



Draft Blessington Local Area Plan Submission - Report

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Blessington Local Area Plan 2025

Submission by Ballymore Eustace Trout and Salmon Anglers' Association,
Thomas Deegan, [REDACTED]

Public Consultation for Blessington Local Area Plan 2025

Ballymore Eustace Trout and Salmon Anglers' Association (TSAA) welcomes the opportunity to submit a submission at this Stage of the Draft Blessington Local Area Plan 2025

SEA Environmental Report for the Draft Blessington Local Area plan 2025

Section 4.9 Water

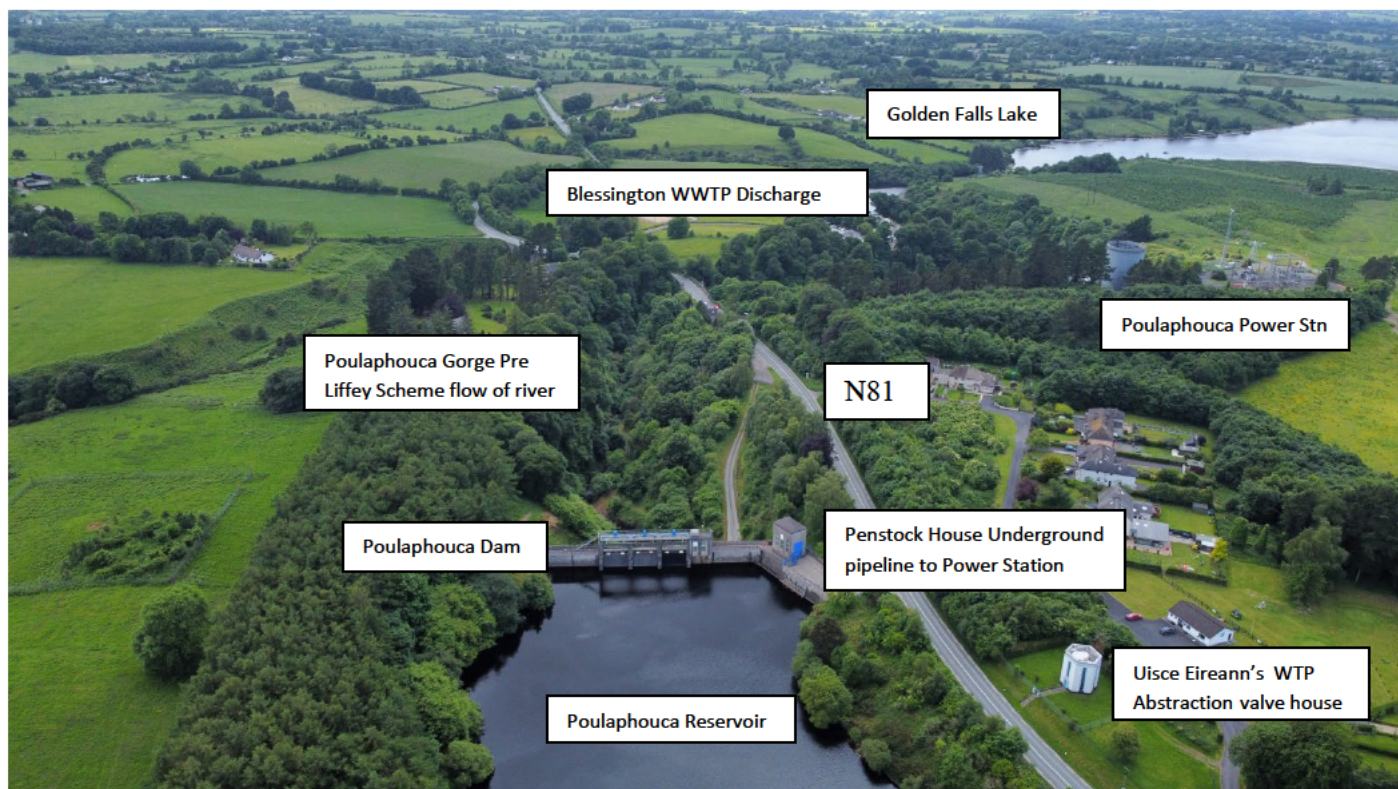
Subsection 4.9.3 Surface Water Drainage

Dealing with Poulaphouca Reservoir to the south and east of Blessington, the Report states inter alia *"The reservoir receives water from the River Liffey, at the northern end, and the Kings River, at the southern end. The exit is into the River Liffey gorge at the western end."*

Comment: This is incorrect. Since the Liffey Scheme 80 years ago there has been no river flowing through Poulaphouca Gorge. This falsehood needs to be corrected immediately as it is continually used by Uisce Éireann and Wicklow County Council to obtain Planning Permissions and Waste Water Discharge Licences (WWDL).

