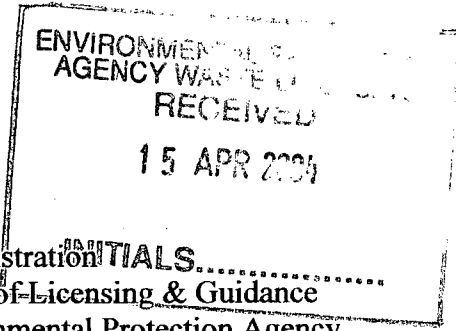


Sub 6

Nanaimo
Newtown
Donard
Co Wicklow

04/04/04



Administration INITIALS.....
Office of Licensing & Guidance
Environmental Protection Agency
Headquarters
P O Box 3000
Johnstown Castle Estate
County Wexford

204-1

**Re: Waste Licence Application by
Brownfield Restoration Ireland Ltd at
Whitestown Lower, Co Wicklow**

Dear Sir or Madam:

As a long time resident in the area referred to above, I wish to formally object to the proposals by Brownfield in relation to their newly acquired illegal dump at Whitestown.

I am addressing the non-technical summary of Brownfield's Environmental Impact Statement submitted to the agency as follows:

Mrs and Mrs Stokes's 20 years in land development and Brownfield's incorporation within the past year in no way qualifies them to properly manage the operation they propose.

The statement (Vol 1, page 3 "A fully engineered landfill") intimates that the landfill aspect of the operation is in keeping with European and Wicklow County Council objectives. This is not so. I have been informed by letter dated 22 December 2003 from Wicklow County Council that the "County Development Plan makes no provision for a landfill at this location, not does the Council's Waste Management Plan."

Cultural Heritage: The area has always been pastoral, scenic, peaceful, quiet. The businesses traditionally and currently carried on have evolved as a result of the nature of the area - farming (including organic farming), a highly successful retreat centre, a similarly successful tourist caravan park, furniture making from locally sourced wood. The creation of a waste management facility at Whitestown would destroy this heritage.

Traffic: The N81 has been host to numerous traffic accidents in recent years, some resulting in death. The volume of traffic, with Dublin commuters from as far away as Carlow, Rathvilly and Baltinglass, is very heavy. Movement of trucks to and from the site can only result in the same hardship, hazards, danger and obstruction experienced in the Blessington to Dublin stretch of the road, caused by gravel trucks.

Noise: As stated earlier, this is a quiet, peaceful area. The sound of one truck reversing in this site can be heard at my house. Increased traffic volume and use of plant during construction and operation of the facility, as described in the application, would be intolerable for me and my family.

Landscape: This is a hilly rural neighbourhood, with streams and a river running through, and fields divided by trees and bushes native to the locality. The houses and businesses are unobtrusive and blend in with the surroundings, as required by their respective planning permissions. The proposed facility would be a blight on the landscape, akin to a set from a "Mad Max" movie. It is proposed that after completion (page 30, 2.14, Facility Decommissioning and Restoration Scheme Vol 1 of EIS) various works would be carried out to restore the site. In this connection I would draw the Agency's attention to the granting of permission for the operation of a gravel pit at the site in 1978 (Vol II Appendix 2 of EIS). Conditions attaching to this permission included 4(b) "scheme for the landscaping and reinstatement of the land" 4(c) "security by way of a bond or similar guarantee for the satisfactory composition of the reinstatement works necessary to rehabilitate the site when quarrying has ceased." In view of the current application it is obvious that rather than restoring the site, a further desecration is proposed. It is obvious from this, and the appropriate Authority's difficulty in enforcing planning conditions, that BRI's proposal in respect of reinstatement must be viewed with cynicism. This site is currently the subject of legal proceedings, yet on Saturday the 20th March last there were trucks operating between it and another quarry across the road

Page 16 of Section 3 of the EIS states "a field investigation of houses, farms and businesses surrounding the site was undertaken on the 22nd and 23rd of January 2004" and from this it is deduced that the site is not visible from my house in Newtown. I have no memory of anyone coming to my house on such an investigation and am incensed to think that these people, whoever they are, have been snooping around my house unbeknownst to me. This amounts to trespass.

BRI have referred (Page 24, Section 3 EIS) to an Invitation for Public Comment which they state "was circulated to 37 premises in the vicinity". They state that they got 6 responses. I enclose a copy of the invitation, together with a copy of my response, which I made to Wicklow County Council, the Council in my view being the appropriate body for such a response.

