



Submission

Submitter:	Mr Amanda O'Sullivan
Submission Title:	concern for environment
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Application

Applicant:	Kilsaran Concrete Unlimited Company
Reg. No.:	W0311-01

See below for Submission details.

Attachments are displayed on the following page(s).

Environmental Protection Agency
Johnstown Castle
Co Wexford

18 October 2023

Re: Kilsaran waste licence application for Ballinclare – W0311-01

Expression of concern

Dear Sir/Madam

I have recently become aware that this application has been made to you. I am a local resident and I have grave concerns regarding the granting of a waste licence for this site. As you may be aware An Bord Pleanála recently refused planning permission on the grounds that insufficient evidence was provided that the operation of this site as a land fill and C&D recovery facility would not be detrimental to the environment.

As a private individual, I am not qualified to provide scientific proof of any adverse environmental impact of the intended activities under this licence application, but given that APB found the applicants did not provide sufficient information regarding the potential environmental impact, I would have huge concern for the impact on the local environment and the environment down river of Potters river given that this waterway has the potential to carry contamination from the site downstream to a wider area including a SAC.

The very fact that an application was made with unsatisfactory information is a reason for concern. If Kilsaran did not appear to consider it of enough importance to provide proof that they had sufficiently surveyed the environment and considered the implications on their ability to mitigate against any adverse environment affect, when submitting what was a very important application, it makes one wonder how much weight they attach to environmental issues and how much care they would take to ensure no environmental harm should a licence be granted.

Indeed in their application, the number of staff on the site would appear insufficient to monitor incoming waste to ensure no hazardous waste is included. I believe there have been instances at other landfills where unsuitable waste has not been detected before it has gone into the landfill cells. Given that the Waste Plan encourages redevelopment of brown field sites, the likelihood of the presence of hazardous waste must be higher than from green field sites. Again it is a concern if they do not employ enough staff to ensure every load is adequately screened before offload onsite.

I am also greatly concerned about the size of this proposed landfill. Given the question around sufficient screening of waste, should contamination occur on such a large site, the implications for the environment are magnified by the sheer amount of waste onsite. While I understand the Waste Planning framework favours a smaller number of larger sites over a higher number of small sites, it

seems to me that when an issue arises on a large site, the potential contamination is of such a scale as to cause huge damage to the surrounding environment whereas on a smaller site contamination may be more easily contained and oversight more easily provided.

I understand much of the waste will be located below the water table. This is a concern especially given the unpredictable potential effects of climate change on water levels. Should the proposed liner prove ineffective, the leaching of contaminants into the ground water could affect both the local waterways and the local drinking water supply (which is generally private wells in the surrounding area on this side of the M11). While our water quality is regularly monitored due to the proximity of Ballynagran, this may not be the case for all local residents. If there are substantial changes to the water table due to intensive rainfall over the coming years, is there a possibility that any contamination may be more widespread than currently envisaged and have an adverse health effect as well as adversely affecting local biodiversity.

If the lining is of sufficient quality to contain all waste without leaching out into the surrounding ground, what happens when the rainwater builds up in this massive basin and becomes contaminated by the waste products? It will either be pumped away during the lifetime of the landfill or spill out after the void is filled. Surely such water should not be allowed to flow into the surrounding rivers and streams. Indeed at a time when such efforts are being made to clean up our waterways and farmers are under huge pressure to reduce any pollution from their farm practices, it could not be right to allow potential pollution from landfill to do so.

Has sufficient consideration been given to the existing wildlife which now uses this site as a habitat. I understand that Peregrine Falcons have specific breeding conditions that are found at the quarry site that are not easily replicated in this local area. Before granting a waste licence will a full survey be carried out of all wildlife affected by the activity on site and any detrimental effect on their life cycle. If their habitat is sufficiently disrupted to require a move to another area this may not suffice to give wildlife the conditions needed to protect biodiversity in the local area.

On a separate point, given that you provide the licence to Ballynagran and are aware of its proximity to Ballinclare, could it be considered fair to local residents that two huge facilities should be located so close together. Even if all required environmental protection is in place and no adverse effects have resulted and if there is no overlap in operations, it is surely an unfair imposition on local residents to extend the detrimental impact of large amounts of HGV traffic in the local area and local concern for the environment by possibly another 20 years.

Although traffic management may not come under your remit, the addition of a huge number of HGVs each day into the same area as Ballynagran is also an environmental concern. Given that I believe the Wicklow building programme is near capacity, I assume the majority of waste will come from Dublin-based sites. The environmental impact of transporting waste such a long distance, only then to re-transport back recovered C&D waste at a time when we are all being encouraged to reduce our fossil fuel emissions seems out of line with our emission reduction targets, to say nothing of the detrimental impact on local flora, fauna and humans of huge vehicles causing inevitable damage to verges, road surfaces, habitat and personal safety.

Given the size of the proposed landfill and the potential detrimental effect on the local environment, I would ask that you do not grant a waste licence unless you are sure that every possible

environmental impact has been considered and proved manageable and that sufficient monitoring is guaranteed to ensure no pollution/contamination of the local area and the area downstream of Potters River including the marine area and no disturbance of protected wildlife.

Yours sincerely

Amanda O'Sullivan