

Sub. (66)  
office

Catherine O'Keeffe

---

**From:** cllrjoeryan@eircom.net  
**Sent:** 09 May 2007 23:46  
**To:** Suzanne Wyldé  
**Cc:** Catherine O'Keeffe  
**Subject:** W0111-03

**Attachments:** SERC.doc



SERC.doc (36 KB)

I email regarding the application by SERC W0111-03 lodged on 13th February 2007. Please find attached a submisson on the matter. I would appreciate if these points were considered by the board prior to taking a decision on the matter and I ma asking htat the board reject this application to extend operating hours and volumes at SERC.

Yours sincerley

Cllr Joe Ryan 053-9123031

-----  
Find the home of your dreams with eircom net property Sign up for email alerts now  
<http://www.eircom.net/propertyalerts>

---

This email has been scanned by the MessageLabs Email Security System.  
For more information please visit <http://www.messagelabs.com/email>

---

For inspection purposes only.  
Consent of copyright owner required for any other use.

40, Cromwellsfort Drive,  
Mulgannon Road.  
Wexford

**Re; Application SERC Ltd for review of license**

Dear Ms Wylde,

I write in connection with the application by the above W0111-03 to amend the terms of the license granted to it under W0111-01. This request for a review was lodged on February 13<sup>th</sup> last. I wish to make the following submission as to why the request to relax conditions on the operation should be refused.

(a) Road Safety

As a parent of 4 children attending the nearby Gaelscoil Charman at Whiterock Hill, I believe that the proposal to allow lorries laden with domestic waste to deliver to the facility from 8 AM onward constitutes a potential hazard to children like my own and accompanying adults who opt to walk to school and who must cross the road to enter the school. All children enter the school from 8.30 until 8.55 when class starts and older children (180 approx) leave at 2.30 PM. I am opposed to any move that could allow lorries travelling to and from the SERC facility to use the road while children are accessing or leaving the school. Wexford County Council has been asked to put in place a speed limit of 30 Km/hr on this stretch.

Discouraging the use of cars for school runs is a key objective for the Department of Education and Science as it contributes to an increased carbon footprint. Some children also cycle to the school and in its decision the agency should bear in mind that a significant and immediate increase in heavy vehicles on the road during school hours will end walking to this school.

Furthermore there is no footpath along Whiterock Hill Road even though there are a number of estates already built and more applications have been received or are planned for this road. Allowing heavy vehicles to use the road will be a significant hazard to pedestrians. The capacity of the proposed facility is such that it will import to Wexford District significant volumes of waste which will access the facility by the N11 & N25 using the Wexford by-pass, turning off at the Duncannon roundabout and using the New Line Road and turning at the new roundabout which is under construction at the bottom of Whiterock Hill. Trucks will most easily access the facility by the right hand turn here as the facility is about 1 Km from this junction. The alternative access from Coolbalow requires sharp turns off the N25 and also from the regional road in the direction of the facility.

The nature of lorry movement generated by the facility will be fourfold, delivery of waste, return of empty trucks, arrival of collection vehicles and departure of collection vehicles. Given the proposed volume of 50,000 tonnes per year or 1,000 tonnes per week

it will mean on the basis of a 5 day week, this will effectively result in a lorry movement every 15 minutes from the plant on average.

#### Calculation of frequency of vehicles using Whiterock Hill

Annual Tonnage = 50,000 = 1,000 per week = 200 approx per day = 20 approx per hour  
Tonnage entering per hour based on 10 hour working day allowing for breaks etc.  
Given the capacity of a truck approx 20 tonnes, departure & arrival added to the arrival and departure of trucks collecting processed waste,  
Average number of truck movements based on the delivery of a 20 ton load = 4 per hour.

This figure is predicated on the assumption that each truck collecting processed waste exits full.