The site is an illegal dump with criminal and civil proceedings in progress. The waste materials were brought in from outside the area and must be removed at the expense of those who profited from the illegal activities which have gone on there over the years. Those who recently acquired the site have acquired the responsibilities that go with it, and I am informed by Wicklow County Council that they have instructed their Senior Counsel to join the new owners in all legal proceedings. The fact that illegal dumping has gone on at the site over the years indicates that there are no effective measures in place to monitor the proposed facility. **Granting a waste management licence for this site creates a precedence for illegal dumping to evolve from de facto to de jure, with the criminal activity being rewarded rather than recompense being extracted.**

I would suggest that, having properly removed the waste on their newly acquired site, the Stokeses do what they do best and have 20 years experience in doing – develop the land and sell it on at a profit, possibly a golf course?

Kindly acknowledge receipt of this letter, and let me know the procedure involved for me to monitor this situation.

Yours truly,



Florence Staunton

Copy to Mr Michael Nicholson, Environmental Services Section, Wicklow
County Council, County Buildings, Wicklow.
Mr Sheehy, County Manager, Wicklow County Council, County
Buildings, Wicklow.
Mr and Mrs Ray and Ann Stokes, 7 Ardilea Downs, Mount Anville
Road, Dublin 14.

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Newtown
Donard
Co Wicklow

27 February 2004

Mr Michael Nicholson
Environmental Services Section
Wicklow County Council
County Buildings
Wicklow

Re: Illegal landfill at Whitestown

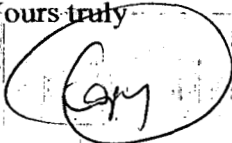
Dear Mr Nicholson,

Further to your letter of 22 December last, in reply to mine and for which I thank you, I enclose a copy of a notice I received from Brownfield Restoration with an address at a PO Box in Naas.

What Brownfield are proposing is unacceptable. Nothing less than the complete and proper removal of all waste from the illegal dump at Whitestown can be tolerated. For Brownfield to "remediate" the site and turn it into an official dump is not an option. We cannot continue to allow individuals and businesses to desecrate our county for their own profit.

I would refer you to the third paragraph of section 2 of your letter in which you state "The County Development Plan makes no provision for a landfill at this location, nor does the Council's Waste Management Plan."

Yours truly



Florence Staunton

Copy to County Manager, Wicklow County Council
Copy to Tommy Cullen, Councillor, Wicklow County Council

Proposed Rehabilitation and Restoration of O' Reilly's Pit, Whitestown Lower, Co. Wicklow

Invitation for Public Comment

To Whom It May Concern:

Brownfield Restoration (Ire.) Ltd. are proposing to rehabilitate and restore a disused 14.6 ha site, known as O' Reilly's Pit, at Whitestown Lower, Co. Wicklow. A number of activities will be carried out during the course of the restoration programme as follows:

- Development of site infrastructure i.e. roads, drainage systems, buildings and offices
- Excavation and processing of all wastes previously deposited at the site
- Processing and treating wastes, using appropriate technology, including household, commercial, industrial, and construction/demolition wastes
- Depositing the residues of the waste treatment processes in a fully engineered waste management facility on site
- Restoring the land to a greenfield, as it was prior to gravel extraction and waste disposal, within a 10 year period

The extent of the proposed lands for which a Waste Licence Application and Planning Application will be lodged, is outlined on the attached drawing.

Measures to Minimise Environmental Impact

- All elements of the development will meet the stringent requirements of the Environmental Protection Agency (EPA) in regard to design, operation and monitoring of waste management facilities.
- A full landscaping programme including planting and screening berms will be implemented throughout the restoration process.

Environmental Benefits of Proposed Activities

- The current environmental risks associated with previously deposited wastes on the site will be eliminated
- A disused visually unappealing site will be removed from the landscape

As part of the planning and waste licensing processes, you are invited to submit your comments regarding the proposed development outlined above. Further details on the proposed development and an Environmental Impact Statement will be available for viewing at the offices of the EPA or Wicklow County Council in due course.

Please submit your comments by post before 5 March 2004 to the following address:

**Brownfield Restoration (Ire.) Ltd.,
P.O. Box 719,
Naas,
Co. Kildare**