatment works are considered under the section headed North Dublin Model (Section 6.4).

The sewage treatment works recommended for Portrane in the GSDSDS and considered in the *Draft Environmental Report* is an 850,000PE plant – some 36pc larger than the 624,617PE plant modelled by the UCD Centre for Water Resources Research. No mention of this large discrepancy is made in the *Draft Environmental Report*. Yet the *Draft Environmental Report* concludes that a discharge pipe from an 850,000PE WwTP at Portrane would have a “neutral” impact on the surrounding waters. Fairshare feels that drawing conclusions about a modelling exercise done to gauge the impact of a discharge pipe from a 621,617PE plant for an 850,000PE plant is dubious.

Fairshare also challenges the conclusion that a discharge pipe from an 850,000PE WwTP at Portrane would have a “neutral” impact on the surrounding waters, when the UCD report states in Section 6.4 on page 98:

There is no bathymetric, hydrodynamic, or water quality data available for the Broadmeadow Estuary or the Rogerstown Estuary available to the modellers. There are no flow data for the contributing streams. It is therefore difficult to predict with any confidence the responses to increasing loads in these water bodies.

Fairshare also feels it is unjustified to conclude, as the *Draft Environmental Report* does, that its recommended preferred strategic drainage option of an outfall pipe somewhere on North Dublin coastline is supported by the UCD Centre for Water Resources Research paper. In fact, the only location for an outfall pipe from a large-scale treatment works considered under the section headed North Dublin Model in the UCD modelling paper is at Portrane (see Section 6.4).

Please note that no other data or studies are cited in the *Draft Environmental Report* to back up the argument that Portrane or the North Dublin coastline are suitable locations for a discharge pipe from an 850,000PE WwTP.

Therefore, Fairshare considers the following statement made in Section 6.14 (page 134) Selection of Preferred Strategic Drainage Option of the *Draft Environmental Report* to be inaccurate:

The Irish Sea adjacent to the Northern Greater Dublin Area poses significant opportunities to select an appropriate outfall location whose suitability can be determined based on standard and acceptable hydrodynamic modelling techniques. Based on previous assessments conducted by the Centre for Water Resources Research at University College Dublin the suitability of the coastal discharge approach has been confirmed subject to appropriate necessary further bathymetric, hydrodynamic and water quality data investigations required when selecting a particular coastal outfall location.

This statement must be deleted from the Final Environmental Report.

### **5.3 Fairshare hydrodynamic study dismissed**

As part of the public consultation phase of the draft Scoping Report of the SEA, Fairshare had a hydrodynamic modelling exercise carried out by Aqua-Fact International Services Ltd, of Galway. This study looked at the likely impact of an outfall pipe on the Portrane, Donabate and Malahide beaches from discharges emanating from an 850,000PE plant. (See *Water Quality Report, Portrane, Co Dublin* prepared by Aqua-Fact International Services Ltd, Galway, Ireland, in Appendix 1.)

The Aqua-Fact International report was modelled on the basis of a 600m outfall pipe from an 850,000PE WwTP. In an oral presentation to representatives from the Donabate-Portrane community

on October 4th, 2005, officials, including engineers, from Fingal County Council (the contracting authority for the SEA) stated that an outfall pipe of this length would be suitable for discharging effluent from a regional wastewater treatment plant in Portrane to the Irish Sea.

Aqua-Fact estimated that the new facility would emit effluent which would contaminate sea water. Using computer modelling, the report has predicted that the contamination levels in Portrane and Donabate would be in excess of that allowed for Blue Flag status. The Aqua-Fact report states in section 5.3, page 30:

It is likely that these beaches would lose their blue flag status as a result of the proposed discharge.

It added that contaminated water during the spring tide could threaten water quality at Malahide.

The *Draft Environmental Report* states that this Aqua-Fact report is “premature” as no design for the plant, or volume of discharge, has been produced. Fairshare takes issue with this dismissal of a report it had commissioned and points out that:

- ♦ The Aqua-Fact report is calibrated unlike the Centre for Water Resources Research report which the *Draft Environmental Report* relies on to dismiss the Aqua-Fact report. (Please note that the references to a “wealth of data” in *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* indicates that it is not difficult to validate and calibrate a water modelling report);
- ♦ The Fairshare-commissioned report was carried out by an independent, reputable consultancy;
- ♦ The Aqua-Fact report is based on discharges from an 850,000PE plant, and not a 621,617PE plant;
- ♦ The authors of the SEA *Draft Environmental Report* have no competency in hydrodynamic modelling, therefore it is inappropriate for them to dismiss the Aqua-Fact report.
- ♦ The contractors engaged by Fingal County Council to conduct the SEA did not have a copy of the *Report on Water Quality Modelling in Dublin from Bray to Balbriggan* to hand when requested by Fairshare. Therefore, it is likely the contractors conducting the SEA were relying on secondary sources (i.e. the summary of the UCD study in the GSDSDS). This may explain why a distorted version of the modelling report has been used to dismiss the Fairshare-commissioned Aqua-Fact water modelling exercise.

#### **5.4 Contradictory and inconsistent**

In conclusion, the *Draft Environmental Report* states that the hydrodynamic modelling done for Fairshare by Aqua-Fact on the likely impact of an outfall pipe on the Portrane, Donabate, Malahide beaches is “premature” as no design for the plant, or volume of discharge, has been produced. However, the *Draft Environmental Report* claims (inaccurately) that a hydrodynamic modelling exercise done by the Centre for Water Resources Research (CWRR) in UCD shows the suitability of discharging into the Irish Sea at Portrane and elsewhere along the North Dublin coastline. Fairshare submits that it is contradictory and inconsistent to dismiss the Aqua-Fact report while claiming the CWRR report supports the concept of costal discharge in North Dublin. Additionally, the claims made for the CWRR modelling exercise are not supported by the facts for the reasons outlined above.

## **6. FAILURE OF THE COMPETENT AUTHORITY TO REFLECT THE AT RISK STATUS OF BROADMEADOW ESTUARY WHEN EVALUATING THE SUITABILITY OF PORTRANE FOR A DISCHARGE PIPE FROM A REGIONAL WWTP**

### **6.1 Risk assessment required by EU Directive**

Both Broadmeadow Estuary (also known as Malahide or Swords Estuary) and Rogerstown Estuary are at risk from pollution, according to the Eastern River Basin District (ERBD) project. The ERBD carried out a series of risk assessments which were required under the provisions of the EU Water Framework Directive (2000/60/EC). (See Section 5.5.3 on pages 75 to 78 of the *Draft Environmental Report* for a summary of Eastern River Basin District risk assessment findings).

The Donabate/Portrane area falls within the Nanny-Delvin catchment as part of the Eastern River Basin District. It should be noted that:

- ♦ the following are Special Areas of Conservation (SACs): Lambay Island, Rogerstown Estuary, and Broadmeadow/Malahide Estuary;
- ♦ the following are Special Protection Areas (SPAs): Lambay Island, Rogerstown Estuary, and Broadmeadow/Malahide Estuary;
- ♦ the following are recreational waters: Donabate and Portrane;
- ♦ Broadmeadow Estuary is classified as having Nutrient Sensitive Waters, according to the Eastern River Basin District.

### **6.2 Rivers at risk**

The Broadmeadow and Ward Rivers, which feed into Broadmeadow Estuary, are “probably at risk”, according to the Eastern River Basin District project. The same applies to the Ballyboghil River, which feeds into the Rogerstown Estuary. (See section 5.5.3 of the *Draft Environmental Report*, from page 75 to 78, and *Final Characterisation, September 2005* Eastern River Basin District Project.)

### **6.3 Estuaries at risk**

Rogerstown Estuary is “probably at risk” on the basis of both point source, and morphological pressures. The most significant point source risks were considered to be municipal WwTPs and CSOs (combined sewer overflows) and the most significant morphological element was considered to be intensive land-use, according to the Eastern River Basin District project.

Broadmeadow Estuary was considered to be 1a “at risk” on the basis of multiple pressures. This is the highest risk rating used as part of the Eastern River Basin District assessment. Broadmeadow Estuary is “at risk” from both WwTPs and CSOs, and “at risk” on impoundments. It is “probably at risk” due to intensive land-use and coastal defences, as well as being “at risk” for OSPAR (dangerous/hazardous substances) and UWWTD (the Urban WasteWater Treatment Directive) sensitive water status.

### **6.4 Costal waters**

Broadmeadow Estuary is considered 1a “at risk” on the grounds of impoundment caused by the railway line embankment. (See *Final Characterisation, September 2005* Eastern River Basin District Project, Section 6.7.2). Under the heading Nutrient Sensitive Areas, Broadmeadow Estuary is assessed as 1a “at risk” (See Section 6.10 of *Final Characterisation*).

### **6.5 Transitional waters**

Broadmeadow Estuary is rated as 1a “at risk” under this heading. Rogerstown Estuary is rated as 1b “probably at risk”. (See Figure 5.5, on page 81, of *Draft Environmental Report*; and Table B5 in Appendix B of *Final Characterisation, September 2005*).

### **6.6 Sensitive waters require better than secondary treatment**

It should also be noted that the EU Urban Wastewater Treatment Directive (91/271/EEC) specifically requires that more advanced treatment than secondary treatment is required for agglomerations greater than 10,000PE in designated sensitive areas and their catchments. We can find no mention being made of this in the *Draft Environmental Report*.

### **6.7 Neutral assessment hard to explain**

Given the foregoing, Fairshare fundamentally disagrees that it could be “considered as neutral” to discharge treated effluent from an 850,000PE WwTP plant at Portrane, given that Portrane is straddled by “at risk” Broadmeadow Estuary and “probably at risk” Rogerstown Estuary. (*Draft Environmental Report*, Section 6.3, page 108). Please note that Portrane is 3km from Broadmeadow Estuary and 1.5km from Rogerstown Estuary.



Fairshare also considers it inconsistent and inaccurate to claim that the coastline around Portrane is suitable for the discharge of treated sewage from an 850,000PE WwTP, citing for support a limited, un-calibrated and inaccurately summarised UCD Centre for Water Resources Research report, while failing to mention the at risk/probably at risk assessment of Broadmeadow and Rogerstown estuaries and other risk assessments assigned to the North Dublin coastline.

Any consideration of Portrane, or the anywhere else on the Fingal coastline, for discharge must take into account the risk assessments carried out as part of the Eastern River Basin District as required under the provisions of the EU Water Framework Directive. The *Draft Environmental Report* does not show any evidence of having taken the ERBD data into account when assessing various options despite setting this down as one of its assessment criteria. For example, in Table 4.2, Environmental Indicators and Targets/Assessment Criteria, under Water, on page 56, it states:

The assessment of potential significant impact to receiving waters will be based on a review of existing data from the WFD Eastern River Basin District Project, EPA water quality data and reports, and local authority data.

However, when it comes to Section 6, Selection Preferred Strategy, under the headings Biodiversity, Flora and Water (section 6.3, pages 106 to 111) and Water (section 6.5, pages 113 to 117) no mention is made of ERB Project data, nor is there reference to EPA or local authority data. Despite this, the *Environmental Report* asserts that Portrane and an unidentified site in northern Greater Dublin are suitable as locations for costal discharge from for a regional WwTP. Fairshare considers it significant that the only data mentioned is the limited, un-calibrated and inaccurately summarised UCD Centre for Water Resources Research report referred to in Section 5 of this submission.

Fairshare also submits that it contradictory and inconsistent that the concept of discharging from a regional WwTP at Portrane is considered “neutral” when the *Draft Environmental Report* states in Section 6.3 Biodiversity, Flora and Fauna (page 106) that the preferred

..strategy should not significantly impact on European designed sites (SACs and SPAs) and other Designated Sites (e.g. sensitive waters, bathing waters).

As outlined already in this section, Broadmeadow Estuary (3km from the site proposed in the GSDSDS for a regional WwTP) and Rogerstown Estuary (1.5km from the site proposed in the GSDSDS for a regional WwTP), along with Lambay Island (5km from Portrane), have SAC and SPA designations.

In conclusion, a “neutral” weighting assigned to discharging into the sea at Portrane is not supported by an objective consideration of the facts. The failure to mention the ERBD risk assessments under Biodiversity, Flora and Fauna and under Water renders the document flawed. The risk assessments of the two estuaries need to be specifically taken into consideration when selecting a preferred drainage strategy. It bears repeating that Broadmeadow Estuary (a SAC and a SPA) is “at risk” from pollution. The *Draft Environmental Report* must be radically amended to give due regard to this fact.

## **7. FAILURE OF THE COMPETENT AUTHORITY TO RECOGNISE THE EXISTENCE OF A NUMBER OF PROTECTED SPECIES IN THE DONABATE/PORTRANE AREA**

### **7.1 Seals and rare plants**

There are a number of protected species in the Donabate/Portrane area. Two plant species, which are legally protected under the Flora (Protection) Act, 1999, occur at Rogerstown: Hairy Violet (*Viola hirta*) and Meadow Barley (*Hordeum secalinum*). In addition, the Green-veined Orchid (*Orchis morio*) is to be found at Rogerstown estuary. Rogertown has been a breeding site for the Little Tern. Fingal County Council’s biodiversity officer has announced plans to reintroduce the breeding of the Little Tern at Portrane beach.

Lambay Island supports the only breeding colony for Grey Seal on the east coast. Seal populations may be at risk from human-induced threats [according to *Grey Seals: Status Monitoring in the Irish and Celtic Seas*, Maritime Ireland/Wales INTERREG Report No 3].

The existence of these species is not mentioned in the *Draft Environmental Report*. Fairshare considers it to be a significant omission not to mention protected species in a strategic environmental report.

## **8. FAILURE OF THE COMPETENT AUTHORITY TO ASSESS THE 16 STRATEGIC DRAINAGE OPTIONS USING SCIENTIFIC, OBJECTIVE AND CONSISTENT CRITERIA**

### **8.1 Assessment criteria subjective**

The criteria used to assess the 16 options in the *Draft Environmental Report* of the SEA are qualitative and are therefore subjective.

Evidence of this can be gleaned from the fact that the early part of the *Draft Environmental Report* goes into a lot of detail on the environmental characteristics of North County Dublin, including the ecological importance of the Portrane, Malahide, Donabate area. It then rates as a neutral or minor neutral the siting of a plant and outfall pipe in Portrane.

Fairshare notes that options 1A and 1B (expand Ringsend) are rated a major negative under the heading Population and Human Health (Section 6.4, on page 112) because expanding that WwTP would impact on the beaches at Dollymount, Sandymount and Merrion Strand. This contrasts with the rating given to options 2B, 2C, 3C, 5B, 6B, 7B and 4 (most of which involve a large plant at Portrane, or discharge somewhere else on the North County coastline). These options are rated a neutral, despite the report acknowledging the amenity value of the beaches at Portrane, Donabate and Malahide. Therefore, it must be concluded that the ratings have been applied in an ad hoc, subjective and inconsistent fashion, perhaps to meet some instructions (which are unspecified in the tender document for the SEA and not outlined in the *Draft Environmental Report*) from the contracting local authority.

### **8.2 Different standards for different areas**

Another example of the subjective and inconsistent application of the ratings applied to various options can be found under Biodiversity, Flora and Fauna (Section 6.3, pages 106 to 111). Here the report concludes expanding Ringsend is a “major negative” because of the Special Area of Conservation (SAC) and Special Protection Area (SPA) European designations of nearby Bull Island.

We have quoted the following paragraph in full (reproducing it exactly as it appears in the *Draft Environmental Report*, replete with editorial errors) because we feel it is a good example of how the criteria used to assess the 16 options are being applied in a haphazard and inconsistent manner. In Section 6.3, under the heading Flora and Fauna, on page 108 it says:

**Option 2B** is a similar strategy to Option 2A with the exception that the discharge from the 350,000 p.e. WwTP in South Dublin (Grange Castle) would be via the Grand Canal Storm Cell and Grand Canal By-Pass culvert for discharge to the River Liffey Estuary. Based on the influence that water quality has on the characteristics of water dependent ecological designated site it is considered that this option poses unacceptable risk to Dublin Bay with particular reference to North Dublin Bay and South Dublin Bay pNHA, Howth Head SPA Dolphins/Dublin Docks pNHA, North Bull Island Nature Reserve and Wildlife Sanctuary, North Dublin cSAC, North Bull Island SPA, South Dublin Bay cSAC and Sandymount Strand/Tolka Estuary SPA. Similar to Option 2A the provision of a 450,000 p.e. WwTP on the North Fingal Coastline (Portrane) would also have to be considered in the context of the designated ecological sites in the area. Subject to an appropriate outfall selection process and validatory hydrodynamic modelling the principle of a marine discharge cannot be discounted. Considering the likely direct impact on Dublin Bay as a result of the discharge via the River Liffey Estuary this scenario is considered as **Major Negative**.

What the above paragraph appears to state is that there are a number of proposed National Heritage Sites (pNHA), candidate Special Areas of Conservation (cSAC), and Special Protection Areas (SPA) that would make it unacceptable to discharge from a WwTP in South Dublin.

But Portrane has two estuaries, both with SPA and and SAC designations. Despite this, the *Draft Environmental Report* in the next paragraph to the one quoted above rates discharging at Portrane as a “neutral”. This, even though the report specifies that the preferred drainage strategy “should not significantly impact on the European designated sites” (Section 6.3, page 106). Therefore, Fairshare submits that the above quoted paragraph and the neutral rating assigned to discharging from Portrane (in the paragraph following the one quoted above) indicates that the *Draft Environmental Report* is inconsistent, contradictory and selective in the applications of the ratings criteria used to assess each option. The same standards must be applied to each area if the credibility of this SEA is not to be damaged beyond repair.

Fairshare submits that siting a major WwTP on top of SACs/SPAs is a major negative, whether those SACs/SPAs are at Bull Island or Broadmeadow Estuary.

### **8.3 Some beaches are more equal than others**

Fairshare notes that under Population and Human Health two options are rejected and rated “Major Negative” (Options 1A and 1B) because of the impact on Dublin Bay and on the beaches at Dollymount, Sandymount and Merrion Strand.

But other options that involve locating either a 450,000PE or 850,000PE WwTP at Portrane (Options 2A, 2B, 2C, 3C, 5B, 6B and 7B) are rated as neutral despite the amenity value of the beaches at Portrane, Donbate and Malahide. These three beaches either have or had in the recent past Blue Flag status and are used extensively especially during the summer months for sailing, swimming, wind surfing etc. (See Section 6.4, pages 111, 112). Fairshare asserts that this is a selective application of the ratings.

## **9. FAILURE OF THE COMPETENT AUTHORITY TO CARRY OUT A RISK ASSESSMENT BEFORE ARRIVING AT A PREFERRED STRATEGIC DRAINAGE RECOMMENDATION**

### **9.1 Malfunction a major risk**

No risk assessment appears to have been done on the likely impact of the preferred strategic drainage option of a large, regional WwT plant and associated orbital sewer. However, the *Environmental Report* merely mentions that a discharge pipe needs “adequate dispersal characteristics” (Section 6.5, page 115).

### **9.2 Why a risk assessment is needed**

A risk assessment is necessary to properly weigh up each strategic drainage option. The failure to carry out a risk assessment has led to an incomplete and distorted assessment of the various options. This distortion has resulted in the SEA consultants promoting the merits of a single large treatment plant. Fairshare feels a proper risk assessment would throw cold water on the merits of single, regional WwTP. This is because a proper risk assessment would consider:

- ♦ malfunction, as the breakdown of a single, regional WwTP will leave an enormous void in the treatment capacity of the Greater Dublin region. Multiple WwTPs, on the other hand, would have a much smaller impact should one or even two of them malfunction. Also, the potential impact of a failure in one large WwTP as opposed to a small plant would have greater potential consequences to human health.
- ♦ the impact on receiving waters of large volume discharges. The malfunction, temporary shut down of a regional WwTP for maintenance, or a terrorists attack, would all likely lead to large volumes of untreated wastewater being discharged directly into the sea. Such an event would

amount to an ecological catastrophe. On April 23, 2007, a failure of a pump at the Seafield WwTP in Leith, Scotland, caused the discharge of 1,000 litres per second of diluted but untreated sewage to be poured into the Forth of Firth. The City of Edinburgh Council was forced to issue an emergency warning to people in the area. Members of the public were warned to keep out of the water and not to eat fish or shellfish from the Firth. The Marine Conservation Society said there was widespread loss of marine life. (See 'Sunday Herald', Scotland, April 24, 2007).

- ♦ the risks associated with pumping untreated sewage along a 22km orbital sewer. The GDSDS – Final Strategy Report admits that the long distance transfer of loads increases the risks/consequences of system failure. (See GDSDS, Section 11.6.6, page 164). A treated effluent orbital sewer, on the other hand, would pose a significantly lower risk.

In conclusion, Fairshare notes that a risk assessment was not carried out on the 16 options and specifically the preferred strategic drainage option of a single, regional WwTP with associated 22km orbital sewer. Numerous submissions at the Scoping Report stage of the SEA expressly called for just such an assessment to be conducted. Fairshare is of the view that had a risk assessment been carried out a different preferred strategic drainage recommendation would have been arrived at. The failure to carry out a risk assessment is a major omission and has led to an incomplete and flawed assessment of the 16 options and a faulty recommendation.

## **10. FAILURE OF THE COMPETENT AUTHORITY TO ASSESS THE ENERGY DEMANDS OF THE DIFFERENT STRATEGIC DRAINAGE OPTIONS CONSIDERED**

### **10.1 Keeping energy consumption down**

The *Draft Environmental Report* sets out as one of its assessment criteria the selection of a preferred drainage strategy based on minimising energy consumption and greenhouse gas (GHG) production (see Climatic Factors in Section 6.7, page 117).

This section goes on to state that it is not possible to determine the actual energy demand for each of the strategic drainage options considered. It claims this is because of insufficient engineering design information. The section continues:

Instead, the relative number of WwTPs is being used as a proxy indicator for this objective. Strategic drainage options with relatively lesser numbers of WwTPs (e.g. 1 - 10) will perform better against this objective, as it is likely that there will be less energy consumption when compared with the likely pumping and electricity consumption requirements associated with decentralised (and as a consequences more) drainage and wastewater treatment facilities. On the countering side, strategic drainage options with relatively greater numbers of WwTPs (e.g. 15/20) will not perform as well under this Environmental Objective.

Fairshare commissioned international engineering consultants Pick Everard to estimate the likely energy consumption of a) a single 850,000PE plant; b) seven plants providing 850,000PE in total; c) 15 plants providing a total of 850,000PE of treatment. Pick Everard reported that a regional WwTP solution would have greater transfer pumping requirements than a de-centralised solution (i.e. a large number of WwTPs). (See *Energy Demand & Operational Cost Review, Greater Dublin Strategic Drainage Study for Fairshare*, 30 November 2007, in Appendix 4). The Pick Everard cost review states in section 1.2 Options:

The pumping requirements to convey large flows to a single location for treatment are likely to be significant, and require some consideration before the proposed proxy indicator can be used with confidence.

The Pick Everard cost review estimates the energy demand (principally electricity consumption) and running costs for the additional pumping which would be required for a centralised solution or number

of WwTPs, and then balances this against the additional sludge tankering costs and manpower costs of a de-centralised solution. The Pick Everard review states in Section 1.3.1, Energy Demand:

Energy demand or power consumption requirements for the WwTPs is likely to be closely proportional to the population equivalent and hence treatment capacity for the works. If this treatment capacity is split across several works, the total power consumption is unlikely to change significantly.

The report concludes, in Section 1.5, Summary, that the additional energy demand associated with the energy demand associated with a centralised solution can be estimated to be of the order of 3MW. This is due to the additional transfer pumping requirements. Assuming typical power costs, an annual additional cost of €1.53m for a centralised solution would not be unreasonable.

There are additional operating costs associated with a de-centralised solution, principally sludge tankering and manpower costs, which would counter the additional energy demand differences. Taking these factors into account, an approximate additional operational annual cost for a centralised solution could be estimated to be of the order of €0.45m.

The Pick Everard review acknowledges that a number of broad assumptions have been made to arrive at this figure, and a whole life cost assessment of each option will be required to provide more certainty of the figures. But the review concludes (again in Section 1.5):

However, it is apparent from the above that assuming that the less WwTPs an option has, the less energy it will consume is not necessarily correct, and therefore using the relative number of WwTPs as a proxy indicator for energy consumption is unsafe.

It is also apparent that the development of a lesser number of WwTP sites may not necessarily achieve cost effectiveness in terms of operational costs, including those for energy demand.

## **10.2 Economies of scale**

Fairshare also finds it bizarre that the Draft Environmental report can state that it is not possible to determine the energy demands of different options while at the same time referring to economies of scale (Section 6.7, page 118):

**Options 7A and 7B** have a greater number of WwTPs (i.e. 15 no.) and associated infrastructure resulting in a likely reduction in overall energy efficiency, due to reduced economies of scale and increased energy demands from the greater number of WwTPs.

It is either one or the other – if energy consumption cannot be calculated how can the consultants know when economies of scale come into play?

It should also be noted that it may be technically feasible to incorporate a greater proportion of renewable energy sources into a series of smaller plants than one large one.

## **10.3 Fuzzy thinking on emissions**

Fairshare submits that it is not valid to assume that a small number of plants will produce less greenhouse gas than a large number; nor can you suppose the opposite. No effort was made to calculate the like emissions from the various options. This has led to fuzzy conclusions being drawn; conclusions which have no basis in scientific fact. (See Section 6.7, Climatic Factors, on page 118.)

# **11. FAILURE OF THE COMPETENT AUTHORITY TO CONDUCT A COST-BENEFIT ANALYSIS ON THE 16 STRATEGIC DRAINAGE OPTIONS CONSIDERED**

## **11.1 Costings are contained in the GSDS**

The *Draft Environmental Report* states, erroneously in the view of Fairshare, that there are no cost estimates, either capital or optional, for the various options. The GDSDS – Final Strategy Report, April 2005, has an entire chapter devoted to costs: Chapter 12, Proposed Works and Cost Estimates. The existence of this chapter contradicts the claim in the *Draft Environmental Report* that it is not possible to assess the 16 options in terms of costs. Table 12.3, on page 170, in the GDSDS – FSR summaries the costs associated with siting a regional WwTP in Portrane and constructing a 22km orbital sewer. It can be seen from this table that the lion’s share of the €989.5m total costs (which is made up of costs of €255.7m up to 2011 and €733.8m to 2031) is made up of expenditure on sewerage infrastructure (piping and pumping stations). For example, the West Dublin to Portrane part of the orbital sewer will cost €218m by 2031. The 9B South Dublin PS and rising main to orbital sewer will cost €64.7m, the Meath catchments to the orbital sewer will cost €18.3m etc. Granted much of this expenditure will be needed whatever drainage option is selected, but it needs to be pointed out that the table states that just €140m of the overall €989.5m cost is attributable to regional sewage works at Portrane.

The consultants engaged by Fingal County Council have failed to provide costs associated with the construction of seven WwTPs (Options 5A and 5B) and the costs associated with constructing 15 WwTPs (Options 7A and 7B) and the costs of building 850 WwTPs (Option 6A and 6B). However, in Section 6.12, Economic Factors (pages 125 to 126), of the *Draft Environmental Report*, it is stated that fewer plants will lead to “cost effectiveness”. In the absence of the rigorous attribution of costs to the various options this cannot be regarded as anything other than a subjective statement. A rigorous cost-benefit analysis needs to be carried out before any conclusions can be drawn. Otherwise, it is merely the opinion of Fingal County Council’s consultants that is being promoted. (The costings contained in Chapter 12 of the GDSDS, and the research used to build up this section of the GDSDS would provide a starting point for this cost-benefit process.) Any consideration of costs when considering the appropriate number of WwTPs must take into account other economic factors such as the impact on tourism and related businesses from the scale of the plant, odours, flies, mosquitoes, and loss of the Blue Flag Status of beaches.

