

Response to SAI F23A/0636 Dublin Airport Drainage Area Infrastructure



Photo: Baldoyle Bay SAC by Philip Swan

Submission by:
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Submission

1. Introduction

1.1 Sabrina Joyce-Kemper makes this submission in response to Significant Additional Information (SAI) on planning reference F23A/0636. Ms Joyce-Kemper has an advanced diploma in Planning and Environmental law from the Honorable Kings Inn. The planning application F23A/0636 is described as follows;

"in the townlands of Pickardstown, Coultry, Huntsown, Forrest Great, Forrest Little, and Collinstown; and to the east of the airfield in the townlands of Cloghran, Corballis, Commons, Toberbunny, Stockhole and Clonshagh.

The proposed development includes upgrades to existing drainage infrastructure and construction of additional drainage infrastructure to improve performance of the surface water management system at Dublin Airport and will consist of:

- a. a contamination detection and response (CD&R) system comprising detection devices, network decision points (DPs), control kiosks, and ancillary infrastructure including local access roads, local drainage and communications and power ducts;*
- b. clean water supply pipelines consisting of large diameter trunk pipelines;*
- c. airfield contaminated pipelines consisting of large diameter trunk pipelines;*
- d. upgrades to the West Apron surface water collection network including reconfiguration of the existing network, construction of an underground attenuation tank, installation of a local CD&R system, network DPs and a control kiosks, construction of an underground pollution storage tank, a pumping station, and ancillary development including local ductwork, local access roads and local drainage;*
- e. upgrades to the existing surface water collection network in the vicinity of the South Apron including reconfiguration of the existing network, construction of network DPs, upgrade of the existing flow diversion structure (FDS) and reconfiguration of the existing Cuckoo supply channel;*
- f. a central pollution control facility (CPCF) consisting of underground pollution control storage tanks, a pumping station, a discharge pipeline to the Uisce Eireann network, mechanical and electrical equipment, a control building, an electrical substation, and ancillary development including a local access road, enhanced flood bund, local drainage and ducting;*
- g. a CPCF pipeline consisting of a large diameter trunk pipeline;*
- h. a central supervisory control and data acquisition (SCADA) system comprising kiosks and associated electrical power and signal connections;*

- i. repurposing of the central section of the existing Airfield Trunk Culvert (ATC) as a contaminated pipeline; and
- j. ancillary and associated development including pipework, mechanical and electrical service connections and upgrades, temporary compounds and site works.

This planning application is accompanied by an Environmental Impact Assessment Report and Natural Impact Statement.

- 1.2 In my first submission to this application at section 2.8 of that submission I made the following observation:

No mention of unauthorised development of PFAS contaminated soil that has already been excavated without AA or EIAR. Can this application be accepted in section 34.12 of the Planning and Development Act 2001 to present is triggered.

- 1.3 The applicant has not assessed the confirmed and existing PFAS contamination in soils and groundwater on the Airport campus. The only comment I can see in the NIS is on page 14 a comment added with RFI which states:

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Soils within the airport will require the excavation and there is a possibility that these soils have been contaminated by airport-related activities in the past. Mitigation measures will be required in relation to soils and soil movements within areas of excavation airside.

- 1.4 In the response memorandum document the applicant states the following in reply to RFI request 6:

A. PFAS Contamination at daa

Response:

The potential for encountering contaminated material is considered **Chapter 11 - Lands, Soils, Geology and Hydrogeology** of the EIAR. As described in **Section 11.6.1.1**, site investigation and laboratory analysis will be carried out to determine potential contamination of ground that will be excavated during the construction phase, including testing for PFAS. As described, if contaminated soil/water is encountered, it is proposed that it be removed by a licensed waste contractor for treatment or disposal at a suitably licensed facility in accordance with the Waste Management Act 1996 (as amended), the Waste Management (Collection Permit) Regulations 2007 (as amended) and the Waste Management (Facility Permit & Registration) Regulations 2007 (as amended). Where appropriate daa propose to use a structured approach in line with the Environmental Protection Agency's (EPA's) **Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites**, taking account of best international practice, evolving standards and emerging knowledge and experience in remediation technologies to determine the most appropriate environmental solution for its management. **Section 11.6.1.2** describes the potential for accidental contamination of surface water run-off during construction activity. **Section 11.7** lists mitigation measures to reduce this risk including development of the Construction and Environmental Management Plan (CEMP), measures to control soil excavation to ensure that exposed soils are stable and minimise erosion including ensuring works are carried out within the main excavation site as far as possible, application of pre-treatment and silt reduction measures, and careful management of storage areas. EIAR **Appendix 13.1 - Resource & Waste Management Plan** outlines how to manage contaminated soil should this be identified prior to starting works.

