

Sub no ③

**Ann Kehoe**

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**Subject:** FW: Indaver Ireland Limited

**Importance:** High

**From:** Ken [mailto:kenoheiligh@eircom.net]

**Sent:** 23 June 2012 18:53

**To:** Aoife Loughnane

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Attn: Aoife Loughnane

Submission on Planning Ref. No. 17.PA0026:  
Indaver Ireland Limited, Carranstown, Duleek, Co. Meath

The following is an objection to the proposed plan to introduce the burning of hazardous waste as an addition to that normal found in household waste. While the existing plant was designed to treat 200,000 tonnes per annum the company now alleges that due to operational efficiencies it can treat an additional 20,000 tonnes per annum. The site selection measure for Hazardous Waste Facilities which relates to general hazardous waste suggests that screening criteria should be used to eliminate unsuitable areas.

While Indaver herald their achievements why so soon after starting operations do they wish to grow the tonnage and seek to increase the hours to 24 for waste deliveries. Currently the domestic waste is required to primarily come from the North East Region and that such an ambitious plan would require a significant increase in tonnage to be delivered to the facility from outside the region. The proposed nationwide warehousing maintenance spare part facility is a clear indicator that Indaver is gearing up from a major increase in vehicular traffic numbers.

As a condition of the planning permission granted to Indaver Ireland an annual financial contribution is made to Meath County Council for the provision of environmental improvement. The apparent influence of Indaver on the Community fund grants award is a concern and clear separation in this respect should be established. It appears that the sweetener of an additional €25,000 per annum offered to the local fund is further muddying the waters.

It is not clear from the current planning application what quantity of toxic waste the plant is proposed to treat nor is it stated whether the plant presently treats to the allowable ceiling of 200,000 tonnes imposed by the Planning Board/EIS. The EPA's National Waste Report for 2010 found that household waste in Co. Meath alone fell by 3,600 tonnes compared to the 2009 figure and this is despite an increase in the population. The EPA further states that this reduction in household waste reflects the decrease in personal consumption in the economic downturn. Ireland's municipal waste has decreased by 16% overall since its highest level in 2007. It is obvious that Indaver now want to overturn Condition 3 of the previous permission and are seeking to ignore the National and North East Waste Management Plans.

The EPA which is in charge with the licencing of such facilities in particular the application of eco-toxicity testing to the bottom ash material must subject this facility to more stringent control through licences issued and through substance licence enforcement and facility monitoring.

A centre of gravity model was used when selecting the site which suggested that the waste would be treated as close as possible to where it would be generated.

If the facility is not currently operating at full capacity and the catchment area is extended then the treatment to the ceiling of 220,000 tonnes /annum, including the treatment of hazardous waste, could have a detrimental environmental effect.

It should be noted that Drogheda suffers from higher than normal cancer rates.

The current application also seeks to:

Extend the opening hours for waste acceptance

- This is an addition of 4 ½ hours per day Mon – Fri from 8.00a.m- 6.00pm to 06.00a.m- 20.00p.m. Also an extension to the Saturday opening by 2 Hours which equates to 31% of increase in opening times.

Unrestricted Hours for dispatch

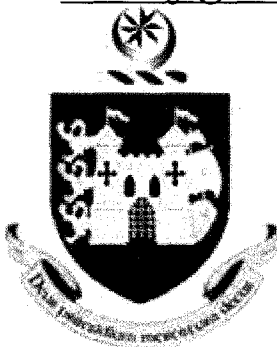
- The reluctance of HGV operators in using the tolled sections of the M1 is evident on a daily basis. With much of the HGV's using the R132 route to access the area. This through traffic is having a negative impact on traffic movement on the internal road network in Drogheda. Also under pressure operators cut across country roads, especially out of hours.

Conditions attached to the parent permission required that certain road improvements be undertaken as part of the development. A short section of the R152 was required to be widened to allow for a right turning lane and de – acceleration lane on the approach to the site access. However the R152, particularly that section between the Cement Works and Drogheda, and Duleek to the N2, can be considered as substandard. Over the years there have been a number of fatal accidents on this road. All other roads in the area are local roads. A considerable amount of traffic, generated by the facility, travels through the main street of Duleek village itself. This village is notorious for traffic jams and delays. Indaver stated that the 2007 permission gave rise to an additional 8 vehicles/hr through Duleek. They further stated that the Meath Development Plan has as an objective to by-pass the village. The R150 / R152 junction is of particular concern. The inclusion of this objective in the Development Plan was a major factor in the 2007 permission being granted. However this expensive east west bypass is now unlikely to become a reality for many years to come. Should funding become available the construction of the Slane bypass would be far higher up the pecking order for construction in Meath.

For the above stated reasons the proposed expansion of the Indaver Plant is premature and should be rejected.

Regards

Cllr. Ken O Héiligh  
43 Ashfield  
Drogheda  
Co. Louth.  
Tel: 041 9837310 (direct line)  
Mobile : 087 2637863  
Email: [kenoheiligh@eircom.net](mailto:kenoheiligh@eircom.net)



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