

Sub (58)

ENVIRONMENTAL PROTECTION  
AGENCY  
15 NOV 2006

Walshestown,  
Lusk,  
Co. Dublin.

Re: Proposed Tooman/Nevitt Landfill Development.

10 November 2006.

Dear Sir/Madam,

I wish to bring to your attention the horrific environmental and human impact to County Fingal, and especially to Lusk Village, if you allow this proposed development to proceed. It is your solemn duty, as protectorate of our nation's countryside and environs, to ensure that developments such as landfills are located where they have minimum impact to the environment.

Taking into consideration the vast enormity of this proposed development, i.e. the biggest landfill site in Western Europe, it is obvious that there will be an odour/smoke plume of some considerable size. The EIS refers to an odour plume and the dispersal of this plume, however, the EIS optimistically and naively predicts this plume will rise vertically above and conveniently within the confines of the landfill boundaries. This is nothing less than pure fantasy. I would go so far as to claim that there is not an active landfill facility in the entire world where this has been achieved. No cognisance to the effect of wind was entertained by this "comprehensive" EIS. It is inevitable that this plume will be visible throughout Dublin City, North County, Howth, Malahide, Swords, Rush, Skerries, especially Lusk, etc, as a result of its siting at an elevation of approx 200 feet above sea level on the side of the first hill north of Dublin. It is also adjacent the M50, the main North/South thoroughfare from Dublin to Belfast. (The EIS conveniently omitted to show the location of this artery when plotting expected odour dispersal area). The odour from this facility will be the first welcoming sign of the metropolis of Dublin for tourists and visitors alike. Also adjacent is an undeveloped archeological site dating from early Christian times. Known as the "Chapel Bank", it is planned to develop this site in the future as a tourist attraction highlighting our long cultural history. An odious odour would not be complimentary!! These facts alone would preclude this site if local decision-makers employed a broad-minded, "big picture" approach when selecting the location.

The site lies approx 1km North West of Hedgestown Primary School (54 pupils and increasing) and a mere 4km NW of Lusk village square... With the prevailing winds predominantly Westerly, the odour/smoke plume will drift directly over the village. The resultant conditions in the village and surrounding areas of high-density population will become absolutely intolerable. Depending on wind direction and velocity, this swathe of real estate includes Balbriggan all the way south along the coast to Malahide, Swords and North Dublin City. What does this plume consist of??? Smoke, fumes, chemicals from illegally dumped paints etc released due to spontaneous combustion, oxidants, carcinogens, methane from decomposing organic matter AND chemical agents sprayed by management in a futile effort to control insect population. The list is unending and more frightening, unknown. Apart from the obnoxious, repugnant odours, there is a colossal Health and Safety issue here, especially regarding the pupils of Hedgestown School at a mere 1000 metres distance. To make matters worse for the pupils, their new playing field is to be located 500 metres from this landfill. This will ensure they will take really deep lungfulls of this unhealthy air when training and playing sports.

The effects of atmospheric temperature inversions on the plume dispersal will certainly aggravate the situation. The air mass will be forced to remain virtually on the ground and will roll down the hill southwards across the M50 due to orographic effect, enveloping all before it.

The effect of Land/Sea breezes in the evenings (the site lies approx 8km from Rush strand) will further add to the dispersal of this toxic plume over populated areas between the site and the coastline.

Fingal County Council have, to date, made no effort to inform the local community of the existence of even a risk of odour and/or fallout contamination in the area. This is grossly inept at best, and borders on criminal negligence. The EIS they commissioned is flawed, biased and totally inaccurate. It contains insufficient information regarding the long-term impact on the environment, ground water, air pollution, population, horticulture industry, etc.

The Council have ignored completely the effect on the population, the flora, the fauna, the horticulture produce (50% of the nations output is produced in this immediate area) and concentrated solely on the short-term financial value of the development to the Councils coffers. A CWEP survey claims Ireland has enough landfill capacity to cater for the next 20 years. They are not serving the best interest of Fingal community.

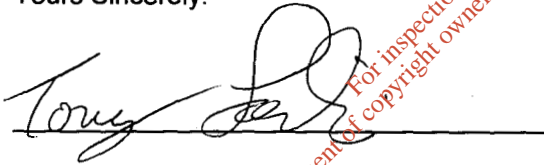
**FOR WHAT DIED THE SONS OF ROISIN? WAS IT GREED?**

I have been in touch with residents close to Inagh Waste Management Facility. This is a new modern engineered waste management facility some miles from Ennis in county Clare. It is assumed that this facility is a smaller version of what is planned for the Nevitt. An EIS carried out prior to development has proved to be flawed. There is a permanent, constant odour discernable to a distance in excess of 3km from the site. This envelops a section of the only tourist road from Ennis to West Clare. For some strange reason, the facility is unable to contain this odour within the confines of the boundary as is promised in our modern engineered facility proposed for the Nevitt. This odour is then further displaced by the prevailing wind over a much wider area. As you know, you have issued numerous "Letters of Non-Compliance" to Clare County Council. In excess of 100, we believe. To no avail, we believe. We believe that Clare County Council has a severe, and to date, unsolved problem disposing of leachate. We have no reason to believe that this scenario will not repeat itself in County Fingal, but on a much grander scale of course.

In conclusion, we besiege you to deny permission to dispose of waste where such an activity has an enormous detrimental impact on the environment and local population. We besiege you to insist that Fingal County Council adhere to EU guidelines for the locating of such facilities. Ireland does not need the extra landfill capacity as is identified by the CWEP survey. We besiege you to insist that Fingal County Council commission an impartial, comprehensive EIS with proper regard to air pollution, ground water pollution, population impact, etc.

Please remember that the long-term irrevocable damage the environment will sustain will be passed on to our children, to their children, and to their children's children etc. Is this the legacy we wish to leave? I would hope not.

Yours Sincerely,



Tony Larkin

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