

Planning Observation

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 and Wild Irish Defence CLG wish to make a submission on decision on planning reference F23A/0636. Ms Joyce-Kemper has an advanced diploma in Planning and Environmental law from the Honorable Kings Inn. While we make this planning submission due to the lack of assessment & dual assessment under the EIA Directive and Habitats Directives, we do support the Planning Application but wish to ensure robust mitigation measures are implemented on any historical/ current and future impacts relating to F23A/0636 which 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 Due to a number of planning applications and planning appeals live on Dublin airport developments, we have not had time to give this application a full rundown of the issues with this development. We believe we had identified a number of issues in relation to detail of the planning application and some deficiencies in the application report, documentation and Environmental assessments which, need to be updated in order to constitute a complete application (in accordance with the law), which is capable of being properly assessed by the Planning Authority. We have raised the procedural/ administration issues and deficiencies in the below submission which we believe should require the application to be deemed invalid and require a new application or without prejudice to that argument require substantial additional information.
- 1.3 Below we lay out the very basic reasons and considerations in bullet form, in support of our contention that the application must be invalidated and reapplied for or updated. We must reiterate that we support this development which will attempt to reduce the continuous discharge of contaminated surface water and discharge into protected water bodies in North Dublin. We make this submission in order to shore up the omissions in the application documentation and lacunae in environmental screening and assessment and failure to carry out a dual consent process with the EPA in relation to the licensing of additional in fluent to Ringsend that is in breach of its current licensing limits.

2. Administrative / Procedural issues:

- 2.1 The Development crosses two local authority boundaries and therefore planning areas at the R132 and therefore may be required to be lodged as Strategic Infrastructural Development directly to An Bord Pleanála after the requisite re application consultation.

- 2.2 In Uisce Eireann pre connection form applicant answers question 31 incorrectly as the connection is for storm water (contaminated and so waste water) to sewer. They incorrectly tick the no box. Therefore the application should be remade to Uisce Eireann.
- 2.3 The applicant failed to carry out an AA on the following NATURA Sites which are hydro logically linked to the development or have pathway receptors to the development.
- Ireland's EYE SAC & SPA**—Hydraulically linked via Mayne River, Sluice river and via Baldoyle Estuary which has tidal impact of Ireland act (PCBs/ Pop have impact on marine life and trophic food chain impacting marine biodiversity and birds (bird health and reproductive success with PCB bio- accumulation weakening eggs.)
- Rogerstown Estuary SAC/SPA** —is linked via the ward River has poor status and cumulative impact re uncompliant Swords WWTP
- Western Irish Sea SAC - H** Hydraulically linked via Mayne River, Sluice river and via Baldoyle Estuary
- Rockabill to Dalkey SAC** —Pathway receptor from development site contaminated waste water via sewer and WWTP at in the first instance Ringsend WWTP and in the second proposed instance Greater Dublin Drainage Clonsaugh WWTP and pipeline.
- Bull Island SPA**- pathway receptor via ringsend impact on eelgrass and brent geese that are linked to Bull island and Baldoyle SPA and SAC
- Tolka Estuary SPA**- Ringsend sewage overflows and North fringe sewer sewage overflows to Tolka river impacts nitrogen , microplastic Pollutants of emerging concern in waters.
- 2.4 It was impossible to be able to go through the approx 2500 pages in 5 weeks let alone the two days I had to look through the application. The fact that the EIAR (and NIS) was not in electronic searchable format as statutorily required under the 2014 EIA directive caused great difficulty in trying to locate certain keywords and phrases to zoom in on information and extract or reproduce info to refer to in a submission. This is contrary to the law and the application should be invalidated or without prejudice to that argument a further sufficient time under the EIA directive given to review EIAR and appendices.
- 2.5 A number of statutory prescribed bodies were excluded.
- 2.6 I would question the application form that states an IPPC is not required.
- 2.6 Dual assessment and consultation with EPA required.
- 2.7 Application does not demonstrate how water bodies, mayne, sluice and ward rivers will be brought up to good status under the WFD with this application, particularly as the contaminated water will end up in sewers which cannot treat all the contaminants. An alternative of storage and sucker truck removal for proper treatment should be part of an EIA Assessment.

- 2.8 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.
- 2.9 Ringsend agglomeration and WWTP is not in compliance and is overloaded. This issues must be considered at the time of making the application.
- 2.10 The GDD WWTP and pipeline cannot be relied on to grant permission in this development as it is not yet consented.

Please invalidate or refuse permission and or have the application updated.

Yours Sincerely

Sabrina Joyce-Kemper

and

Wild Irish Defence CLG