If there was a river flowing through the Gorge, Poulaphouca Waterfall would still be a major tourist attraction.

The water from Poulaphouca Reservoir normally enters Golden Falls Lake/Reservoir via Poulaphouca Power Station which is connected to the Poulaphouca Dam by an underground tunnel. Poulaphouca Gorge is now only used as a Spillway when Poulaphouca Power Station is not available. Golden Falls Lake/Reservoir is fed intermittently when the Power Station is on load, approximately 3% of the time.



“Wastewater Treatment Capacity

Upgrades to the wastewater treatment plant have recently been completed as a result of this significant investment by Uisce Éireann and will increase the capacity of the plant to serve a population equivalent (PE) of up to 9,000. This will enable future growth and safeguard the environment by ensuring compliance with national and EU legislation.”

Blessington LAP

Section A3.2 Physical Context

Page 19 Services and Infrastructure

---“In terms of waste water, Uisce Éireann have recently completed an upgrade to Blessington Waste Water Treatment Plant to c. 9,000 population equivalent, which would serve the level of growth envisioned by the Wicklow County Development Plan Core Strategy over the plan period.”

Blessington LAP P58 Wastewater

“Uisce Éireann has recently completed upgrades to the Blessington Waste Water Treatment Plant (WWTP) that have significantly increased the capacity of the plant. Due to these upgrades, there is sufficient capacity for the growth envisioned for Blessington in the core strategy as set out in the Wicklow County Development Plan 2022-2028. This plan will support any further required upgrades.”

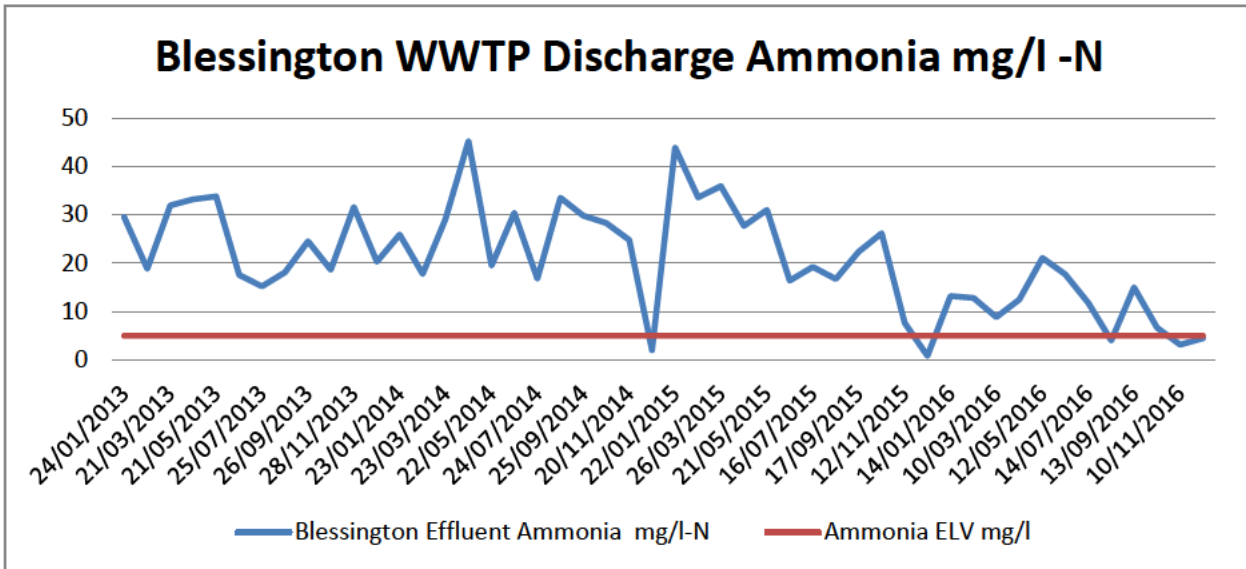
Comment: Uisce Éireann obtained planning permission for the upgrade of the Blessington WWTP to 9000 P.E., based on the falsehood that the discharge is into a river of 1.5m³/sec minimum flow. Uisce Éireann have now admitted to the EPA that this is not true and that there is in fact no constant minimum flow pass the Blessington WWTP discharge point in Golden Falls Lake/Reservoir. In fact there is no flow pass the Blessington WWTP discharge point for up to 97% of the time. (Source: ESB data submitted as Further Information for Blessington WWTP Planning application to upgrade to 9000P.E., hourly flow discharges data submitted for the year June 2017 to June 2018.) There can be no flow into Golden Falls Lake/Reservoir, i.e. pass the discharge point, for up to 7 days when ESB have to lower the water level in Golden Falls Lake/Reservoir to carry out maintenance on Golden Falls Dam. At that stage there is only the effluent from Blessington WWTP in the lowered lake.

