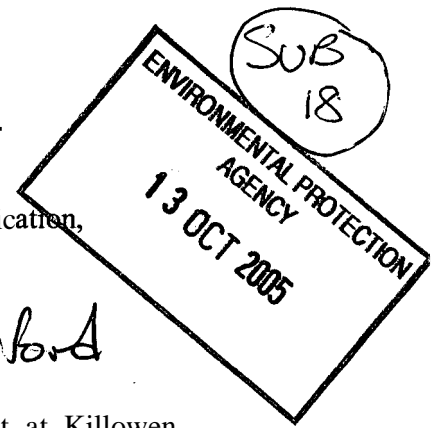


RE: Proposed development, ref. Number: PD 04/1831



In addition to my previous objection in regard to this planning application,

I, SEAMUS LUCY

of KILLOWEN, PORTLAW CO. WATERFORD

Wish for my continued objection to the proposed development at Killowen, Portlaw, Co. Waterford to be noted paying particular notice to the following issues:

- 1) No significant local consultation has been carried out by the company at any stage of the planning procedure, save an initial verbal exchange with five households in the immediate area. At no time has the company attempted to hold a public information meeting or formal consultation process to inform the local communities of their proposed development.
I was directly affected by the previous facility and suffered primarily from odour, noise and traffic nuisances and light pollution.
As a result, I feel that AES should be obliged to hold a proper consultative forum with all concerned local residents prior to any further submissions to the County Council.
- 2) AES still has not provided an adequate EIS which is in accordance with Article 5 (3) of the European (EIA) Directive 97/11/EC.
AES was required to provide further information including a "revised EIS" on 26th January 2005 to be made available within six months of being issued with the requirement by Waterford County Council. As this information has not been submitted within that timeframe, I feel that the application should be deemed withdrawn. Planning regulations Article 33 subsection 4 specific to dealing with further information state:
"Where a requirement under sub-article (1) is not complied with, the planning application shall be declared withdrawn after a period of 6 months from the date of the requirement for further information or evidence has elapsed"
- 3) The proposed development is not fully in compliance with the Joint Waste Management Plan for the South East region (JWMPSE). AES does not give an undertaking to source all of its' liquid streams (Wastewater) from within the South East region, instead it states "AES may at times source waste from outside the region depending on availability of waste streams and other market forces." Thus we are faced with the prospect of importing waste from outside the region, burdening our waterway which, given its Quality rating of 3, is particularly hazardous to the candidate Special Area of Conservation (cSAC) annex II in which it is situated.
- 4) AES intends to operate a dirty materials recovery facility in Killowen for an unspecified period of time until the waste can be separated at source in a three-bin collection system.
It is envisaged that the rolling out of a three-bin collection system will not be carried out until 2008. AES are proposing to operate outside of JWMPSE regulations in the interim. This facility should not be considered a viable venture until the three-bin system is in place throughout the region.

- 5) The final quality of the compost dictates its eventual market. As the nature, quantity and type of bio-solids entering the facility cannot be anticipated it is highly unlikely that grade "A" compost would be achieved. AES has failed to identify where it intends to sell or dispose of the processed material. It is unacceptable to rely on information suggesting this "third party company" (Landfeeds Ltd, owned by AES) will dispose of the compost without ascertaining where it will end up. There is no guarantee that reliable and stable markets will be available for this material.

No area been designated for the compost's storage and for the prevention of contamination to or the mixing of different grades of final compost This will be an issue particularly during the restricted winter months when the compost cannot be ploughed into land.

- 6) The EU commission has stated that "*additional efforts will be necessary*" in Ireland to "*meet the directives landfill-diversion-targets*."

The public participation in recycling schemes has increased dramatically in the past number of years as a result of public access to recycling centres and the "*reduce, reuse, recycle*" campaign. Increasing the numbers of bring sites and civic amenity centres and their collection frequency would further assist in source separation of recyclables. Allowing for the recycling of paper and pre-washed recyclable plastics at all bring sites would do likewise. Encouraging households to compost much of their organic waste – as is practice in many counties would further reduce the amounts of waste collected in the region much of which currently goes to landfill.

The levy on plastic bags in supermarkets was hugely successful in this regard and stands as an excellent example of how consumers can adapt to environmentally friendly policies once encouraged to do so.

I trust this and my previous submission will be taken into consideration when making a decision on the outcome of this application.

Yours Sincerely,

Samuel Lucey