In conclusion, Fairshare can find no independent, verifiable evidence in the *Draft Environmental Report* to base the claim that 850 community-sized WwTPs will be more costly to build and operate than a single, regional WwTP. Nor is there any basis for the claims that seven or 15 WwTPs will be less cost effective than a single, regional WwTP. A standard cost-benefit analysis would have been a more exacting way to determine the relative costs of the different options. The failure to carry out this exercise out renders the conclusions arrived at in *Draft Environmental Report* questionable. Additionally, the report is fundamentally flawed in not recognising that local treatment is more sustainable from an economic and environmental point of view.

## **12. FAILURE OF THE COMPETENT AUTHORITY TO INCLUDE THE ELIMINATION OF INFLOW/INFILTRATION/EXFILTRATION AS A STRATEGIC DRAINAGE OPTION**

### **12.1 Need for regional WwTP questioned**

As part of an 80-page submission to the Scoping Report phase of SEA process, Fairshare commissioned a leading international expert on sewage treatment to write a report on the proposal for a regional sewage plant at Portrane in the GDSDS. The report was written by Duncan Green of British engineering consultancy Pick Everard. (*Initial Review of Final Strategy Report & Draft Scoping Report for Strategic Environmental Assessment* prepared by Pick Everard, architects, consulting engineers, project managers, surveyors, of Leicester, England). Mr Green is recognised as a leading authority on wastewater treatment, and acts as an expert witness for privatised utilities Thames Water and Severn Water in court cases.

The Pick Everard report states that there is a fundamental question about the need for a regional facility in the GDSDS area. It states:

If the recommendations in the Greater Dublin Strategic Drainage Study are adopted it will result in the construction of a new waste-water treatment plant, the capacity of which will effectively equal the volume of ground and surface water entering the sewerage system.

(Source: *Initial Review of the Final Strategy Report & Draft Scoping Report for Strategic Environmental Assessment – Pick Everard, April 2007*)

Infiltration is a major issue for Greater Dublin, Pick Everard concludes from the evidence in the GDSDS. Between a third and a half of the flow in the foul sewers which arrives for treatment is infiltration and does not require treatment. Pick Everard notes that removing the need to treat this level of infiltration from the sewerage system would mean there is no need for a regional plant at Portrane.

The Pick Everard report adds that drains which deal with storm or rain water have been incorrectly linked into foul water sewers carrying water to treatment facilities in the Greater Dublin area. This storm water should not require sewage treatment and should be able to flow directly into rivers or lakes.

Mr Green's report concluded that there was no need to build a regional WwTP in North Dublin. In other words, the need for a new regional plant for Greater Dublin would disappear if existing plants stopped treating vast quantities of storm water and ground water. Mr Green notes that the GDSDS in Section 3.4.1 points out that infiltration for the Ringsend WwTP catchment is 2011 litres/sec. At a daily sewage discharge per household of 650 litres, 2011/s corresponds to 267,300 households. The GDSDS in Table 1.1 puts the current household size at 2.92. The infiltration, therefore, equates to a PE of 780,516, or 90pc of the PE figure for the proposed regional WwTP, Mr Green stated. (See *Initial Review of the Final Strategy Report & Draft Scoping Report for Strategic Environmental Assessment – Pick Everard, Section 2.3.*)

The need to limit infiltration, or storm water overflow, is specifically mandated in EU Directive 91/271/EEC (the Urban Wastewater Treatment Directive). In Annex IA, it states that collecting systems for urban systems must be put in place. The collection system must comply with Annex IA which states:

#### **Collecting systems**

Collecting systems shall take into account waste water treatment requirements.

The design, construction and maintenance of collecting systems shall be undertaken in accordance with the best technical knowledge not entailing excessive costs, notably regarding:

- volume and characteristics of urban waste water,
- prevention of leaks,
- limitation of pollution of receiving waters due to storm water overflows.

The EU Water Framework Directive is also relevant. A booklet entitled *Water Matters* on the implementation of the Directive was published by 12 local authorities and the Eastern River Basin District in June, 2007. The Eastern River Basin District booklet states on page 13 the following:

The potential impacts of pollution from increased urbanisation areas was voiced by the Advisory Council as a particular problem in the Eastern Basin. The subject of combined sewer overflow spillage and run-off from road networks into the Basin's estuaries, rivers and canals was also of concern. In addition to this, questions were raised as to the basis of design of combined sewer overflows, in that examination of the receiving water body's ability to assimilate overflows should receive higher consideration. Increased urbanisation and impermeable areas allow storm water to reach drainage networks faster than before. The receiving sewer networks may be unable to cope with the influx and there is an increased potential for localised flooding. Increased storm flows, previously attenuated by undeveloped land can increase the occurrence of combined sewers overflowing to surface water.

Despite the requirements of the EU Urban Wastewater Treatment Directive and the EU Water Framework Directive, and Pick Everard's references to the volume of ground and surface water entering the system, the SEA consultants engaged by Fingal County Council are dismissive about the needs to eliminate leaks and the impact this would have on the size of any regional treatment facility in Portrane. The SEA consultants state the following:

Even allowing for the elimination of all inflow/infiltration/exfiltration, there will still be a requirement to provide treatment capacity for 850,000p.e., in whichever treatment strategy is recommended.

(See *Submissions Report – Further to the Draft Report of the Strategic Environmental Assessment, Greater Dublin Strategic Drainage Study*, June 2007, Section 3.4, pages 8 to 10).

The *Draft Environmental Report* does not include the elimination of inflow/infiltration/exfiltration as one of its strategy options. This leads Fairshare to conclude that the SEA process has been steered towards a large plant/orbital sewer solution.

### **13. FAILURE OF THE COMPETENT AUTHORITY TO ADDRESS WATER CONSUMPTION ISSUES**

#### **13.1 Water consumption can be reduced**

Fairshare feels Inflow/Infiltration/Exfiltration (I/I/E) is of particular relevance in light of expected water shortages in the Greater Dublin area in the years ahead. Dublin City Council, on behalf of eight local authorities in the Greater Dublin area, is currently looking at two proposals to provide sources of water for the region post 2016. The proposals are:

1. The piping of water from the River Shannon, which will then be treated;
2. The desalination of sea water, requiring a major plant on the east coast of Ireland.

An SEA into these proposals was completed in July this year (See *Major Source SEA Statement*, Dublin City Council, July 2007). At the time of writing, no final decision has yet been taken on which option to pursue.

The context for these proposals is the expectation that 2.5m people will be living in the Greater Dublin Area by 2031 (See *Investigating Potential New Sources of Water For The Greater Dublin Area – Post 2016*, Dublin City Council, July 2007). It is estimated, by Dublin City Council, that the average water requirement for the Greater Dublin Area is 550m litres a day at the moment, with this demand set to rise to 800m per day by 2031. Peak requirement is estimated at 880m litres per day.

The greater Dublin area currently gets water from the Rivers Liffey, Vartry and Dodder. But new sources of water will be needed by 2015/6, according to the eight local authorities on the east coast of Ireland. Additional supplies of 80m gallons per day (350Ml/d) will be required. Otherwise, water shortages and curtailment of economic growth will be unavoidable, according to *Investigating Potential New Sources of Water For The Greater Dublin Area – Post 2016*.

There is some disagreement between the GSDSDS and the *Major Source SEA Statement* referred to earlier on the proposals to meet future water needs for the Greater Dublin Area. The GSDSDS assumes that per capita consumption is 222.6 litres a day (according to calculations in the Pick Everard report prepared for Fairshare).

On the other hand, the *Greater Dublin Water Supply – New Major Source Development, Strategic Environmental Assessment, Interim SEA Statement*, May 2007 (under the section headed Demand Projections) concludes that per capital consumption is 145 litres per head, a day. It further points out that there is customer leakage of 50-60 litres/property/day. Distribution leakage of 33% of water production in 2005, is set to fall to 20% by 2031, it adds.

The Fairshare-commissioned Pick Everard report points out that over time, water consumption levels can be reduced by environmentally sustainable policies that encourage lower domestic water usage. In the UK, where they have water metering, water consumption per capita is 150 litres per head, per day. Pick Everard states:

Adopting a per capita consumption of this level would clearly have a significant impact on the required hydraulic capacity of the future treatment facilities.



(See *Initial Review of the Final Strategy Report & Draft Scoping Report for Strategic Environmental Assessment – Pick Everard*, Section 4.1 in Appendix 2).

This reduction in water consumption is required by the EU Water Framework Directive. In Article 9, under the heading Recovery of Costs for Water Services, it states:

Member States shall take account of the principle of recovery of the costs of water services, including environmental and resource costs, having regard to the economic analysis conducted according to Annex III, and in accordance in particular with the polluter pays principle.

The Water Framework Directive goes on to state that member states shall ensure by 2010 that water-pricing policies are in place as incentives to ensure water is used efficiently.

Fairshare feels the SEA process into the GSDSDS has been compromised because of the failure to address water consumption issues. This is particularly relevant when there are plans to drain the River Shannon to supply water to the Greater Dublin Area. Measures to lower demand for water will have a major impact on the demand for wastewater treatment capacity. A proper SEA into the GSDSDS would look at the water consumption issue.

## **14. FAILURE OF THE COMPETENT AUTHORITY TO ADDRESS THE PROXIMITY PRINCIPLE**

### **14.1 Principle has been abandoned**

The internationally accepted definition of sustainable development is:

Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.

It is not sustainable, and contrary to the proximity principle, to have raw sewerage travel up to 22km from South and West Dublin and parts of Meath to North County Dublin. Raw sewerage becomes septic when left untreated for long periods. Numerous pumping stations would be needed to get it to Portrane.

Perversely, the GSDSDS actually invokes the proximity principle for rejecting one of the options (Option 3C). It says, in Section 11.6.6 on page 164:

Long distance transfer of loads from development (South Dublin) via city network, Dublin Bay and onwards to Portrane conflicts with the proximity principle for sustainable development and increases risk/consequences of system failure.

Despite this statement, the GSDSDS confusingly still managed to recommend siting a regional sewage plant in Portrane – a recommendation which necessitates the long-distance transfer of loads from South Dublin and further a field. The *Draft Environmental Report* of the SEA into the GSDSDS alters this recommendation to an unspecified location in the Northern part of Greater Dublin, which will also necessitate the building of an orbital sewer in addition to six pumping stations. This preferred drainage strategy is in direct conflict with the proximity principle.

The attitude of the consultants carrying out the SEA can be gleaned from the *Submissions Report – Further to the Draft Report of the Strategic Environmental Assessment, Greater Dublin Strategic Drainage Study*, June 2007. In section 3.9, page 14 it is stated:

### **EQUITY, SUSTAINABILITY AND THE 'PROXIMITY PRINCIPLE'**

#### **Issues Raised**

Many submissions commented that it was not sustainable, and contrary to the 'proximity principle' to collect sewage from County's Meath, Kildare and Wicklow and transport it to

Portrane. These submissions also stated that "raw sewage becomes septic when left untreated for long periods".

#### Response

The 'proximity principle' is a solid waste management concept which was developed from a general set of waste management principles, including, self-sufficiency; producer responsibility and the polluter pays principle; principle of sustainable development; and the precautionary principle. Scannell (2006) *Environmental and Land-Use Law* notes (p. 690) notes that the proximity principle requires that an integrated network of solid waste disposal installations is required to enable waste to be disposed of in one of the nearest appropriate installations, by means of the most appropriate methods and technologies in order to ensure a high level of protection for the environment and public health. The basis for the proximity principle is the reduction of the potential environmental impacts and financial costs of moving solid wastes.

In relation to the treatment of wastewater arisings, the proximity principle can be useful, although as noted above it is primarily a solid waste management concept. The 16 no. strategy options to be assessed in the Environmental Report range from single facility strategies (options 2C, 3A, 3B, 3C and 4); smaller, regional scale-facility options (option 2A); multi-regional/catchment-based facilities (options 5A and 5B); community-based facilities (6A and 6B), localised facilities (7A and 7B) and the 'Do-Nothing' (8). The development of a wider range of strategy options (in comparison to those in the GSDSDS Final Strategy Report) and the subsequent assessment of all 16 Strategy Options is a consideration of the proximity principle, but it is a consideration of the proximity principle along with a range of other environmental considerations.

In assessing each of the 16 Strategy Options, the strategy which emerges as the preferred option will be the option which performs best across all the Environmental Objectives but will also have regard for the general application of the proximity principle notwithstanding its specific focus on solid waste.

In relation to sewage going septic in pipelines and long distance pumping of wastewaters, this is a scenario which is catered for in drainage infrastructure and wastewater treatment plants all over the world. Specific design requirements can be integrated into the design process to prevent against septicity and odour impact.

Fairshare submits that as many of the strategy options considered in the *SEA Final Scoping Report* and the strategy recommended in the *Draft Environmental Report* involve the use of a 22km orbital sewer that this indicates that there is a bias towards large plant/orbital sewer solutions and this is in conflict with the proximity principle. The SEA process has failed to give equal consideration to more sustainable solutions which accord with the proximity principle. And the SEA consultants appear to be dismissing concerns about the proximity principle, as evidenced from the response in the 'SEA Submissions Report'.

Fairshare submits that the preferred strategy recommended by the SEA is in direct conflict with the proximity principle.

## **15. FAILURE OF THE COMPETENT AUTHORITY TO AVOID A BIAS TOWARDS A LARGE TREATMENT PLANT SOLUTION**

### **15.1 Big not necessarily best**

The SEA *Draft Environmental Report* demonstrates a clear bias towards large plant solutions. Of the 16 strategy options considered, seven involve plants of greater than 450,000PE, a further two involve treatment plants of 140,000PE, two strategy options involve expanding the existing Ringsend plant, and one strategy option involves "doing nothing". Another strategy option, and the one recommended

as the preferred strategic drainage option in the Draft *Environmental Report*, is listed as northern Greater Dublin, but an exact location for this option is not outlined.

There are just four strategy options listed that involve smaller, sustainable plants, and two of those options involve constructing a 22km orbital sewer for outflow of the treated effluent at sea. (See *Draft Environmental Report*, section 3.2.2, from page 14 to 43.)

The Draft Environmental Report explicitly states that there is a preference for larger plants. In Section 4, SEA Methodology, Table 4. 2, under Deliverability and Planning Risk on page 62, it is stated:

Options with a relatively large number of facilities will not perform as well against this Objective in comparison to Options which have a relatively smaller number of sites. The basis for this is that the greater the number of sites, the greater the risk that all of the Strategy will not be delivered and constructed due to potential delays (site selection and acquisition, planning process, procurement, construction, operation etc) with a few of the sites.

Fairshare submits that the consultants engaged by Fingal County Council to conduct the SEA have not seriously looked at the alternatives to large, regional plant solutions. It would appear that smaller plant strategy options have been added from the Draft Scoping Report stage as comparators to the proposed large-plant solutions in the GSDS. The consultants engaged by Fingal County Council then used these to baseline the large-plant options proposed in the GSDS. The logical outcome of this skewed process was that the large plant options in the GSDS were judged to be the optimal solutions.

Also, under Material Assets in the same section (page 59), it is claimed that smaller number of plants will perform better under this “environmental objective”. Also in the case of Air (page 57) and Climatic Factors (page 58), there is the same bias in favour of a low number of WwTPs.

### **15.2 Diametrically opposite conclusions just as valid**

Fairshare takes issue with what it regards as subjective and incorrect assumptions being made by the consultants engaged by Fingal County Council and outlined in the *Draft Environmental Report* about the desirability of having single, large WwTP. Fairshare submits that:

- ◆ It is just as valid to argue that a single, large WwTP will be more difficult to deliver than a range of smaller ones (Deliverability and Planning). Witness the acceptance of the Donabate/Portrane community of a 65,000PE plant to treat the sewage of Rush, Lusk and Donabate and Portrane. On the other hand, the community on the Donabate/Portrane peninsula has fought a ferocious campaign against the GSDS recommendation that a 850,000PE plant be sited in Portrane.
- ◆ It is just as valid to argue that a smaller number of WwTPs will have fewer problems with odours (Air). There have been numerous on-going problems with odours from the Ringsend WwTP plant (see Section 5.6.1, Draft Environmental Report, pages 93, 94). Although there have been odour problems with the Swords WwTP (60,000PE), odour problems have not been noted with other small and medium sized WwTPs in the Fingal area.
- ◆ It is just as valid to argue that a smaller number of WwTPs will consume less energy than a single, large one (Climatic Factors). A larger, regional WwTP (as recommended in the *Draft Environmental Report*) will need at least six pumping stations as part of a 22km orbital sewer. This will be highly energy intensive, whereas smaller, localised WwTPs may rely partially or wholly on gravity to convey the sewage for treatment.
- ◆ It is just as valid to argue that a single, large WwTP will have a greater impact on material assets than a smaller number (material assets are defined as public and private assets, and areas of economic, public and recreational importance, in the Draft Environmental Report). Sludge is a major issue with any size of WwTP, but the larger the plant, the more sludge is produced. Calculations carried out for Fairshare by UK engineering and environmental consultancy Pick Everard estimate that an 850,000PE WwTP could produce as many as 43 truck movements of sludge a day (See Appendix 5 for a detailed calculation by Pick Everard). This will mean increased congestion, more greenhouse gasses being produced, the need for more road maintenance, and more expense in terms of buying and maintaining trucks. Also,

the breakdown of a large plant will have a major negative impact on areas of public recreational importance.

In conclusion, the preferred drainage strategy in the *Draft Environmental Report* fails the test of sustainability. Proposing large plants and proposing to pump raw sewage 22km could not be considered sustainable and is at variance with the proximity principle. There a clear bias towards large plant solutions in the SEA *Draft Environmental Report*, something which conflicts with the stated aim of an SEA of "protection for the environment". Fairshare submits that the assumptions made in relation to the performance of large WwTPs are subjective and just as open to alternative conclusions. Fairshare and other groups in the Donabate/Portrane made submissions at the Draft Scoping stage of the SEA process pointing out the large plant bias and appealing for a fair and open-minded assessment of the various plant options. Fairshare contends that the consultants engaged by Fingal County Council have approached the SEA exercise with a large plant bias and have come to a flawed conclusion about the need for a single, regional WwTP. The large plant bias strips much of the credibility from the process.

## 16 CONCLUSION

This submission has been made under protest because of the decision of the SEA consultants, likely steered in this direction by Fingal County Council, to ignore a previous Fairshare submission (which included specially commissioned technical reports) made in May this year at the *Draft Scoping Report* stage. Serious factual errors in the *Environmental Report for the Strategic Environmental Assessment of the Greater Dublin Strategic Drainage Study* provide irrefutable evidence that the Fairshare submission has not been properly read by the competent authority or its contractors. Therefore, the SEA process has failed to comply with statutory obligations regarding public participation.

Consideration of the location or locations of the treatment works should include the entire Greater Dublin (GDSDS) region and not just the Northern Greater Dublin area.

Fairshare takes issue with the claim in *Draft Environmental Report* that a hydrodynamic modelling exercise done by the Centre for Water Resources Research (CWRR) in University College Dublin (UCD) shows the suitability of discharging treated wastewater into the Irish Sea at Portrane, and elsewhere along the Northern Dublin coastline. The UCD report is limited, un-calibrated and inaccurately summarised. For this reason, the UCD report cannot support the claims being made for it. In contrast, the Fairshare-commissioned report by Aqua-Fact International, is calibrated, was carried out for an 850,000PE plant and was conducted by a reputable, independent consultancy.

Fairshare notes the assigning of a neutral rating to discharges from a regional WwTP plant at Portrane despite the Eastern River Basin District Project findings that Broadmeadow River, Broadmeadow Estuary and the costal waters at Broadmeadow are at risk of pollution. This is the highest risk assessment assigned under the provisions of the EU Water Framework Directive. The failure to even mention this risk assessment under Biodiversity, Flora and Fauna and under Water renders the document flawed. It also indicates its conclusions are unscientific and so should be rejected. Fairshare can only conclude that the failure of the SEA consultants to point out the pollution risk to Broadmeadow Estuary means that their independence has been compromised by commercial considerations.

There are a number of protected species in the Donabate/Portrane area. The existence of these species is not mentioned in the *Draft Environmental Report*. Fairshare considers it to be a significant omission not to mention protected species in a Strategic Environmental Report.

The criteria used to assess the 16 options in the *Draft Environmental Report* of the SEA are qualitative and are therefore subjective. Fairshare also submits that the ratings have been applied in an ad hoc, subjective and inconsistent fashion, perhaps to meet some instructions (which are unspecified in the SEA tender and not outlined in the *Draft Environmental Report*) from the contracting local authority.

Fairshare finds it extraordinary that a risk assessment was not carried out on the 16 options and especially the preferred strategic drainage option of a single, regional WwTP with associated 22km

orbital sewer. The failure to carry out a risk assessment is a major omission and has led to an incomplete and flawed assessment of the 16 options and a faulty recommendation.

Fairshare commissioned an internationally recognised consultancy to test the claim in the *Draft Environmental Report* that fewer WwTPs will use less energy than a single, large one. The Fairshare-commissioned energy and optional cost review concluded that it is not safe to assume a lesser number of WwTPs will be more cost effective than a large number. Additionally, Fairshare finds it inconsistent and contradictory that the *Draft Environmental Report* can state that it is not possible to determine the energy demands of different options while at the same time referring to economies of scale.

Fairshare submits that the consideration of the location or locations of the treatment works should include the entire Greater Dublin (GSDS) region and not just North County Dublin and parts of Meath. The failure to consider the entire GSDS region means the *Environmental Report* contravenes the EU Directive on SEAs and Irish law.

Fairshare feels the SEA process has been compromised because of the failure to address water consumption issues.

The *Draft Environmental Report* does not include the elimination of inflow/infiltration/exfiltration as one of its strategy options. This leads Fairshare to conclude that the SEA process has been steered towards a large plant/orbital sewer solution.

Fairshare submits that as most of the strategy options considered in the *Final Scoping Report* and the strategy recommended in the *Draft Environmental Report* involve the proposed construction of a 22km orbital sewer that this indicates that there is a bias towards large plant/orbital sewer solutions. This is in conflict with the proximity principle.

Finally, Fairshare submits that the assumptions made in relation to the performance of large WwTPs versus smaller plants are entirely subjective and just as open to alternative conclusions.

---

Submission prepared by [redacted] (Fairshare) and [redacted] (Fairshare), with contributions from [redacted] (Fairshare), [redacted] (Fairshare), [redacted] (Fairshare), and [redacted] (Fairshare).

Address queries to [redacted] on [redacted].

---

---

**From:** [REDACTED]  
**Sent:** Tuesday, May 31, 2011 6:00 PM  
**To:** info@greaterdublindrainage.ie; peter.oreilly@fingalcoco.ie  
**Cc:** manager@fingalcoco.ie  
**Subject:** Fairshare letter on ASA process

## FAIRSHARE

OUR SHARE AND NO MORE

CAMPAINING TO STOP A MEGA SEWAGE PLANT BEING DUMPED ON PORTRANE



Monday, May 31, 2011

Peter O'Reilly  
Senior Engineer,  
Fingal County Council  
Swords  
Co Dublin

Mr O'Reilly,

I am writing to you as the co-ordinator of the Fairshare campaign, based in the Portrane-Donabate area, and set up to oppose the citing of the new regional sewage plant in Portrane.

As you are aware, the 2005 Greater Dublin Strategic Drainage Strategy (GDSDS) recommended that a new regional wastewater treatment plant be located in Portrane. A Strategic Environmental Assessment (May, 2008) into the GDSDS removed Portrane as the preferred location and recommended that the plant be located in an unspecified location in the northern greater Dublin coastal area. However, it did not rule out Portrane.

We understand consultants Jacobs/Tobin and RPS have now been contracted by Fingal County Council and six other local authorities on the east coast of the country to conduct an alternative site assessment (ASA) process to select a location for a regional sewage wastewater treatment plant, and associated orbital sewer, in the northern greater Dublin area, as part of the Greater Dublin Drainage Strategy.

As Portrane had already been pre-selected in the 2005 GDSDS as the location for this regional treatment facility, we feel it incumbent on you to now exclude Portrane from the sites being considered. By definition, an alternative site selection process should solely look at alternative sites.

The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of seven Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane – Rogerstown Estuary SPA (code 04015); Rogerstown Estuary cSAC (code 0208); Broadmeadow/Swords Estuary SPA

(code 04025); Malahide Estuary cSAC (code 0205); Baldoyle Bay SPA (04016); Baldoyle cSAC (code 0199); Lambay Island SPA (code 040) and cSAC (code 0204).

The Strategic Environmental Assessment (May, 2008) into the GDSDS and the ongoing attempts to keep Portrane in the assessment process smack of a determination to ensure Portrane emerges as the selected location, despite the close proximity of protected estuaries at Rogerstown and Broadmeadow/Malahide.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager’s report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site(ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager’s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

In addition, any ASA process risks being tainted and lacking in credibility if Portrane is not excluded due to the fact that it has already been pre-selected as the location for the treatment facility. Should Portrane be selected as the site of choice this would suggest a pre-determined outcome and lead to the conclusion that the ASA was simply “going through the motions” process to justify this decision and give the appearance of objectivity.

If Portrane is not excluded from the sites being considered as the location for the regional treatment facility we intend to take High Court review proceedings, and if that is not successful we will appeal to the Supreme Court, and to the European Commission.

You are, therefore, being put on notice by Fairshare that a failure to exclude Portrane from the ASA process will result in legal action, something that could involve considerable time delays and expense for the seven local authorities seeking to progress the Greater Dublin Drainage Strategy.

Yours faithfully,

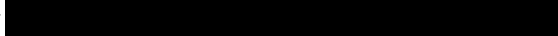


C.C. David O’Connor, county manager, Fingal County Council.

**Please think of the Environment before printing this email.**

\*\*\*\*\*

Private Confidential & Privileged

This Email and any files and attachments transmitted with it are confidential and/or privileged. They are intended solely for the use of the intended recipient. Any views and opinions expressed are those of the individual author/sender and are not necessarily shared or endorsed by  or any

---

**From:** [REDACTED]  
**Sent:** Monday, July 04, 2011 12:28 PM  
**To:** info; [REDACTED]  
**Subject:** Fairshare query on funding of Greater Dublin Drainage project  
**Attachments:** Fairshare-funding query.doc

## Fairshare

**Campaigning to stop a monster sewage plant being dumped on the Portrane/Donabate peninsula**

[REDACTED]  
[REDACTED]  
[REDACTED]  
Monday, July 4, 2011

Elizabeth Arnett  
Director,  
Project communications,  
RPS/ Greater Dublin Drainage  
Dun Laoghaire,  
Co Dublin.

Dear Ms Arnett,

We in Fairshare understand that the Greater Dublin Drainage initiative aims to provide strategic drainage infrastructure for the greater Dublin area. We understand that the initiative involves the provision of a new wastewater treatment works; a marine outfall, and a new drainage network in the northern part of the GDA.

We understand this project will be delivered via a public-private partnership with a private consortium being awarded a contract to design, build, and operate (DBO) the infrastructure.

Fairshare is anxious to know: a) the overall cost of this project; b) how this public infrastructure is to be funded; c) will it be fully funded by the private sector, or involve a mixture of public and private funding; d) if there is a mixture of private and public funding, what is the percentage breakdown of this mix?

Specifically, will the contract awarded for this project be:

- a design-build and operate (DOB) contract, or
- a design-build-finance and operate (DBFO) contract, or
- a design-build-finance and maintain (DBFM) contract?

As this project is one of the largest infrastructural undertakings in the State at the moment Fairshare feels it is important that there is clarity on the funding plans for same.

Thank you,

[REDACTED]





Please think of the Environment before printing this email.

\*\*\*\*\*

Private Confidential & Privileged

This Email and any files and attachments transmitted with it are confidential and/or privileged. They are intended solely for the use of the intended recipient. Any views and opinions expressed are those of the individual author/sender and are not necessarily shared or endorsed by [redacted] or any associated or related company. The content of this EMail and any file or attachment transmitted with it may have been changed or altered without the consent of the author. If you are not the intended recipient, please note that any review, dissemination, disclosure, alteration, printing, circulation or transmission of this Email and/or any file or attachment transmitted with it, is prohibited and may be unlawful. If you have received this Email or any file attachment transmitted with it in error, please notify

[redacted], by Emailing

[redacted] or contact :



This footnote also confirms that this email message has been swept by F-Secure for the presence of computer viruses.