Blessington WWTP History

In 1985 despite strong opposition from the Ballymore Eustace Community, who were appalled that a neighbouring village were even contemplating dumping their waste in our backyard, Wicklow County Council obtained a discharge licence from the ESB to discharge the effluent from the new Blessington 3000 P.E WWTP with permission to upgrade to 6000 P.E. In the year 2000 the EPA described Golden Falls Lake/Reservoir as being Hypertrophic, i.e. a very high level of pollution and a very high level of impairment of use of the Lake. The ESB waste water discharge licence agreement for 6000 P.E. has not been updated.

Wicklow County Council upgraded Blessington WWTP to 6000 P.E in 2009 using false information that the Blessington WWTP Discharge was into a river with a minimum flow of 1.5 m³/sec and based the assimilative capacity of the receiving water on that false information.

Wicklow County Council obtained a Waste Water Discharge Licence (WWDL) in 2012 from the EPA (D0063-01) using the same false information as above. The WWDL set out Emission Limit Values (ELVs) for the Blessington WWTP Discharge, based on a maximum 6000 P.E. which is still the current WWDL. The WWTP was more often non compliant than compliant and both Wicklow County Council and later Irish Water were guilty in this regard.



Blessington WWTP ELVs were non compliant and ignored for years resulting in filamentous algae pollution of the Liffey.

The newly upgraded Blessington 9000 P.E WWTP operating at only 66% capacity was non compliant with its Ammonia ELV on the 12th September 2024. The new Plant is already non compliant.



Blessington WWTP Discharge into Golden Falls Lake 2016, Poulaphouca power Station in background, Golden Falls Lake/Reservoir lowered to pre Liffey Scheme river level to facilitate maintenance on Golden Falls Dam.
3rd photo, filamentous algae pollution of Liffey at Ballymore Eustace

Despite the Blessington WWDL D0063-01 specifying a maximum 6000 P.E., Irish Water applied for planning permission from Wicklow County Council to upgrade the Blessington WWTP to 9000 P.E. and again based the application on false information that the Blessington WWTP Discharge was into a river with a constant minimum flow of 1.5 m³/sec and based the assimilative capacity of the receiving water on that false information. Wicklow County Council granted planning permission which was appealed to An Bord Pleanála by Ballymore Eustace TSAA. The Inspector dealing with the appeal had this to say:

Extract from ABP Inspector’s Report ABP -302732-18 PA Reg. Ref 18/255 Upgrade to Blessington Waste Water Treatment Plant.

“There are no indications on the file as to whether it is projected that the proposed plant is required simply for growth within the immediate future (i.e. the lifetime of the current Plan, or is to provide a longer term capacity. As it is clear that the plant is already over capacity, it seems reasonable to conclude that an increase in scale to 9,000 pe will provide little more than capacity for the existing quantum of zoned land if it is developed within the current plan period, so if growth continues at the current rate a further expansion in the near future may well be required. This raises the overall question of whether it is appropriate to facilitate incremental increases to what appears to be a less than satisfactory arrangement for final disposal of the effluent. While the location of the treatment plant is uncontroversial, discharging to the Liffey directly upstream of a lake seems questionable in the light of known issues with maintaining water quality in both the lake and the overall. An obvious solution would be to direct the discharge to downstream of Golden Falls dam where there would be greater assimilative capacity, although there is no

information on file to indicate if this would address all the known issues, in particular due to problems known from apparent discharges from the other Irish Water treatment plant at Ballymore Eustace. The appellant also raised the issue of connecting to the greater Dublin scheme, but there is no information available to state whether this is practical or appropriate. I note with regard to the assimilative capacity of the Liffey between the two dams that flow rates are subject to statutory levels set out in the original enabling act for the ESB works at Poulaphouca. But it seems that this is difficult to achieve these levels during times of water stress and may result in problems up to at least the implementation of a future additional drinking water supply scheme for the region. I also note the sensitivity of the local environment. The reservoir is a significant local amenity, as is the Liffey. The Poulaphouca Reservoir is an SPA. The ravine between the two does not however appear to be easily accessible to the public, although it was once a well-known tourist attraction prior to the construction of the two dams.

