

OH Doc No: 32

Rec'd From: Dr. Brendan
Quayle
Date Rec'd: 10/31/08,
15.41 P.M.

Brendan Quayle Consultancy
The Studio
Laxey Cottage
Shincliffe Village
Durham City
DH1 2NN
Tel: 44 (0) 191 386 2167
Fax: 44 (0) 191 383 1434
Email brendanq@tiscali.co.uk

Mr. Des Johnson
C/o Siobhan White
Executive Officer
An Bord Pleanala
64 Sraid Maoilbhríde
Baile Atha Claith 1.

Ref: 06F.EL.2051

13th October 2006

Email: bord@pleanala.ie

Dear Mr Johnson

Re Proposed Landfill at Tooman/Nevitt, North County Dublin – Evidence for Oral Testimony and Written Submission.

I am writing at the behest of several local individuals affected directly and indirectly by the above proposals and from whom the Bord will already have received objections.

Firstly, I should explain my background and expertise. My father, Michael Quayle, is Eire born, an Eire Citizen and formerly resident in North Dublin. Members of my family still live within the area affected by the development. I am an international environmental consultant and anthropologist. I am known principally for: my environmental and media work over fifteen years with the ecological campaigner Professor David Bellamy; my seminal involvement in scoping the first EIS's within the UK; and for developing early conceptual models for the implementation of sustainability in practice for a variety of UK government and non-government bodies in the 1980's and 1990's. Recently I moved into private practice as a freelance consultant but have been continuing seminal work on Teesside for ICI and its successor bodies on a series of reclamation projects involving ecological mitigation leading to the re-creation of derelict industrial land into marshland nature reserves. One of these involves one of the largest and longest running industrial landfill projects in the region, at Cowpen Bewley near Billingham.

I am generally familiar with the technologies proposed for landfills to meet EC Directives and UK planning guidance and the scope and schedules of the works required to be carried out and have some experience in dealing with reclamation sites and activities. I am not an expert in landfill engineering however and for comments below arising from

the latter I sought the advice of my colleague Iain MacDonald of the firm CarlBro, with whom I am working on Cowpen Bewley, and a firm rapidly becoming in the view of many, the pre-eminent consultancy in this area within the UK - if not elsewhere. I know and have also worked alongside RPS in the past, the firm that carried out the EIS for the above site, but have not sought to involve them in any of my projects for over 20 years.

The application details groundwater risk as low. But in the documents available to us we have not seen any numerical modeling if any has been done. There also appears to be no analysis on the effect on agricultural abstraction which I understand to be significant in this area. There appears to be no contingency plan for the effect on agricultural holdings in the area around the landfill should there be a leakage of landfill runoff – the leachate that is created when landfill materials compose and settle. If leachate from the proposed landfill were to enter the groundwater this could potentially contaminate holdings and render agricultural activities in the locality of the landfill economically and environmentally un-sustainable.

The application has not majored on how the site will be operated (there are for example no details given of operational controls such as birds litter and vermin) and given that rigorous operational management is a significant component of leachate management during the landfill process, we are concerned that there is insufficient planning set out here to ensure rigorous procedures are in place to deal with leakages and to prevent contamination of the groundwater and surface water supplies critical to food production and the local environmental and ecological equilibrium.

In general, considering the vital economic importance of this area as the “breadbasket” of North Dublin, and the increased requirement of both government and public for clean, healthy non-contaminated food products, the introduction of a major landfill into this part of the county, verges on the irresponsible – no matter how well operated and managed. A “breadbasket” is hardly the most appropriate location for a pile of rotting rubbish and compressed poisons that will be fermenting slowly and poisonously well into the foreseeable future.

From the proposals it would also appear that the landform which will end up on site at the conclusion of landfill activities will be a traditional dome. The application is not clear if the restoration contours are pre or post settlement (pre settlement could add 20 – 25% to the height of the landfill). Either way, the penultimate form will not be in keeping with the surroundings, and risks looking significantly out of place. The height of the proposed landfill is significantly above the surrounding environs and will break the skyline from certain views. No detailed modeling of landscape finish options appears to have been done (from the information available to me) and without this it is difficult to evaluate the ultimate impact upon the landscape and scenic environment of this attractive area of green space and urban edge green lung. Re-use of landfill for agricultural purposes, as with the argument above, will be inappropriate, given the risks to production qualities should something go wrong during and after settlement processes.

Questions arise also on the void needed and types of waste involved. 11M tones seem high given that thermal treatment and recycling is proposed. The volume of construction and demolition waste is very high compared with the UK, particularly as this waste

stream is normally one of the first to be recycled. Equally, the application suggests that there will be limited household waste but at the same time predicts very high gas yield – this does not stack up.

All these considerations and queries invite me to question altogether the appropriateness of a landfill in this area, the type of landfill proposed and the efficacy of the operations and risk management procedures involved. The philosophy and practice of sustainability in this area of human activity requires responsible authorities to: recycle before dumping; to invest as a priority in waste minimization at source and much earlier in the waste cycle; to deal with environmental problems and wastes where they occur rather than visiting them upon other places and other people; and not to create new environmental problems where there were none before. Taking an open greenfield site and surroundings with a long tradition of agriculture and turning it into a waste tip for urban excess is not a responsible gesture towards sustainability and a duty of environmental care.

All in all, we would hope that the Inspector would request a re-consideration of the Tooman/Nevitt site for the Fingal landfill, on the grounds of its environmental inappropriateness and non-sustainability. At the very least the proposal requires a third-party technical review to assess the voracity of some of the technical arguments put forward so far and to re-assess the appropriateness of the site selection.

Yours sincerely

Dr Brendan Quayle

Cc Iain MacDonald, Carlbro, Seamus Lunney.

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