\*\*\*\*\*

Registered in Ireland  
No: 153066

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 2:47 PM  
**To:** manager@fingalcoco.ie  
**Cc:** peter.oreilly@fingalcoco.ie; info@greaterdublindrainage.ie  
**Subject:** Fairshare seeks deadline extension for consultation process for Greater Drainage process

## Fairshare

**Campaigning to stop a monster sewage plant being dumped on the Portrane/Donabate peninsula**

[REDACTED]  
[REDACTED]  
[REDACTED]  
Wednesday, June 16, 2011

David O'Connor  
County Manager  
Fingal County Council  
Swords  
Co Dublin

Mr O'Connor,  
Campaign group Fairshare is anxious to encourage as many people as possible in the locality to engage in the consultation process being conducted at present by Greater Dublin Drainage. The deadline for submissions is Friday, June 24, as you know.

People in the Donabate/Portrane area are anxious to make submissions but are having difficulty getting up to speed again on what is complex topic. Also, there has been a short lead-in time of just two weeks from the announcement of the consultation process to its start.

Fairshare requests a two-week extension to the deadline for the non-statutory process.

This has been facilitated by your council in previous consultation processes pertinent to the peninsula.

I await your reply.

Thank you.

[REDACTED]

CC Peter O'Reilly, senior engineer, Fingal County Council  
Elizabeth Arnett, Dublin Drainage (RPS).

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 11:35 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Fairshare submission - acknowledgement needed  
**Attachments:** Fairshare submission June 2011.docx

Dear Sir/Madam,

Please find enclosed the final Fairshare submission as part of the so-called Greater Dublin Drainage initiative. This submission is lodged under protest as the entire process has been compromised by inaccurate and misleading information disseminated by Fingal County Council and its agents/consultants.

Please acknowledge receipt of this document.

[REDACTED]

# FAIRSHARE SUBMISSION

Fingal Co. Co. Consultation in relation to so-called Greater Dublin Strategic Drainage Development.

Friday, June 24, 2011

## Introduction

Fairshare is opposed to the proposed development of an 850 kppe wastewater treatment plant (WWTP) in Portrane, Co. Dublin on the bases of: (a) rationality and common sense, (b) fairness and equity, (c) economic sustainability, and (d) environmental conservation.

Firstly, it is our opinion that the proposed scheme makes no common sense, even if we, as a nation, were not facing the worst economic crisis in the history of the state. While we want to build some development capacity in the Greater Dublin Area (GDA), why would we 'hang' this vital potential on one massive WWTP, when rational thinking would suggest that spreading the 'load' makes more sense, from the perspectives of capital expenditure, investment potential for success, targeted growth and sensible development. Have we not learned the lessons of lazy thinking in the last decade?

Fairshare suggests that building a massive WWTP to service the apparent needs of seven different local authorities is extremely inequitable – who will benefit (and how?) from Fingal Co. Co.'s acceptance of the burden of treating and disposing of other authorities' wastewater? The taxpayers of Donabate and Portane are to carry the can for all the other towns in this so-called region – is that natural justice?

One of the basic tenets of Sustainable Development is that growth must be based on carrying capacity – this proposal suggests that growth in Kildare is based on the carrying capacity of a small rural peninsula (and its foreshore) some 50km to the Northeast. Have we, as a nation, lost all perspective and reason when our public officials expect us to accept this patent nonsense as 'the greater good'?

And, to cap it all, this wonderful plan has chosen, as a location for a huge WWTP, a site right alongside some of the most important (and statutorily protected) ecological sites in the GDA. These sites are, rightly, protected by the state and the EU to allow access for observation, learning and enjoying nature for our citizens – how does the development of a malodorous sewage plant alongside: (a) protect the sensitive, exceptional ecology, and (b) foster the human analysis that is its due?

Fairshare implores those in Regional Planning to learn from our recent mistakes – we cannot follow uncontrolled development with crazy development. It is not a solution – we deserve more from our public officials, and we will get what we deserve.

## Lazy, Disingenuous or Dishonest Proposals?

The project website ([www.greaterdublindrainage.com](http://www.greaterdublindrainage.com)) claims that "*Greater Dublin Drainage has its origins in the key findings of the Greater Dublin Strategic Drainage Study (GSDSDS)*". This is, at best, extremely misleading, and at worst, a barefaced lie. It is patently not one of the key findings of the GSDSDS, which sought to examine, in the main, the options to avoid flooding problems in Dublin into the future. The proposed project may have been dreamt up by the same people involved in the GSDSDS, but to suggest that it was connected with the obviously sensible national policy to undertake the GSDSDS is laughable (at best).

The project website introduction goes on to claim that "*the need for Greater Dublin Drainage is firmly established in National, Regional and Local Planning Policy*". To elaborate, it suggests that "*this project is one of the key infrastructure projects required*

*to support the National Development Plan, the National Spatial Strategy, and the 'Smart Economy' objectives of Government".*

The National Development Plan (2007-2013) outlines many projects, conceived in different economic circumstances, designed to assist the nation's development. It does not include this proposal. The National Spatial Strategy (2002-2020) (NSS) does say that "*residential development located at greater and greater distance from where people work, are not sustainable in the longer-term — economically, socially or environmentally*" and "*investment funded by the Exchequer on foot of the NSS will need a sufficient level of economic growth to generate the required resources*" and "*it is ... unsustainable that an undue weight of future population growth in the State should take place in or adjoining the GDA*", but it does not make any reference to this proposed project. Building Ireland's Smart Economy (2008) makes reference to several infrastructure projects in Ireland – this proposal is not one of them.

To us, as citizens, this is disingenuous at best, and is not what we pay our taxation to provide in terms of communication from our public officials. So why is this project so important to our local authorities (and their consultants) that it requires this type of promotion? Is it a shameful effort to harness the excess effluents generated by the unbridled housing developments allowed by our Planning Authorities in Dublin, Kildare, Meath and Wicklow in 'one fell swoop'? Is it a last, vain, face-saving attempt from our public officials to try to meet the requirements of the EU Urban Drainage Directive (of 1991), twenty years too late, with no capital in the public purse? Is it a result of an economies-of-scale proposal from a private company, under the auspices of a public-private-partnership (PPP) to try to absolve the past sins of our planners at the taxpayers' expense?

Whatever it is; it is not informing the public appropriately for a meaningful consultation process.

#### 'Steering' the Options

If we take, at face value, the requirement for wastewater treatment capacity to aid future development in counties Kildare, Wicklow, Meath and Greater Dublin, is the proposal to treat all this effluent together really the best option?

The 'Options Assessment' in reality presented three alternatives: (1) an 850 kppe WWTP in Portrane, (2) an 850 kppe WWTP, ostensibly situated somewhere else, and (3) seven smaller WWTPs located in their supply districts. All are assumed to feed an orbital sewer, discharging somewhere in the Irish Sea. All are 'scored' similarly, except in relation to *Flexibility* and *Planning Risk*.

Option (1) is described as 'Minor Positive' in terms of *Flexibility*, as it will allow the authorities to place all the eggs in one basket and develop it in a modular fashion on a needs basis, while *Planning Risk* is described as 'Major Negative', as Portrane had not been seen to have been chosen in an equitable fashion.

Option (3) is described as 'Minor Negative' in terms of *Flexibility*, as it will offer additional flexibility in the system, but apparently will not allow the discharge to the orbital sewer of untreated effluents, and may require additional pumping requirements. *Planning Risk* is described as 'Minor Negative' as it will require seven planning permissions instead of one.

Thus, the preferred Option (2), which we will call 'Portrane (but not just yet)' has the benefits of 'Minor Positive' in terms of flexibility (see Option (1)) and 'Minor Positive' for *Planning Risk*, as it will allow a process to be completed to choose Portrane as the optimum site for the project.

So, on the face of it, the Option (B) that best meets the tenets of Sustainable Development, i.e. local carrying capacity, structured development and meeting development needs, has been 'marked down' on *Flexibility* for being more flexible than the favoured option, and marked down on *Planning Risk* because the planners want to

allow development in areas that, apparently, cannot 'deliver' planning for their own WWTP. So much for Sustainable Development which is actually National Policy, unlike the proposed project!

We, as a nation, are now in different times to those when this proposal was mooted – our development needs are different, our investment capital is different, thus our approach must change accordingly.

Fairshare proposes that realistic options for the development of additional capacity for economic and social development in the GDA be assembled and examined by parties/agents that do not have an economic 'conflict-of-interest' (or have such conflicts removed by their exclusion from subsequent design, build and operate elements of the project/development). These options, for clarity, should be appropriately costed/valued (using the methodology already prepared on behalf of the state<sup>1</sup>) prior to their presentation to the public as a consultation topic.

### Learning Our Lessons

Our public officials do not have a good track record in commissioning WWTPs on this scale – their failings in relation to their only other attempt in the history of the state are well documented, in relation to Ringsend. The issue of foul odours from the plant took six years to address, and the chronology of the site's development has been a catalogue of poor design, poor commissioning and poor management. The previous Minister's report<sup>2</sup> on the issue is sobering reading for any community that would be expected to live with such incompetence.

The report found that the plant (the largest such investment in the history of the state) had been poorly designed and inadequately sized. It found that the local authority's expectations of the plant operations did not match the plant they had commissioned; thus the local authority (and the taxpayer) bore the burden of 'fixing' the six-year odour problem.

Fairshare proposes that the local authorities involved undertake a complete, open and full cost-benefit analysis of the Ringsend WWTP in comparison to other WWTPs in the GDA, on the basis of cost per treatment unit, including an appropriate assessment of environmental and social cost, and that this analysis informs the decision-making process in relation to developing additional WWTP capacity in the GDA.

---

<sup>1</sup> Economic Evaluation of Water Supply & Waste Water Projects – Cost-Benefit Analysis Methodology (DKM Consultants, Aquaverra Research, ESRI, 2004)

<sup>2</sup> A Review of and Report on Certain Matters in relation to Dublin City Council's Ringsend Wastewater Treatment Plant (Brendan Fehily, 2008)

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 11:31 AM  
**To:** Manager@fingalcoco.ie  
**Cc:** info@greaterdublindrainage.ie; peter.oreilly@fingalcoco.ie  
**Subject:** Fairshare warns county manager  
**Attachments:** DUBLIN DRAINAGE.jpg; Fairshare letter on submissions June 2011.doc

## Fairshare

**Campaigning to stop a monster sewage plant being dumped on the Portrane/Donabate peninsula**

[REDACTED]  
[REDACTED]  
[REDACTED]  
Thursday, June 23, 2011

David O'Connor  
County Manager,  
Fingal County Council.

Dear Mr O'Connor,  
I wrote to you via email on June 15, 2011, seeking an extension to the deadline for the non-statutory consultation process as part of the so-called Greater Dublin Drainage process. You replied in an emailed letter, dated June 20 last, refusing that request.

Fairshare is now putting you on notice that it intends to take legal advice in relation to the refusal of the competent local authority to extend the deadline in line with Article 6, Section 3, of the Aarhus Convention (on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) which states:

The public participation procedures shall include reasonable time-frames for the different phases, allowing sufficient time for informing the public in accordance with paragraph 2 above and for the public to prepare and participate effectively during the environmental decision-making.

The refusal to accede to the Fairshare request for an extension to the deadline, given the short two-week lead-in time to the consultation process, exposes the process as a sham. Fairshare is of the view that the consultation is merely a cynical exercise initiated to flush out the arguments to be made by the community ahead of a planning application/appeal so the competent local authority can be in a position to counter those arguments at a planning appeal before An Bord Pleanala.

It is also worth noting that previous requests for extensions to deadlines for consultation processes from Fairshare and/or the community in Portrane/Donabate were granted – namely consultations on the draft Scoping Report of the Strategic Environmental Assessment (SEA) for the GDSDS (Greater Dublin Strategic Drainage Study) in 2007, and the draft Environmental Report of the SEA on the GDSDS in 2007/2008.

Fairshare is also putting you on notice, as county manager of the competent local authority, that we intend to raise at any public planning appeal hearing, should Portrane be identified as the location for a regional wwtw and/or marine outfall, the serious concerns we have about the false and misleading information being issued by said competent local authority and/or its agents (consultants) during the current non-statutory process. Contrary to information on the

website [www.greaterdublindrainage.ie](http://www.greaterdublindrainage.ie) (we have attached a “screen grab” of the relevant page) the proposed project is highly speculative and is not in the process of evolving as a consequence of any national policy. We understand that this website is a joint initiative of Fingal County Council and its consultants/agents RPS.

Under the section headed ‘Project Introduction’ on the aforementioned website what is referred to as “the Greater Dublin Drainage initiative” is defined as follows:

The initiative involves the provision of:

- A new wastewater treatment works;
- A marine outfall, and
- A new drainage network in the northern part of the GDA.

This page of the website goes on to state the following:

The need for Greater Dublin Drainage is firmly established in National, Regional and Local Planning Policy in the following ways:

**National Economic Policy:** This project is one of the key infrastructure projects required to support the National Development Plan, the National Spatial Strategy, and the ‘Smart Economy’ objectives of Government. The inclusion of Greater Dublin Drainage in the Department of Environment, Heritage and Local Government’s Water Service Investment Plan (WSIP) Programme, emphasises these commitments.

**Environmental Policy:** The project is necessary to meet the Water Framework Directive (WFD) criteria and the related EU Directives and National Regulations related to water quality.

**Regional Policy:** The Regional Policy Guidelines (RPG) support the National Policy objectives for socio-economic development and environmental improvement. The Local Development Plans make provisions in support of the Policy, including the drainage policies and guidelines of the Greater Dublin Strategic Drainage Strategy.

It is quite extraordinary, misleading and disingenuous to state that there is a demand/need for this project stated in the documents listed above. The competent local authority is only too well aware that *the need or otherwise for a new regional sewage treatment works, a marine outfall and an orbital sewer is not referred to at all in the National Spatial Strategy 2002-2020, the Smart Economy document, or the National Development Plan 2007-2013.*

As already stated, the refusal to grant an extension to the deadline for the non-statutory public consultation process is in contravention of the Aarhus Convention and specifically the need to allow “reasonable time-frames for the different phases”. Further, the provision of false and misleading information as part of the non-statutory public consultation process renders the process null and void.

Additionally, you are put on notice that should Portrane be identified as the location for the regional treatment works and/or marine outfall this false information presented by a competent local authority as part of a non-statutory process will form one of the central planks of our objections to any granting of planning approval.

Please note that I will be forwarding this letter to the Minister for the Environment, Community and Local Government and local public representatives.

Yours faithfully,



**Please think of the Environment before printing this email.**

\*\*\*\*\*

Private Confidential & Privileged



---

**From:** [REDACTED]  
**Sent:** Monday, May 30, 2011 12:06 PM  
**To:** info@greaterdublindrainage.ie  
**Cc:** peter.oreilly@fingalcoco.ie  
**Subject:** FW: Fairshare made the Indo tomorrow !!  
**Attachments:** Screen shot 2011-05-29 at 21.51.10.png; Screen shot 2011-05-29 at 21.51.10.jpg

Elizabeth,  
See today Irish Independent for a piece and a picture on the new Fairshare campaign.

[REDACTED]

[REDACTED]

**Please think of the Environment before printing this email.**

\*\*\*\*\*

Private Confidential & Privileged

This Email and any files and attachments transmitted with it are confidential and/or privileged. They are intended solely for the use of the intended recipient. Any views and opinions expressed are those of the individual author/sender and are not necessarily shared or endorsed by [REDACTED] or any associated or related company. The content of this EMail and any file or attachment transmitted with it may have been changed or altered without the consent of the author. If you are not the intended recipient, please note that any review, dissemination, disclosure, alteration, printing, circulation or transmission of this Email and/or any file or attachment transmitted with it, is prohibited and may be unlawful. If you have received this Email or any file attachment transmitted with it in error, please notify

[REDACTED], by Emailing

[REDACTED] or contact :

[REDACTED]

[REDACTED]

This footnote also confirms that this email message has been swept by F-Secure for the presence of computer viruses.

\*\*\*\*\*

Registered in Ireland  
No: 153066

---

**From:** [REDACTED]  
**Sent:** Friday, June 10, 2011 1:34 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Greater Dublin Drainage website has some major omissions

Elizabeth, Mary,

I was looking at the website [www.greaterdublindrainage.com](http://www.greaterdublindrainage.com). I notice in the section Publications a list of links – see below.

I feel it is a major omission not to provide links to the Habitats Directive and the Birds Directive. The North Dublin coastline is littered with Natura sites. Surely, it is important to be fair here and include the two directives mentioned as they will have a material impact on the selection of a site.

[REDACTED]

[REDACTED]

[REDACTED]

## Background Materials

Please find some relevant background materials that may be of interest.

[Greater Dublin Strategic Drainage Study](#)

[Strategic Environmental Assessment for the Greater Dublin Strategic Drainage Study](#)

[Water Framework Directive \(2000/60/EC\)](#)

[Planning & Development \(Strategic Infrastructure\) Act, 2006](#)

[Water Service Investment Programme \(2010-2012\)](#)

[Building Ireland's Smart Economy](#)

[Our Good Health](#)

[EU Water Framework Directive](#)

[Regional Planning Guidelines for Greater Dublin Area](#)

[National Spatial Strategy](#)



**Please think of the Environment before printing this email.**

\*\*\*\*\*

Private Confidential & Privileged

This Email and any files and attachments transmitted with it are confidential and/or privileged. They are intended solely for the use of the intended recipient. Any views and opinions expressed are those of the individual author/sender and are not necessarily shared or endorsed by [redacted] or any associated or related company. The content of this EMail and any file or attachment transmitted with it may have been changed or altered without the consent of the author. If you are not the intended recipient, please note that any review, dissemination, disclosure, alteration, printing, circulation or transmission of this Email and/or any file or attachment transmitted with it, is prohibited and may be unlawful. If you have received this Email or any file attachment transmitted with it in error, please notify

[redacted], by Emailing

[redacted] or contact :



This footnote also confirms that this email message has been swept by F-Secure for the presence of computer viruses.

\*\*\*\*\*

Registered in Ireland  
No: 153066

---

**From:** [REDACTED]  
**Sent:** Monday, June 27, 2011 2:45 PM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Re: Submissions Received

Joanne,

Could you also acknowledge as submissions all letters/submissions sent to RPS and the county manager of FCC by Fairshare in the past three months. I make it four letters/submissions in total. In particular, I am anxious that the 2007 Fairshare submission, in response to the draft environmental report of the SEA into the GSDSDS is counted; as is the letter pointing out that Portrane should be excluded from the ASA process as it was already pre-selected and there has been a precedent established not to build near Rogerstown estuary; and also the letter sent last Thursday pointing out the failure of the submissions process to have regard to the Arrhus Convention and the issuing of misleading information by FCC and its agents as part of the submissions process. All of these letters/submissions were emailed from [REDACTED]

Thank you.

[REDACTED]

[REDACTED]

[www.fairshare.ie](http://www.fairshare.ie)

Facebook: Fairshare Portrane.

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 2:07 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** "Early Consultation Opportunity" on Greater Dublin Drainage initiative  
**Attachments:** Letter to RPS 21Jun11.jpg

Please find attached a scanned version of our submission to be considered as part of Fingal County Council's "Early Consultation Opportunity" on the Greater Dublin Drainage initiative.

A hard copy will be sent by post.

[REDACTED]

RPS,  
Greater Dublin Drainage Project Manager,  
c/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire,  
Co. Dublin.

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

21<sup>st</sup> June 2011

Dear Sir/Madam,

We wish to have the comments below taken into account as part of Fingal County Council's "Early Consultation Opportunity" on the Greater Dublin Drainage initiative.

We believe the approach being taken, as described on the Greater Dublin Drainage website, is fundamentally flawed. The website states:

*The initiative involves the provision of a new wastewater treatment works, a marine outfall and new drainage network in the northern part of the Greater Dublin Area.*

This clearly indicates that the approach of having a single "monster" treatment plant on the Fingal coastline is predetermined. The proposed location to facilitate a marine outfall appears to be based on the pretext that sewage can be treated to a lesser quality; this is unacceptable. Failure of a single "monster" plant is likely to be catastrophic. The location of a single "monster" treatment plant in any community will engender strenuous opposition; experience shows that smaller localised plants are accepted by reasonable people. For all these reasons, we are against the imposition of the proposed "monster" plant on any community.

Notwithstanding these comments, Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Some 20% of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

We would strongly urge you to reconsider the approach being taken and to ensure that the environmentally sensitive area of Portrane is not endangered by any proposal.

Yours faithfully,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2011 3:59 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Donabate/Portrane peninsula

By Post and Email

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin, Ireland

21<sup>st</sup> June, 2011

**Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin**

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

- 1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.
- 2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

*"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. "*

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

- 3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and "day-trippers" during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.
- 4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.
- 5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate,

Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

- 6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully

A large black rectangular redaction covering the signature and name of the sender.A single horizontal black redaction bar.A large black rectangular redaction covering a significant portion of the page's content.



---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 12:06 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** [REDACTED]

Dear Sir/Madam,

the [REDACTED] group would like to make a submission to the Greater Dublin drainage project to remove the Portrane/Donabate Peninsula from the site selection process.

We believe that the naming previously of Portrane as a suitable site a few years back compromises the fairness of the current process, leading to a feeling of a pre determination or pre selection of the outcome.

[REDACTED] has been involved in environmental projects in conjunction with Fingal Co. Co, including the drawing up of a biodiversity plan which includes a wetlands project which is happening at the moment in Portrane. Wetland areas are very sensitive environmentally and changes in drainage, water levels or pollution can destroy the habitats for the flora and fauna that reside there.

A project the scale of the proposed plant would have serious implications to the wetlands and other ecologically sensitive areas on our peninsula.

Surely the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would preclude a development such as this from this area?

Indeed the FCC county manager commented at the time on the decision to not locate a football academy 3 years ago

**“However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity”**

And so the precautionary principal applied. In fact the wording was that “the **precautionary principle must be applied**”.

I would urge you to also see that in this instance the precautionary principal **MUST** be applied and that further consideration of Portrane as a suitable candidate is a waste of time and resource on your part as the siting of a plant here simply could not be allowed to happen.

[REDACTED] supports other residents and community groups on the peninsula in urging you to remove Portrane from the site selection process.

Yours sincerely

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, June 12, 2011 9:35 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Dublin Drainage Orbital Sewerage Plant

To whom it concerns,

I feel compelled to submit this email to you with regards the proposed orbital sewer that is currently under consideration and for which you have requested feedback from the public. I, like every other person living in the Donabate / Portrane peninsula are massively opposed to this outrageous, ill thought out, badly conceived Monster sewerage treatment plant. I find it difficult to understand why Fingal CC are so gung ho to impose this upon the people that they purport to work for. Of course areas outside of Dublin will pay Mr O'Connor and Fingal CC to take their waste away and North County Dublin will suffer. We all are extremely aware of the mess that was and is the Ringsend treatment plant which was at that time a 'state of the art' facility. If this plant get's the go ahead, I am certain that the very same issues will affect us but on an even greater scale given the scope of the orbital sewer planned.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

As noted on your website

'A new orbital sewer is required to bring waste water from the west of the GDA and to accommodate future development and new industries in areas around **Blanchardstown, Lucan, Clondalkin, Mulhuddart, East Meath and Kildare.**'

David O'Connor states that ' We hope that by offering the public this very early chance to have their say on the criteria that should be taken into account before any locations for the project are placed on a map, we can build the infrastructure Dublin needs in partnership with the people who **need it most.**

Portrane / Donabate have the 65,000 PE plant being currently built ( which will take waste from Rush & Lusk ) and we need this orbital monster plant the least. Therefore locate it in one of the areas as noted by Mr O'Connor.

Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled

out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager’s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

20pc of the world’s Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I trust that my comments are noted and I hope that Fingal CC do not underestimate the depth of feeling in this area concerning this project. We are doing our bit already but no more. You really couldn't hope to pick a more inappropriate area than our peninsula.

Sincerley,

[Redacted signature]

[Redacted name]

[Redacted address line 1]

[Redacted address line 2]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 8:32 AM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Feedback about Sewage Plant

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

A chara,  
I wish to submit some concerns regarding selection for a large Sewage plant in North County Dublin.

1. Lack of public awareness

One of the failures in the development of the Ringsend plant was a lack of public awareness regarding what was actually happening. I appreciate for this project there have been notifications in local newspapers, the Fingal websites, twitter etc. However public awareness is still very low. People are very busy. Unfortunately, they don't always have time to read the local papers. I only found out about it through a local website [www.donabateportrane.com](http://www.donabateportrane.com).

It would have made sense to have simple information leaflets where footfall was high such as Supervalu. This was not done.

The public consultations should have been arranged when people could attend them. They were all arranged when people are at work (or when they'd be minding their children). If you finish work at 6.00 you only get home for 7.00 which is when all the public consultations actually ended. They should have been on weekends or later in the evening.

There seems to be absolutely nothing on the part of 'Greater Dublin Drainage' to ensure they have got their information across. They appear to be working off some very inaccurate assumptions; that they have notified people sufficiently when they clearly have not. What percentage of people living in the area do they think have a good knowledge of this project? Have they set a goal for this? Are they sure they have met it?

2.

There are very large number of young families in Donabate / Portrane. This can be verified from census data from the CSO. It is dangerous to have heavy goods vehicles (that would inevitably come with the construction of a large sewage site) in areas where there are a large number of small children.

Any Sewage plant in Portrane would mean that the large Lorry's and large vehicles etc would have to pass four schools. Three primary; one Secondary.

Surely this is dangerous.

3.

In addition to the above, the roads into and out of Donabate / Portrane are extremely narrow and not suited for large vehicles. Hearse Road and Turvey Road are so narrow they are dangerous to cycle on.

Donabate is one of the few parts of Dublin that it is too dangerous to cycle out of. More heavy vehicles means the chances of a serious accident for anyone brave enough to cycle are seriously increased.

4.

Again because of the narrow roads, there is nowhere where a large lorry could make a 180 degree turn. What happens in the case of an accident and a Lorry has to turn?

5.

It is difficult to ascertain the environmental impacts of such a large project. I contacted Greater Dublin Drainage several times looking for peer reviewed scientific papers on the matter. I was told they are not at that stage yet. To me this makes no sense. Surely this would be the very first stage. What is the point in trying to select the most appropriate area without consulting the best available international scientific work on the treatment of sewage and making sure the public understand they are doing that?

If the science is not explained and understood it is difficult to contribute constructively.

6.

Even in the very unlikely case there is no adverse environmental impacts from a large sewage plant there is a public perception about them. The Ringsend plant has been well documented as emitting unpleasant odours particularly in 2007. This is admitted by Dublin City Council and there is plenty of information about it on their website.

Donabate /Portrane thrives on the perception of a well kept, clean, suburban village with a rural feel to it. It already has a reputation for caring and contributed back to the community with the establishment of various centres for troubled youths.

In the boom, there was more development in Fingal than anywhere else in Ireland. Most of this was of a very poor standard and happened without the development of much needed facilities. Donabate / Portrane doubled in population but sadly did not receive any extra facilities. For example: No library, no dart, no police station, no direct bus into town, no extra sport facilities such as tennis court or zoned land for the development of any other sports. Mother and toddler groups can find it difficult to even find somewhere to meet up. The local drama club had to use golf club which is now closing down and is now relying on a using pub. This is all ridiculous and indicative of gross negligence regarding planning. Profit for developers first, people last.

It is imperative that this project is dealt with in the most professional manner. The country has been ruined through a major lack of sustainable planning and reckless economic policies. This project can't use the banks and developers as a scapegoat. I cannot emphasise enough the importance this project is done fairly and that the public are kept on board to exactly what is happening.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 7:53 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** FW:  
**Attachments:** [Untitled].pdf

-----Original Message-----

**From:** [REDACTED]  
**Sent:** 24 June 2011 08:52  
**To:** [REDACTED]  
**Subject:**

Name:  
Address:



Email:



Date:

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 11:37 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Fw: Proposed sewage plant in Portrane

Dear Sir/Madam,

As a [REDACTED] I was horrified to hear of a proposed monster sewage plant in the area.

