

Dorota Richards

Sub. No. 16

Subject: FW: New submission entered for Reg no: W0294-01. (Reference Number: W0294-01-170222074851)
Attachments: Rocks Valley Submission.doc
Importance: High

From: Sr Miriam Lucas [mailto:]
Sent: 22 February 2017 19:49
To: Licensing Staff
Subject: New submission entered for Reg no: W0294-01. (Reference Number: W0294-01-170222074851)
Importance: High

Title: Ms
First Name: Sr Miriam
SurName: Lucas
Organisation Name: Luisne Centre for Spirituality
Address Line 1: Darraghville
Address Line 2: Main Street
Address Line 3: Kilcoole
County: Wicklow
Post Code: A63 W089
Email: [redacted]

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

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

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

1. LEGALITIES

The stream flowing through 'The Rocks' is part of the catchment for the Murrough. The WCC turned down a previous proposal for the site (Ref 9635/98) on the grounds that

'the development would be contrary to the proper planning and development of the area as it would damage a local natural habitat and because the stream on site is within the Murrough catchment. The development would increase the risk of pollution to the Murrough. . . .'

The Proposed Priestnewtown LAP (Rocks Valley landfill) is one, therefore, that has the potential to impact on the Murrough Wetlands SAC and the Kilcoole Marshes SPA, and so, in accordance with the Habitats Directive this plan should be screened to establish if it will have an impact on these designated sites (if this has not already been done) and, if it does, an appropriate assessment is required of the implications for the sites in view of the sites' conservation objectives. If the assessment shows a negative impact on the sites (as seems to be obvious from the quote above) then the plan should only be carried out for reasons of overriding public interest as detailed in Art 6.4 of the Habitats Directive. Where a priority habitat is present the plan or project should only be carried out for reasons relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of public interest. The appropriate screening assessment may be a separate document or form part of the SEA as per the EU Commission guidelines entitled "Assessment of plans and projects significantly affecting Natura 2000 sites; Methodological guidance on the provisions of Article 6(3) and (4) of the habitats Directive 92/43/EEC". Should a decision be taken to carry out an SEA the DoEHLG will be pleased to provide further advice on the contents of the Environmental Report at the Scoping Stage.

HAS THIS BEEN DONE? There was no mention of this in the 6 steps outlined in the original information flyer from WCC!

Finally, the current proposal has even greater impact potential than the previous ones and the situation with regard to the Murrough and the Kilcoole Marshes has not changed.

2. TRAFFIC and OTHER DISRUPTIONS

- a) The proposed works on the Rocks Valley involving large trucks carrying huge weights of spoil will cause severe traffic disruption on the main road into Kilcoole (R761), not to speak of the smaller road involved (L5542). There are minimal pedestrian paths on the latter and there are many children on the Farrankelly housing estate who will have to make their way to school during the landfill work period. Even a temporary stoppage of traffic on the main Kilcoole road (R761)- for example, when hedge cutting is in progress - currently causes big delays and backups due to the great increase in the population of Kilcoole in recent times (even since 2001 when a lesser landfill of the same valley was proposed and rejected).

HAS AN INDEPENDENT TRAFFIC SURVEY BEEN UNDERTAKEN ON PROJECTED TRAFFIC FLOWS ARISING FROM THE DEVELOPMENT?

- b) Tonnes of spoil coming into the site per day will mean that the local roadways will be damaged and dirtied (especially when there is rain) over a period of 18 months. Road accidents will be almost inevitable.

Similar concerns about traffic led to the rejection by WCC of a previous application to infill the Rocks Valley (Ref 9635/98). The traffic flow has greatly increased in the meantime.

- c) The NOISE and DUST created by the truck movements during the landfill will seriously injure the amenities and depreciate the value of the properties in the vicinity. WCC itself turned down the proposal for the eastern side of the valley on these grounds in the past (Ref 9635/98). The land fill period for the present proposal will last 18 months at least!!

This will cause serious implications for the Luisne Centre for Spirituality which currently is a haven of peace and calm for many people (up to 1000 attendees per year) and the centre's programmes are to be developed further to include programmes for the corporate sector.

Our main catchment area covers Dublin to Wicklow. At the time this proposed work will start we will be involved in a serious expansion stage of our programmes and are therefore concerned about the impact on our work.

There are other serious social impacts on the community which have not been explored or documented.

3. DRAINAGE

The Rocks Valley is a glacial melt water channel carved out by water flowing from the retreating Ice Age 10,000 years ago. Since then this valley has been vital to the drainage of surrounding lands. The landfill in this valley will disrupt the natural flow of the drainage of the area. The houses surrounding the landfill site are currently served by septic tanks – including the Luisne site. WCC has refused planning permission in the past on the grounds that the water table is too high and saturation point has been reached. The impact of 280,000 tonnes of spoil on the percolation of the current septic tanks is likely to have major health and safety implications for current landowners.

The fields bordering the Rocks Valley and the cottage gardens in Priestnewtown contain many springs, particularly in winter months. The change in hydrology brought about by the landfill will result in extra flooding. Slope protection measures - particularly if there is an impervious bank next to the stream - and piped drainage will hardly suffice.

4. ALTERNATIVE SITES

The WCC was furnished with alternatives for dumping the spoil. We were promised an explanation for a rejection (if that was the decision) of ECT Sand and Gravel, Redcross, Co Wicklow – a licensed quarry with which WCC has done business in the past and which was willing to take the spoil - but did not receive such. There seems to be a stubborn refusal by WCC to seriously look at viable alternatives.

Where is the logic in destroying an ancient natural eco system which is part of only 3% of natural habitat left on the entire island of Ireland? We should protect and preserve this intact as it is, a 'local natural habitat' (Cf WCC statement at the start of this document)

We hope that this submission of objection will help you come to the decision to reject the proposed works at the Rocks Valley.

With every good wish,

Sr Miriam

On behalf of The Luisne Centre for Spirituality BOM

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

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