



Ref: CE04561/NM/EIS

Date: November 24th 2008

Waste Licensing Unit
Environmental Protection Agency
Johnston Castle
Wexford
Co. Wexford

To Whom It May Concern:

Additional Information – Amendment to the Environmental Impact Statement for Kilmartin, Coynes Cross, Newcastle, Co. Wicklow

Buchpa Ltd. applied to Wicklow County Council in April 2008 for planning permission (file # 08/557) for the restoration of lands comprising the infilling and land raise of a deep valley approximately 23 ha in size with clean inert clays, soils and stones, temporary installation of a site office, access road, storage container, wheel cleaner, oil bund, parking area, waste inspection bays, waste quarantine bay, septic tank, percolation area, silt trap, oil interceptor, soak pit, drainage and settlement ponds for their site at Kilmartin, Coynes Cross, Newcastle, Co. Wicklow. On June 20th 2008, Buchpa Ltd lodged a planning appeal application to An Bord Pleanala. A decision is due January 15th 2009.

The original Environmental Impact Statement which was submitted as part of the planning application is attached as part of the Waste Licence Application to the Environmental Protection Agency. Changes to the development were made as part of the An Bord Pleanala (ABP) appeal process. As the EIS has already been submitted to a public body, the following changes are noted as amendments. A copy of the report submitted as a planning appeal to ABP is attached in *Section 8 Planning Information* of the Environmental Impact Statement.



Please find a summary of changes listed below, not made to the original EIS, but made to the development as part of the planning appeal process and reflected in the waste licence application.

Site Selection Exercise. As part of the planning appeal process, a site selection exercise was undertaken to verify the site located at Kilmartin, Coynes Cross, Newcastle was the most suitable site for the proposed development. The proposed catchment area of the site was defined as East County Wicklow and including south Dublin and north Wexford. In the site selection study, the east county was therefore considered. This would not rule out the possibility of accepting materials from the west of the county though the distances involved may prove an economic barrier to potential clients. The site selection study is based on a series of exclusion zones based on environmental reasons/criteria and is provided in the form of a series of maps generated on Geographic Information Systems (GIS). The maps show the various levels of exclusion criteria on individual maps with the final map showing a composite of all of these layers on one single map that gives a relatively detailed overview of site suitability in the study area. Copies of these maps are presented in *Section 8 Planning Information* of the EIS.

The site selection study shows that there is substantiated assessment to show that the site is superior in environmental terms to any other in the study area (and by extension in the County). While any development of this nature would necessarily encroach on natural land features, the uniqueness of this particular site and its intrinsic natural ameliorative values confirm that it would be the optimum and most sustainable location for such a development and therefore not contrary to but in keeping with the protection of the landscape of Wicklow and to proper planning and sustainable development.

Final Tonnage. The initial tonnages as outlined in the original EIS attached with the Waste Licence Application calculates the void space as estimated at approximately 2.35 million m³ which would represent approximately 4,230,000 tonnes at an estimated rate of 1.8 tonnes per 1m³ of clays and soils. The existing recovery project operating under waste permit (No. 249) will utilise some 58,000 m³ (max. tonnage allowed is 130,000 tonnes) of the void space if it runs its full course.

Taking on board the local authorities concerns in relation to the final tonnages for the site, a revision of the site plans in terms of the proposed final heights and volumes of material to be infilled was undertaken.

These new proposed final contours are shown on the accompanying drawing (Drawing 05374C2_R1) within the Planning Appeal Application (attached in Section 8 of the EIS). These indicate that the proposed final contours have been reduced by approximately 5m over the development area. In order that the fill levels do not exceed the road levels we have redrawn the final contours such that they coincide exactly with the existing natural levels along the western boundary road (Coynes Cross road) in a straight line to the same level on the eastern boundary road. For example, the proposed 50mOD contour starts at the existing natural level of 50mOD on the western boundary road and goes in a straight line across the valley footprint to the existing 50mOD level along the eastern boundary road. The same procedure for the 55mOD contour and for the 60mOD contour and this will be the case for all other contours in between these. In this way the final height of fill will not go above the road level at any point along the road (for both the western and eastern boundary roads). This reduction in height translates into a significant decrease in the overall volumes of waste clays/soils to be brought to the site. It is now calculated that there will be some 1.89million m³ of clays/soils required to complete the operation. This would represent approximately 3,402,000 tonnes at an estimated rate of 1.8 tonnes per 1m³ of clays and soils. Please note that this is the total proposed tonnage for the site although not detailed in the EIS, is expressed in the Waste Licence Application.

The tonnages of materials imported to the site are therefore significantly less than those used in the EIS and will result in a shorter lifespan for the project or a lower rate of importation of materials per year. Therefore the figures, calculations and assessments used in the EIS to assess potential impacts on the environment are an overestimation as there will clearly be a lower level of impact from this proposed development. However, the figures of 2.35 million m³ (4,230,000 tonnes) which are used in all calculations/assessments in the EIS will provide a conservative worst case scenario in terms of potential impacts to the environment.

Noise Survey. The initial noise survey undertaken for the EIS was taken prior to the current waste permit activities on site. An additional noise survey was undertaken in June 2008 during the operational hours of the waste permit. The results from this noise survey were compared to previous noise surveys conducted on site and are presented in Appendix 3 of the An Bord Pleanála Appeal report attached in Section 8 of the EIS.

Further detailed information on the amendments listed above are provided in Section 8 Planning Information of the EIS. Please accept these changes as amendments to the original EIS attached and take them into consideration upon review of the document. Should you have any queries in relation to the above matter, or require further information; please do not hesitate to contact us here at the office.

Yours Sincerely



Natasha Murphy
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On behalf of WYG

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