

Observation/Submission to draft Clare County Development plan 2023 -2029.

The Miltown Malbay Waste Water Treatment Plant has been located on our family land since its construction in 1948. Uninterrupted access has been provided to the facility since that time. In recent years both the condition of the facility and its operational capacity has been a source of concern. These concerns were expressed to Clare County Council and Irish Water some time ago . They included the following :

- (a) The poor quality of the discharge coming from the facility which flows into a stream bordering the land on its way to Spanish Point
- (b) Our concern that if the discharge is not meeting the regulatory requirements for such waste water treatment plants, the negative effect it could have on livestock on our lands and the surrounding environment.
- (c) The fact that this plant, which was built in 1948, is now catering for a population in excess of what was originally intended.
- (d) The capacity of the plant to meet the current demand for waste water treatment for Miltown Malbay .
- (e) The future plans for the facility.

At that time the facility was about to be audited by the EPA .The EPA issued its report subsequent to a site visit on 31/10/2018 Site visit reference no. SV 14250 .In it, the following comments were made:

- (1) The Miltown Malbay WWTP is significantly overloaded.
- (2) Storm water is continuously overflowing including on dry weather days.
- (3) A contingency plan to manage a power cut is not in place.
- (4) SIP required as part of licence has not been completed.
- (5) There is visual evidence of pollution at or downstream of the discharge point to the receiving water. Numerous rags were observed.
- (6) No record of desludging events.
- (7) There is ongoing waste water spillage from the peat bed tank.



(8) Summary: The WWTP is significantly overloaded , influent being diverted untreated to the receiving water . SIW have not been completed.

The draft Clare County Development Plan 2023-2029 has recently been issued. On page 59, Miltown Malbay section , it states : “ There is sufficient capacity in both the West Clare Regional Water Supply and Miltown Malbay Wastewater Treatment Plant to meet the needs of the targeted population “. We find that conclusion regarding Miltown Malbay WWTP extraordinary when the most recent EPA audit clearly states that the WWTP is “significantly overloaded “.

Ongoing discussions are taking place with Clare County Council and Irish Water regarding improving the necessary access to the plant with a view to remedying some of the deficiencies outlined in the EPA report . All of us involved are in agreement that it will be only applying a ‘sticking plaster ‘to a facility which needs major surgery or replacement. Miltown Malbay is entitled to a modern efficient WWTP capable of meeting its requirements well into the future and should be high on the list of Clare County Council’s and Irish Water’s priorities.

Observation/Submission to draft Clare County Council Development Plan 2023-2028

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Please acknowledge receipt of Observation/Submission.