

Roches Point,
 Trabolgan,
 Whitegate,
 Midleton,
 Co.Cork

12 September 2008

E.P.A Headquarters
 Licensing Unit,
 P.O box 3000,
 Johnstown castle estate,
 Co.Wexford.



Submission to reference PO830-01

Dear Sir /Madam,

I refer to the application for an integrated pollution prevention control licence (I.P.P.C) by Bord Gais Eireann at their site in Corkbeg/Glanagow, Whitegate, Co.Cork.

I wish to point out that I am a landowner of farmland southwards of Whitegate Independent Power plant and that the stream in which W.I.P.P propose to discharge into, flows into 2 irrigation dams/ponds situated 200meters downstream of their site. They have blatantly omitted and failed to mention this very important point in their reports. Please refer to reference no. 5/06/10126 dated 26th September 2006, where Michael Savage Senior Executive Engineer states it is recommended the applicant submit a detailed study of this stream before a decision is made.

- I have used those dams since the early 1990s to provide irrigation to my crops of field to table potatoes and vegetables (i.e. lettuce, cauliflower and cabbage) and also to provide water for animals and other farm uses.
- The Glanagow stream then flows on through my land to the fine bathing beach of Whitebay to enter the sea. This is a very popular destination all year round for walkers and hobbie fishermen and especially in the summer time where thousands of parents bring their children to swim and play. This point needs to be given serious investigation as the stream fans out on a large area of the beach before entering the sea. It attracts young children in particular who sit and play in it for hours. Water will come in contact with children, safety of children and the general public is paramount, water quality cannot be compromised.
- 1. (a) I must point out that I have never cropped, tilled or put animals on the lands around Glanagow due to its environmental sensitive nature. This was a conscious decision made at great cost to myself.

- 1. (b) Any discharge into the Glanagow stream that has the possibility to pollute this watercourse has to be stopped or I will be seriously financially damaged.
- 1.(c) The environmental impact statement dated 8th august 2006 which was prepared by Arup consulting engineers on behalf of the applicant describes the groundwater source and flow into the Glanagow stream as a locally important (LI) aquifer and with an extreme vulnerability rating(E). I fear that there has been major interference in the Geological structure at the source of this vulnerable stream.
- 1. (d) the applicant has already constructed a culvert for a considerable distance along the stream route and have effectively covered the source of the water for the stream with compacted hardcore and site roads. Rainwater runoff from an industrial environment also untreated into the stream and then into my dams and onto the public beach.
- 1. (e) With very little fresh water available for local and migratory wild bird life in the area this water source is very important.
- 1.(f) I have invested a large amount of time and money into this system to pump water 1.5 miles in 6 inch pipe underground to the rest of my land. No thought or consideration has been given to my enjoyment of this very important water course nor has it been highlighted in the EIS report.
- 2(a) Human health and safety must be protected against the possibility of inadequately treated effluent or the unacceptable levels of dangerous substances such as phosphorous and nitrogen.
- 2 (b) I must emphasis my need for irrigation for my crops because of my location i.e. strong winds drying out the light soils common to my area the elevation , types of crops grown and also quality required. Climate change will have major implications for me going forward. I purchased this land at Glanagow knowing that I would have the benefit of the water course that runs through it.
- 2(c) In the future I hoped to look into fish farming or fresh water course fishing on my dams.
- 2(d) Interference with the rises see “field inspection” 12.4.3 map showing fields 1,2,3 fig.12.4 and the course of the stream has effected the natural collection catchments of the Glanagow stream and will effect its flow/capacity and (if it survives) its supply to my dams.
- 3 (a) The increased flow of water in the Glanagow stream during and after heavy rainfalls now directly discharged into the stream instead of percolating over and through the ground as it did previously. Where is the impact study on volume of water expected off a 25acre (10ha) site. These need to be quantified and the expected discharge rates demonstrated and the effect on the stream.
- 3(b) I question the monitoring of the noise levels (db) upwind of the site taking that the prevailing winds are south, southwest. The use of cork airport weather station over Roche point?.

- I question if the ecology of the area will be altered.
- 3 (c) Attention needs to be given to "worst case" potential impacts (i.e.) if there were diesel spills, if there were problems with chemicals off loading to tanks. Fire flow should be stated (wcs) worst case scenario.
- 3(d) soil sample leach ate samples. Have these samples been accessed by independent bodies and how often sampled for and results available.
- 3(e) Residual impact on the Glanagow stream and whitebay bathing beach. Outlet flow monitoring and sampling need to be put in place.
- 4(a) Has occupational exposure limits (OEL'S) such as hydrogen sulphite 10ppm exposure limits been looked at in detail ref. employees, local land owners or the general public.
- 4(b) I question if there has been a site notice erected for the IPPC licence correctly, I do not recall seeing such a notice.
- 4(c) I conclude by submitting that discharge from bord gais (wipp) must be NORTHWARDS in order to ensure protection of the environment.
- Please give your full attention to all my submission so as GLANAGOW water course can be fully protected.

James Stafford
Enclosures (5)

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15 August 2008

Re: Mr. James Stafford,
Roches Point
Whitegate,
Co. Cork



To whom it may concern:

As Teagasc Horticultural advisor to James Stafford Roches Point Whitegate, I would like to make the following points:

James grows intensive mixed field vegetables and potatoes at his farm in Roches Point.

His soils are light, free draining mineral loam in nature, which are ideally suited to early and late season production for which he had become specialist in over a long number of years.

During the late spring, summer and more recently even in autumn, the particular soil type is subject to drying out. This risk is increased due to his land aspect, elevation and exposure from the sea. Given his range of crops and particular cropping practice and the desired quality requirement by his customers, his irrigation system is absolutely essential to the functioning and ultimate profitability of his business. James has invested heavily in all aspects of his horticultural business over the years including in particular sophisticated high tech equipment for irrigation. The availability of a local source of water has allowed him to continue and specialise in production and he has been using the water from the Glenagow stream since the early 1990s. Without the latter he could not continue in vegetable and potato production.

The implications of climate change to farming practice are well documented and with drier seasons particularly spring and summer predicted the use of irrigation will become even more critical to specialist production such as in James's case.

James Stafford is a highly respected and reputable producer and grows to the Bord Bia Quality Assurance standards which sets a requirement for high standard quality produce with water as one of the key quality production factors.

I think that it is critically important to local areas and communities that people such as James Stafford and his family are able to continue farming & growing profitably in the future.

Should you wish to discuss any of the above in greater detail, feel free to contact me at anytime.

With kind regards,

Your sincerely,

Andy Whelton
Horticultural Adviser