



**PAUL KEHOE TD**

**Wexford Constituency**

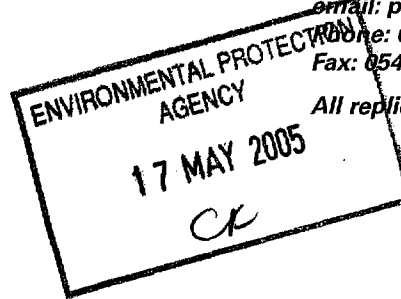
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IPC Licencing  
Environmental Protection Agency  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford

16<sup>th</sup> May 2005

Re: Reg No 742, NRG Anaerobic Digester, The Deeps, Killurin, Co. Wexford

Dear Sirs,

I make representations on behalf of the concerned residents of the Killurin area and would like to support the submission made by the Crossabeg/Killurin Local Environment Association.

I enclose the details of their concerns about the environment and would ask that the local residents concerns are taken into account when a decision is being made.

With kindest regards.

Yours sincerely,

**PAUL KEHOE TD**  
Fine Gael Chief Whip

**EPA**

MAIN FILE ☒

PUBLIC FILE ☒

EVALUATION FILE ☒

DATE 18/5/05 (CK)

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## **Crossabeg / Killurin Local Environment Association.**

### **Proposed erection of an Anaerobic Digester on the banks of the River Slaney.**

A planning application Number 2005/0055 for the erection of an Anaerobic Digester adjacent to an existing pig fattening station owned and operated by Reenard Pig Farm, at the Deeps Killurin was lodged with Wexford County Council.

The Crossabeg / Killurin Local Environment Association (KLEA) lodged an objection to this development.

Planning permission was refused on the following grounds;

Please see Attachment 1.

**Please note that an Environmental Impact Statement was never requested by Wexford Co. Council.**

It is anticipated that said planning application will be resubmitted within the next few weeks.

EPA

*IPC Licence*

An application was lodged on April 1<sup>st</sup> 2005 with the EPA, Reg. No. 742 for a review and extension of the license to incorporate the use of an Anaerobic Digester.

The local community have agreed to vigorously oppose the granting of this License by the EPA.

It is clearly recognised that without using the services of the best available consultants, it will prove extremely difficult to succeed in opposing the granting of an EPA license.

Consultants have now been appointed.

**The development includes the following;**

- Erection of industrial buildings on the banks of the River Slaney, up to 60 feet in height, in a highly sensitive area, currently being enjoyed by anglers, boating enthusiasts, rowing, and other forms of marine sports, at Killurin pier, which is directly opposite the proposed development.
- Erection of underground storage tanks, circa 2 million gallons of slurry, dangerously close to the water table, and the River Slaney, in the event of leakage occurring, would be a source of major pollution.

- The erection of the above structures in an area, which is subject to flooding from both river and surface water, and is built on soils of such variable structures, could be deemed to be highly porous and risky.

### **Process**

Anaerobic Digestion is a process going back to the 1850's and can process almost all types of organic waste. It is intended as per its license application to process, belly grass from meat factories, cake sludge from effluent treatment plants, fish waste, etc.

**Please note the etc. as this could be any type of offal, which is currently being disposed of in rendering plants, but could be processed far cheaper in an anaerobic digester.**

### **The process is not dependent on the availability of pig slurry.**

- In the event of the pig farm ceasing operations, this facility can continue to process all types of organic waste, sourced off site.
- The scale of the proposed operation is far in excess of the on farm requirements.
- The above Fatty waste will be sourced off site, with the resultant increase of traffic in the area, and the obnoxious odour which offal generates during transportation, and storage on site.

### **Odours**

The process will result in odours emanating from the digester. Because of the location of the piggery, being situated in a valley on the bank of the Slaney, these new but more obnoxious odours, than those from the piggery and adjoining landfill site, will like the existing odours, with little wind and high humidity meander like a fog along the river, and inland to the surrounding area.

The risk that the new odours and sounds generated by the facility will have a devastating effect on the Fauna.

### **Employment**

There are currently 5 people employed in the piggery. It is not envisaged that there will be an increase in employment numbers when the Digester is in operation.

### **Project Overview**

The proposed development is situated on the banks of the River Slaney, an area that is designated under the following headings in the Wexford County Development Plan 2001.

- The River Slaney is designated water, under the European Communities (Quality of Salmon Waters) Regulations 1978 and one of few remaining spring salmon rivers in Ireland. The Council recognizes the fishing status of the Slaney and its tributaries and the contribution it can make to tourism.
- The river Slaney is a candidate for Special Area of Conservation and supports several species listed in the European Habitats Directive. As such the River Slaney is not only of national conservation significance, but has now been included in European legislation. (Section 5.11) Natural Heritage Area. (Section 8.3.1)
- River Slaney is designated an area of Vulnerable Landscape, which represents the County's highest quality scenic landscape, with limited potential to absorb intensive development, and need to be given the greatest possible protection. (Section 8.5.3)
- River Slaney is designated as an area of High Amenity (Section 8.5.13) Killurin Bridge is on a scenic Route No 9B (Section 8.5.15)
- It is the policy of Wexford Co. Council to protect inland waterways as resources for water based activities, including angling and cruising. (Section 6.3.5)

We have no objections to the use of Anaerobic Digester per se.

In truth the Site so close to the River Slaney (see attached map), an area flooded by tides and surface water run off is perhaps the worst possible location in Wexford for this development.

It is protected by;

- Habitats Directive 1992
- Wild Life Act 1976
- Wild Life Amendment Act 2000
- National Habitat Regulations 1997

The movement storage and processing of Animal Waste on this site, is a risk to groundwater, to the River Slaney, a salmonoid river, and is contrary to WFD Directive 2000.

This is one of the most scenic high amenity areas of Co. Wexford, which has experienced a dramatic population increase in recent years, and with the promotion of fishing, boating, wildlife, and leisure activities, with big numbers of young people in the age group 10 – 35 years, meet for training in Killurin Pier which is situated directly across from the proposed facility. To damage these wonderful amenities by locating an Aerobic Digester, on the banks of the River Slaney, is totally at variance with the concept of Sustainable Rural Development.