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Co. Dublin
31/8/06
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To. 12/19/06
Dr. Pádraig Hooker,
Director of the Office of Licensing & Guidance
E.P.A.
Johnstown Castle Estate
Co. Wexford.

Dear Dr. Hooker,
This personal letter to you is
by way of complaint about the manner in
which Fingal County Council Environmental
Department and RPSMCOS have conducted
the site selection process, planning application
to An Bord Pleanála, and application for
a licence to the EPA regarding a proposed
landfill at the Merritt, Fingal Co. Dublin.
I will be as brief as possible, but
these matters will be taken up in detail with
your licensing section and An Bord Pleanála
at an oral hearing.

• During the lengthy site selection
process the location of the proposed 'site B'
was given as the townland of Tooman,
and consistently so named! It was
only after the site selection process was
finalized and a map of the chosen site

produced for the first time that it was realized by the public that the townland in question was in fact not Tooman but the adjoining townland of Nerrit in its entirety.

Thus the public were seriously misled all through the site selection process.

- The Nerrit site was allocated the lowest rating in terms of archaeological potential of all investigated sites. Having recently completed an M.Phil. in Early Irish at Trinity College and taken the subject of Celtic assembly sites as a thesis, I was aware of the importance of the placename Nerrit. I mentioned its potential importance in a book launched by Fingal County Council Library for the millennium, and also in numerous local newspaper articles. Thus Fingal officials were aware of the archaeological potential of the site since circa 2000, but it was disregarded.

- In the EIS Non-Technical Summary and the non-technical summary of the application to the EPA the statement is made that underlying gravel beds lie outside of the landfill footprint. This is a ~~re~~ misrepresentation of the facts. It is abundantly clear from the EIS Technical Appendices that the proposed site is underlain by an extensive gravel aquifer that connects with the Public Water Supply in the form of the Ring and overlies the locally important aquifer in the underlying greenrock.

Again a misrepresentation of a critical issue.

- An important borehole water level located on the groundwater and surface water divide by the G.S.I. was omitted during the computer modelling process in the EIS. This omission has resulted in a false location of the groundwater divide, placing it between the proposed site and the Public Water Supply. In fact the GSI report on the Bog of Rin places this divide directly in line with the proposed dump.
- The EIS has misrepresented the importance of private wells down gradient of the dump site in a northern direction. These wells are extensive in number, highly productive (circa 1000 m³/day) and are primarily used by the local Horticultural Industry i.e. they are part of the food chain.
- The EIS has misrepresented the importance of the aquifer on which the proposed dump is to be located as a potential source of clean potable water for public use. The size of the aquifer in the northern direction is in excess of 100 km² and is clearly a potential future public water supply. The location of a dump in the centre of this aquifer will essentially sterilize the whole area for either safe Horticultural or public water supply use.

- Fingal County Council have already purchased one large farm for a reputedly large sum in the district, in advance of any permission being granted for the proposed development. This action has resulted in the false expectation that other landowners and households in the area affected will be similarly handsomely rewarded. This is clearly not the case.

All of the above is highly disturbing, particularly in view of the recent scandals surrounding the Public Authorities in the Dublin Region, and many people are distressed.

This is not a matter of "not in my back yard" to me personally, as I live in Rush. However I have, as a resident of North County Dublin, been witness to the most awful abuse of the planning system by the Local Authority in the past, and I am seriously concerned about the integrity of this application.

Yours truly

Patrick Boyle, B.E.