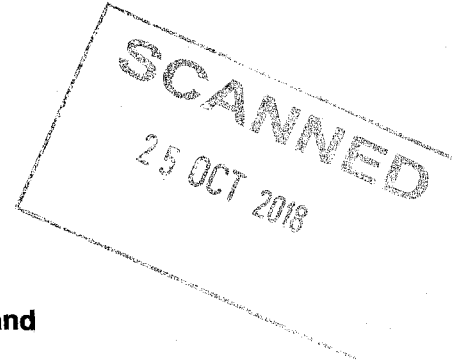
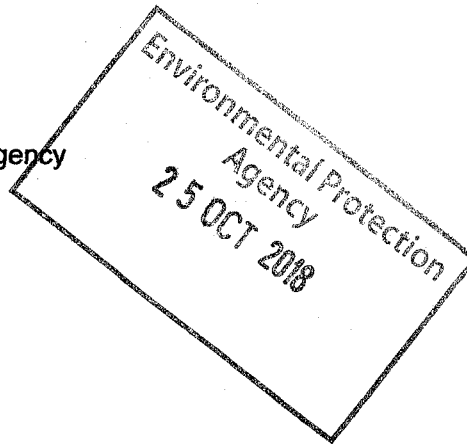


Albert Kerr

Environmental Protection Agency
PO Box 3000
Johnson Castle Estate
Wexford Y35 W821



22nd October 2018

Dear Fiona,
(Dear Sirs,)

Re: **Environmental Licence Application Reference: W0293-01**
Applicant: Roadstone Limited
Application: Restoration of Calary Quarry at Killough Upper and
Glencap Commons Upper, Kilmacanogue, County Wicklow

Dear Sirs,

I wish to formally make a submission in respect of the above Waste Licence application. I am submitting this application as a representative of a group of concerned local activity, adventure and sporting groups who consider that by granting this application a "once and for all" opportunity will be lost to the North Wicklow Community.

I will set out in the following paragraphs the grounds under which I believe that this application should be rejected.

1. Calary Quarry Today

Calary Quarry is today, not an empty "hole in the landscape", needing to be filled up and re-instated. Unlike many quarries that have outlived their economic life, Calary Quarry has, since being abandoned by Roadstone, filled with water and become a scenic lake located at the side of the beautiful Sugar Loaf Mountain. This scenic lake is around 28metres deep with clean clear water. It has the potential to become an ideal all year round public recreational facility to support all kinds of sporting activities in the community. These can include, inter alia:

- Swimming
- Scuba diving
- Body boarding
- Kayaking
- Rock climbing
- Abseiling
- Zip Lining
- Orienteering
- Rafting
- Wind surfing

There is no other facility that could compare with Calary Lake (if suitably developed) within short driving distance of a significant centre of population.

Such a use is not unusual. I attach to this letter a list of other quarry locations in Ireland and UK where flooded quarries have been turned into leisure facilities taking advantage of the deep water and safe surroundings. Such Facilities have been seen to be a boost to tourism and create employment in the local community.

2. Location and Surrounding Land Use

The applicant site is located within a rural landscape which is designated as a "Mountain and Lakeshore Area of Outstanding Natural Beauty" (ML-AONB) within the current Wicklow County Development Plan 2011 – 2017.

There are several listed views and prospects within a 5km radius of Calary Quarry and the Quarry is visible within a number of them.

There are also several Special Areas of Conservation (SAC), Special Protection Areas (SPA) and proposed Natural Heritage Areas (pNHA) within a 5km radius.

