

File With _____

Appeal NO: ABP 32466

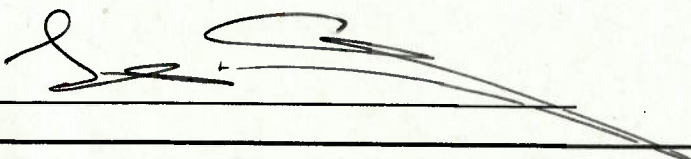
Defer Re O/H

TO: SEO

Having considered the contents of the submission dated/ received 21/4/15
from

Brendan O'Halloran I recommend ~~to~~ not to circulate at this stage for the following

reason(s): no w 1852

E.O.: 

Date: 25/7/15

To EO: _____

TO BE CIRCULATED Y/N

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare SC _____ - enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4weeks - SC _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 321466

M _____

Please treat correspondence received on 21/7 as follows:

1. Update database with new agent for Applicant/Appellant _____	
2. Acknowledge with EO <u>FO20</u>	1. RETURN TO SENDER with BP _____
3. Keep copy of Board's Letter <input type="checkbox"/>	2. Keep Envelope: <input type="checkbox"/>
	3. Keep Copy of Board's letter <input type="checkbox"/>

Amendments/Comments
<u>S131 Rep + R</u>
<u>LVD 21/7</u>
<u>*To be scanned</u>

4. Attach to file (a) R/S <input type="checkbox"/> (d) Screening <input type="checkbox"/> (b) GIS Processing <input type="checkbox"/> (e) Inspectorate <input checked="" type="checkbox"/> (c) Processing <input type="checkbox"/>	RETURN TO EO <input type="checkbox"/>
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	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>[Signature]</u>	AA: <u>[Signature]</u>
Date: <u>25/7/15</u>	Date: <u>28/7/25</u>

9 Peck's Lane,
Castleknock,
Dublin 15
20th July 2025

The Secretary,
An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

AN COIMISIÚN PLEANÁLA	
LDG- _____	
ACP- _____	
21 JUL 2025	
Fee: € _____	Type: _____
Time: 10:55	By: [Signature]

REF: Case number ABP-321466-24

Dear Sir/Madam,

I refer to your letter dated 30th June 2025 in respect of submission received from the Department of Housing, Local Government and Heritage and I comment as follows.

Department of Housing, Local Government and Heritage are extremely concerned that any operations taking place within the development could release polluting materials which might adversely affect downstream biota and that could enter the natural drainage system in the area by run-off because of leakage or other accidents on site.

These accidents and leakages have already taken place on site despite the fact of them being major incidents they were not properly documented in the submissions of the applicant's consultants whilst seeking planning permission for substitute consent and or Planning. The concern from the Department is there shall be a continuous run-off from the development site which are present and will continue in the future to be directed into a field drain south of the entrance from the R122 Road which is then conveyed in a culvert under the R122 before re-emerging 180 meters to the West to eventually outfall into the Huntstown stream circa 500 meters downstream of the site.

Problems, if created may not be recognised or uncovered until pollutants re-emerge for 500 meters downstream from the site, the risks here considered are

those which will flow directly from the draining system from the site elements. However, what also needs to be considered are the pollutant escaping by a windblown or transported from the site surface water leaking out on agricultural land to the rear and contaminants making their way into the ground water system.

The Department is concerned about the risks and have highlighted these risks in the correspondence and now putting the onus on the Commission for Planning that they should satisfy themselves, taking into consideration the various recycling operations that are due to continue the site, will have no effect whatsoever on the environment.

The Commission have the ball solidly in their court. The downside are the risks to the environment and public health and the information provided by the applicants has not been open and clear over the period of the process and historically.

Accordingly, I urge the commission to refuse planning

Yours Faithfully

 20/7/2025
Brendan O'Halloran

9 Peck's Lane,
Castleknock,
Dublin 15
20th July 2025

The Secretary,
An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
21 JUL 2025	
Fee: €	Type: _____
Time: 1655	By: HANP

REF: Case number ABP-321466-24

Dear Sir /Madam,

I refer to your letter dated 30th June 2025 in respect of submission received from the DAA and I comment are as follows.

The DAA have noted, why sustainable urban drainage systems (SUDS) are essential for managing surface water and promoting environmental resilience. The SUDS system promoted by the applicants is not suitable and not fit for purpose at such a development, that not only causes problems for the airport in relation to water bodies but primarily is designed for clean surface water, i.e. water also that is totally uncontaminated and causes no risk whatsoever to the water body itself.

In the Saint Margaret's scenario, the surface water from the localised sheds shall be retained on site for washing down water. It was also recorded in previous documentation by the applicants that dusting down and washing down of the rooftops would be necessary because of particles of contaminants leaving the site and or being airborne from the activities being carried out from shredding of bailing stock, piling, sorting of all kinds of scrap, car parts, engine parts, etc, being processed in an open area at the rear of the premises.

It has also been noted that any water from quarantine/stockpile or wash down from within the yard area will enter the surface water system, which is not fit for purpose, within the drainage system and exit into the open localised water drainage system. The substantial risks are the pollutants being released from the activities within the yard, i.e. oils, hydraulic oil, brake fluid, gear oil, antifreeze, paint, battery fluid, lead particles, metal particles, and their combinations. There

is also the risk of fire water being released into the ground water system in the likelihood of a major incident, as has been previously documented.

The treatment of surface water and the submissions by the applicants over the course of numerous submissions to the local authorities, the Planning Board and the Waste Department of the local authority, lack any comprehensive plan to deal with surface water management. The applicants have not shown the competency to deal with this issue to meet the requirements for the local area including the concerns of the DAA and local government.

The proposal by the DAA for underground attenuation or rapid infiltration system was never proposed by the applicants and may not be sufficient based on the calculations submitted as NO allowance has been made for firewater, torrential rain and those factors that have announced themselves quite recently with climate change events.

There is a significant concern that any underground attenuation would need to be outside the proposed boundary of the site and would mainly carry and store contaminated water containing pollutants from the activities in the open yard processing area.

I have also had numerous correspondence with the Waste department of Fingal County Council in relation to the activities carried out on the site in the last number of years. The breaches in permit regulations, the numerous noncompliance and once again I am concerned that these issues have not been dealt with in the submissions of the applicants nor have they clearly shown the engagement by Fingal County Council in the years that the applicants seek to apply for substitute consent.

In conclusion, it is quite obvious that the concerns highlighted by the DAA for general surface water being released from site is a risk to airport operations. The DAA it seems may not be aware of the additional risks created by the pollutants that are also released from the Site.

Therefore, the application for planning for these facilities is out of sorts with the area.

Yours Faithfully


Brendan O'Halloran