I completely object to this proposal for a number of reasons:

- - - As a [REDACTED] we have the responsibility to look after our own waste, not the waste of the Greater Dublin area (which I believe includes a population of other County Councils and up to 1.5m people).
    - As a keen sea angler, this project will devastate local marine life. I am also keenly aware of the strong tidal movements in the area (e.g collapse of the rail line at malahide), and the sheer volume of waste being discharged will inevitably be washed back up

into Rogerstown and Malahide estuaries and beaches from Howth, Portmarknock and up to Rush and Skerries.

- - - [REDACTED], where a phenomenal range of winter duck and geese species spend their winter. Rogerstown is a protected wildlife area under law, and the proposed development will devastate the wildlife in the long term.
    - Infrastructure of Donabate/Portrane peninsula is not suitable for a plant of this size, which is clearly seen at the moment with road blockages, traffic lights and trucks constantly holding up traffic. A short journey normally taking 5 minutes can take up to twenty minutes now. Indeed a football academy to be located near Rogerstown estuary was not granted planning by Fingal CoCo, due to the potential wildlife impact
    -

- I expect to be kept updated on the proposal and I want a prompt reply to my concerns

Regards,

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 2:29 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Fw: Sewage plant update

To whom it may concern:-

I oppose any move to locate a regional sewage plant in Portrane for the following reasons:-

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was

successful in stopping the infill of Dublin Bay .

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 9:43 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Fwd: [Fwd: Objection to Monster Sewage Treatment Plant for Portrane]

Dear Sir / Madam,

We understand that you are currently in the process of carrying out a site assessment to find a suitable site for a monster sewage treatment plant (circa. 850,000 PE) to be located somewhere along the North Dublin coastline.

[REDACTED] the beautiful Donabate / Portrane peninsula for the past seven years, we feel the unique environmental attributes of Portrane, and the surrounding area, make it highly unsuitable as a possible location for such a facility.

The Donabate/Portrane peninsula is willing to do its fair share. The area is already taking a 65,000 PE plant which will cater for our immediate neighbours. However....we will not be the dumping ground for the entire East Coast of Ireland, and as such, **we will strenuously oppose any attempt to locate such a monstrosity on our beautiful peninsula.**

We believe our argument is quite clear and definitive. Please see below detailed rationale:

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

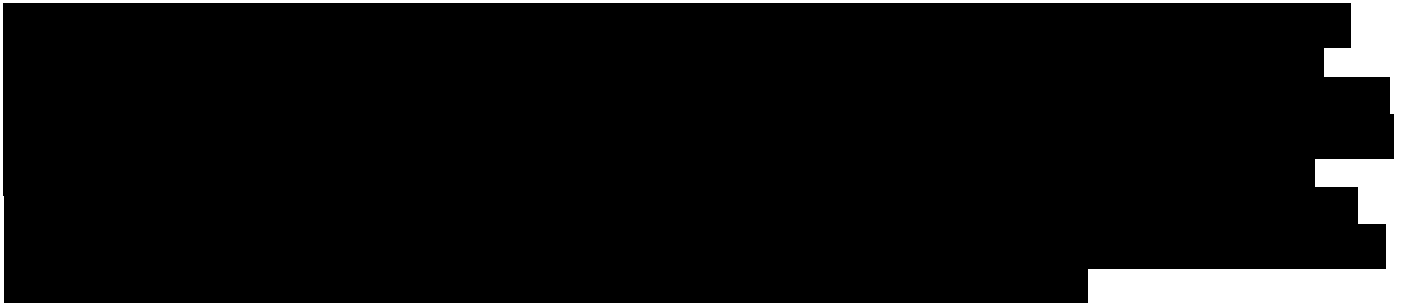
3) As previously outlined above, the Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay .

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Regards,

A black rectangular redaction box covering the signature of the sender.A large black rectangular redaction box covering the entire bottom section of the page, likely containing contact information or a full signature block.

**From:**  
**Sent:**  
**To:**  
**Subject:**

Tuesday, June 21, 2011 8:39 PM  
info@greaterdublindrainage.ie

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin, Ireland

21st June, 2011

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (99/245/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. ?

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and ?day-trippers? during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our

beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 2:19 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** greater dublin drainage

- 1.all sites of special interest as identified in the county development plan should be excluded as a location for WWTP.<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
2. Heathrow airport has WWTP within its confines as has Barcelona why not Dublin Airport?.Site does not have to be coastal .the proposed Dart from Clongriffin to Airport could include a discharge pipe for the treated waste to the coast
- 3.Inland Sites should be considered such as at the Nevitt site of new land fill
4. why has Bremeore Balbriggan not been included as port is being developed here why not WWTP and outfall .
- 5 There is no reason why WWTP and outfall must be sited together.

These are points I feel should be taken into account when consultants are considering possible locationsfor WWTP.

Best Possible practise rather than minimum standards should be applied. It is Cheaper to do it right initially rather than have to rectify shortcomings and failings as happened in Ringsend.

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 9:58 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Greater Dublin Drainage

Dear Sir/Madam,

Fingal council currently faces various options for the development of Donabate and Portrane. One of these options is the building of a huge sewage plant. This is a path of industrialisation, it will involve trucks, roads and, as night follows day, other industrial uses will follow this one. This will lead to an industrial land use for the peninsula.

An alternative option would lead to an area of sustainable living, recreation and wildlife. Fingal is a council with a track record of commitment to the environment and biodiversity. It has made steps down this path already in refusing a football stadium on the Donabate peninsula, due to environmental concerns, and instead developing an ambitious and imaginative plan for a nature park on the site. The Rogerstown park was heralded at the time for its vision and foresight. It would be a major tourist attraction not just for the wider region but for the country. The plans for bridges over the estuary, pedestrian links with Newbridge and the village, parking facilities, allotments, look-out towers, a new park on the old Baleally site, picnic areas, an interpretative centre, 8km of woodland and grassland trails - would make this an amenity up there with any in the country. In very constrained fiscal times Fingal has been slowly but steadily confirming its commitment to this plan. Other ambitious plans, at various stages, include a cycleway that would connect Malahide and Donabate. If Donabate/Portrane is chosen as the site of the sewage plant, it will create a precedent for industrialisation and all of these plans for recreation and protection of wildlife will be for nothing. All of the work that has gone into them will be for nothing and the ultimate long term dividend for the council will be much less.

Regards,

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Thursday, June 09, 2011 6:49 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Greater Dublin Drainage Project

Dear Sir/Madam,

I am writing to you to oppose the selection of Portrane/Donabate peninsula for the proposed Sewege Plant. Our peninsula is home to several beautiful beaches, a protected wildlife sanctuary and a raft of flora and fauna which would be immediately under threat though the development of this Plant.

Also, our peninsula is widely used by Dubliners living in the surrounding areas as a place to spend recreational time with the family using facilities such as Newbridge Park and the beaches. These facilities provide much needed commercial activity and supports hundreds of families financially.

Using the Ringsend Plant as an example, it is very clear that these Plants should not be built at all and the burden of the waste shared locally i.e. not a 'host site' and if such a large Plant is required, then it should be situated away from urban areas or places of natural significance.

I trust that a company such as Jacobs/Tobin and RPS will make the right decision.

Regards

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 11:00 AM  
**To:** info@greaterdublindrainage.ie; info@fairshare.ie  
**Subject:** Greater Dublin Drainage Project / Massive Sewage Plant  
**Attachments:** Fairshare letter.doc

Hello

Attached is a letter of submission regarding my objection to the above proposed site in Donabate/Portranre peninsula.

Thank you

[REDACTED]

22<sup>nd</sup> June, 2011

Email: [REDACTED]

Jacobs/Tobin and RPS  
The consultants  
Greater Dublin Drainage Project Manager  
c/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin

**RE: Greater Dublin Drainage Project / Massive Sewage Plant**

Dear Sir/Madam

I am writing to you regarding my objection to the location (suitable site) of the above project being considered to be located at the Donabate/Portrane peninsula, Co Dublin.

I would like to say that I feel a massive plant is not the solution to Leinster area sewage problems. I feel smaller plants should be located in several areas around Leinster. This is not an issue of “not in my back yard” as I feel the Portrane plant in the Donabate/Portrane peninsula is willing to do its fair share. At present this plant is taking a 65,000 PE plant but I feel the Donabate/Portrane peninsula should not be the dumping ground for the entire East Coast of Ireland.

Within the Donabate/Portrane peninsula there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility.

I feel although Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) I think An Bord Pleanála will not approve planning permission for a massive sewerage plant or as you call it Drainage Project in the Donabate/Portrane peninsula because Fingal County Council has set a precedent with regard to the recently proposed football academy which was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive.

Fingal County Council felt that there were potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager’s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

I trust the above submission will be accepted as my objection and I would be grateful for any updates from yourselves which your study/survey/research may find why the Donabate/Portrane peninsula would be suitable site.

Yours sincerely,

[REDACTED]

[REDACTED]

EG 11Jun

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2011 12:14 PM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Greater Dublin Drainage Project - Feedback - Receipt Required  
**Attachments:** Feedback 2011 - GDDP.wps

Dear Sirs,

I have attached my original submission to the Draft Scope outlined by Fingal County Council back in 2007. The issues remain the same for Donabate/Portrane in this new round of consideration. I have also forwarded the email below sent to Paul Smyth in 2007.

Please note that two areas have changed since 2007

1. Population predictions.

As I clearly recall from a very well represented meeting with the local community back in 2007, Fingal presented population predictions to justify their wish to take on sewage treatment for the Greater Dublin area. Considering that all other national government decisions are being reworked to suit latest census figures, this decision should be revisited.

2. Current Works on Portrane Road to upgrade existing Water Treatment Plant.

This work is currently being conducted at great inconvenience to local businesses and residents. It is a miracle that no child has been injured in the process of this work. The roads and footpaths remain unsafe. While Fingal remain unable to manage relatively small projects, they should not be entrusted with the management of anything on the scale planned in the Greater Dublin Drainage Project.

Donabate/Portrane is not a suitable area for the planned Drainage Project. However, I must state very clearly that Ireland should not see a Monster Sewage Treatment Plant built in any locality.

Please confirm receipt of my email.

Regards,

[REDACTED]  
Date: 11 April 2007 14:06

Subject: GDSDS strategy - Size Matters!  
[REDACTED]

[REDACTED],

Before I spend my time writing a long and detailed email in response to the Draft Scoping report for the SEA on the GDSDS strategy I would first like a response to my open question below.

**Ireland** does not need another monster Sewage Treatment plant. Given the level of mis-management currently in operation in existing sewage treatment plants and highlighted in a recent EPA report, I am flabbergasted to think that any county council would agree to attempt to take on the management of such a large scale plant as proposed. Of particular mention in the EPA report was the current lack of recording and accountability for the management and disposal of sludge. Why would Fingal County Council agree to build a monster plant to take waste from councils that do not have existing transparency in their waste management process?

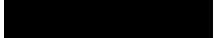
I am also disappointed to read this month that Swords treatment plant, which has recently been upgraded and had money pumped into it, was allowed to run for six weeks with malfunctioning sludge pumps. The resulting noxious smells permeated through the local community for SIX WEEKS before Fingal council admitted a problem. There will be a further wait before the problem is fixed.

I am therefore lead to believe the the problems detailed in the EPA report are not purely to do with lack of development of old treatment works. It is my belief that we do not have adequate management and accountability in operation in the existing system.

This is a fundamental issue which should be considered in the SEA.

*And so to my open question.....Why is a **Monster Plant** the answer to any proposal for Sewage Treatment in Dublin if we have no available expertise to manage the proposed solution?*

Thank you and regards,



Copy of 2007 Submission - Feedback on Plans for North Dublin Sites to host Monster Sewage Treatment Plant.

**To:**

Greater Dublin Drainage Project Manager  
c/o RPS Group  
West Pier Business Campus  
Dun Laoghaire,  
Co Dublin

**Submission on the Draft SEA Scoping Report of the Greater Dublin Strategic Drainage Strategy.**

**To:**

[Redacted]

**From:**

[Redacted]

## Executive Summary

We [REDACTED], strongly oppose the development of the sewage treatment plant in Portrane. We feel that it is being proposed against the will and wish of the people of Portrane/Donabate. It is proposed to be of a scale which is inconsistent with the policy of treating waste locally. Based on information supplied, waste will travel over 22km from source, to be treated in Portrane. With a projected population of 20,000 people over the next ten years, we feel that agreeing to accept an increase of the current waste treatment capability to 65,000 ppe is a significant acknowledgement of the seriousness of the treatment of waste and the need for each community to do it's part, and should be accepted by Fingal County Council as such. We feel that Fingal county council should be lobbying the six regions from which the waste is planned to come, on behalf of the people of Portrane/Donabate, in order to convince them to act similarly in accordance with best practice and reasonableness. Also, the Department of the Environment should not be given the authority to waste public money on a consultant's report that is seriously flawed, inequitable and invalid. **Given that Portrane is proposed as a potential location for a monster sewage treatment plant in >50% of the scenarios listed, why are the environmental impacts on Portrane not measured in this SEA? Our recommendation is that this decision be made at central government level due to its scale and certain impact on Ireland's natural resources.**

**Therefore this submission is made under protest. Our expectation, as a stakeholder in this process, is that we will receive a written response to the points detailed below.**

The following list of points is to be included as a submission on the contents of the draft SEA Scoping Report of the Greater Dublin Strategic Drainage Strategy.

The following known significant environmental considerations will *not* appear in the final SEA .....

1. Rogerstown estuary, which is 1.5 km from the proposed sewage plant site, is a National Heritage area, and a special protection area, and a wetland site of international importance under the Ramsar Convention. It is also a Nature Reserve and a wildfowl sanctuary under the wildlife act 1976.
2. Donabate's and therefore the greater Dublin area's material assets will not be considered. Namely;
  - a) Blue Flag Beaches at Portrane and Donabate
  - b) 6 Golf Courses
  - c) (*as taken from the Fingal County Council Website*) Newbridge Demesne covers an area of 150 ha. (370 acres).
    - \* The park was designed by the Wexford landscape gardener Charles Fritzell about 250 years ago.
    - \* The parkland is a good example of an eighteenth century landscape park with perimeter woodland belts and fine vistas across lawns and wildflower meadows.
    - \* **Newbridge House** #built by the Cobbe family in the mid 1700s is open to the public and is a fine example of Georgian architecture. It is a focal point in the park and the cobbled courtyard includes a restaurant, and a range of interesting outbuildings.
    - \* Other visitor attractions include **Newbridge Traditional Farm** #where you can see old breeds of farm animals, as well as displays of machinery were part of Irish farming life in previous centuries.
    - \* The Walled Garden has extensive orchards and a collection of old Irish apple varieties.
    - \* Two 19th Century glasshouses have recently been restored and sections of the walled garden have been replanted with herbaceous borders.
    - \* The Park also includes a major Children's Playground and Sports Pitches.
  - d) Broadmeadow Estuary is listed as a nutrient sensitive waterway in the EPA's most recent report – Urban Waste Water discharges in Ireland – A Report for the years 2004 and 2005. As published on 12<sup>th</sup> March 2007.



3. The Portrane road, which will be the main access point for the proposed sewage treatment plant, is a minor, narrow, and winding road. This road is also an access road for Donabate/Portrane's three Primary schools, proposed secondary school, community centre, credit union, and Portrane beach. As a result, the current volumes of traffic are significant and any additional heavy goods vehicles using this road as access to the proposed plant pose risks not confined to public safety and the environment.
4. There would be no need for the proposed Portrane plant if a proper policy on leaks and storm water getting into foul water pipes was implemented. Half of what flows into Ringsend treatment works is the result of rain and storm water getting into the foul water piping system.
5. The proposed plant poses major risks to public health from flies and mosquitoes.
6. It is not sustainable, and contrary to the proximity principle, to have raw sewage travel up to 22km from Meath, Kildare and Wicklow to Portrane. Raw sewage becomes septic when left untreated for long periods. Numerous pumping stations would be needed to get it to Portrane.

## Detailed Submission Points

Scoping Report Reference	Scoping Report related quotation	Comment
1.1	“Adequate wastewater collection and treatment is mandated by numerous national and European legislative instruments.”	Note: according to the proximity principle when treating sewage, raw sewage becomes septic when left untreated for long periods. This would be the case with sewage travelling up to 22km from Meath, Kildare and Wicklow to Portrane.
1.1	“The preparation of the GSDSDS was necessary as the economic success since the 1990’s has resulted in the foul and storm water drainage infrastructure not keeping up with the demands of ongoing population growth and expansion of the Greater Dublin Region.”	There would be no need for the proposed Portrane plant if a proper policy on leaks and storm water getting into foul water pipes was implemented. Half of what flows into Ringsend treatment works is the result of rain and storm water getting into the foul water piping system.
1.1	“The SEA may recommend that the final strategy in the GSDSDS be amended. Such a decision is the responsibility of the seven local authorities within the Greater Dublin Region as depicted in Figure 1.1 below”	Given the scale of works proposed and the potential impact on Irish citizens, this decision should be escalated to governmental/national level.

1.2	“It is however, important to note that no statutory obligation to undertake an SEA applies to the GDSDS. Nevertheless, this SEA is being completed in accordance with the requirements of the underpinning legislation.”	This is an apparent contradiction. What are the implications on the submissions received from the public? If there are no implications and the statement has no relevance, then it should be removed from the document. Any relevance should be clarified in the document itself.
Figure 1.2		Please outline the relevant process flow and stages if this plan is rejected.
1.2.7	“Monitoring begins with the adoption of the plan or programme and continues for the duration of the plan or programme”	Clarify the period of monitoring in this instance. What processes are in place in cases of major breaches? What is considered, and who considers, a ‘significant’ effect on the environment?
1.3 (1.)	“Determination and consultation on the likely significant environmental issues within the strategy area, namely the area illustrated in figure 1.1 above”	This objective creates a flawed SEA. This strategy area should be amended to look at the impact on the key areas outlined in the proposals in the GDSDS i.e. Portrane/Donabate. The approach outlined here is not equitable.
1.3	“It should be noted that public consultation is not required under the SEA regulations and is being undertaken to ensure that the public can provide input into the scope of the Environmental Report and the SEA process.”	What are the implications on the submissions received from the public? If there are no implications and the statement has no relevance, then it should be removed from the document. Any relevance should be clarified in the document itself.

2.2 (1)	“The determination of the likely significant effects on the environment will be based on qualitative assessment under a series of environmental objectives, which are presented in section 6.”	Clarification needed on the term “significant effects”. Who is responsible for the decision as to what is determined “significant”?
2.2 (1)		Please clarify the heading under which the effect on the existing road infrastructure will be considered.
2.2 (1)		The methodology should also reference the EPA report – Urban Waste Water discharges in Ireland – A Report for the years 2004 and 2005. As published on 12 <sup>th</sup> March 2007. Please note that Broadmeadow Estuary is listed as a nutrient sensitive waterway.
2.2	“It is important to note that the assessment is focussed on the strategic/high-level effects, rather than site-specific issues.....Site specific issues and potential impacts on specific receptors will be addressed at the appropriate stage in the planning process.”	As a result of this statement the SEA is seriously flawed. This is not an equitable approach given the vast area covered in figure 1.1, and the frequency with which Portrane appears in the scenarios under review. For example; the population of donabate/portrane may be 100% adversely affected by an environmental breach and this breach would not hit the radar in the overall greater Dublin area population. This would result in any major local issue not being highlighted as significant against the entire population in figure 1.1.
3.1 (3)	“To develop tools for the effective management of the drainage systems including Geographical Information systems (GIS), network models and digital mapping”	Please also note the recommendations in the EPA report published on 12 <sup>th</sup> March 2007. Specifically the requirement for staff training, adequate documentation and processes required to manage a treatment centre.
3.1 (4)	“Thus giving confidence in the predictions”	Were these predictions stress tested against the inaccurate predictions used for the basis of Ringsend capacity?

3.2	“appropriate level of accuracy”	Please clarify this in quantitative terms.
3.3	“Planning and Development Act (2000)”	This was updated in 2004
3.3	“The GDSDS strategy can be thought of as a drainage strategy document for the Greater Dublin Region”	As agreed by who? When was this strategy document voted on?
4.1	“The data gathering and catchment modelling tasks are not considered to be within the scope of the SEA”	Was the data verified? (Ref Ringsend as previously)
5.1	“In addition, the baseline data (and indeed, the Environmental Report and whole SEA process) will focus on relevant strategic and significant environmental issues rather than site-specific issues.”	As a result of this statement the SEA is seriously flawed. This is not an equitable approach given the vast area covered in figure 1.1, and the frequency with which Portrane appears in the scenarios under review. For example; the population of donabate/portrane may be 100% adversely affected by an environmental breach and this breach would not hit the radar in the overall greater Dublin area population. This would result in any major local issue not being highlighted as significant against the entire population in figure 1.1.
6.2	“It is not possible to consider site-specific effects (such as cultural heritage) at this strategic assessment stage, as such effects are more appropriately considered during the consideration of alternative sites as part of the preparation of a planning application”	This invalidates the SEA process.
Table 6.1	Population	Note: Please review against future planned population expansion rather than impact on current population numbers.

Table 6.1		Under which heading will the impact on the existing road network and infrastructure be considered?
Table 6.1		Under which heading will the managerial and personnel requirements be considered? Also the availability of required personnel in relation to scale of scenarios etc.
Table 6.2 Air	“The number of wastewater treatment plants will be used as a proxy indicator for this objective”.....”The strategy option with the lowest number of wastewater treatment plant sites will perform better against this objective, as there will be a relatively lower number of potential odour sources”	This is not accurate. The frequency with which a treatment plant/plants is likely to fail should be the indicator. This could be determined by complexity of solution, lack of management capability etc etc.
Table 6.2 Climatic Factors	“While not possible to determine the actual energy demand for each strategy option.....” “ The strategy option with the lowest number of wastewater treatment plant sites will perform best against this objective”	Not a valid assumption if not possible to quantify.

<p>Table 6.2 Material Assets</p>	<p>“This area is site specific and thus, will be considered when alternative site(s) have been identified (not part of the GDSDS SEA)”</p>	<p>This invalidates the SEA. Portrane is listed as a potential site in &gt;50% of the scenarios to be reviewed. As for recreational impacts;</p> <ul style="list-style-type: none"> <li>a) Blue Flag Beaches at Donabate, Portrane and Malahide</li> <li>b) 6 Golf Courses in Donabate</li> <li>c) (As taken from the Fingal County Council Website) Newbridge Demesne covers an area of 150 ha. (370 acres).</li> </ul> <p>* The park was designed by the Wexford landscape gardener Charles Fritzell about 250 years ago.</p> <p>* The parkland is a good example of an eighteenth century landscape park with perimeter woodland belts and fine vistas across lawns and wildflower meadows.</p> <p>* <b>Newbridge House</b> #built by the Cobbe family in the mid 1700s is open to the public and is a fine example of Georgian architecture. It is a focal point in the park and the cobbled courtyard includes a restaurant, and a range of interesting outbuildings.</p> <p>* Other visitor attractions include <b>Newbridge Traditional Farm</b> #where you can see old breeds of farm animals, as well as displays of machinery were part of Irish farming life in previous centuries.</p> <p>* The Walled Garden has extensive orchards and a collection of old Irish apple varieties.</p> <p>* Two 19th Century glasshouses have recently been restored and sections of the walled garden have been replanted with herbaceous borders.</p> <p>* The Park also includes a major Children's Playground and Sports Pitches.</p>
<p>Table 6.2 Cultural Heritage</p>		<p>As Above Also Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage area, and a special protection area and a wetland site of international importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.</p>

Table 6.2 Landscape		As Above EPA report – Urban Waste Water discharges in Ireland – A Report for the years 2004 and 2005. As published on 12 <sup>th</sup> March 2007. Please note that Broadmeadow Estuary is listed as a nutrient sensitive waterway.
Table 6.2		Under which heading will existing road infrastructure be considered?
7.3	“The first three authorities are the only bodies with whom scoping consultation is legally required”	What are the implications on input received from the remaining seven authorities and the public? If no implications then the statement should be removed. Alternatively any implications should be stated in this document.



---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 11:30 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Letter  
**Attachments:** [Untitled].pdf

Please find attached a letter from myself, a resident of [REDACTED].

Kind Regards,  
[REDACTED]

Name:  
Address:

Email:

Date: 24 June 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

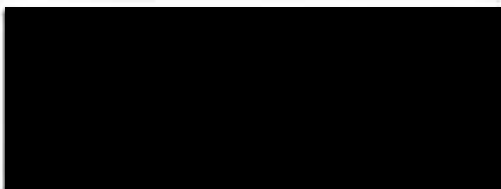
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 9:10 AM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Location of Monster sewage Plant

I would like to express my concerns about the proposed location of the "Monster Sewage Plant" in Portrane.

We are a small community located in an idyllic location where the local population have worked hard to present the area in an attractive light for the promotion of Tourism and the use of our Beaches and Parks. We have many areas that are Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) on the peninsula or close by and it is the feeling of the people that the location of such a monster sewage plant would be detrimental to these areas.

We also have a Blue flag Beach in Portrane and we are working towards Donabate Beach achieving this standard, with a "Monster Sewage Plant" in the locality the possibility of having usable beaches is brought into question.

I also list the following reasons as to why such a monster sewage plant wouldn't be suitable on the Donabate / Portrane Peninsula

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

**3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.**

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principle, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

---

**From:** [REDACTED]  
**Sent:** Sunday, June 12, 2011 8:17 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** LOCATIONS FOR VITAL NEW DRAINAGE AND WASTE WATER TREATMENT INFRASTRUCTURE

Dear Sirs,

I am writing to you with regard the Waste Water treatment Plant and the possible location of this plant in Portrane. North county dublin does not need to have this facility imposed on the area. Stop this maddness and listen to the people.

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Regards,

A solid black rectangular box used to redact the signature of the sender.

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 10:27 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Locatoin of Monster sewage plant

Dear Sir/Madam

[REDACTED],and have lived in Portrane since I was 2.I love Portrane's clean beaches and I think it is a lovely area to live in.

However,I am not happy about the Monster sewage plant,and that you even considered putting it in this wonderful area.I really don't want to grow up with it in my area.

Yours sincerely,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, May 31, 2011 4:18 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** looking for info on proposed sewage plant

i was reading an article on a site and i would appreciate it if you could send me a link to the proposed sites of this new plant or any pdf that is available due to the fact i will be out of the area on the dates of the meeting Open Day: 7th June(Swords), 8th(Blanch),14th(Balbriggan),16th (Swords) all 2-7pm.

Thanks

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Thursday, June 09, 2011 3:18 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Monster Sewage Plan - Donabate and Portrane

I would like to raise a strong objection to the proposed siting of a monster sewage plant in Portrane. This would have an enormous impact on the communities of the peninsula not to mention the wildlife of Rogerstown Estuary, a protected national heritage site.

We already have a plant so I do not see why we have to do more than our fairshare and become a dumping ground for the entire east coast of Ireland. The impact on the quality of our beaches and the sea should not be ignored.

Regards

[REDACTED]  
A concerned resident

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 9:37 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Monster Sewage Plant

Dear Greater Dublin Drainage

I disagree to a monster sewage plant being put in Donabate or Portrane [REDACTED] so I go out to play a lot but I can not if it smells bad. Also I do not want to wake up to a foul smell every morning, *would you??* (which will happen if you put a monster sewage plant in Donabate or Portrane.) There is already work being done on our sewage plant to take in local towns and the roads have disimproved with the roadworks for this!! It's dangerous enough crossing the road without the roadworks. This will only get much worse for a monster sewage plant!!! One of the best things about living here is the beaches. I am really worried that a monster sewage plant will mean we can't use them.

I strongly object to what you could be doing to Donabate and Portrane. We already did our **FAIRSHARE** taking in sewage from Skerries, Lusk and Rush. So please pick somewhere else!!!

Yours faithfully

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 10:06 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** MONSTER SEWAGE PLANT - NOT IN PORTRANE  
**Attachments:** SewageLet2011B.doc

Please find attached letter regarding location of regional sewage plant.

[REDACTED]



23<sup>rd</sup> June, 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group  
West Pier Business Campus  
Dun Laoghaire  
Co. Dublin

RE MONSTER SEWAGE PLANT

Dear Sirs,

Portrane should not be the location for any new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown Estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act, 1976.

