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An Bord Pleanála,
64, Marlborough St.
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D01 V902

Observation on application for pumping stations in Howth, 315902-23

A chairde,

I wish to make the following observations on the above application and appeals.

Firstly, I would note that Irish Water have been very good at engaging with people in terms of describing their plans, offering briefings to local residents, the Howth Special Amenity Area Order Management Committee and the Howth/ Malahide Area Committee of Fingal County Council. This open approach to informing people and discussing their proposal has been very welcome and very helpful in terms of enabling people to engage. Unfortunately, however, Irish Water have not taken the feedback on board, neither by amending their proposals nor even by explaining why they wish to continue with the proposals unamended. We have been left with the impression of a “this is the way we always do it” approach.

Secondly, while this work to end the discharge at Doldrum Bay is over 11 years overdue, it is very welcome and I fully support the project which will end the discharge of sewage to Doldrum Bay. The sooner Irish Water carries out this work and complies with it’s legal obligations under its EPA licence the better.

In this context, I have the following observations.

1. Visual intrusion of proposed Carrickbrack Road pumping station PSO2

I made the following observation to Fingal County Council:

“It has been expressed that this building is necessary in order to provide a toilet for maintenance workers. It would appear, as there is no toilet proposed at Ceanchor Road, that such a facility doesn’t necessarily have to be on each site. There is a major sewage pumping station beside Sutton train station and another at Claremont Beach in Howth which could be used. (Even closer, there are public toilets at Howth Summit and Howth Harbour. However, I appreciate they may not be suited for this use.) If it is necessary to provide a toilet at one of these two new pumping stations, the Ceanchor Road location would suit much better as a residentially zoned, developed area, not impinging on any views. The fencing proposed for the Carrickbrack Road

pumping station is clearly unnecessary as the building itself is secure, and fencing of the scale proposed is contrary to the SAAO.”

There is no consideration of these points in the Inspector’s Report, aside from a summary as follows:

“If a toilet is required, the location of the pumping station on Ceanchor Road would be more suitable, given the zoning.”

With apologies for any repetition, I will try to set out my observation more clearly.

I can fully accept that there may be a need for toilet facilities for maintenance workers. That need should be met in the manner most consistent with the provisions of the Special Amenity Area Order.

By only applying to provide a toilet at only one of these two proposed pumping stations, which are just under 1km apart, we can understand that Irish Water considers that toilet facilities don’t have to be on site at each pumping station.

Irish Water have pumping stations at Claremont Beach and at Station Road, Sutton, both of which are between 3 and 4km distant from the proposed Carrickbrack Road pumping station. If they are too far away and toilets must be provided at one of the new pumping stations, then clearly the toilet facilities should be provided at the Ceanchor Road station. This is because it will not impinge on any of the views protected in the SAAO.

There is no fencing proposed for the Ceanchor Road pumping station. It has been confirmed by Irish Water that the pumping station building and infrastructure are secure in themselves. Despite being asked, there has been no explanation as to why security fencing is required at Carrickbrack Road when the SAAO would provide only for agricultural fencing and/or hedges.

The proposed Ceanchor Road pumping station is a model of unobtrusive, sympathetic design, which is appropriate in a residential area. However, Irish Water’s application fails to engage with the sensitivity of the landscape and the protected views on Carrickbrack Road. A similar design approach should be taken there. If a toilet is required, then it can be much more easily incorporated into the landscape on Ceanchor Road than on Carrickbrack Road. A small building of the type currently proposed for Carrickbrack Road could easily fit into the landscape on Ceanchor Road.

The current proposal is a clear breach of the SAAO Objective 2.1 and Policy 2.1.1 to protect views, in this case from Carrickbrack Road as marked on Map B of the SAAO. The fencing proposed is a clear breach of Policy 3.4.2 of the SAAO.

2. Discharge of surface water to the sea

My observation to Fingal County Council in this regard was as follows:

“2. Surface water drainage

It is proposed to connect the surface water drain on Ceanchor Road to the pipe currently serving as combined sewer outflow to Doldrum Bay. This sort of direct connection of surface water to a drain straight into the sea is contrary to surface water policies. The current pipe obviously has to remain as an emergency overflow route, but there is no justification for

discharging surface water through it. The surface water should be discharged to a soakaway or similar.”

There is no consideration of this in the Inspector’s Report, aside from a summary as follows:

“Concerns regarding the disposal of surface water.”

While it’s a massive improvement to have the foul sewer diverted from this discharge and there needs to be an overflow route in the event of failure in the pumping system, no justification has been given for the continued use of this pipe to discharge surface water from Ceanchor Road. This surface water should be sent to a soakaway to avoid polluting the beach.

This is a principle which would be applied to any new development as regards how it deals with surface water. This is even more relevant when the discharge is to a Special Area of Conservation and a beach which we can anticipate will be used by the public when the major health hazard of the sewage discharge is ended.

Thank you for considering the above observations.

Is mise, le meas,

Cllr. David Healy