This reply is completely uninformed as I can only presume the planning consultant replied in this manner as daa have not provided their planning consultant with the 4 reports that detail confirmation of PFAS contamination in the soil, groundwater and migration to water bodies. The information coming through from the daa, EPA, Fingal County Council and these reports indicate that the PFAS contamination issue at Dublin Airport first came to light in approx 2016. The reports which are too large to append to this document can be downloaded and reviewed by the planning section at the following links. I request that they are considered as part of my submission.

https://www.dublinairport.com/docs/default-source/sustainability-reports/2021-2023-environmental-monitoring-report.pdf?sfvrsn=36299b4d_2

https://www.dublinairport.com/docs/default-source/sustainability-reports/2021-2023-environmental-monitoring-non-technical-summary.pdf?sfvrsn=cfae8fda_2

https://www.dublinairport.com/docs/default-source/corporate/material-management-design-report-for-the-management-of-impacted-soils-2020.pdf?sfvrsn=fc671644_2

https://www.dublinairport.com/docs/default-source/corporate/groundwater-and-surface-water-risk-assessment-and-remediation-options-appraisal-2021.pdf?sfvrsn=2e845f1a_0

- 1.5 The planning authority simply cannot carry out an EIA, AA and Water Framework assessment and Waste assessment without comprehensive report from the daa detailing the interaction of this development with existing PFAS contamination currently in soil, groundwater and water bodies. Remediation and decontamination measures capable of preventing PFAS contaminated runoff from impacting water resources, protected sites and from being discharged to sewer and then Ringsend (which has no technology to deal with PFAS contamination) MUST be assessed, mitigation identified, compensation identified for unauthorised reburial of contaminated soils and removal of contaminated soils.
- 1.6 the current from of application will not prevent the extreme risk to human health, sensitive habitats and the species that live there. ROBUST and definitive measure must be identified and implemented as a matter of urgency at full costs to the daa due to their inability to comply with Planning and environmental issues to date on this specific issue.
- 1.7 Multi party consultation with the EPA, Fingal CC, Health and Safety Authority and daa must commence immediately.

The planning authority have a responsibility under the Local Government Act of 2001 and the Ethics in Public office Act 1995, in addition to environmental and planning legislation, to act in the public interest.

Yours Sincerely




Sabrina Joyce-Kemper


https://www.dublinairport.com/docs/default-source/sustainability-reports/2021-2023-environmental-monitoring-report.pdf?sfvrsn=36299b4d_2

https://www.dublinairport.com/docs/default-source/sustainability-reports/2021-2023-environmental-monitoring-non-technical-summary.pdf?sfvrsn=cfae8fda_2

https://www.dublinairport.com/docs/default-source/corporate/material-management-design-report-for-the-management-of-impacted-soils-2020.pdf?sfvrsn=fc671644_2

https://www.dublinairport.com/docs/default-source/corporate/groundwater-and-surface-water-risk-assessment-and-remediation-options-appraisal-2021.pdf?sfvrsn=2e845f1a_0

-  [2021-2023-environmental-monitoring-non-technical-summary PFAS.pdf](#)
-  [2021-2023-environmental-monitoring-report PFAS technical.pdf](#)
-  [groundwater-and-surface-water-risk-assessment-and-remediation-options-appraisal-2021.pdf](#)

-  [material-management-design-report-for-the-management-of-impacted-soils-2020.pdf](#)