Some 20 per cent of the world's Brent Geese population nest is in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

This previously proposed location is wholly unsuitable.

I would strenuously urge you to consider alternative locations for this facility.

Yours faithfully,

---

A black rectangular redaction box covering the signature area at the bottom left of the page.

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 8:52 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Monster Sewage Plant

I am [REDACTED] who lives in Donabate.

I would hate the monster sewage plant to be put in Donabate because it won't be a nice place to live.

We already have a sewage plant in Donabate. Since last year they have been doing work to make this bigger. It means there is traffic all the time and it is not safe walking to school. Sometimes there is a horrible smell too. I am looking forward to this work being finished so the roads won't have holes anymore. It would not be fair if we got another even bigger plant here.

We have already done our fair share.  
Put it somewhere else please.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 11:49 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Monster Sewage Plant



21<sup>st</sup> June 2011

RPS

Greater Dublin Drainage Project Manager

C/O RSP Group

West Pier Business Campus

Dún Laoghaire

Co. Dublin

Dear Sir/Madam,

Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is:

**1. A National Heritage Area**

2. **A Special Protection Area**

3. **A Wetland Site of International Importance under the Ramsar Convention.**

4. **It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.**

Some 20 % of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility.

Yours faithfully

[Redacted signature]

[Redacted name]

[Redacted signature block]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 11:02 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Monster Sewage Plant

**Importance:** High

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21<sup>st</sup> June 2011

RPS  
Greater Dublin Drainage Project Manager  
C/O RSP Group  
West Pier Business Campus  
Dún Laoghaire  
Co. Dublin

Dear Sir/Madam,

Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is:

- 1. A National Heritage Area**
- 2. A Special Protection Area**
- 3. A Wetland Site of International Importance under the Ramsar Convention.**
- 4. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.**

Some 20 % of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility.



Yours faithfully

A solid black rectangular redaction box covering the signature area.

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 11:15 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** New Greater Dublin Wastewater Treatment Plant & Works

Dear Sir/Madam,

I believe that Fingal County Council's proposal for a large scale wastewater treatment plant & associated outfall in Portrane should not be allowed to proceed.

The main reasons for this are because of the environmental sensitivity of the area.

- 1) There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would rule out Portrane as a location for such a facility.
- 2) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent with this decision.
- 3) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
- 4) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Also, the fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed by An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means, from your point of view, that selecting Portrane would pose too big a planning risk.

I am aware that a solution has to be found to provide long term sustainable wastewater drainage and treatment for the Greater Dublin Area. I believe that the best solution is to have a number of smaller plants serving the surrounding areas. We are willing to do our fair share. As you know, we already have agreed to the 65,000 PE plant that is currently under construction.

I would strongly urge you to consider alternative locations and solutions to this initiative.

Yours faithfully

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 10:45 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** New Wastewater Treatment Works

Dear Sir/Madam,

I believe that Portrane should not be the location for the new regional sewage plant and associated outfall. This is because of the environmental sensitivity of the area.

- 1) There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/45/EEC) would rule out Portrane as a location for such a facility.
- 2) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent with this decision.
- 3) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
- 4) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Also, the fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed by An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means, from your point of view, that selecting Portrane would pose too big a planning risk.

I am aware that a solution has to be found to provide long term sustainable wastewater drainage and treatment for the Greater Dublin Area.

We are willing to do our fair share. In fact, we already have by agreeing to the 65,000 PE plant that is currently under construction.

I would strongly urge you to consider alternative locations for this facility.

Yours faithfully

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2011 10:43 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** No sewage plant for Portrane

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin, Ireland

21st June, 2011

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. ?

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and day-trippers during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanála immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 5:55 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** North Dublin Sewage

To whom it concerns,

As a [REDACTED] resident I wish to object to the massive sewage plant that may be planned for our peninsulas. The peninsula is a beautiful natural environment. It is a peninsula with seawater of a standard that has gained a blue flag.

This is not the case in beaches in the Ringsend area.

Portrane seems to be seen by Fingal County Council as an area which will absorb problems of Leinster. We have a Detention Centre, Sofia Housing Project, & Grove House. That is a lot of problems per head of population. No sewage plant we have enough .

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2011 10:45 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Objection to locate a regional sewage plant in Portrane  
**Attachments:** [REDACTED]

Dear Sir/Madam,

I wish to strongly oppose any move to locate a regional sewage plant in Portrane. It seems insane to even consider Portrane when there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours sincerely

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 9:00 AM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Objection to Monster Sewage Treatment Plant for Portrane

Dear Sir / Madam,

I understand that you are currently in the process of carrying out a site assessment to find a suitable site for a monster sewage treatment plant (circa. 850,000 PE) to be located somewhere along the North Dublin coastline.

As a proud resident of the beautiful Donabate / Portrane peninsula for the past seven years, I feel the unique environmental attributes of Portrane, and the surrounding area, make it highly unsuitable as a possible location for such a facility.

The Donabate/Portrane peninsula is willing to do its fair share. The area is already taking a 65,000 PE plant which will cater for our immediate neighbours.

However....we will not be the dumping ground for the entire East Coast of Ireland, and as such, **we will strenuously oppose any attempt to locate such a monstrosity on our beautiful peninsula.**

We believe our argument is quite clear and definitive. Please see below detailed rationale:

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) As previously outlined above, the Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay .

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Regards,

A large black rectangular redaction box covering the signature area.A large black rectangular redaction box covering the contact information area.



---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 8:56 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Objection to Monster Sewage Treatment Plant for Portrane

Dear Sir / Madam,

We understand that you are currently in the process of carrying out a site assessment to find a suitable site for a monster sewage treatment plant (circa. 850,000 PE) to be located somewhere along the North Dublin coastline.

As proud residents of the beautiful Donabate / Portrane peninsula for the past seven years, we feel the unique environmental attributes of Portrane, and the surrounding area, make it highly unsuitable as a possible location for such a facility.

The Donabate/Portrane peninsula is willing to do its fair share. The area is already taking a 65,000 PE plant which will cater for our immediate neighbours.

However....we will not be the dumping ground for the entire East Coast of Ireland, and as such, **we will strenuously oppose any attempt to locate such a monstrosity on our beautiful peninsula.**

We believe our argument is quite clear and definitive. Please see below detailed rationale:

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) As previously outlined above, the Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay .

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Regards,

A large black rectangular redaction box covering the signature area.A large black rectangular redaction box covering the signature area.

---

**From:** [REDACTED]  
**Sent:** Thursday, June 16, 2011 8:52 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Objection to Portrane as site for regional sewage plant

I absolutely object to the consideration of Portrane as the site for the regional sewage plant catering for 850,000 people. We are already taking our fairshare by locating the 65000 PE sewage plant. As a resident of [REDACTED] we have endured traffic restrictions for quite a time now on the portrane road if the regional plant is built this would make the traffic situation unbearable in donabate.

Portrane is totally unsuitable for the following reasons:

- 1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- 2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site(ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

- 3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

- 4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

- 5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

- 6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 8:52 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Plan for regional sewage plant at Portrane

Greater Dublin Drainage Project Manager  
RPS Group

Dear Sir/Madam

I wish to state that I am firmly opposed to the proposal to locate a regional sewage plant in the lovely seaside village of Portrane.

The Donabate/Portrane peninsula has already taken it's fair share so we should not be made the dumping ground for the entire east coast of the country.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategy Drainage Study means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been preselected all along. This means again selecting Portrane poses too big a planning risk.

Also the requirements of the EU Birds Directive and Habitats Directive would also appear to rule Portrane out as a location for such a facility. There are 8 special areas of conservation or special protection agears within a 10km radius of Portrane.

Yours faithfully

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2011 6:25 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** portrane/donadate

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin, Ireland

21st June, 2011

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. ?

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and ?day-trippers? during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully



---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 10:42 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Portrane should only process its fairshare

To whom in may concern

I am distressed to discover that Portrane may once again be considered for a 'all of Dublin' (and Lord only knows where else) waste-water treatment plant. We have, as a community, already accepted a 65,000 PE plant and have had to put up with months of disruption on our roads. It has also been noted by me, as a regular beach walker, the impact on the seabed of the activity that has taken place between Portrane and Lambay. The vast increase on debries and seaweed washed onto the beaches could not possibly have been just coincidence.

It is totally unacceptable that this small peninsula should be subjected to the waste products from such a vast region as is being proposed. I don't want to even get into my feelings on the proposal when this was last raised, that waste from other districts would be 'trucked' in. I will not stand quietly by and allow the development of a plant of this size OR one that includes the transporting and transferring of waste of this nature. This is simply to much. You cannot possibly assure me that this plant will be unseen and un-smelt, not to mention the potential of accidents with this type of lorry and the inevitable results.

How on earth can a football academy (may 2008) be refused a site in this area due to the sensitivity of the environment and the heritage of the natural inhabitants of Rodgerstown estuary and yet the same council even consider Portrane as a possible site for this plant.

I am disgusted to even be having to write this letter. I thought we had this resolved when we agreed to permit a smaller plant for the immediate surrounding area for Piped waste only. I don't agree with the principle of these monster plants that inflict the waste of an entire region on one community and I certainly don't agree with it coming here. I feel as a community we are being literally 'dumped' on and it is simply not acceptable. I think you will find that the residents of this community will not be quite in their objections to this proposal.

Your very, very sincerely

[REDACTED]

[REDACTED]

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 2:24 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Proposal to siting of 850,000pe Sewage Treatment Plant in Portrane Area

Dear Sir/Madam,

I oppose any move to locate a regional sewage treatment plant in Portrane, The Donabate/Portrane peninsula is willing to do its fair share which is taking a 65,000pe plant to meet the needs of not just our own but also the surrounding communities. However, I do not want my community to be the dumping ground for the wastewater and by products of the entire eastern area of the Irish coast. The following are a number of points which support my objection to this ridiculous project.

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But

we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay .

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, July 05, 2011 12:16 AM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Proposed Monster Sewage Plant

Dear Sirs,

On the Tuesday 7th June last - exactly four weeks ago, my husband and I attended the 'Consultation' at Fingal County Offices in Swords in respect of the proposed Monster Sewage Plant and were shown the map outlining the area where, within the marked boundary, it is proposed to site this Plant.

The 3 representatives who were there to enlighten us could not answer the questions my husband and I put to them. They consequently wrote our questions on a Form and noted our names, addresses and 'phone number promising to telephone us with the appropriate answers before the deadline of the 24th June when the consultation period ended.

Since then of course, no such answers were provided to us by either letter or 'phone by Fingal County Council or the 3 representatives who attended the Consultation. It was our understanding that the exercise was to provide information to the public in a democratic way. Because this was not done, it is blatantly obvious now that the whole Consultation process is invalid since the provision of information was the supposed purpose of holding these Consultation Information meetings in several areas in the County, in the first place.

It is now quite clear that it was never intended to provide the answers to these reasonable questions and this whole consultation process was just an exercise of going through the motions in an attempt to hoodwink the residents of the Portrane/Donabate peninsula into thinking that this was being done on a fair and equitable basis. 'Fair' and 'Equitable' are words that are obviously not in the lexicon of any of the agencies trying to foist this monstrosity on an area which has been lauded for its Environmental, Leisure and Ecological amenities, of which you are well aware and which are protected by European Directives and Laws signed up to by the Irish Government.

We are Septuagenarians who have better ways of using the precious time left to us than having Fingal County Council waste it by an exercise that was both dishonest and misleading. There were 5 other people at Fingal Offices at the same time, aslo asking relevant questions in relation to this 'Consultation' farce.

We would therefore be obliged if you could kindly advise as to what exactly was the purpose of these 'Consultations' since it obviously was not meant to seek feedback from people who would be greatly and adversely affected by the proposed imposition of this monstrosity on our doorstep but rather seems to be a P.R. exercise on behalf the Consultancy Firm and Fingal County Council.

Yours faithfully,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 8:52 PM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Proposed Portrane Sewage Dump

Dear Sir/Madam,

As a resident of Donabate, which is situated right beside Portrane , I was horrified on learning of a proposed monster sewage plant in the nearby area of Portrane.

No contact has been made to the local residents of the areas of Portrane nor Donabate by the local authorities which would have me believe that this matter is being pushed under the radar and treating us residents as ignorant to what goes on in their own local area which of course you should be aware is not the case at all.

I and my family completely object to this proposal on the following grounds:

- Quality of life for my family and myself
- Infrastructure of Donabate/Portrane peninsula as completely unsuitable for a plant of this size
- Impact on the environment - health, pollution, increased traffic levels, risk to wildlife, potential accidents, location near a growing community and much much more.....

It is my understanding as to the following issues:

- The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) rules out Portrane as a location for such a facility. There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive.
- 20% of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
- Rogerstown estuary is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Please note that I will be communicating my concerns to the local and national media including contacting all local and elected TD's who have been seriously silent on this matter which I find unacceptable.

As a resident of the area I would expect to be kept updated or informed where I can get further information and would request a speedy reply to my concerns.

Regards,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 12:30 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Proposed sewage plant for Donabate/Potrane Peninsula

Sir/Madam,

I am a resident in [REDACTED] and on behalf of my family I wish to strongly oppose the consideration for the Donabate and Portrane peninsula as the location for this "super " sewage treatment plant. We have done our fair share in accommodating a 65,000 PE plant and the massive interruption to our daily lives with appalling roadworks which seem to have no end to them.

As an alternative, why cant sewage from other regions be processed locally and the remaining treated water be piped to the nearest coastal location.

I would strongly urge that an alternative location be sought, perhaps one with less impact on society and nature is appropriate.

Please see some points below to enforce such an opinion.

- 1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- 2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

- 3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.
- 4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord

Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I welcome your acknowledgement of this email and your comments.

**Regards,**

A solid black rectangular redaction box covering the signature area.

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 11:06 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Proposed sewage plant in Portrane

Dear Sir/Madam,

As a resident of [REDACTED] I was disgusted to hear of a proposed sewage plant in the area. Not only is there a proposal for a smaller dump, there is also a proposal for a monster dump. There has been no communication regarding this from any authority which clearly shows that this is being pushed under the radar

I completely object to this proposal for a number of reasons:

- Quality of life for my family and myself as we live in [REDACTED] in Portrane.
  - Infrastructure of Donabate/Portrane peninsula is not suitable for a plant of this size, which is clearly seen at the moment with road blockages, traffic lights and trucks constantly holding up traffic. A short journey normally taking 5 minutes can take up to twenty minutes now.
    - Impact of this plant on the environment - Health, quality of life, pollution, smell, level of traffic, risk to wildlife, potential accidents, location near a growing community. We [ersonally moved away from a heavily built up area to Portrane to potentially take on a 'Monster Sewage Plant'. this is simply not acceptable. As residents of North County Dublin we have the responsibility to look after our own waste, not the waste of the Greater Dublin area (which I believe includes a population of other County Councils and up to 1.5m people).
    - The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) rules out Portrane as a location for such a facility. There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
      - Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive.
        - 20% of the world's Brent Geese population nest in Rogerstown, which I can see from my kitchen window. The Birds Directive was successful in stopping the infill of Dublin Bay.
          - Rogerstown estuary is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I will be communicating my concerns to all local and national media along with all local and elected TD's who have been worryingly silent about this

I expect to be kept updated or be informed where I can get further information and would like a prompt reply to my concerns

Regards,

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 4:04 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** proposed sewage plant in Portrane/Donabate.

A Chara,

This small peninsula of Portrane/Donabate is not a suitable part of North Co. Dublin for the proposed Monster Sewage Plant.

Is it NOT ENOUGH that we are prepared to accept a 65,000 PE plant to include Rush and Lusk, without being expected to agree to this proposal for a Monster Plant to cater for the Greater Dublin and Leinster areas.

This is MOST UNFAIR to the residents of Portrane and Donabate and the many holiday visitors.

We already know about the problems in Ringsend. We do not want to see them repeated in this beautiful little peninsula.

We are proud of our lovely beaches and many of us have worked with the Fingal Council for a clean-up operation on an annual basis.

Now we have our Blue Flag at Portrane beach. We wonder what is the quality of the water in Ringsend??????

We wish to lodge our objection most vehemently.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 14, 2011 10:48 PM  
**To:** info@greaterdublindrainage.ie  
**Cc:** [REDACTED]  
**Subject:** Proposed sewage plant Portrane

Dear Sir/Madam,

As a resident of [REDACTED] I was disgusted to hear of a proposed sewage plant in the area. Not only is there a proposal for a smaller dump, there is also a proposal for a monster dump. There has been no communication regarding this from any authority which clearly shows that this is being pushed under the radar

I completely object to this proposal for a number of reasons:

- Quality of life for my family and myself
- Infrastructure of Donabate/Portrane peninsula is not suitable for a plant of this size
- Impact of this plant on the environment - Health, quality of life, pollution, smell, level of traffic, risk to wildlife, potential accidents, location near a growing community
- The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) rules out Portrane as a location for such a facility. There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive.
- 20% of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
- Rogerstown estuary is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I will be communicating my concerns to all local and national media along with all local and elected TD's who have been worryingly silent about this

I expect to be kept updated or be informed where I can get further information and would like a prompt reply to my concerns

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, May 29, 2011 11:17 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** RE: Grater Dublin Drainage Scheme

Emma,

Sorry I have been difficult to contact - I have been interviewing this week and necessarily out of phone contact. You can always leave a message for me on my office ansafone.

I am still unaware of the location of the Blanchardstown consultation - perhaps you can advise? I would like to get along to speak in person to you or your colleagues but need to know the location of the Blanchardstown public consultation.

Thank you for the links provided. I have word searched the documentation and find no mention of "anaerobic" "digestion" and wonder if this was considered?

Can I suggest that your experts be asked to review the recent advances in anaerobic digestion at low temperatures which have enormous potential to deliver eco-friendly and net energy positive treatments of domestic sewage? The Irish tax payer (through the researchers at NUI Galway) is investing heavily in this research, it would be a shame if its benefits were to be discovered abroad whilst we at home waste scarce resources building outdated infrastructure for the want of adequate investigation at planning stage.

Furthermore, there is very good research available on the adaptability of those systems to deal with food processing and industrial wastes, two additional loads on the current water catchments which could usefully be relieved, especially in the context of climate change. Doing nothing in relation to those existing sources of pollution in the context of declining water levels as a result of climate change is likely to return our rivers to unacceptable levels over time. Those waste streams, and projected additional industrial waste streams, need to be taken into account and dealt with in the context of any such plan.

I would cite two research papers which indicate the technologies currently available, or likely to become available within the planning timeframe of the infrastructure contemplated, which question the quality of the research conducted to date and may have significant benefits in terms of odour mitigation and energy consumption:

Anaerobic co-digestion of household waste and sewage sludge - cost effective sustainable waste management  
<http://oldweb.northampton.ac.uk/aps/env/Wasteresource/1997/Mar97/97mar38.htm>

Perturbation-independent community development in low-temperature anaerobic biological wastewater treatment bioreactors  
<http://onlinelibrary.wiley.com/doi/10.1002/bit.22507/abstract>

Please advise the venue details for Blanchardstown.

Regards,  
[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 12:14 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dun Laoghaire,  
Co. Dublin,  
Ireland

22nd June, 2011

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. "

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches, Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate / Portrane are heavily dependent on holidaymakers and "day-trippers" during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

7) I would assume proper planning would require the proposed plant to be constructed at an adequate level above sea level, in order to negate disastrous affects of the "200 year storm" criteria. As you are aware this stipulation covers construction of other facilities in close proximity to the coast. Portrane is a relatively low lying area, storm surge, & potential failure of the pipe will cause a significant health hazard to the local residents & indeed the schools which the pipe would be laid adjacent to.

Unfortunately this scenario is not without precedence in Fingal. In September 2003, St. Fintans School in Sutton had to close due to raw sewage entering the school caused by a pipe failure at a new pumping station.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours Sincerely,

A solid black rectangular box used to redact the signature of the sender.

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 5:28 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dun Laoghaire,  
Co. Dublin, Ireland

23rd June, 2011

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie

Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. ?

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager?s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and day-trippers during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully

A black rectangular redaction box covering the signature of the sender.



---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 9:14 PM  
**To:** info  
**Subject:** Re: Subject: Greater Dublin Drainage- First phase of Consultation closes 24th June 2011

Dear Emma,

Thank you for your email. I have circulated this among some residents that I think may be interested in the issue.

I look forward to hearing from you.

Kind regards,

[REDACTED]

----- Original Message -----

**From:** "info" <[info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)>

**To:** [REDACTED]

**Sent:** Tuesday, 14 June, 2011 17:48:48 GMT +00:00 GMT Britain, Ireland, Portugal

**Subject:** Subject: Greater Dublin Drainage- First phase of Consultation closes 24th June 2011

Dear [REDACTED]

As you may be aware, Fingal County Council commenced an initial consultation on the Greater Dublin drainage initiative with all stakeholders on 25<sup>th</sup> of May 2011. The **Greater Dublin Drainage** initiative aims to provide the drainage infrastructure that the Greater Dublin Area needs to continue to develop, both socially and economically. This phase of public consultation will close on the 24<sup>th</sup> of June 2011.

In this phase of consultation, Fingal County Council is seeking feedback from all interested stakeholders on issues or concerns that should be considered in determining the locations of the three elements of the Greater Dublin Drainage project.

The Council is determined to ensure that the most appropriate and suitable locations are selected for Greater Dublin Drainage, and that all interested stakeholders be consulted with and involved in the decision making process.

If you know any groups or individuals that are interested in this project or that you feel we should contact, please let us know or pass our contact details on to them.

Interested stakeholders can participate in this phase of consultation in a variety of ways:

**In writing:** by submitting feedback in writing to: Greater Dublin Drainage Project Manager (c/o RPS Group, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland)

**Online:** by emailing us at [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie) or by visiting [www.greaterdublindrainage.ie](http://www.greaterdublindrainage.ie)

**Phone:** 1890 44 55 67

**Public Information Days:**

To date three Public information days have taken place during this phase of the non-statutory consultation, with one more to be held:

- **16th June**, Fingal County Council, Swords 2pm-7pm

The Greater Dublin Drainage initiative involves the provision of a new wastewater treatment works, a marine outfall and new drainage network in the northern part of the Greater Dublin Area. Without this initiative, the potential for the development of essential resources and facilities, such as schools, hospitals, industry, businesses and homes, will be severely restricted throughout the Greater Dublin Area – a scenario which is unthinkable for a capital region.

Kind regards,

Emma  
On behalf of Greater Dublin Drainage

---

**From:** [REDACTED]  
**Sent:** Thursday, June 16, 2011 6:06 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Re: Subject: Greater Dublin Drainage- First phase of Consultation closes 24th June 2011

Thank you Emma.

----- Original Message -----

**From:** [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)  
**To:** [REDACTED]  
**Sent:** Thursday, 16 June, 2011 09:45:12 GMT +00:00 GMT Britain, Ireland, Portugal  
**Subject:** Re: Subject: Greater Dublin Drainage- First phase of Consultation closes 24th June 2011

Dear [REDACTED]  
Thank you so much for your response and for circulating it to interested residents.  
We will keep you updated as the project progresses.  
Kind regards,  
Emma  
On behalf of Greater Dublin Drainage.

**On Wed 15/06/11 9:14 PM**, [REDACTED] **sent:**

Dear Emma,  
  
Thank you for your email. I have circulated this among some residents that I think may be interested in the issue.  
  
I look forward to hearing from you.  
  
Kind regards,

[REDACTED]

----- Original Message -----

**From:** "info"  
**To:** [REDACTED]  
**Sent:** Tuesday, 14 June, 2011 17:48:48 GMT +00:00 GMT Britain, Ireland, Portugal  
**Subject:** Subject: Greater Dublin Drainage- First phase of Consultation closes 24th June 2011

Dear [REDACTED],

As you may be aware, Fingal County Council commenced an initial consultation on the Greater Dublin drainage initiative with all stakeholders on 25<sup>th</sup> of May 2011. The **Greater Dublin Drainage** initiative aims to provide the drainage infrastructure that the Greater Dublin Area needs to continue to develop, both socially and economically. This phase of public consultation will close on the 24<sup>th</sup> of June 2011.

In this phase of consultation, Fingal County Council is seeking feedback from all interested stakeholders on issues or concerns that should be considered in determining the locations of the three elements of the Greater Dublin Drainage project.

The Council is determined to ensure that the most appropriate and suitable locations are selected for Greater Dublin Drainage, and that all interested stakeholders be consulted with and involved in the decision making process.

If you know any groups or individuals that are interested in this project or that you feel we should contact, please let us know or pass our contact details on to them.

Interested stakeholders can participate in this phase of consultation in a variety of ways:

**In writing:** by submitting feedback in writing to: Greater Dublin Drainage Project Manager (c/o RPS Group, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland)

**Online:** by emailing us at [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie) or by visiting [www.greaterdublindrainage.ie](http://www.greaterdublindrainage.ie)

**Phone:** 1890 44 55 67

**Public Information Days:**

To date three Public information days have taken place during this phase of the non-statutory consultation, with one more to be held:

- **16th June**, Fingal County Council, Swords 2pm-7pm

The Greater Dublin Drainage initiative involves the provision of a new wastewater treatment works, a marine outfall and new drainage network in the northern part of the Greater Dublin Area. Without this initiative, the potential for the development of essential resources and facilities, such as schools, hospitals, industry, businesses and homes, will be severely restricted throughout the Greater Dublin Area – a scenario which is unthinkable for a capital region.

Kind regards,

Emma  
On behalf of Greater Dublin Drainage

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 9:50 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Ref: Proposed Sewage Treatment Plant, North Dublin

**Importance:** High

Dear Sir/Madam,

I am writing to you in relation to the above proposed sewage treatment plant in North Dublin, in particular to the possibility of Portrane being short-listed as a possible site for the location of this plant.

I could list the points of the environmental impact such a treatment plant would have, but I would ask you to consider the cost involved to the lives of the people on the Donabate/Portrane peninsula. To locate such a facility here would mean that our children would no longer be able to play sport on pitches behind the cliffs. It would also mean that the many people who walk along our cliffs daily and the visitors who come at weekends would be deprived of a fantastic natural amenity. It seems absurd that Fingal County Council would send Biodiversity officers to our schools to bring our children birdwatching to this area and then propose to locate a facility that would destroy such activities.

Donabate and Portrane have already accepted a sewage treatment plant the capacity of which far exceeds the number of people living on this peninsula and this should be enough.

When you are making your decision on this I would ask you to ask yourselves this question: if this sewage treatment plant was proposed for the area you live in, how would you feel? While we are being told that the health of the people of Dublin and the development of our city's infrastructure depends on a new sewage treatment plant, I would ask you to consider that the people of Donabate and Portrane (including the many children who enjoy life on this peninsula) are also citizens of Dublin and have an entitlement to a safe, healthy life and if you must construct a plant of this size (which is debatable, needs could probably be better served by several, smaller treatment plants), please locate it in a place where there is minimal impact both to the surrounding environment and people's lives.

Yours sincerely,

[REDACTED]  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 7:56 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** regional sewage plant  
**Attachments:** Letter to GDDPManager.doc.pdf

Dear Sir/Madam,

Please find attached letter opposing to the proposal of imposing a regional sewage plant on the Donabate/Portrane peninsula. The proposed plant is unfair. The community is prepared to take its share. The people of the Donabate/Portrane peninsula have already agreed to take a 65,000PE plant to serve the needs of Portrane, Donabate, Rush and Lusk.

Kindest Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Name:  
Address:

Email:

Date: 23 Jun 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

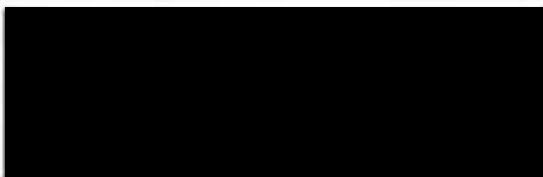
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 10:50 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage

[REDACTED]

Sir/Madam,

I am a resident in Donabate and on behalf of my family I wish to strongly oppose the consideration for the Donabate and Portrane peninsula to cater for hundreds of thousands of people within the county and surroundings (I believe up to 850,000).