I would ask the Environmental Protection Agency to carefully consider whether such a receiving environment is appropriate for a "Waste Recovery Facility" that will have the following environmental impacts on such an important community and tourism setting:

- Approx. 3,300,000 tonnes of waste is to be transported to the site on the R755 Regional Road over a period of 13 years at an average annual rate of approx. 250,000 tonnes. Assuming an average payload per truck of 25 tonnes this will equate to 10,000 trucks per year. Based on a 5 day week and 50 week year this will equate to an average of 40 trucks per day, arriving and leaving. The current number of HGVs on the R755 road to the applicant site appears to be of the order of 40 trucks in each direction. Therefore the operation of this site as a waste recovery facility will effectively double the HGV traffic on the road. This is inappropriate for an area of Outstanding Natural Beauty.
- The noise and dust created by such an activity will irrecoverably interfere with the natural receiving environment

3. Centre of Gravity Analysis

Whilst not an expert in this area, I am led to believe that the establishment of any waste disposal site requires a "Centre of Gravity" analysis. This in effect is necessary to prove that the applicant's assessment of the waste to be dumped in the Applicant Site is in fact available and within appropriate travel time from the location. I would ask the Environmental Protection Agency to carefully consider this matter and ensure that such a Study is carried out. There is, I believe, recent High Court decisions on this subject.

4. Impact on Flora and Fauna

I would ask the Environmental Protection Agency to carefully consider the impact on Flora and Fauna. Whilst it probably can be argued that the applicant site on completion of reinstatement will be compatible with support to the existing flora and fauna, what is unarguable is that for the 13 to 15 years that this will take to achieve may be irreversibly damaging.

By this stage the lake that has formed will undoubtedly have developed its own animal life. There will be frogs and other water insects and life. I would ask the Environmental Protection Agency to carefully ensure that a proper study of such matters is completed.

5. Key Observation

In my view there is one key question to be asked in respect of this application. If the Calary Quarry did not exist and an application for a "Waste Recovery Facility" was submitted to Wicklow County Council for such a Facility – would such an application be granted?

The answer is undoubtedly "No"!

In fact it is clear that no sane thinking entity would apply for such a use in such a location.

Is the Environmental Protection Agency satisfied that the Applicant has carried out a comprehensive review of all similar retired quarries, gravel pits etc in the region and concluded that this particular location best serves the needs of the region for waste disposal?

I do not see such an analysis in the applicant's documentation.

Given the particularly sensitive nature of this location, and assuming that alternatives exist it should be necessary to complete such a study.

Thus, this raises the question of an "Alternative Use Strategy"

6. Alternative Use Strategy

In many legislations, and as part of any planning or licencing application or Environmental Impact Assessment, it is incumbent on the applicant to look at alternative uses for the site.

I accept that the site cannot be left to remain as a disused quarry. However if the choice was for

- a community driven (public/private) Amenity taking advantage of the site as it exists and with no environmental impacts associated with reinstatement or
- the destruction of those same aspects and creation of a waste recovery facility in an area of Outstanding Natural Beauty then

I would ask that the Environmental Protection Agency consider carefully this application.

7. Footnote

I have, on behalf of a group of people who share my view of the amenity potential for the Applicant Site, approached Roadstone with a view to working with a properly funded group to exploit this wonderful amenity. A meeting was convened with Roadstone to establish if there was any interest within Roadstone to accommodate such a development, but I believe that such approach has coincided with this application, and as such was not considered of interest.

Notwithstanding the above, I would wish to share with the Environmental Protection Agency this vision of an amenity that would be commercially impossible to create on a greenfield site and yet as a man-made residual from a quarrying activity could bring pleasure and adventure into the lives of young people in the communities and schools in the region at viable cost.

Yours Faithfully

Albert Kerr





OLD QUARRIES,
PORTROE,
CO. TIPPERARY

PORTROE DIVE CENTRE

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

Delph Dive Centre

HOME OPENING TIMES FACILITIES ATTRACTIONS CONTACT US GUESTBOOK BUDDY CLUB FORUM

THE DELPH...

Home
Opening Times
Facilities
Attractions
Contact us
Guestbook
How to find us
History
Gallery

SERVICES...

