



Submission

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Application

Applicant:	Dairygold Co-Operative Society Ltd and TINE Ireland Ltd
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See below for Submission details.

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The expansion of the Dairygold Cheese Plant at Mogeely is a positive development. It will create employment and boost agricultural production and exports.

However it is absolutely incredible that discharging effluent into the inner reaches of Cork Harbour is even being considered when untreated sewage discharges into Cork harbour will be stopped by the end of 2020 after huge investment by Irish Water in Waste Water treatment.

The assumption that the discharges at Rathcoursey on an ebbing tide will leave the Harbour is well and truly proven as false in this report.

This EPA report [Quality of Estuarine and Coastal Waters 2007-2009](#)

Water Quality Survey of Irish Estuaries and Coastal Waters for 2007-2009 has the following to say on Page 108

Nitrogen and phosphorus levels in estuarine and coastal waters

In relation to achieving the environmental objectives established by the Water Framework Directive (WFD), three coastal areas, Cork Harbour, Outer Cork Harbour and Malahide Bay, failed to comply with the environmental quality standard (EQS) for DIN (S.I. No. 272 of 2009). Absolute concentration and exceedance values for DIN are shown in Figures 5.2a and 5.2b.

While these are old figures and relate to Nitrogen and Phosphorous they do indicate the ineffectual flushing and dilution effect of the Tidal flows in Cork Harbour.

Although it is proposed that waste water is only discharged on an ebbing tide, the question needs to be asked of independent experts how much of this water actually reaches the open sea and DOES NOT come back into the Harbour again when the tide turns?

Clearly discharging to the open sea would be a far better proposition to ensure dispersion and dilution of this water. This option appears to have been discounted by the applicant prior to the Planning Permission stage. At this point a request for further information should have sought a detailed analysis of all options considered and where none were considered they should have been an insistence that a proper appraisal of all alternatives be carried out.

CHAPTER 3 Alternatives Considered

3.3.2

3.3.2 New treated effluent discharge pipeline The Kiltha River does not have the capacity to accept the increased volumes of treated wastewater. Therefore a new discharge point is required. As part of this development proposal it is being proposed to discharge treated process effluent into Cork Harbour at Rathcoursey. The pipeline route selection process initially commenced by defining a broad area of search between the two fixed start and end points. Two general route options for the treated effluent discharge pipeline were considered as follows: Option 1 (Figure 3.3) – Combination of Off-road and On-road route Option 2 (Figure 3.4) – On road only route (Option 2a and Option 2b)

In effect, no alternative discharge point appears to have been considered.

5.3.1.2 Wastewater discharge pipeline The wastewater discharge pipeline will be installed along public road for a length of 13.61km from the on-site WWTP to the Midleton Main Drainage Outfall at Rathcoursey.

By contrast the distance from Mogeely to the open sea along the public road is approximately 8 km and seems a logical option for investigation.

Several alternative suggestions for waste treatment were put forward in third party Planning submissions including anaerobic digestion, constructed wetlands, irrigation of farmland and discharge to the open sea.

Angling in Cork Harbour is a hugely important generator of Tourism Revenue. Sea Bass are a protected species. In early 2015 and again in 2016, the EU Commission introduced a series of emergency measures to halt population declines, including catch restrictions and an increase in the minimum landing size from 36 to 42 cm. The EU Commission has since proposed that further measures will be adopted to protect the species. Their movements and sensitivity to environmental factors were not considered at all in the EIS that accompanied the Planning application. This is a serious deficiency that needs to be remedied. This research

<https://www.nature.com/articles/srep45841#t1> outlines the importance of inner Cork Harbour to this species which can live for more than 20 years (Pickett, G. D. & Pawson, M. G. *Sea bass. Biology, exploitation and conservation. Fish and Fisheries Series 12*, i-xvi 1–337 (1994)).

There is very little mention of fish in all of the studies that accompanied the Planning application and this EPA Licence application and this cannot be acceptable.

There is a serious flaw in the Planning and Licencing processes in Ireland. Independent experts should be employed to undertake research and write the necessary reports by those assessing applications as opposed to the applicants. The costs must be carried by the applicant but they should have no interaction with those writing the reports.

Hendrick Verwey

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Cobh Tidy Towns