We have done our fair share in accommodating a 65,000 PE plant and the massive interruption to our daily lives with appalling roadworks which seem to have no end to them.

I would strongly urge that an alternative location be sought, perhaps one with less impact on society and nature is appropriate.

In these challenging times we need to ensure the things in life that are free (parks, beaches, sporting grounds) and suchlike are in no way compromised by dumping a massive sewage plant in such a location.

Please see some points below to enforce such an opinion.

- 1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- 2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned



developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I welcome your acknowledgement of this email and your comments.

Regards,



---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 11:19 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage Plant  
**Attachments:** 0022\_001.pdf

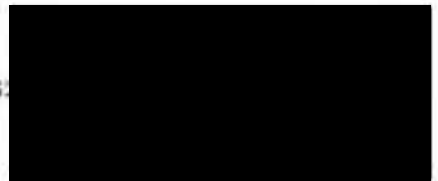
Hello

Please see attached letter opposing Donabate as location for new Sewage Plant, thanks

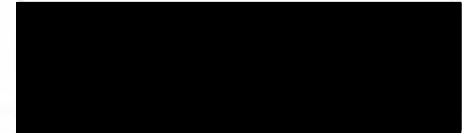
[REDACTED]

[REDACTED]

Name:  
Address:



Email:



Date 23 JUNE 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

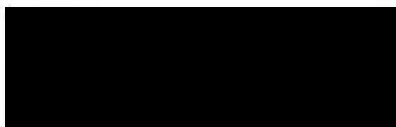
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (SAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

Yours truly,



---

**From:** [REDACTED]  
**Sent:** Tuesday, May 31, 2011 6:32 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage Plant.

To Whom it may concern,

Rush does not want any sewage plant in it. We already have enough experiments with Eirgird. So please find somewhere else to put it.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 9:59 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage Plant - Comments [REDACTED] Residents Group

Dear Sir/Madam

We are submitting the following comments on behalf of the [REDACTED] Residents Group, a copy of which will be sent in the post also. Included with [REDACTED] copy will be a copy of letter dated April 2007 addressed to Fingal County Council opposing the siting of a monster sewage site at Portrane. The comments contained therein are as valid today in 2011 as they were in 2007.

In addition we would like to make the following comments:

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane/ Rush peninsulas are willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland. In Rush we have lived with the blight that is Balleally Dump - one of the largest landfills in Ireland serving the whole of the Dublin area. Originally opened in 1971 the licence for the operation of the dump was extended a number of times, despite commitments and assurances of its closure which finally happened in 2009. We now have a mountain of 34 years waste to blot our landscape for the future generations.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds

Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I would ask you to take all of the above into account when considering your response and we look forward to hearing from you in due course. Please acknowledge safe receipt of this mail

Yours sincerely

A large black rectangular redaction box covering the signature area.

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 10:11 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** SEWAGE PLANT - PORTRANE NOT THE LOCATION  
**Attachments:** SewageLEt2011P.doc

Please find attached letter regarding the above and noting my concerns.

[REDACTED]



23<sup>rd</sup> June, 2011

Greater Dublin Drainage Project Manager  
C/o RPS Group  
West Pier Business Campus  
Dun Laoghaire  
Co. Dublin

RE MONSTER SEWAGE PLANT

Dear Sirs,

Portrane should not be the location for any new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown Estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act, 1976.

Some 20 per cent of the world's Brent Geese population nest is in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

This previously proposed location is wholly unsuitable.

I would strenuously urge you to consider alternative locations for this facility.

Yours faithfully,

---

A black rectangular redaction box covering the signature area.



---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 10:13 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** SEWAGE PLANT - PORTRANE NOT THE LOCATION!  
**Attachments:** SewageLet2011A.doc

Please find attached my letter regarding the above and noting my serious concerns.

[REDACTED]



23<sup>rd</sup> June, 2011

Greater Dublin Drainage Project Manager  
C/o RPS Group  
West Pier Business Campus  
Dun Laoghaire  
Co. Dublin

RE MONSTER SEWAGE PLANT

Dear Sirs,

Portrane should not be the location for any new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown Estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act, 1976.

Some 20 per cent of the world's Brent Geese population nest is in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

This previously proposed location is wholly unsuitable.

I would strenuously urge you to consider alternative locations for this facility.

Yours faithfully,

---

A black rectangular redaction mark covering the signature area at the bottom left of the page.

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 10:09 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** SEWAGE PLANT - Portrane not the location!  
**Attachments:** SewageLet2011M.doc

Please find attached letter regarding the above.

[REDACTED]



23<sup>rd</sup> June, 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group  
West Pier Business Campus  
Dun Laoghaire  
Co. Dublin

RE MONSTER SEWAGE PLANT

Dear Sirs,

Portrane should not be the location for any new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown Estuary, which is 1.5 km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act, 1976.

Some 20 per cent of the world's Brent Geese population nest is in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

This previously proposed location is wholly unsuitable.

I would strenuously urge you to consider alternative locations for this facility.

Yours faithfully,

\_\_\_\_\_  
A black rectangular redaction box covering the signature area.

---

**From:** [REDACTED]  
**Sent:** Thursday, June 16, 2011 12:38 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage Plant

[REDACTED]

Dear Sir/Madame,

I am a resident in [REDACTED] and on behalf of my family I wish to strongly oppose the consideration for the Donabate and Portrane peninsula to cater for hundreds of thousands of people within the county and surroundings (I believe up to 850,000).

We have done our fair share in accommodating a 65,000 PE plant and the massive interruption to our daily lives with appalling roadworks which seem to have no end to them.

I would strongly urge that an alternative location be sought; perhaps one with less impact on society and nature is appropriate.

In these challenging times we need to ensure the things in life that are free (parks, beaches, sporting grounds) and suchlike are in no way compromised by dumping a massive sewage plant in such a location.

Please see some points below to enforce such an opinion.

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Please advise that you have received our correspondence and we would be grateful if you could comment on this matter.

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 10:56 AM  
**To:** Info@greaterdublindrainage.ie  
**Subject:** Sewage Plant  
**Attachments:** Letter To Fingal Co Co..doc

Dear Sir / Madam,

Please find my attached letter for your overview

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Sir/Madam,

I am a resident in [REDACTED] and on behalf of my family I wish to strongly oppose the consideration for the Donabate and Portrane peninsula to cater for hundreds of thousands of people within the county and surroundings (I believe up to 850,000).

We have done our fair share in accommodating a 65,000 PE plant and the massive interruption to our daily lives with appalling roadworks which seem to have no end to them.

I would strongly urge that an alternative location be sought, perhaps one with less impact on society and nature is appropriate.

In these challenging times we need to ensure the things in life that are free (parks, beaches, sporting grounds) and suchlike are in no way compromised by dumping a massive sewage plant in such a location.

Please see some points below to enforce such an opinion.

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).



3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

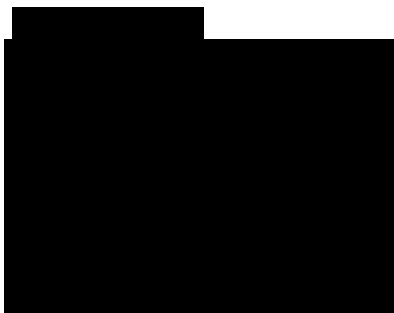
4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I welcome your acknowledgement of this email and your comments.

Regards



---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 10:08 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage plant

[REDACTED]

Sir/Madam,

I am a resident in [REDACTED] and on behalf of my family I wish to strongly oppose the consideration for the Donabate and Portrane peninsula to cater for hundreds of thousands of people within the county and surroundings (I believe up to 850,000).

We have done our fair share in accommodating a 65,000 PE plant and the massive interruption to our daily lives with appalling roadworks which seem to have no end to them.

I would strongly urge that an alternative location be sought, perhaps one with less impact on society and nature is appropriate.

In these challenging times we need to ensure the things in life that are free (parks, beaches, sporting grounds) and suchlike are in no way compromised by dumping a massive sewage plant in such a location.

Please see some points below to enforce such an opinion.

- 1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- 2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for

indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager’s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world’s Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I welcome your acknowledgement of this email and your comments.

Regards,



---

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2011 2:12 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage plant North County Dublin

A chara,

Regarding the assessment process to find a location for a sewage plant

I am really concerned the public are not been informed about exactly what is going on.

I only found out about this from a community website (see: <http://www.donabateportrane.com/>)

My understanding is that there were public consultations arranged but they were arranged when most people were at work.

For example, the consultants appointed to find a site for the plant held an open day in County Hall, Main Street, Swords (the offices of Fingal County Council) this Thursday (June 16) between 2pm and 7pm. I only get home from work at 7pm. I am sure I am not the only person as there are usually a few hundred getting off the train I get. I think it is outrageous that such a significant project can go ahead and it can be so difficult for people to find out about it. I would hate to think that Fingal think there is public apathy about this project when the reality is Fingal have made it too difficult for most people to even keep up to speed with what's happening regarding it.

I suggest you make it possible for the public to engage with the process. Have your open days on a Saturday.

Kind Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 9:43 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** sewage plant objection/Portrane

Dear Sir/Madam,

Portrane is NOT a suitable site for putting a large sewage works. It only needs an ounce of common sense to realise this! It is not rocket science and I do not know why anybody would even consider it! Doh!

1.The land is low-lying and on a flood plain - therefore NOT suitable

2.It is a protected consevation/bird sanctuary area - therefore NOT suitable

3.It is a holiday area with beaches - therefore NOT suitable

4.It is already suffers with severe traffic congestion - therefore NOT suitable

I strongly insist you look at the alternatives.

Yours Faithfully,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 9:20 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage Plant Proposal Donabate/Portrane

Dear Sirs,

I write with reference to the request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

#### Blue Flag Beach

1) Portrane/Burrow Beach is one of only two beaches on the Dublin North coast awarded the Blue Flag in 2011. "The Blue Flag is an internationally recognised eco-label, awarded to beaches and marinas with excellent environmental management". This signifies that not only is the water quality good enough for bathing, but also demonstrates the residents genuine respect and appreciation for the beach by volunteering their time to help with beach clean ups, building safe public walkways and also erecting fencing to help protect the dunes from coastal erosion. The Blue Flag status is part due to such community efforts. Portranes Blue Flag record has thus been recognised internationally and if lost it becomes more than just a local issue.

#### Tourism & Activities

2) The beach is also vital for encouraging the much needed growth in the tourism sector. The issue of tourism growth in Ireland has become increasingly important in recent years and a Blue Flag beach is the perfect tool to help advertise and promote Dublin and County as an attractive holiday destination. The Beach Management Plan details the benefits of the Burrow beach as it is an ideal location for recreational activities and is used regularly by walkers, runners, swimmers, water sports enthusiasts, holiday makers and those who just wish to relax and unwind. Travel information websites echo these sentiments and advertise the beach as a place worth a visit. This outlook should be encouraged and enhanced rather than potentially destroyed.

#### Education

3) The Burrow beach and surrounding estuary harness the potential to educate communities and schools alike about environmental issues such as eco systems, flora and fauna. It provides a unique opportunity in which schools in Donabate, Rush and Lusk etc can use the area as a live location for learning. This may coincide with a wild life park which I believe was under discussion for the area. The local council also held successful tree planting days on the grounds near to the estuary. One would believe this demonstrates the direction that many see the area developing and progressing in the future.

#### Birds Directive

4) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

#### pNHA, SPA and SAC

5) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low

ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager?s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

#### Businesses

6) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and 'day-trippers' during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

7) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

#### Existing Works and Fairness

8) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully

■

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 2:36 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Sewage works in Donabate Portrane peninsula

To the Greater Dublin Drainage Project Manager (c/o RPS Group, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland)

I am writing to inform you of my opposition to the sighting of any large sewage works on the Donabate Portrane peninsula. It would be totally out of keeping with the surrounding environment and will have a detrimental impact on the beaches and coastline which are used by thousands of families from Fingal and surrounding areas during the year and especially in the summer months. Please don't vandalise our beautiful coastline and make it unusable by the local community or as a major tourist attraction in North County Dublin. Who would want to visit a beautiful beach with a huge sewage plant located next to it. I certainly don't think this would look good in a tourist brochure. The sewage plant would also have a devastating impact on the local community with the increased number of lorries, smell and debris coming from the site.

Please also take into consideration the following points

- 1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- 2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. .
- 3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.
- 4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.
- 5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
- 6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

[REDACTED]



---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 2:53 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Site assessment - Donabate/Portrane

Dear Sir/Madam,

I believe that the Donabate/Portrane peninsula is the wrong location for the proposed 850,000 PE sewage plant. The following reasons are given :

1. The shoreline is used heavily by both the local and non-local population for a variety of activities ranging from walking, swimming, fishing, diving, surfing, bird-watching... The building of a plant of the size proposed would damage this vital amenity.
2. There are two pristine beaches on the peninsula. They are too precious to put at risk.
3. This is a residential area with more land zoned for home building in the future.
4. The location of a Natural Heritage area close to the proposed plant.

Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 7:56 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

?In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. ?

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and ?day-trippers? during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 9:25 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dun Laoghaire,  
Co. Dublin, Ireland

22nd June, 2011

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. "

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and "day-trippers" during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 9:34 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Site assessment process to find a location for a major sewage plant on the Coast of North Dublin

Re: Site assessment process to find a location for a major sewage plant on the Coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

?In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site(ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. ?

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and ?day-trippers? during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility

for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donabate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, June 26, 2011 10:33 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission

First name: [REDACTED]  
Last name: [REDACTED]  
E-mail: [REDACTED]  
Address: [REDACTED]

Submission: 1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

---

**From:** [REDACTED]  
**Sent:** Saturday, June 25, 2011 12:58 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission

First name: [REDACTED]  
Last name: [REDACTED]  
E-mail: [REDACTED]  
Address: [REDACTED]

Dear Sir/Madam, I am writing to you because I am extremely concerned by the plans to build a large regional sewage plant on the Portrane/Donabate peninsula. The site is not suitable for such a project for the following reasons: 1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) rule out Portrane as a location for such a facility. There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. 2) Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The proposal was rejected on the basis of the precautionary principle of the Habitats Directive. 3) Some 20% of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay. 4) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. 5) The Donabate/Portrane peninsula is willing to do its fair share. The area is already taking a 65,000 capacity plant to serve the needs of Donabate, Portrane, Rush & Lusk. But we will not be the dumping ground for the entire East Coast of Ireland. Yours sincerely, [REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 11:10 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission

First name: [REDACTED]  
Last name: [REDACTED]  
E-mail: [REDACTED]  
Address: [REDACTED]

Submission: Please do not locate the monster Sewage treatment plant in Portrane



---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 11:39 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission

First name: [REDACTED]  
Last name: [REDACTED]  
E-mail: [REDACTED]  
Address: [REDACTED]

Dear Sir/Madam, I wish to make a submission that Portrane/Donabate peninsula be excluded from the forthcoming site selection process for the 850,000 pe sweage treatment plant. The Donabate/Portrane peninsula is an environmentally sensitive area. Rogerstown estuary, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. This woud lead me to preclude that the peninsula should not even be considered as a potential candidate. I, along with many community members have been following developments on the proposed 850k pe sewage works over the years. We are active and vocal and we are well informed. We have no illusions what this plant would mean for our peninsula. It would be a blight on our landscape and a disaster for our status as an ecologically sensitive area. The construction of a facility of this size would have a huge impact on our residents also. We are already putting up with enormous disruption with the building of the 65k p.e plant in Portrane, which we did agree to accept even though it treats an area far exceeding our local area. The citizens of the peninsula are tired of being a dumping ground for projects that are not suited for our area, but we are not tired enough to fight any proposal to foist this on us. I urge you to consider all aspects of the plan on our peninsula when assesing suitability. Let not the availability of cheap land, the cost of a build and availability of coastline outweigh the environmental and human cost of building a plant on our peninsula. Le meas, [REDACTED]  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 1:30 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission  
**Attachments:** Submission.doc

Please find attached submission...

## Submission

This submission is made with a passion for the community that I live.

### **Consultation and engagement**

I live in Donabate and Portrane with my friends and neighbours. Like any other community we are entitled to enjoy self-determination through our elected representatives and voluntary groups. Planning decisions and the provision of national infrastructure should only be considered when meaningful consultation is provided for the views of the community. This implies the Critical infrastructure bill of 2006 is undemocratic and dilutes the powers of our representatives.

With regard to this project, since 2005 there has been no meaningful consultation with the community. Fingal County Council and its acting consultants may argue differently when it comes to consultation. I have no doubt that statistics can be produced regarding consultation; this is what I term “a box ticking exercise”

There is little and meaningful consultation with groups. Recently four public consultations were held by RPS and Fingal County council between 14:00 and 19:00 during a week day. The people of Donabate and most communities have family and work engagements and found these times difficult to engage.

If meaningful consultation was engaged and the spirit of consultation was upheld Fingal county council would have consulted with the community on Saturday or out of office hours and would leaflet residents and associations and the community council for the residents to engage in the process.

The recent consultation process which I was reminded was not statutory, highlights the cynical approach that is taken to meaningful consultation and proper engagement.

In fact funds should be provided for the community to engage professionals to get a better understanding. It would not be unreasonable to conclude that a deliberate attempt to complete the process and disregard the views of the community. A recent request by the community council was refused by the county manager to extend the submission date. This is most surprising.

### **Site selection**

The process is flawed .

In March 2005, Portrane in north Dublin was identified in the Greater Dublin Strategic Drainage Study as the preferred site for the new municipal sewage plant to satisfy the region's growing needs. The inclusion Portrane in the GDSDS did not take into any consideration of the local community or people living in the area. This report cost 10 million and no extensive public consultation was conducted for this report

In November that year, Fingal councillors voted to reject the plan and ordered that the drainage study, which had cost €10million and involved intensive analysis over five years, be reviewed.

### **Portrane Area**

Portrane is a peninsula that is surrounded by 2 estuaries .

1. The Rogerstown Estuary
2. The Broadmeadows Estuary

The Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

This was reinforced by the county manager in a recent decision regarding a proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principle, as enshrined in the EU Habitats Directive. Fingal county council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk. The county manager clearly understands the importance of the area by using the precautionary principle. The manager should use his powers to highlight the precautionary principle again in relation to this project.

*Quotation from the report on the proposed soccer academy*

*The Manager then gave a detailed summary of this report and concluded that in light of this directive (Habitats Directive 992/45/EEC) it was now back to the drawing board to consider other sites. In the course of a prolonged discussion on this item during which issues raised by the members were responded to by the Manager and Mr. Gilbert Power, the Manager stated that it was his intention to carry out a baseline study for the County Development Plan in relation to the effect of this directive on future planning for the area.*

*The Manger continued the assessment for a proposed football academy did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.*

[http://www.fingalcoco.ie/minutes/meeting\\_fulldoc.aspx?id=854](http://www.fingalcoco.ie/minutes/meeting_fulldoc.aspx?id=854)

### **A Significant Scientific interest area**

Minister of State at the Department of the Taoiseach (Mr. N. Treacy): Rogerstown Estuary has been designated a special protection area for birds under the EC Birds Directive (Article 4 of Council Directive No. 79/409 EEC). It is also included in the list of Wetlands of International Importance, established under the terms of the Ramsar Convention. The area has also been a statutory wildfowl sanctuary, no shooting area, for over 17 years. In 1988 part of Rogerstown Estuary was established as a National Nature

1. Reserve under Statutory Instrument No. 71 of 1988.

Please see below order 1988 citing the Rogerstown estuary as a significant scientific area

[Taking into consideration of the order 1988 the planning risk is demonstrated to be too big to consider citing a regional sewerage treatment plant serving 800,000ppe](#)

Mr NOEL TREACY, Minister of State at the Department of Finance, after consultation with the Minister for Agriculture and Food, the Minister for the Marine and the Commissioners of Public Works in Ireland, being satisfied that the land specified in Article 2 of the following order, being land to which [section 15](#) of the

[Wildlife Act, 1976](#) (No. 39 of 1976), applies, **includes a marine ecosystem which is of scientific interest and that the said ecosystem** is likely to benefit if measures are taken for its protection and that it is desirable to establish the said land as a nature reserve and that the proper management of the said land as a nature reserve would not be precluded by any interest of any other person in or over the said land, for the purpose of conserving the said ecosystem hereby, in exercise of the powers conferred on me by section 15 of the said Act, the Wildlife (Transfer of Departmental Administration and Ministerial Functions) Order, 1987 ( [S.I. No. 156 of 1987](#) ), and the Finance (Delegation of Ministerial Functions) Order, 1988 ( [S.I. No. 30 of 1988](#) ), order as follows:

2. (1) This Order may be cited as the nature Reserve (Rogerstown Estuary) Establishment Order, 1988.

### **The Ramsar convention and what does it mean.**

The Convention on Wetlands came into force for Ireland on 15 March 1985. Ireland presently has 45 sites designated as Wetlands of International Importance, with a surface area of 66,994 hectares. The Fingal Area has only two wetlands protected under the Ramsar convention. These are the Broad meadow Estuary and the Rogerstown estuary. The citing of a regional sewerage treatment plant will compromise the status and would be classed as environmental vandalism within Europe. A European objection will be supported by me and the community

#### **Extracts from Website showing protected wetlands in the Fingal area**

**Broadmeadow Estuary.** 11/06/96; 546 ha; 53°27'N 006°10'W. An estuary cut off from the sea by a large sand spit. The site includes well-developed saltmarshes, salt meadows, rocky shores, a well-developed outer dune ridge and sand mudflats exposed at low tide. Vegetation consists of a large bed of eelgrass (*Zostera noltii* and *Z. angustifolium*) and extensive mats of green algae (*Enteromorpha* spp., *Ulva lactuca*). The estuary is an important wintering site for numerous species of waterbirds. The Brent goose population is of international importance. The high numbers of diving birds reflects the lagoon-type nature of the inner estuary. Human activities include water sports. There is a marina and some housing. Ramsar site no. 833. Most recent RIS information: 1995.

**Rogerstown Estuary.** 25/10/88; Dublin; 195 ha; 53°30'N 006°08'W. Special Protection Area EC Directive; Nature Reserve. A small tidal embayment sheltered from the sea by a broad sand and shingle spit. Extensive areas of mud, sand and gravel are exposed at low tide. The mudflats support beds of green algae (*Enteromorpha*) and *Spartina anglica*. Numerous species of large numbers of wintering waterbirds use the tidal flats and the site is internationally important for

*Branta bernicla hrota*. Human activities include bait-digging and shellfish collection. Ramsar site no. 412. Most recent RIS information: ?.

www.ramsar.ie

### **Eirgrid and its implications**

Eirgrid's recent decision not to route the interconnector east west interconnector 500 mw cable cables through the Rogerstown estuary demonstrates their sensitivity to the community and the environment. Their decision was underwritten by an bord pleanna with concerns for the environment. In their assessment they list the Natura sites nearby

- Lambay Island SPA (4069), Cpac (0204)
- Skerries Island )4122)
- Rogerstown Estuary SPA (4015) and Csac(0208)
- Broadmeadow / Swords Estuary SPA (4025) AND Malahide Estuary Csac (0205)

Eirgrid made reference not to disturb the eco systems of the Rogerstown estuary.

The estuary was a planning risk for Eirgrid and could have jeopardised the entire project. The same applies for this project.

**I request that you do not consider Portrane as site for the regional Sewerage Treatment plant.**

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 11:50 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission  
**Attachments:** Fairshare template letters.doc





Date: 23<sup>rd</sup> June 2011

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,  
Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility.

Yours faithfully

A black rectangular redaction mark covering the signature area.

---

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 9:04 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission

First name: [REDACTED]  
Last name: [REDACTED]  
E-mail: [REDACTED]  
Address: [REDACTED]

Submission: Dear Sirs, I would like to object to the sewage treatment plant for the following reasons, some 20 pc of the worlds Brent Geese population nest in Rogerstown. Rogerstown is within 1.5km from the proposed sewage plant site.It is a nature reserve and a wildfowl sanctuary under the wildlife act 1976. regards

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 4:31 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission

First name:

Last name:

E-mail:

Address:

Submission: The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2011 10:41 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission

First name:  
Last name:  
E-mail:  
Address:

[REDACTED]

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant which is already causing major upheaval to infrastructure within Donabate and Portrane but we should not be a dumping ground for the entire East Coast of Ireland. The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. The area is

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 1:20 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission Donabate Portrane Community Council  
**Attachments:** DPCC submission 20110624 sewage plant.doc

I attach a submission from the Donabate Portrane Community Council

[REDACTED]

# **Donabate Portrane Community Council Submission to Greater Dublin Drainage Project Team**

**June 2011**

Donabate Portrane Community Council calls on the Regional Authority, the six local authorities that it comprises, and Fingal County Council in particular, to exclude Portrane from this site selection process for the following reasons:

1. During the original project to determine the type of waste water treatment process to be adopted by the Regional Authority of the 15 options considered, Portrane was identified as the location of choice in 7 of these. Portrane was also the only site identified in the process. This pre-selection of Portrane clearly compromised the original project and resulted in the decision to carry out an alternative site-selection (ASA) process. Should Portrane be selected as one of the sites to be considered in this ASA process, we believe this project would also be compromised. Excluding Portrane would make a statement about the objectivity of the process and send a clear signal to the public that the Regional and Local Authorities have not pre-ordained the site for the mega sewage plant.
2. Portrane is clearly unsuitable as a site for a major infrastructural project especially a waste water treatment plant of this scale. There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane (details provided below). In order to comply with the requirements of the European Commission Birds Directive (Council Directive 79/409/EEC) and the Habitats Directive (992/45/EEC) it is imperative that Portrane is not selected as a site for a major waste water treatment plant and therefore should be excluded from this ASA.

Details of cSACs and SPA/Ramsar sites within a 10km radius (approximately) of Portrane:

## **Rogerstown Estuary SPA (code 04015)**

This site extends from the Newhaggard Bridge to the seaward side of Portrane. The SPA is a fine example of an estuarine system, providing both feeding and roosting areas for a range of wintering waterfowl. Rogerstown Estuary SPA site is of high conservation importance, with an internationally important population of Brent Geese and nationally important populations of a further 10 species.

## **Rogerstown Estuary candidate Special Area of Conservation (code 0208)**

Extent of site is similar to the SPA. Site is specifically selected for Estuaries and Tidal mudflats, three types of salt marsh (Atlantic, Mediterranean, Salicornia mud), as well as various dune types.

Rogerstown Estuary is a relatively small, narrow estuary separated from the sea by a sand and shingle bar. The estuary is divided into two distinct parts by a causeway and narrow bridge, built in the 1840s to carry the Dublin-Belfast railway line. The estuary drains almost completely at low tide.

The intertidal flats of the outer estuary are mainly of sands, with soft muds in the north-west sector and along the southern shore. Associated with these muds are stands of the

alien cordgrass *Spartina anglica*. Green algae (mainly *Enteromorpha* spp. and *Ulva lactuca*) are widespread and form dense mats in the more sheltered areas.

The area of intertidal flats in the inner estuary is reduced as a result of the local authority refuse tip on the north shore. The sediments here are mostly muds, which are very soft in places. Cordgrass is widespread in parts, and in summer, dense green algal mats grow on the muds. In the extreme inner part, the estuary narrows to a tidal river.

Salt marshes fringe parts of the estuary, especially the southern shores and parts of the outer sand spit. Common plant species of the saltmarsh include sea rush *Juncus maritimus*, sea purslane *Halimione portulacoides* and common salt marsh-grass *Puccinellia maritima*. Low sand hills occur on the outer spit.

Rogerstown has long been known as an important site for wintering waterbirds. Detailed winter counts commenced in the late 1980s and continue today as part of the Irish Wetland Bird Survey (I-WeBS) co-ordinated by BirdWatch Ireland. For counting purposes the estuary is divided into 23 subsites. In the most recent published review (Crowe 2005), the site is listed of international importance for its population of light-bellied Brent geese, and also because it regularly supports in excess of 20,000 waterbirds. It is nationally important for a further 16 species. Most of the birds commute on a daily basis between the inner and outer estuaries, usually in response to tidal state or disturbance.