Conclusions: I have very strong concerns that the proposed development represents a short term iterative response to an ongoing and serious issue, with local under-capacity in wastewater treatment leading to the increased use of an outfall which seems suboptimal in terms of modern requirements. It is a matter for the EPA to decide if the discharge would meet statutory requirements, but having regard to the cumulative impact of other developments in the area and the uncertainty over whether the capacity is enough for more than short term needs for Blessington, I would consider the approach of the applicants to be questionable. It is my opinion that granting permission for this development is not addressing the need to satisfy the broader policy objectives for Blessington as set out in the LAP and Development Plan. I would note that a somewhat larger development would result in the development being in excess of 10,000 pe, which would bring it within Schedule 2 of the EIA regulations, and as part of this a full assessment of cumulative and indirect impacts would be required, in addition to an assessment of alternatives. There are very significant areas of ambiguity in the stated aim of the proposed works and how it fits in with projected future growth for Blessington in the context of the National Planning Framework and CDP and LAP For inspection purposes only. Consent of copyright owner required for any other use. EPA Export 09-04-2021:02:35:40 objectives. The proposed works seem primarily intended to address existing overloading and to provide scope for relatively short term future growth in the town. I would be concerned that this represents an inappropriate approach to ongoing problems with what I would consider to be a suboptimal solution to disposing of the effluent to allow for both the protection of the water catchment and allow for reasonable projections of future growth for Blessington. If the proposed development was for a short term upgrade pending a full review, I would consider it possibly justified, but in the absence of a clear technical case that the ongoing use of the discharge to above the Golden Falls reservoir is the best available solution, I would recommend a refusal of permission for the proposed development. I conclude that there is sufficient uncertainty about the appropriateness of the scale and design of the proposed development with regard to the amenities of Golden Falls lake to refuse permission. If the Board is minded to grant permission, I would recommend that it seeks clarification from the applicant as to when it is anticipated a further upgrade would be required having regard to proposed planned increases in population for the Blessington catchment, and to address other possible alternatives for discharge including to below the Golden Falls reservoir; connection with other systems in the region; or other technical solutions such as the use of reedbeds for further treatment of effluent prior to discharge.” End of extract

Despite the Inspector recommending that planning permission for the upgrade be refused An Bord Pleanála granted the planning permission.

In 2021 following a request from the EPA, Irish Water applied to the EPA for a WWDL review for the Blessington WWTP discharge into Golden Falls Lake/Reservoir. Again Irish Water based the application (D0063-02) on false information that the Blessington WWTP Discharge was into a river with a minimum flow of 1.5 m³/sec and based the assimilative capacity of the receiving water on that false information.

Following a request from the EPA to Uisce Éireann to “Provide flow data for the receiving waterbody in the vicinity of the primary discharge point showing a constant minimum flow of 1.5m³/s at all times.” Uisce Éireann replied on the 7th September 2023--- “hydrological analysis shows that there is not a consistent flow of 1.5m³/s at the Blessington WWTP primary discharge point.”

The Blessington WWDL review (D0063-02) is still under review by the EPA.

The current ESB and EPA WWDL is for 6000 P.E. and yet Uisce Éireann have constructed a 9000 P.E. Blessington WWTP.

It took a long time for Uisce Éireann to admit that all their data for the Blessington WWTP Upgrade and WWDL Discharge is false. All the data now needs to be corrected and for Golden Falls Lake/Reservoir to be declared a totally unsuitable location for the Blessington WWTP Discharge.

The Wicklow County Development Plan 2022-2028 identifies Blessington as a Level 3 Self-Sustaining Growth Town.

P23 Blessington LAP

“Water supply is currently provided to most areas of Blessington primarily by the Poulaphouca Reservoir via the Ballymore Eustace Water Treatment Plant. In the 2000s the water supply to the town was improved with the construction of two reservoirs in Glen Ding Forest and the laying of piping to connect, in the vicinity of Eadestown, to the main 1600mm trunk from Ballymore Eustace. Consultation with Uisce Éireann has indicated that there is water supply capacity available over the plan period, based on the Wicklow County Development Plan population targets.”