Dive Shop
Equipment Servicing
Equipment Hire

Air Fills

COURSES

Trial Dive
Padi Courses
Bscac Courses

How To Find Us

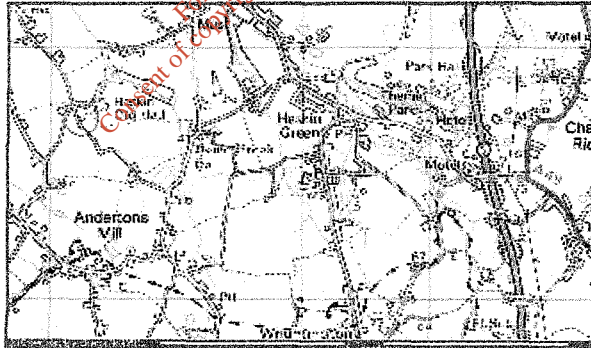
For you budding gurus out there who have GPS, all you need to know is the postcode, which is PR7 5PR. However if like me, I'm sure you are more than aware that technology has a habit of letting you down when you need it most. Alternatively if you're more of a traditional driver who enjoys driving without the aids of such gadgetry. In either case we have put together directions to the delph that should prevent anyone from getting lost.

From The North

Leave M6 at junction 27 and turn right
Take the second right past the hotel (before speed camera)
Take the next right into courage low lane
Carry on for one mile then turn left into halfpenny lane
The delph is on the right

From The South

Leave M6 at junction 27 and turn left
Follow same signs as shown above.



Please be ware that once off the motorway, most of the roads leading to the delph are narrow country roads, which can be occupied with runners, walkers, cyclists and plenty of wildlife, so please take care when driving.

[| Click To Print This Page |](#)



INFOBAR

Water Temperature

- Quarry 10C
- Pool 27-30C

Updated Nov 2008

Equipment hire
available at the delph



Delph News

It's exciting times at the delph; we are in the process of starting our very own buddy club and will be offering boat trips on our new rib.

[» Read More](#)

Delph Development

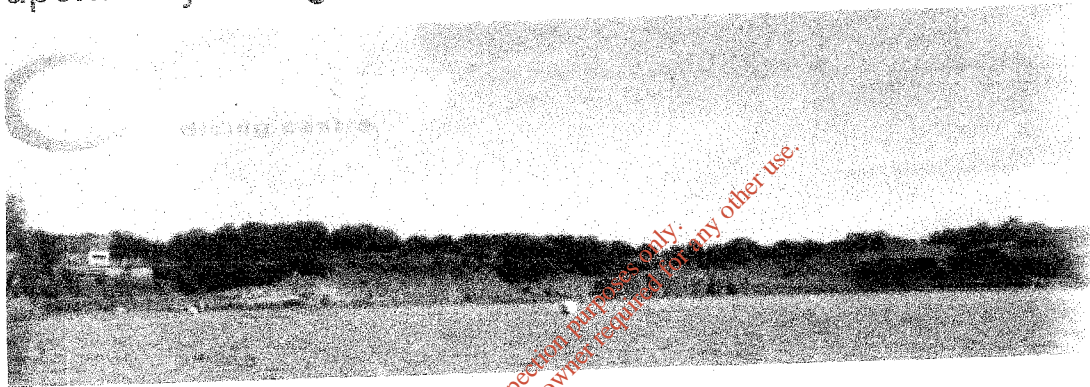
Currently under construction, we are not far off finishing our new training room

[» Read More](#)



Home	News	Facilities *	Gallery	Dive Site	Learn to Dive	Staff
gear Hire	Find Us	Links				

apernwray Diving Centre



The Dive Site is open

for diving and open water swimming

- MONDAYCLOSED
- TUESDAY.....10:00 TO 17:00
- WEDNESDAY.....10:00 TO 17:00
- THURSDAY..... 10:00 TO 17:00
- FRIDAY..... 10:00 TO 17:00
- SATURDAY..... 09:00 TO 17:00
- SUNDAY..... 09:00 TO 17:00

LAST DIVE AT 16:00

always open for the Monday bank holiday

UK

stoney cove diving centre

Search

Alert Mail

Web Images Video News Shopping More

Safe Search On Any License Advanced

Colour
All
Type

Size
All S M L