This site qualifies under **Article 4.1** of the Birds Directive (79/409/EEC) by supporting a population of European importance of Golden Plover, a species listed on Annex I of the Directive.

The site also qualifies under **Article 4.2** of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: Brent Goose.

#### **Broadmeadow/Swords Estuary SPA (code 04025)**

This site extends from the Broadmeadow river (just below M1) to eastwards of Malahide village. The Broadmeadow/Swords Estuary SPA is a fine example of an estuarine system, providing both feeding and roosting areas for a range of wintering waterfowl. The lagoonal nature of the inner estuary is of particular value as it increases the diversity of birds which occur. The site is of high conservation importance, with an internationally important population of Brent Geese and nationally important populations of a further 12 species.

#### **Malahide Estuary candidate Special Area of Conservation (code 0205)**

Similar in extent to the SPA and of importance for a range of estuarine habitats which are listed on Annex I of the Habitats Directive. These include various types of sand dune and salt marsh habitats.

#### **Baldoyle Bay SPA (04016) (and Ramsar site)**

Baldoyle Bay extends from just below Portmarnock village to the west pier at Howth, Co. Dublin. It is a tidal estuarine bay protected from the open sea by a large sand-dune system. Two small rivers, the Mayne and the Sluice, flow into the inner part of the estuary.

Baldoyle Bay is of high ornithological importance for wintering waterfowl, providing good quality feeding areas and roost sites for an excellent diversity of waterfowl species. It

supports an internationally important population of Pale-bellied Brent Geese, and has a further seven species with nationally important populations.

#### **Baldoyle Bay cSAC (0199)**

The cSAC site is similar in extent to the SPA and is of importance for a range of estuarine habitats which are listed on Annex I of the Habitats Directive. These include estuarine mud flats and various types of salt marsh habitats.

#### **Lambay Island SPA (040) and cSAC (0204)**

This large island, situated c.5 km offshore, is an internationally important site for breeding seabirds. The site is also designated as a cSAC for the Annex I habitat seacliffs and for a breeding population of grey seal (Annex II species).

**There would be a significant risk of potential impacts under the following headings should Portrane be selected as a site for the 850K PE plant:**

- Loss or disturbance to habitats
- Risk to water quality during construction works
- Risk to water quality during operation of scheme
- Disturbance to birds during construction phase
- Disturbance to birds during operation phase

The peninsula is already experiencing significant disturbances due to the 65K PE plant currently under construction. A larger plant would pose an unacceptable risk and cause the destruction of and disturbance to habitats and birds, during construction and operation of such a plant.

3. Consistent application of the Precautionary Principle: Fingal County Council have already acted responsibly to protect Rogerstown Estuary by applying the precautionary principle in relation to a proposal to site a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

“In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (i.e. Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.”



(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager’s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

It would be inconsistent of the Competent Authorities if they did not apply the Precautionary Principle and exclude Portrane as a possible site due to its close proximity to so many SACs/SPAs.

4. The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant serving the four towns/villages of Donabate, Portrane, Rush and Lusk. We are already suffering major inconvenience from the construction of this plant. It would be unreasonable to expect us to take on the responsibility for treating the waste for the entire East Coast of Ireland.

While DPCC acknowledges that the terms of reference of this ASA limits the consideration to that of identifying a site for a single 850K PE waste water treatment plant, we still hold the view that this is a flawed approach. And for the record we wish to reiterate our view that a single mega treatment plant is not the most sustainable option, nor the best solution, for the Irish public. Current waste water treatment technologies are such that this approach is not the best option and smaller plants dealing with local populations waste should be the preferred option. DPCC again call on the Competent Authorities to ask responsibly and exclude Portrane from this ASA.

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 12:23 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission in relation to the "Dublin Drainage Scheme"  
**Attachments:** ATT00007.txt

Dear Sir/Madam,

As a resident of Donabate on the Donabate/Portrane peninsula I am calling on the Competent Authorities to exclude Portrane from the alternative site selection process (ASA) for the following reasons.

- 1) The unique environmental attributes of Portrane, and the surrounding area, make it highly unsuitable as the location for a massive waste water treatment plant.
- 2) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- 3) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

4) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant to service DONabate, Portrane, Rush and Lusk. It is entirely unreasonable for us to be asked treat the waste of the entire East Coast of Ireland.

5) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic

Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

6) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

7) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Yours sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 11:45 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission in relation to the "Dublin Drainage Scheme"

As a resident of Donabate on the Donabate/Portrane peninsula I am calling on the Competent Authorities to exclude Portrane from the alternative site selection process (ASA) for the following reasons.

- 1) The unique environmental attributes of Portrane, and the surrounding area, make it highly unsuitable as the location for a massive waste water treatment plant.
- 2) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.
- 3) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site(ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

- 4) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant to service DOnabate, Portrane, Rush and Lusk. It is entirely unreasonable for us to be asked treat the waste of the entire East Coast of Ireland.

5) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

6) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Yours sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 5:06 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission objecting to the consideration of Portrane for a large scale Sewage Plant.



SEA SCOUTING

### **63<sup>rd</sup> DUBLIN, 14<sup>th</sup> PORT DONABATE SCOUTS**


Donabate Scouts strongly object to any further planning to increase the already agreed 65,000 PE plant or the location of a further massive sewage plant. The Donabate/Portrane peninsula is doing its fair share with this development and it would be grossly wrong to turn this facility into a much larger plant. It is tempting to go for the cheaper option in the current economic climate but long term it would be a disaster for our area. We know many groups and people have submitted their views. We want to submit our objection based on our use of the natural amenities on our door step.

The Aim of Scouting is to encourage the physical, intellectual, social and spiritual development of our young people. This is achieved through a well planned Scouting programme that is based on many things and one of these is the use of the out of doors. In Scouting we believe that the out of doors is the best 'class room' allowing us to provide limitless scope and challenge. In the outdoors young people are faced with real situations to which they have to respond using their own solutions. Outdoor education allows young people to be themselves and to be creative so that their personal and social skills can develop uninhibited.

Donabate Scouts are very fortunate to have wonderful amenities which we use to the fullest –

- Our beaches and cliff walk in Portrane and Donabate are a treasure trove unequalled. We use these for orienteering, marine studies, swimming, fishing, hiking, kayaking and sailing.
- In Turvey Hide beside Rogerstown Estuary, we use this area for backwoods skills. Here we are able to instruct our Scouts in survival skills such as the uses of plants and trees, making shelters, learning to light fire using many different techniques, backwoods cookery, camping and bivouacking\*.
- Broadmeadows Estuary provides us with a safe alternative environment for water-based activities where our Scouts are instructed in kayaking, canoeing, sailing, learning to navigate and how to work on engines.
- Ballymastone is another amenity that we use for hiking, track & trail, orienteering, studying of wild life and nature.

The Country Code is one that our Scouts use with all of our outdoor activities and 'leave nothing but memories' is our motto. This is something this sewage plant cannot do. This peninsula is a special area and we appreciate all it offers us. Our young people are able to use it for their development. Do not let this plant become an issue that they will have to fight against.



\* Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

*In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.*

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 9:53 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission on site assessment process for a major sewage plant in Fingal

Greater Dublin Drainage Project Manager  
c/o RPS Group,  
West Pier Business Campus,  
Dun Laoghaire,  
Co. Dublin,  
Ireland

22<sup>nd</sup> June, 2011

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I am writing to make a submission with regard to the above. I am totally against any proposal to locate such a facility on the Donabate/Portrane Peninsula, my reasons are outlined as follows:

- 1)** There are a number of businesses on the Donabate/Portrane Peninsula which are heavily dependent on visitors to the area who come in pursuit of leisure activities/relaxation, these businesses employ local people. Up until recently the peninsula boasted six golf courses, unfortunately due to the economic downturn, one of these golf courses had to close its doors. The remaining five golf courses, still attract large numbers of visitors along with their own club members. There is also a hotel, that is very successful as a wedding venue due primarily to the fantastic scenery/location. Any decision to locate a major regional sewage treatment plant to the peninsula could only have terrible consequences for the peninsula as an area that people would choose to visit and spend their money, which in turn would have a negative effect on the local community.
- 2)** There are eight Special Areas of Conservation/Special Protection Areas within a 10km radius of Donabate/Portrane, which when the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) are taken into account prove that the Donabate/Portrane Peninsula should not be considered a suitable location for the proposed facility.
- 3)** Rogerstown Estuary, which would only be 1.5km away from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. Locating such a facility on the Donabate/Portrane Peninsula would threaten the wild life and sea habitat that are presently here.
- 4)** There are two beaches along with Newbridge Demense on the peninsula which attracts large numbers of visitors every year. Should such a major facility be located in the area it would have a negative effect on the enjoyment that the people of Fingal and further afield can have when they visit our beaches and Newbridge Demense.
- 5)** The residents of Donabate/Portrane are willing to do their fairshare and are already taking a 65,000 PE plant to serve the needs of Donabate, Portrane, Rush and Lusk. Donabate/Portrane is a small rural area that when looked at logistically and in the interests of fairness, is simply not capable of catering for a such large facility to cater for a wider community in the Greater Dublin and Leinster area.

In light of the above, I would suggest that the rural and unique environment of Donabate/Portrane make it an unsuitable location for the proposed treatment facility.

Yours faithfully





---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 2:26 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** submission re sewage facility

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public.

I am totally opposed to Portrane being considered in this process as I run a small business [REDACTED] in the area. I am convinced that such a facility would have severe negative impacts on the quality of water - Portrane has just been re-awarded its blue flag, air and noise here.

I would also like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention.

It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive.

See the following quotation from the manager's report:

?In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site(ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. ?

- 3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and ?day-trippers? during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.
- 4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.
- 5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.
- 6) Any decision to locate the facility to the Portrane/Donbate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanala immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully

A large black rectangular redaction box covering the signature area.

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 11:09 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission to Greater Dublin Drainage Early Consultation Opportunity from Donabate Portrane Community Council  
**Attachments:** DPCC OBJECTION Jun-11.pdf

Hi,  
see attached submission to the Greater Dublin Drainage Early Consultation Opportunity from the Donabate Portrane Community Council.

# Donabate Portrane Community Council

Donabate Portrane Community Council,  
c/o Donabate Portrane Community Centre,  
Portrane Road,  
Donabate,  
Co. Dublin

Greater Dublin Drainage Project Manager,  
c/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin, Ireland

23<sup>rd</sup> June 2011.

**Re: Greater Dublin Drainage Early Consultation Opportunity**

Dear Sir/Madam,

Donabate Portrane Community Council is a registered representative body for the community of the Donabate Portrane Peninsula.

The Donabate Portrane Community Council strenuously **oppose** any proposal to site a regional sewage plant in Portrane designed to cater for the projected 850,000 PE of the six combined county councils of Fingal County Council, Dublin City Council, Meath County Council, South Dublin County Council, Kildare County Council and Dun Laoghaire Rathdown County Council.

### ***Concern about impact on Environment***

The Donabate Portrane peninsula has unique environmental attributes which make it highly unsuitable as a location for a regional sewage treatment facility of this scale. There is currently a sewage treatment facility being constructed which has been designed to cater for 65,000 PE composing of the existing and projected growth in population of Donabate, Portrane, Lusk and Rush.

The population of Donabate and Portrane per CSO census 2006 was 7,031 people.

The National Parks and Wildlife Service have yet to publish the Conservation Plan for the Rogerstown Estuary as stated on their website.

<http://www.npws.ie/media/npwsie/content/images/protectedsites/natura2000/NF004015.pdf>

The "precautionary principle" as enshrined in the EU Habitats Directive should be applied to all proposed developments, regardless of nature, which are adjacent or bordering any NATURA 2000 sites, (SAC's Special Areas of Conservation and SPAs Special Protection Areas).

There are eight qualifying areas located with a ten kilometre radius of Portrane.

*/continued...*



Rogerstown Estuary, a Nature Reserve, a National Heritage Area, a Special Area of Conservation, a Wetland Site of International Importance under the Ramsar Convention, and a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1978 is located 1.5km from the area previously proposed for the regional sewage plant. 20% of the world's Brent Geese migrate and nest in this unique location. The Birds Directive offers protection for this valuable area.

Fingal County Council has already set a precedent by deciding not to locate a proposed development near the Rogerstown Estuary because of potential risks to the protected site of Rogerstown Estuary.

(see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report )

The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

*"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied."*

The Fingal Biodiversity Action Plan 2010-2015 also states that "The bufferzones around the designated sites shall be developed as multi-functional landscapes. The agricultural land-use shall be maintained and where appropriate combined with nature conservation targets and low-intensity recreational use." The Community Council do not consider a regional sewage treatment plant to fall within this descriptive category.

Quote.....

## **8.2 BUFFERZONES AROUND CORE SITES**

Bufferzones cover the lands surrounding the designated nature conservation areas, particularly the three estuaries and the NHA wetlands. They mainly comprise of farmland and amenity grassland that are used by the estuarine birds around the estuaries. The purpose of these bufferzones is to protect the integrity of the nationally and internationally designated sites and enhance the surrounding lands for the key flora & fauna species. The bufferzones around the estuaries aim to protect existing land uses and may provide opportunities for flood protection, erosion control and amenity use. The bufferzones around the NHA wetlands primarily act as hydrological buffers, ensuring a steady supply of clean ground and surface water to these wet and boggy sites.

### **Vision**

The Fingal estuaries and wetland and their surrounding bufferzones will continue to provide an excellent wintering habitat for the

thousands of birds that spend the winter here. The bufferzones around the designated sites shall be developed as multi-functional landscapes.

The agricultural land-use shall be maintained and where appropriate combined with nature conservation targets and low-intensity recreational use.

New development and land-uses that may have a lasting negative impact on the designated site and the associated bufferzone or the visual amenity of the area shall be located outside the bufferzones.

Lands in ownership of the County Council shall be maintained in such a manner as to provide suitable roosting, feeding and breeding habitat for the flora & fauna associated with the estuaries.

The local community and visitors will be able to enjoy the estuarine sites and the thousands of wintering birds by providing access to the bufferzones by means of walking and cycling routes. Disturbance to migratory birds at their feeding and roosting sites will be kept to a minimum by guiding visitors away from the most sensitive sites."

The requirements of both the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) appear to rule out Portrane as a location for a facility as proposed considering that there are eight Special Areas of Conservation or Special Protection Areas within a ten kilometer radius.

#### ***Concern about impact on local amenities***

The Donabate Portrane Community Council is concerned about the natural amenity of the cliff walk which runs along the coast from Tower Bay, Portrane to the Martello Tower at Donabate being compromised or denied to the thousands of people and their families who use this amenity extensively. Many residents, visitors, holiday-makers and day-trippers are seen regularly on the picturesque walk and many photographers use the locations along the walk to record Lambay Island and views up and down the Dublin coastline. The availability of this much used natural amenity would be compromised if a regional sewage treatment plant on the scale of Ringsend (or bigger ?) is imposed in this very beautiful, tranquil part of our county. There is concern within our communities about the potential denial of this heritage to our future generations.

#### ***Concern about impact on local business***

Every year, our local business communities enjoy a boost in trade attributed to the influx of thousands of day-trippers and tourists to the beaches, cliff walk and caravan parks scattered throughout the unique landscape of the locality. If a sewage treatment facility on the scale of Ringsend is imposed within this unique range of environments, it could destroy this vital local economic activity, threaten the enjoyment and way of life of the local community and also deny the locality to the generations of people who "used to go to Donabate on their holidays" and are now bringing their children and grand-children to a truly unique and special part of the county....described by our local county council as the "jewel of the county".

The Donabate Portrane Community Council urge you to consider alternative locations for a facility of this scale and ensure that it is located well away from communities, families, amenities and protected areas of conservation.

Regards,

A large black rectangular redaction box covering the signature and name of the representative of the Donabate Portrane Community Council.

Donabate Portrane Community Council

---

**From:** [REDACTED]  
**Sent:** Thursday, June 09, 2011 10:04 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission to Manager, Greater Dublin Drainage Authority  
**Attachments:** Submission to Greater Dublin Drainage Authority.doc

Dear Sir/Madam,

Attached you will find a subliission document for Greater Dublin Drainage Authority with regard to the proposed siting of a WWT plant in Portrane. I would be grateful if you could acknowledge receipt of same by return.

Yours respectfully,

[REDACTED]



# Biting Insects and WWTP



A submission to the Greater Dublin Drainage Project on some of the unconsidered health and environmental risks associated with the proposal to locate an 850,000PE sewage treatment plant on the Donabate/Portrane peninsula.

Author :

Address:



## **Introduction and Background.**

The Donabate/Portrane peninsula provides a breeding habitat to various species of nuisance insects from biting midges to mosquitoes. It does so because of the variety of habitats it contains e.g. salt-water marshes, farms, woodlands, streams, ditches, animal and bird sanctuaries. Depending on the design and capacity of WWTP it is likely that a number of species, and most especially the local mosquitoes, would seek to take advantage of such a construction for feeding and breeding purposes. As “**water bodies with high organic pollution levels, such as sewage treatment works, are often a prolific source of mosquitoes** (Whelan P., in *Health WA, 1998*),” the proposed development of an 850,000PE sewage treatment plant in such an area would, if sufficient control measures were not put in place and rigorously enforced, represent **a significant increase in the acreage of potential breeding sites**. This in turn would lead to an explosion in the population of those insects attracted by the nutrient-rich water found in clarifiers, sedimentation areas and treatment basins etc., causing **a severe nuisance and potential health risk** to residents and visitors alike. Such a scenario would compromise the economy of an area highly dependant upon the usage of its various outdoor recreational amenities e.g. beaches, golf clubs, football pitches etc., not to mention the public health of a population the Local Area Plan proposes to at least double in the next ten years.

## **Recent history of attempts to control the biting insects of the Malahide Estuary.**

Mosquitoes having been recognised as a public nuisance in the Donabate/Malahide/Portmarnock areas for decades. In the last seven years several attempts have been made to raise this issue at Council, without any great success. The issue was last raised as part of the Water Services Investment Programme Revised Assessment of Needs 2005-2012 consultation process in 2005. A question (*item No. 26, Mon 14<sup>th</sup> February 2005*) was put regarding the likelihood of the Mosquito Infestation of the Mogden Sewage Plant in the U.K. being replicated in Portrane. The response of the County Manager was that:

*“It is acknowledged that mosquitoes are an issue at the Mogden Plant. However mosquitoes require still water in order to breed which is uncommon in W.W.T.P. There are no recorded mosquito problems in Ringsend, Galway, Cork and Limerick W.W.T.P.”*

This was a rather disingenuous and hasty reply in that Council minutes have several times recorded the problem of mosquitoes in the Malahide estuary and none of the other Waste Water Treatment Plants were located close to Mosquito Breeding grounds. The reply also appears to fly in the face of the readily available scientific literature. Let us take these two issues in turn.

### **(a) The proximity of Mosquito Breeding Grounds.**

That the proposed location of the 850,000PE plant will be sited close to a notorious mosquito breeding ground is not a subject of opinion, but a matter of public record. The matter was raised in May 2000 (MHA/85/00 - Malahide/Howth Area A meeting 04/05/2000) when Councillors P. Coyle and H. Bedell requested that “*The Manager report on the current year’s programme for control of mosquitoes in the Malahide/Portmarnock area*”.

The Manager’s response, which was read at that meeting, claimed that responsibility for the control of mosquitoes belonged to the Northern Area Health Board Pest Control Department, and that it involved the spraying every May of a bacteriological larvacide (bacillus) called "Skeetol". At this time, however, it was thought that the mosquitoes were originating from the beaches rather than the wetlands, where the use of pesticides is banned. A similar question from Councillor Coyle on 11/07/2005 (County Council Meeting F/3068/05) the County Manager asserted that “*the Pesticide Control Service of the Department of Agriculture has confirmed that **there are no pest control products currently registered in Ireland for mosquito control on standing water or vegetation**. The Parks Division has not applied such products in the past and would be **reluctant to increase pesticide use** even if suitable products were registered for use in Ireland.*”

**(b) The species of mosquitoes known to be present.**

At last count there were at least 18 species of Mosquito resident in Ireland, but there does not ever appear to have been a survey of what species are currently resident in Malahide or Donabate. The last noted collection in Malahide was in 1985, in Donabate 1894, and on Lambay Island 1907 (Ashe P., O’Conner J.P., Casey R.J. *Irish Mosquitoes - Diptera: Culicidae - A Checklist of the species and their known distribution*. Proceedings of the Royal Irish Academy, Section B – Biological, Geological and Chemical Science, Vol 91, B, Number 2.). Species previously collected around the Donabate/Portrane peninsula include the following:

- (1) Aedes (Ochlerotatus) cantans.
- (2) Aedes (Ochlerotatus) rusticus.
- (3) Culex (Culex) pipiens.
- (4) Culiseta Annulata.

Of the above the *Culex Pipiens* is a noted sewage dweller, as indeed, to a lesser extent is the *Culiseta Annulata* (which is present throughout the year, being able to overwinter without diapause). From a public health point of view it should be noted that *Culex Pipiens* and *Ochlerotatus Cantans* are both possible vectors of West Nile Virus.

**(c) The notion that midges and mosquitoes will not breed at the proposed WWTP plant.**

Contrary to popular belief and the propaganda of certain water treatment bodies, mosquitoes DO breed, not only in and around sewage treatment

plants, but in the oxidation ponds themselves. But they are not the only insects attracted to such WWTPs.

- (a) Levy, R., and Miller, T. W., Jr. (1977b). Experimental release of a mermithid to control **mosquitoes breeding in sewage** settling tanks. *Mosquito News* 37, 410-414.
- (b) Nielsen BO., & Christensen O. "A mass attack by the **biting midge** *culicoides nubeculosus* (Mg.) (Dipteria, Ceratopogonidae) on grazing cattle in Denmark. A new aspect of sewage discharge." *Nord. Vet. Med.* 1975, Jul-Aug;27(7-8):365-72.
- (c) Keenan M. (1979). Chemical Control of **Mosquito Larvae in Sewage Lagoons** in Maryland. Papers of the 1979 NJMCA Annual Meeting.,
- (d) Zimmerman, J.H and Newson H.D., **Mosquito Breeding In Sewage Oxidation Ponds** And An Adjacent Sewage Irrigation Area-Belding, Michigan, Papers of the 1979 NJMCA Annual Meeting
- (e) Sjogren, R. D. 1968. Notes on *Culex tarsalis* Coquillett **breeding in sewage** (Calif. Vector Views. 15(4): 42-43.)
- (f) The Prevention of Mosquito **Breeding in Sewage** Treatment Facilities. *Bulletin of Mosquito Control Association of Australia Vol. 10, No. 3, November 1998.*

The above are just some examples of academic papers dealing with the subject. There is a wealth of research available, but very few entomologists in this country with experience of mosquitoes and sewage, and a positive dearth of local studies. I took the liberty, therefore, of writing to an American mosquito expert briefly outlining the proposal to build an 850,000PE sewage treatment plant with open decanters close to a woodland area and on a peninsula surrounded by wetlands that housed mosquito breeding grounds. I asked his opinion of the possible consequences. His reply was as follows:

***"You are most correct in assuming that the mosquito population will explode if the sewage treatment plant is constructed as you describe. Moreover, the species generally associated with the high organic loads anticipated in this scenario tend to be culicines - Culex pipiens, in particular. This species is a noted bird feeder and is the primary vector of West Nile Virus in the United States. It tends to switch feeding preferences to humans after their main food source, the American Robin, begin to migrate elsewhere. I can't speak to the species of mosquito found in Ireland, but I'd make an educated guess that there are species there that will exploit the breeding habitat that is being constructed. Placing screening or some other physical barrier over the decanters should obviate any mosquito production. Make no mistake about it, though, there will be a sharp increase in mosquito populations - leaving you the following alternatives:***

1. Preventing breeding by denying access by mosquitoes through an inexpensive physical barrier such as screening.
2. Preventing breeding by denying access by mosquitoes through

*an expensive modification to the digesters, i.e. a covering making them anaerobic.*

- 3. Allowing the plant to be built as planned and addressing the mosquitoes afterward via adulticiding sprays.*
- 4. Allowing the plant to be built as planned and expecting the public in the vicinity to address the problems as they see fit.*

*Option 1 is by far the most desirable and environmentally-friendly. Allowing mosquitoes to breed and then addressing the adults afterward is extremely poor environmental policy, resulting in needless pesticide loading in the environment. It wouldn't be tolerated in the US, except in federally protected wetlands, where habitat modification is not allowed. There is an enormous amount of information available regarding the subject of mosquito breeding in sewage treatment facilities. Please access the Armed Forces Pest Management Board at <http://www.afpmb.org/>. Once at the AFPMB homepage, click on the "Search Literature Database" link on the left side. This will take you to a database from which you can make a query and download (in pdf format) the documents. I did a search on "sewage treatment mosquitoes" and came up with over 70,000 entries."*

There has as yet been no concrete proposal as to the likely design of the 850,000PE WWTP planned for Portrane, and it may well turn out to be an enclosed/anaerobic facility, but as the risk of it being of a lesser specification with open decanters (similar to Ringsend or Mogden) then one cannot but address oneself to that possibility. The majority of what follows is based on such a scenario. An anaerobic facility would not greatly impinge upon the populations of biting insects (as long as stagnant water was not allowed to pool within the plant complex).

## Geographical Considerations.

The proposed site for the 850,000PE WWTP lies within close proximity to public amenities such as beaches, golf courses and football pitches. **A failure to control nuisance species could have a detrimental effect on tourism and outdoor activities**, both of which are major contributors to the local economy. It could potentially make part of the Councils's own proposed coastal walking route an unpleasant experience in summer. A small part of the cliff walk between Donabate and Portrane already has a midge problem in the summer months, and while this is only a minor nuisance and quickly passed at the moment, the construction of a sewage treatment plant nearby can only exacerbate the problem.

That the peninsula is bordered on two sides by bird sanctuaries already provides a risk that the mosquitoes could spread an avian disease. In 1999 the penguin population of several British zoos was decimated by an outbreak of Avian Malaria, carried into the zoos by thrushes and blackbirds and spread to the penguins by the mosquitoes that inhabited their ponds (BBC news, 11/10/1999). Should the H5N1 virus arrive in either of these bird sanctuaries, the risk of it being spread by biting insects is high. The need to control such populations, therefore, should be of concern to environmental and public health authorities alike, not to mention poultry breeders and the open farm at Newbridge House. The greater the number of biting insects, the greater the risk that they will spread a disease.

The proximity of the mosquito breeding grounds to the airport offers a lesser, but still notable risk as the airport is the primary entry point for infectious diseases such as West Nile Virus and Malaria into Ireland (**Two cases of West Nile virus (WNV) infection were confirmed in Ireland in 2004**). Mosquitoes feeding on infected human carriers could spread the disease quite quickly, and if the population of mosquitoes on and around the peninsula increases, so to will the likelihood of their spreading as far as the airport and beyond. West Nile Virus is not considered a Public Health issue in Ireland at the current time, but then neither was it in the U.S. seven years ago. **A small outbreak in New York spread across the entire continent in five years – the primary vector for transmission being *Culex Pipiens*, a species of Mosquito that has been collected in the Malahide Estuary in the past.**

Of course the effects of any increase in the mosquito population of the Donabate/Portrane peninsula, or of the Malahide Estuary would not be confined to the immediate area. The mosquitoes will travel. They can be blown large distances on the wind, and can and do avail of public transport (summer sightings of *Culiseta Annulata* are not unusual on the Dart since it extended to Malahide). To give an example of how far they can travel and the type of problems that can ensue, it is perhaps worth noting that Temple Street Children's Hospital, which is miles from any natural habitat capable of supporting mosquitoes, was infested with the biting form of *Culex Pipiens* as recently as 1999 (Irish Independent, Oct 15, 1999). That same year an

anonymous nurse rang the Gerry Ryan show to say that another Dublin Hospital had also suffered from mosquito attacks.

