

Environmental
Protection Agency

26 OCT 2005

OK.

Killowen,
Crossabeg,
Co. Wexford.

24th October 2005

Re: **Proposed development of an Anerobic Digester at The Deeps, Killurin, Co. Wexford.**

Dear Sir/Madam,

I wish to make a submission in opposition to the abovementioned development.

It is my opinion that, regardless of the merits or otherwise of the Anerobic Digestion (AD) process, site selection for such a development must be guided by a proper and realistic assessment of the potential risks involved. The objective should be to license only that site which presents the minimum risk to humans and the surrounding environment. It follows therefore that any site with inherent deficiencies or whose risk profile cannot be minimised should not be licensed. I would respectfully suggest that the site at Killurin, due to its location and topography, has inherent deficiencies with consequential risks and accordingly is a wholly unsuitable site for this development. In forming this opinion I have considered the following issues:

Odour/Wind borne gasses

As a resident of the area I am acutely aware of the odours emanating from the existing pig fattening facility. Whereas this could be categorised as a nuisance, the construction of an additional pig fattening unit in conjunction with the storage and processing of organic wastes will undeniably increase the odours, gas emissions and airborne bacteria. Whereas this would be undesirable in any location it is particularly so in a residential area.

The valley and adjacent fast flowing river will serve as a conduit for these odours/gasses drawing them down the valley towards one of Wexford's main tourist attractions, The National Heritage Park. This development is highly dependant on its outdoor facilities and guided tours, an extract from its marketing material serves to highlight this when it says;

"...the Irish National Heritage Park, located at Ferrycarrig, County Wexford is veritabily an outdoor museum."

"The park has a reception centre with a picnic area and a beautiful nature trail to enhance the visitor's enjoyment of the park."

"Guided tours of the park if required are available on the hour. Visitors may also if they wish, take a leisurely stroll through the park at their own pace."

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Considering the capital investment in this facility and its value to Wexford Tourism it would be reckless in the extreme to sanction any industrial development which threatened its reputation and future. Furthermore the great strides made in recent years in the development of boating, water-skiing and river-based activities in the area will count for nothing.

Therefore the granting of a licence to the proposed development is highly risky on the grounds that it increases the risk to human health of the permanent residents of the surrounding area as well as the viability of the areas main tourist attractions. Neither of these risks can be minimised as they relate to factors and features beyond the control of the developers, in short, the site is unsuitable due to its location and the pre-existing development of the area.

Water Pollution

In considering the potential for water pollution of a development such as this the materials to be processed and the sourcing thereof are considerations. It is a fact that slurries are a pre-requisite of the anerobic process, much of this slurry will be sourced offsite and subject to on-site transfer. In addition large quantities of slurry will be produced on-site. It goes without saying that slurry presents one of the greatest risks to a watercourse large or small. Regardless of the proposed standard of management at a facility it is prudent therefore to assess its merits on the presumption that accidents will happen and consider the scope for contingency measures and remedial action when they occur. We have ample evidence that even in the best managed facilities human and/or system failures result in unintended spillages and emissions. In considering the licensing of the proposed facility the focus should be on its ability to respond to accidents before the watercourse is affected. In this respect the distance between the potential polluter and the nearest watercourse is of critical importance. Every yard buys time and decreases the damage due to filtration, however undesirable the contamination of the intervening land.

In this context the proposed location of this facility on the banks of the River Slaney is such that regardless of the speed of reaction to an accident the outcome is inevitable. Furthermore the site's elevation above the river with natural drainage towards the river will make water pollution a certainty and an ongoing feature.

What more unsuitable location could you find for a facility such as this?

Visual

The banks of the River Slaney are the subject of many references and designations in the County Development Plan, many of which are intended to preserve the visual amenity and compliment the other amenities on the river. The council have been diligent over the years in policing inappropriate development which could in any way detract from the ever decreasing natural landscape. They have done this for sound reasons much to the disappointment of many a potential householder who wished to build or alter properties which had any potential to interfere with the visual amenity.

The proposed facility is adjacent to the river and has no natural screening. Having regard to the existing elevation of the site and the proposed increased elevation of the

buildings there is no prospect of natural screening being a success. Artificial screening in the form of mounding would be similarly ineffective and would only serve to highlight the incongruity of such a development at this location. To allow such a development on this site would be a travesty and unjustifiable to the many who have had to acknowledge the special conditions applying to developments in the Slaney valley.

Here again the site is inherently unsuitable for a development of this nature and scale.

Roads/Infrastructure

The scale of the proposed development is such that it will generate volumes of traffic in the course of supplying digester materials and services thereto. Given current waste management policies it is inevitable that traffic volumes will increase rapidly. Much of this traffic will be slow moving tankers requiring wide roads and easily negotiable access and egress points onto adjoining main roads. A site on a purpose built industrial estate with main road access is what is required.

The proposed site is several miles distant from the nearest main road at Kyle cross. Not alone is the junction at Kyle Cross a notorious accident blackspot which is difficult to negotiate safely by car but traffic would then have to travel along several miles of narrow country road bounded by private dwellings practically along its full length. Access from the opposite direction is similarly unsuitable and channels traffic onto Killurin Bridge which just about wide enough to accommodate the passage of two cars. Congestion is inevitably and accidents a certainty as local residents take increased risks in passing slow moving vehicles dispensing noxious odours/gasses and additional traffic volumes seek access at very busy Kyle Cross junction.

Because of the many miles of narrow road to be traversed in order to access the site, remedial work is both impractical and impossible due to the preponderance of residential dwellings along its length. The reality is that access to the site is not safe and can never be so.

Summary

As mentioned at the outset only a site which has a low risk profile should be considered for a development with as many potential hazards. I think I have demonstrated above that the proposed site is the very antithesis of this on the grounds of location, proximity to the river, visual impact and roads. If a site which is so unsuitable is licensed it will form an unfortunate precedent for the future and diminish my and I'm sure the public's confidence in EPA's ability to do what is right for the protection of human health and the environment.

Yours sincerely



Gerard O' Reilly & Family