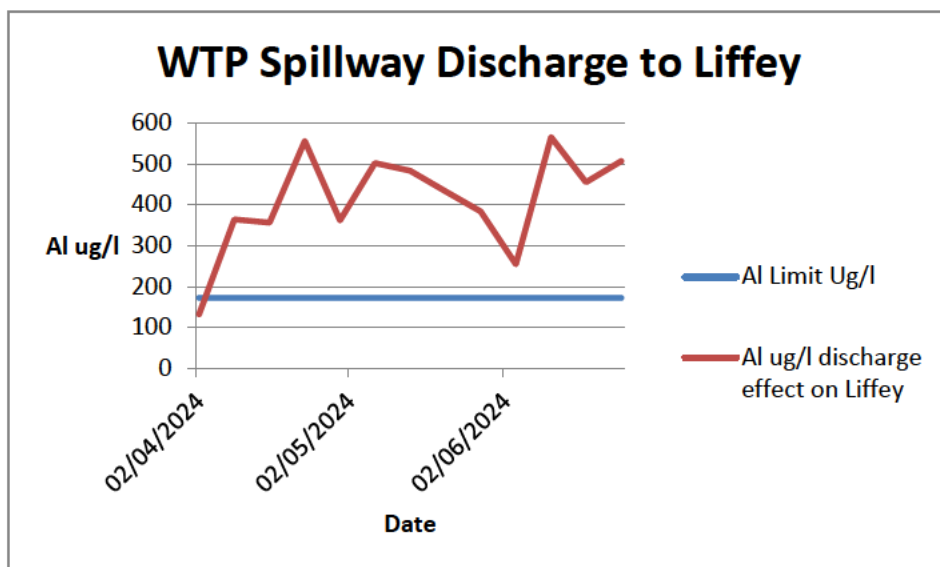
Blessington’s drinking Water Supply is primarily served from the Ballymore Eustace Water Treatment Plant (WTP). *“Based on the Target Population set out in the County Development Plan there is capacity available over the Plan period. However, Blessington does form part of the overall Greater Dublin Area supply, which is constrained at times.”*

Comment: The Ballymore Eustace WTP is the largest in Ireland treating a massive 40% of the total annual flow of the Liffey at Poulaphouca, i.e. there is 40% less water flowing into Golden Falls Lake/Reservoir than flows pass Blessington. Therefore, there is 40% less assimilative capacity in the River Liffey downstream of Golden Falls Dam.

Kildare County Council planning permission Ref. 86/1310 Conditions 1, 2, 3, sets a maximum water abstraction limit through all intakes of 70 mgd (318mld) from Poulaphouca Reservoir for drinking water treatment in Ballymore Eustace WTP. To say that the water supply “is constrained at times” is putting it very mildly. The Ballymore Eustace WTP is non compliant with the conditions of Kildare County Council Planning Ref 86/1310.

Raw water treatment for drinking water purposes is a dirty industry resulting in a toxic aluminium hydroxide coagulated with polyelectrolyte sludge waste. Most of the sludge waste at the Ballymore Eustace WTP is treated at the Sludge Treatment Plant and transported to a suitable landfill site. Not all of the sludge settles in the settling tanks and is carried over onto the sand filters. The backwashing of the filters results in the aluminium sludge being washed down the Spillway into the Liffey at Ballymore Eustace.

Kildare Planning Permission Ref 08/520, An Bord Pleanála Ref PL.09.229575 Condition 8 sets Emission Limit Values for the Spillway Discharge from the Plant to the River Liffey. The WTP is non compliant with condition 8 mostly due to the level of aluminium discharged into the Liffey. Aluminium is known to be toxic to fish.



P.S. The Water Action Plan 2024: 3rd Cycle River Basin Management Plan for Ireland sets out the measures that are necessary to protect and restore water quality in Ireland. The overall aim of the plan is to ensure that our natural waters are sustainably managed and that freshwater resources are protected so as to maintain and improve Ireland's water environment.

For the first time, the Liffey at Ballymore Eustace has been identified as a Prioritised Area for Action (PAA) in The Water Action Plan 2024: 3rd Cycle River Basin Management Plan for Ireland

Thomas Deegan,
Honorary Secretary,
Ballymore Eustace,
Co. Kildare,
2nd December 2024