Quite apart from the vector issues, Portrane must also be considered an unsuitable location for such a plant because of the following geographical/environmental issues:

- The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC). There are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane. It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive "... the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied (ref: Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager’s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000). The council have set a precedent and the proposed plant is unlikely to get past An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.
- Some 20pc of the world’s Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.
- Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

## Seasonal Considerations.

Because the entomological population on the Donabate/Portrane peninsula, and in particular the numbers of biting insects, **varies from season to season and year to year**, a longitudinal study covering several years would be necessary to determine the true populations. A major contributing factor to mosquito numbers is the amount of rainfall received or the height and frequency of tidal inundation. A single short-term study would not give a clear picture of either the risks or possible consequences, nor indeed of the seasonal characteristics of each species. What would be required is seasonal larval surveys. **Such surveys would have to be conducted within the flying range of the mosquito, i.e. 5 kilometres from mapped breeding sites** (*Guidance Statement for Management of Mosquitoes by Land Developers, No. 40*. Environmental Protection Authority of Western Australia, June 2000, and Whelan P.I., June 1988, *Construction Practice Near Tidal Areas in the Northern Territory – Guidelines to Prevent Mosquito Breeding*, NT Coastal Management Committee, Darwin.). This of course would be unnecessary if it was known from the start that the planned design was anaerobic in nature or that the proposed coverings were immune to bird, rodent, wind and storm damage.

## Public Health Considerations.

The control of biting insects, and in particular of midges and mosquitoes, is an important Public Health function. The bites of some of the flying insects of the Malahide estuary can cause severe allergic reactions ranging large swellings to anaphalctic shock. The bites of certain mosquitoes are also capable of transmitting diseases such as avian flu and West Nile Virus should the opportunity arise. **Two cases of West Nile virus (WNV) infection were confirmed in Ireland in 2004** – in both cases in people who had visited the Algarve. One of the cases experienced a mild 'flu-like illness. The other individual had flu-like symptoms with a maculopapular rash, followed by neurological features of mild Parkinsonism with a partial paralysis on the right-hand side. Neither patient was admitted to hospital. The cases were diagnosed by the National Virus Reference Laboratory in Dublin, which alerted the National Disease Surveillance Centre (NDSC) on 20 July 2004. **Luckily neither lived near to a mosquito breeding ground, especially the Malahide Estuary, where two species of mosquito (Culex Pipiens and Ochlerotatus Cantans) are potential vectors of West Nile Virus** (*Emerging Mosquito Borne Diseases – A consultative document on preparing a UK contingency plan for vector control*, Chartered Institute of Environmental Health, 2004 and *Epidemic/Epizootic West Nile Virus in the United States: Guidelines for Surveillance, Prevention and Control*. US Dept. Health and Human Services, Centers for Disease Control, 2003.). The rapid spread of West Nile Virus in the U.S. over the past seven years provides an all too timely reminder of what exactly mosquitoes can do, if they are let:



*These emerging infectious diseases include Severe Acute Respiratory Syndrome (SARS), Ebola virus (Reston strain) and West Nile Virus (WNV). These diseases are zoonoses, or diseases of animals that can be transmitted to humans. Many zoonoses, such as WNV, are transmitted by vectors, such as mosquitoes or ticks. WNV has spread from coast to coast in just five years. Given the increasing globalization of travel and commerce, it is likely that other exotic agents will be transported and established in the United States or in other areas of the Americas. ("Public Health Confronts the Mosquito – Developing Sustainable State and Local Mosquito Control Programs", ASTHO, Feb 2005.)*

It is perhaps worth noting how far ahead of us our neighbours in the UK are in both their vigilance and preparedness for dealing with potential outbreaks. In 2002 mosquitoes were being tested for WNV in three regions of the UK and that the Department for Environment, Food and Rural Affairs (Defra) was carrying out enhanced surveillance of dead birds for West Nile Virus. This is because the primary method of transmission of West Nile Virus is “usually by an amplifying host, normally a bird reservoir where the mosquito feeds on infected birds” (*Emerging Mosquito Borne Diseases – A consultative document on preparing a UK contingency plan for vector control*, Chartered Institute of Environmental Health, 2004). The proposed location of the WWTP is surrounded by bird sanctuaries and close to a mosquito breeding ground. If UK government is taking this threat seriously, why aren't we?

The possibility that an infected person arriving in Dublin could present an exotic disease to a local mosquito should be cause for concern and reason enough to control the mosquito population generally. It should also be reason enough in particular to prevent any increase in midge and mosquito numbers by providing so close to the airport a new breeding habitat such as an 850,000PE WWTP with open decanters. Perhaps it is time to educate the engineers (e.g. “*What Wastewater Treatment Plant Operators Should Know about West Nile Virus*” – Fact Sheet of Commonwealth of Pennsylvania, Department of Environmental Protection, and *Guidance Statement for Management of Mosquitoes by Land Developers*, No. 40. Environmental Protection Authority of Western Australia, June 2000).

A disease more commonly associated with mosquitoes is Malaria – a disease not unknown in this country. Cromwell himself died of a form of Malaria contracted in Ireland, and there was a severe outbreak in Cork in the years following the Crimean War. One of the main reasons why the more common forms of malaria do not occur in Ireland is that the parasites require significantly warmer temperatures than have normally occurred here in the past for the insect stage of their life-cycle (particularly for *P. falciparum*). While *P. falciparum* transmission occurred in southern Europe until successful eradication campaigns after World War II, natural transmission of *P. falciparum* hardly ever occurred in northern Europe because of the temperature. The climate is not, however, the only important factor. Natural transmission of *P. vivax* malaria did occur in south-eastern coastal areas of England until the early part of the twentieth century when a change in agricultural practices largely destroyed the mosquito vector's habitat. Species of *Anopheles* mosquitoes that can carry malaria

(including some strains of *P. falciparum*) do occur in the UK and may also occur in Ireland. The last two recorded cases of natural malaria transmission in the UK were of *P. vivax* in 1953 in Stockwell, central London. There has only been one previous case of presumed natural *P. falciparum* transmission reported in the UK. This occurred in the autumn of 1920 and is postulated to have been the result of acquisition of the parasite by local mosquitoes from infected soldiers returning from the Mediterranean after World War I, in much the same way the Co. Cork outbreak was thought to have been caused by soldiers returning from the Crimean War. The most likely point of entry into Ireland for people infected with Malaria is Dublin Airport. This is already uncomfortably close to a mosquito breeding ground. Should the numbers increase around the Donabate/Portrane peninsula, it is likely they will also increase around the airport.

According to the U.K. Department of Health “**by 2050 the climate of the UK may be such that indigenous malaria could become reestablished.** Local outbreaks of malaria caused by *plasmodium vivax* may occur in the UK and if this comes to pass precautions may need to be taken by those living in **low-lying salt-marsh** districts to avoid mosquito bites” (*Getting Ahead of the Curve - A Strategy for Infectious Diseases - Chief Medical Officer. U.K Dept. of Health, 11th August 2003*). It is perhaps worth repeating that the Donabate/Portrane peninsula is bordered on two sides by low-lying salt-marsh areas, and that the peninsula enjoys its own microclimate and is host year-round to “southern” species of birds such as the Little Egret, a bird that up to ten years ago had never bred anywhere in the British Isles, being normally associated with the warmer climates of southern Europe.

## **Environmental Considerations.**

The primary environmental consideration with regard to insect control at WWTP is the methods used. If screening is used then the environmental impact is minimal, providing the screening is subject to regular inspection, proven to be an effective barrier against mosquitoes **and** midges etc., and immune to damage by birds, rodents, wind, salt and other environmental factors.

The issue of pesticides and larvicides, however, presents an altogether different issue. Tertiary treatment of sewage would not remove chemicals and they would effectively be discharged into the sea. Given the close proximity of the outlet to public beaches and to fishing areas, this would probably be challenged by environmental protection agencies and public health bodies. The spraying of pesticides would probably also be challenged by local residents, not to mention those working in areas adjacent to the proposed WWTP (i.e. in Portrane Hospital).

Failure to control the mosquito population around the WWTP would probably also lead to migration to other sites and necessitate control measures such as the spread of larvicides and adulticides on the nearby salt-marshes, parks, ditches, streams etc., i.e. all potential breeding grounds within a 5km radius (Guidance

Statement for Management of Mosquitoes by Land Developers, No. 40. Environmental Protection Authority of Western Australia, June 2000).

Irrespective of whether construction of the 800,000 PE plant goes ahead it is probably time that by-laws for the control of mosquitoes be drafted and enacted in line with international standards (see “The Prevention of Mosquito **Breeding in Sewage** Treatment Facilities.” *Bulletin of Mosquito Control Association of Australia Vol. 10, No. 3, November 1998*). Any control strategy would necessarily involve multi-disciplinary and multi-agency support, and necessitate the involvement of the EPA and HSE. At the very least, these agencies should seek to be involved in any studies that are taking place.

The breeding of “southern” bird species such as the Little Egret on the Malahide Estuary may be indicative of a ‘climate gradient’ emerging in Ireland, and the consequences of this will also need to be considered when assessing the long term environmental impact of any large scale WWTP on the Donabate/Portrane peninsula and identifying the implications for public health and habitat conservation.

## **Legal Considerations.**

These range from **public nuisance actions** caused by insect infestation to the various legal issues associated with the use of pesticides. In addition to environmental protection legislation and Department of Agriculture **licensing issues**, actions could be taken by individuals or groups opposed to **the use of pesticides**. In the event of a disease outbreak, a case could be taken by victims who believed that the **Council did not exercise due care and diligence**, or were tardy in their response.

## **Cost Considerations.**

However Fingal County Council and the operators of any wastewater treatment plant decide to combat the inevitable increase in the population of biting insects on the peninsula following the construction of any sizeable WWTP, there will be no legal shelter from their responsibility to control such populations. Whether this is through plant design or spraying, the cost will be sizeable and ongoing. Should the increased populations of biting insects lead to a decrease in tourist numbers, the council and plant operators may also find themselves the subject of claims for compensation from local businesses reliant on tourist numbers. Indeed such claims may also result from bad smells.

---

**From:** [REDACTED]  
**Sent:** Monday, June 20, 2011 10:59 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submission to Oppose Sewage Plant in Donabate

Hi

I would like to submit this mail to oppose the proposed sewage plant for Portrane / Donabate.

I feel the unique environmental attributes of Portrane, and the surrounding area, make it highly unsuitable as the location for such a facility.  
We/ Donabate are willing to our Fairshare, The area is taking a 65,000 PE plant, we also have a mental institution, a young offenders institution and a safe house.

Other points to consider,

- 1) Some 20pc of the world's Brent Geese population nest in Rogerstown.
- 2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 11:26 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Submissions  
**Attachments:** [REDACTED]

ATTENTION  
Elizabeth Arnett

Please find the following submission attached.

[REDACTED]

21/6/11

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sir/Madam,

Fingal County Council has appointed Jacobs/ Tobin to carry out a site assessment to suggest a suitable site for a huge Waste Water Treatment Plant (WWTP) in the North Fingal region. In their instructions they have been engaged to locate a suitable site for an enormous WWTP on or with outflow near the Fingal coast. The proposed plant will possible cater for 800,000 PE capacity. The residents of the Donabate/Portrane peninsula yet again face the imposition of an unwanted WWTP in their hinterland. While a selection of six possible site locations is suggested, the predetermined nature of previous reports suggesting Portrane do not preclude it location in this site selection process.

While many of the previous objections are as equally valid this time I wish to object to the location of Portrane as a selected site on the following grounds.

Ecological and planning criteria.

The present WWTP in Portrane is highly unsuitable site for any expansion due to its location adjacent to two estuaries and Blue flag beaches. Both the Malahide and Rodgerstown Estuaries are renowned wildlife sanctuaries and protected areas of conservation. The EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) essentially dismiss the location of such a large scale WWTP in Portrane. In both the operation and construction of such a facility the potential habitat disturbance and potential destruction of the food chain will alter the existing fragile ecosystem which is struggling against the effect of the land fill heavy metal contaminants leeching into the estuarine waters. In terms of

the local ecological heritage there are eight Special Areas of Conservation (SAC) which are areas of special protection (SPAs) in the immediate to medium environment (0.5 to 10km) of Portrane.

FCC has already applied a precautionary principle to the habitats directive when the consideration of locating the Fingal Football Academy Buildings near the Rodgerstown estuary was discussed in FCC council chambers (FCC, 2008). This estuary also had the protection under the Ramsar convention and is a recognised Wildlife Reserve (The Stationary Office, 1976)

Geographical criteria.

Hydrological studies of the immediate area of the Peninsula indicate a wash effect exists.

Phosphate and nitrate levels in estuaries usually rise after prolonged rain due to run off and this is most pronounced in winter time. A detailed study of the Irish Sea indicated that this is a common occurrence and singled both Balbriggan and Portrane as examples of poor water qualities with poor maintenance of the outflow pipe. (M, Gilooly; Nixon, E; Mc Mahon, T; O'Sullivan, G; Choiseul, V, 1991). In light of the potential effects of climate change and increase sea levels consideration of changes in both tidal volumes and directions will become more pronounced. This will affect the concentration of not just organics but the metallic elements of sewage sludge in the estuary and immediate marine environment. Current Irish research indicates this phenomenon of tidal surges will become more commonplace on the east coast (Wang et al., 2008) and accentuate the deposition of inorganic pollutants in the inner estuary.

Any proposal to locate such a large scale WWTP containing a long outflow pipe must consider the very unusual geology of the Irish Sea basin off Portrane which contains many glaciomarine facies within sub-glacial tunnel valleys which inhibit the dispersal of treated effluent discharges (Eyles & McCabe, 1989).

Health and Engineering criteria.

While the GDSDS indicated a need for a wastewater strategy for the greater Dublin region it did not offer nor were the possibilities of other means of waste water treatment considered.

Many countries use variable criteria in design considerations and mixed technological solutions. While the problem of waste water treatment may be a singularity the plurality of the possible solutions must be considered. A complex process of system analysis as suggested by Lynn was not considered in the previous study and must be part of this study to ensure all possible options are considered. (Lynn et al., 1962). In many other countries the reduction of waste-water through recycling removes the necessity to build such large scale energy wasting plants (Mohsen & Jaber, 2003). These features must form part of the proposed design and the production and removal of waste sludge needs to be located away from urban and adjacent to land fill in the interests of health and safety. Again, the unsuitability of Portrane becomes apparent when the previous criteria are applied.

On many occasion I have experienced the odours which emanate from the Swords WWTP and have been asked to represent residents living adjacent to the plant to FCC. While efforts are made to deal with the odours it is a reoccurring problem and a nuisance factor which can be detected on the N1 and nearby in Swords. THE Ringsend WWTP is notorious for noxious odours and is a quality of life issue for residents living nearby. Locating an 800,000 PE plant adjacent to over 1000 residents is verging on negligence in concern to their health and quality of life.

Malahide is the nearest town to Portrane and will be fully expose to the malodorous effect when northern winds are blowing. The potential outfall is the Marina, the northern fringe of the town and the exposed region of Sonesta where a large primary school is located. The potential for residents to be enveloped in a stench and the health risks due to aerial endospore bacteria is very high. This has been indicated in numerous studies. This intractable





## Works Cited

Eyles, M. & McCabe, A.M., 1989. Glaciomarine facies within subglacial tunnel valleys: the sedimentary record of glacioisostatic downwarping in the Irish Sea Basin. *Sedimentation*, 36(3), pp.431-48.

Frechen, F.B., 1994. DESIGN AND OPERATION OF WASTEWATER TREATMENT PLANTS; INSTRUMENTATION, CONTROL AND AUTOMATION. *Water Science & Technology*, 30(4), pp.35-46.

Lynn, W.R., Logan, J.A. & Charnes, A., 1962. Systems Analysis for Planning Wastewater Treatment Plants. *Water Pollution Control Federation*, 34(6).

M, Gilooly; Nixon, E; Mc Mahon, T; O'Sullivan, G; Choiseul, V, 1991. *Winter Phosphate and Nitrate Levels in the Western Irish Sea*. Dublin: Dept. of the Marine.

Mohsen, M.S. & Jaber, J.O., 2003. Potential of Wastewater Reuse. *Salination*, 152(1-3), pp.281-89.

The Stationary Office, 1976. *The Wildlife Act*. Dublin: Government Publications.

Wang, S. et al., 2008. The Impact of Climate Change on Storm Surges Over Irish Waters. *Ocean Modelling*, 25(1-2), pp.83-94.

---

**From:** [REDACTED]  
**Sent:** Tuesday, May 31, 2011 5:37 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** super sewerage plant

To whom it may concern...

Fingal and especially Rush, Co. Dublin and it's closest environs has had its over and above share of being dumped on with everything that is going - gas pipeline to Scotland, Eirgrid electricity, Dump at Ballely for nearly 30 years, and now you want to put a super sewage plant close by to take all the waste from Dublin?? I can't believe it!

I strongly object to this happening. Give somewhere else this super plant, we have had more than our share!

Yours ...

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2011 10:11 AM  
**To:** info@greaterdublindrainage.ie

**Importance:** High

Dear Sir / Madam

I greatly appose any move to locate a regional sewerage plant in Portrane. We are willing to do our fair share, but we will NOT be a dumping ground for the wastewater for the entire East coast of Ireland, as you are aware there are 8 special areas of consveration or special protection areas within a 10km radius of Portrane.

Thank you

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2011 8:05 PM  
**To:** info@greaterdublindrainage.ie

I don't want this here, let Greater Dublin all carry their fair share

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2011 8:31 PM  
**To:** info@greaterdublindrainage.ie

Greater Dublin Drainage Project Manager  
c/o RPS Group, West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin, Ireland

22nd June, 2011

Re: Site assessment process to find a location for a major sewage plant on the coast of North Dublin

Dear Sirs,

I write with reference to the above and request for submissions from the public. I would like to submit the following points as arguments against any proposal to locate this facility on the Donabate/Portrane peninsula:-

1) I would submit that the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) provide a basis that Donabate/Portrane peninsula should not be considered to be a suitable location for the proposed facility on the basis that there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Donabate/Portrane.

2) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976. It has been reported that some 20 per cent of the world's Brent Geese population nest in Rogerstown. You will be aware that the Birds Directive was successful in stopping the infill of Dublin Bay.

It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied. "

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches ? Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) Businesses of Donabate/Portrane are heavily dependent on holidaymakers and "day-trippers" during the winter and high-season. Any decision to locate a major regional sewage treatment plant to the peninsula could (and will) have irreversible consequences for the peninsula as a holiday/day-trip location.

4) It is also submitted that such a major facility could have a negative effect on our beaches, wild life and sea habitat.

5) The Donabate/Portrane peninsula is rural area and is willing to do its fair share for many environmental and social initiatives. The area is already taking a 65,000 PE plant to serve the needs of Portrane, Donabate, Rush and Lusk but, as a matter of practical logistics and in the interests of fairness, it is simply not capable of catering for a larger facility for a wider community in the Greater Dublin and Leinster area.

6) Any decision to locate the facility to the Portrane/Donabate peninsula will be strongly opposed by local resident and businesses and will result in lengthy and costly appeals to An Bord Pleanála immediately.

In light of the foregoing, I respectfully suggest that the rural and unique environment of the Donabate/Portrane peninsula is an unsuitable location for the proposed treatment facility for a variety of economic, socio-economic, environmental and equitable reasons.

Yours faithfully  
De [REDACTED]

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2011 11:11 AM  
**To:** info@greaterdublindrainage.ie

[REDACTED]

Sir/Madam,

I am a resident in [REDACTED] and on behalf of my family I wish to strongly oppose the consideration for the Donabate and Portrane peninsula to cater for hundreds of thousands of people within the county and surroundings (I believe up to 850,000).

We have done our fair share in accommodating a 65,000 PE plant and the massive interruption to our daily lives with appalling roadworks which seem to have no end to them.

I would strongly urge that an alternative location be sought, perhaps one with less impact on society and nature is appropriate.

In these challenging times we need to ensure the things in life that are free (parks, beaches, sporting grounds) and such like are in no way compromised by dumping a massive sewage plant in such a location.

Please see some points below to enforce such an opinion.

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (992/45/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

*"In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned*

*developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.”*

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager’s Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world’s Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

I welcome your acknowledgement of this email and your comments.

Regards,

A black rectangular redaction box covering the signature of the sender.



---

**From:** [REDACTED]  
**Sent:** Tuesday, May 31, 2011 4:55 PM  
**To:** info@greaterdublindrainage.ie

TO WHOM IT MAY CONCERN.

I have just heard that there is talk about putting a sewage plant in the fingal area, and I believe Rush is being considered. I would just like to strongly object to any more of my family's home being polluted by Fingal County Council. We have lived with [REDACTED] Super Dump for years and then Fingal kindly offered Rush for Eirgrid against the residence wishes. So I think we have had our fair share for the greater Dublin area.

My information could be wrong and I really am hoping it is. Please confirm, and let me know if I need to take my concerns further.

Kind regards.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, June 16, 2011 9:46 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Views on Location of Sewerage Plant

I wish to make the following points with regard to Portrane

I feel the unique environmental attributes of Portrane, and the surrounding area, make it highly unsuitable as the location for such a facility.

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches - Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principle, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

---

**From:** [REDACTED]  
**Sent:** Friday, June 24, 2011 3:33 AM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Waste Water Treatment Plant Location



Dear Sir/Madame

The first point that I have a problem with is the "The Greater Dublin Drainage initiative aims to provide strategic drainage infrastructure" This is looking at one part of the water issue that affects Dublin. The water supply for Dublin must be looked at in parallel with waste water treatment. If one looks at waste water treatment only, one will get a different logical solution than if one deals with waste water supply and waste water Treatment.

The Greater Dublin Drainage Scheme fundamental concept is wrong!

Water is the fundamental resource that needs to be conserved and waste water treatment is a core section of this process. Singapore is a bleeding edge example of how water supply and treatment are looked at in parallel. That is what Dublin should be looking to implement especially with the likely climate changes that are occurring.

"The Greater Dublin Drainage Initiative" remit should be altered.

Having said that, the current reality is that you are looking for a place to locate a treatment plant with an initial capacity of 850,000 PE equivalent. It is easier to rule out areas as opposed to ruling them in.

- a) It should not be located on low lying land at could flood due to Global Warming and sea level rise.  
**Reason** : Preservation of Infrastructure.
- b) It should be located near a location that has existing road and power infrastructure.  
**Reason** : Minimise need for Road Infrastructure.
- c) It should be located as near as practical to main and projected main population centres. **Reason**  
: Reduce cost of new pipe infrastructure.
- d) It needs to be located in a place that will not be developed for residential purposes. **Reason**  
: **Maximise Return on investment.**
- e) It should be located in an area that does not already have a regional sewage plant producing or approved.  
**Reason** :Fairshare of pain as well as benefits
- f) Its location should not be determined by where we have located waste water treatment plants in the past.  
**Reason** :Untreated waste water **MUST** be pumped in pipes but treated water if not re-used can flow via gravity or existing rivers.
- g) Take account of nature and Special Areas of Conservation.  
**Reason** : European Law

1) The requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (cSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane.

2) It should be noted that Fingal County Council has already set a precedent by deciding not to locate a football academy near Rogerstown Estuary because of potential risks to this protected site. The County Manager applied the precautionary principle of the Habitats Directive. See the following quotation from the manager's report:

In this case the appropriate assessment has found that no direct impacts are expected from the proposed development on the cSAC/SPA/pNHA/RAMSAR site (ie Rogerstown Estuary). However the assessment did indicate the potential for indirect impacts on wetland birds listed in the cSAC/SPA/pNHA/RAMSAR due to disturbance from lighting, noise and human activity. It also found that although the proposed development land is cultivated land of low ecological value in itself, it is a buffer that protects the cSAC/SPA/pNHA/RAMSAR. Taking into account the cumulative effects from other existing and planned developments in the area, the potential for disturbance to birds and the erosion of the buffer, the appropriate assessment concludes that the proposal could result in negative impacts to the designated sites. It is difficult to quantify these impacts with currently available information. This means that negative impacts could not be ruled out at this stage even when appropriate mitigation measures were taken into account. In this event, and in accordance with the requirements of the directive, the precautionary principle must be applied.

(For reference, see Minutes of adjourned meeting of Fingal County Council held on Tuesday 20th May, 2008, Section F/336/08, Sporting Fingal Football Academy Buildings and Playing Pitches – Manager's Report Pursuant to Part 11 with Local Government (Planning and Development) Act 2000).

3) The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the entire East Coast of Ireland.

4) A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council have set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GSDSDS) means it is unlikely to get passed An Bord Pleanala. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

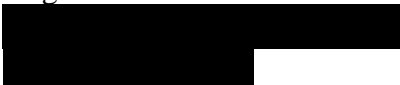
5) Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

6) Rogerstown estuary, which is 1.5km from the proposed sewage plant site, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

For the above reasons, Donabate/Portrane should not be considered as a potential location for a monster treatment plant. but as a constructive suggestion the area around Dublin Airport does match all the criteria for a sustainable water management system which could be a world leader.

If you have any queries or questions, do not hesitate in contacting myself.

Regards



---

**From:** [REDACTED]  
**Sent:** Sunday, June 26, 2011 9:49 PM  
**To:** info@greaterdublindrainage.ie  
**Subject:** Waste water treatment

All the talk is of waste water treatment, surely the talk should be of USED water treatment. The time has come to think outside the box and see what alternative there is to dumping all our used water, treated or otherwise, into the sea. In this day and age it astonishes me that nobody has apparently considered harvesting this treated water and putting it back into the potable water system. It would certainly make economic sense to spend money on a suitable plant in Fingal instead of investing in piping water across from the Shannon which, anyway, will still need to be treated before we can use it. Recycling water should be as much part of our green lifestyle as any other material.

### Fairshare Submissions Received

Template	Number
A: "We oppose any move to locate..."	341
B: "Portrane should not be the location..."	624

Name:

Address:

Email:

Date: 23/6/11

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

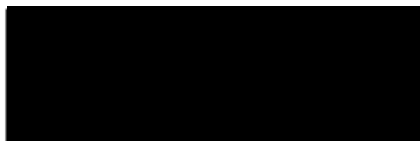
We oppose any move to locate a regional sewage plant in Portrane.

The Donabate/Portrane peninsula is willing to do its fair share. The area is taking a 65,000 PE plant. But we will not be the dumping ground for the wastewater of the entire East Coast of Ireland.

A proposed football academy was rejected for near Rogerstown Estuary on the basis of the precautionary principal, as enshrined in the EU Habitats Directive. The council has set a precedent. The fact that Portrane was already recommended in the Greater Dublin Strategic Drainage Study (GDSDS) means it is unlikely to get passed An Bord Pleanála. Portrane would seem to have been pre-selected all along. This means again selecting Portrane poses too big a planning risk.

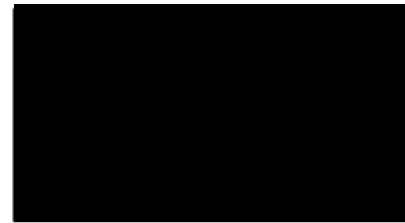
Additionally, the requirements of the EU Birds Directive (Council Directive 79/409/EEC) and the EU Habitats Directive (92/43/EEC) would also appear to rule out Portrane as a location for such a facility. Indeed, there are a total of eight Special Areas of Conservation (sSAC) or Special Protection Areas (SPAs) within a 10km radius of Portrane

Yours truly,





Name:  
Address:



Date:

22/6/11

RPS  
Greater Dublin Drainage Project Manager  
C/o RPS Group,  
West Pier Business Campus,  
Dún Laoghaire,  
Co. Dublin,

Email: [info@greaterdublindrainage.ie](mailto:info@greaterdublindrainage.ie)

Dear Sir/Madam,

Portrane should not be the location for a new regional sewage plant and an associated outfall pipe. This is because of the environmental sensitivity of the area.

Rogerstown estuary, which is 1.5km from the area previously proposed for the regional sewage plant, is a National Heritage Area, and a Special Protection Area and a Wetland Site of International Importance under the Ramsar Convention. It is also a Nature Reserve and a Wildfowl Sanctuary under the Wildlife Act 1976.

Some 20pc of the world's Brent Geese population nest in Rogerstown. The Birds Directive was successful in stopping the infill of Dublin Bay.

I would strongly urge you to consider alternative locations for this facility.

Yours faithfully