#### (b) Unsustainable nature of the proposal

The regional waste strategy in the south east sets out the volume of waste produced in the region (page 5 section 1.7 for 2003). The total tonnage of domestic household produced in the region and collected by local authorities and private collectors was approximately 125,000 tons. The regional Joint Management Waste Plan (JWMP) devised in 2006 put the Co. Wexford element of this generated by commercial companies at 28,000 tonnes.

Given the commercial nature of the waste collection business and the existence of competition in the market it is not commercially realistic to expect that all of Wexford's commercial waste will be processed at this expanded facility. The private market for waste disposal has a number of service providers in addition to South East Recycling Ltd. Even if this expansion were allowed and that the service provider could accommodate all of Wexford's private domestic waste, it would still mean that over 40% of the waste to be processed would not originate in the county and given the nature of the market within which the operator is working there is no certainty that the additional waste to be processed would be sourced within the region. Permitting the expansion at the facility will result in an increased inter and intra regional transport of waste.

Given the reality that national waste strategies are predicated on each region providing for its own waste, it is incompatible with national policy to allow a private facility to expand to receive waste inward from outside the region given the requirement on local authorities to provide for disposal within their region. Consistency in policy implementation means that importation of waste to the region should not be allowed.

The JWMP (2006) forecasts trends in tonnage of household waste for the end of the decade. It is assumed that tonnage will drop (P 145). As a consequence allowing addition capacity at SERC will effectively develop capacity in market rather than effectively provide for the disposal of actual volumes of waste. Table 8.3 of the JWMP suggests an 11% increase in domestic waste in the region by 2011 rather than a fourfold

increase which SERC is planning for. It suggests inter regional waste transfers to achieve value for money however given the extent of the development in the proposal value for money will not be achieved in the context of the JWMP unless the facility is the recipient of significant inward transfers of waste.

(c) Protection of the environs of Whiterock Road

Wexford Town & Environs Development Plan outlines (Fig 8 P.35) significant environmental features in Wexford Town. Identified as significant hedgerows are a number of hedgerows to the rear of the present facility at Pembrokestown. It is an objective of the plan to consider for a hedgerow preservation order the hedge between Pembrokestown and Ballynagee, (P 38, Section 2.5.3 A11).

The Joint Management Waste Plan for the South East 2006 outlines criteria (P 67) which should be considered when siting a waste facility. Fauna Refuges are cited as a consideration to be included when planning facilities. Given that much of the area in the vicinity of the development is earmarked for residential development and that hedgerows constitute important refuges for fauna within residential areas it is my contention that the expansion of the SERC facility will negatively impact on hedgerows in the immediate area.

For inspection purposes only.  
Consent of copyright owner required for any other use.

(d) Proposed Capacity exceeds JWMP recommendation

The Joint Waste Management Plan outlines capacity within the region for Waste Transfer Stations. SERC's household waste capacity is proposed to allow an increase to 11,000 tonnes given the other categories allowed for in the plan SERC is already permitted to reach a total of 27,000 tonnes within the lifetime of the plan to 2011. It is my view that the JWMP provides for an ordered efficient and planned development of waste collection in the region. Providing for additional capacity beyond the planned value will only fuel waste transfers from outside the region and encourage inefficiencies in the plan. The JWMP specifically states that infrastructure should be installed and until such a time the capacity should be maintained. Given the limitations of infrastructure the capacity should not be allowed to reach 27,000 tonnes total (all categories) until the infrastructure is in place. To allow SERC proceed beyond the set limit will undermine the JWMP and it is implicit in the JWMP strategy that SERC must await the improvement in infrastructure.

Implicit in the JWMP is the assumption that waste must be dealt within each region. The capacity to which it is proposed to expand significantly exceeds the amount of waste generated in the region which the company can process. To permit expansion to this extent will conflict with the national policy of dealing with waste at a regional level. It will permit the trafficking of waste to process facilities and will be cited as a precedent for duplication of waste transfer facilities elsewhere.

Yours sincerely

Cllr Joe Ryan

For inspection purposes only  
Consent of copyright owner required for any other use