



3.8 HUMAN BEINGS AND MATERIAL ASSETS

3.8.1 Introduction

This section of the EIS outlines a brief summary of any potential impacts upon Human Beings and Material Assets as a consequence of the review of Waste Licence W0256-01 for the existing soil recovery facility at Tallagh, Belmullet, Co. Mayo. In undertaking this study, due regard has been had to aspects such as infrastructure and economic activities and recreation and cultural matters in the vicinity of the site, and the impact of the continued restoration of the application site on these factors.

The existing licensed facility, as per licence W0256-01, is a soil recovery facility, which is licensed for a final topographic level of a 1m Land Raise and with the acceptance of 24,900 tonnes per annum of soil and stone and its recovery, by spreading material over the deposition site area, with a consequential benefit for improving the land for agricultural use.

The application for the Review is for the continued operation per the existing waste licence, with no change to the licensed final topographic level of a 1m Land Raise and with the acceptance of up to a maximum of 90,000 tonnes per annum of soil and stone for recovery as described above – this is to allow for the acceptance of the currently available suitable material from a nearby large infrastructural project, which is to provide for material from a well monitored source of incoming soil and stone.

The licence review creates no proposed change to the content, nature, composition or volume of materials intended for recovery by deposition at the site, and the overall tonnage of 265,000 tonnes for which the existing licence was issued remains unaffected. The activity will just take a shorter time span to complete and fully restore to beneficial agricultural use.

The activities carried out under the existing Waste Licence are exempt from Planning Permission, as per the 2009 Waste Licence application. The EPA Technical Committee report dated 27th April 2011 relating to the existing Waste Licence acknowledges the development to be exempt from planning permission.

The letter of 8th May 2012 received from Mayo County Council confirms that the proposed alterations to the scheduling of the materials recovery at the site (i.e. the subject matter of the technical review of the waste licence) does not affect the planning status of the works as exempted development.

It is therefore safe to assume that matters relating to human beings and material assets have been considered by Mayo County Council in making their assertion the subject matter of the technical review of the waste licence does not affect the planning status of the works as exempted development. This is in particular with regards to roads and transportation matters. Notwithstanding this point, this section of the EIS identifies and assesses any potential impacts upon human beings and material assets



3.8.2 Existing Environment

The existing soil recovery facility is located in a sparsely populated rural area with surrounding land uses comprising of sheep farming; peat extraction; GAA pitches; former Mushroom Farm and dispersed one-off housing developments and old farmsteads (see **Photo 3.8.2** and **Figure 3.8.2**). There nearest densely populated area close to the site is Belmullet some 2 ½ km to the south. The site is far removed from the public road from which the site is accessed.



Photo 3.8.2: Aerial Photo of Existing Soil Recovery Site at Tallagh

Agriculture, particularly livestock grazing is a fundamental part of the economy and culture of the local community and this recovery project will further assist in providing productive agricultural land in the area for future generations without having any detrimental impact upon the local environment. In the general vicinity of the site at Tallagh there are many fields which have been reclaimed successfully for agriculture.

It is important to stress that were it not for the forefathers in this area and their hard work on the land, there would be little if any productive grassland in North Mayo suitable for livestock grazing.

The existing licensed soil recovery site operating under WP0256-01 has a total area of 27.22ha; which includes the site access road; the proposed area of deposition (20.48ha); and a proposed buffer zone in the northern section of the site (4.46ha), which separates the area of deposition from the Clooneen River, which flows in an easterly direction, along the northern boundary of the site.

The works already carried out at the existing site and proposed under the existing waste licence and under the technical review are for the purpose of land reclamation to enable the lands to be effectively used for agricultural purposes. The word 'reclamation' implies claiming back from some unsuitable state. The definition might imply an unsuitable state arising from topography, drainage, poor-quality soils, damage to soils, presence of rock or vegetation etc.

- The reclamation works will raise the lands by approximately 1 metre.



In regard to the above factors, it is quite clear that the primary objective in carrying out the work is to improve existing agricultural land. It is our professional opinion that the field unit which it is proposed to fill may be rendered more productive by providing a terrain conducive to improved drainage; we also consider that the field unit itself is of a moderate area in terms of modern agricultural practice, and that the depth of fill and duration of operation are reasonable; we consider therefore that the primary objective of the development to be carried out by the licensee is land reclamation; recovery and not waste disposal.

Figure 3.8.2 shows the general features of the site and surrounding area. The existing soil recovery site which has been in operation since 2006 is located with a typical rugged County Mayo agricultural landscape. Many of the fields in the area have been amalgamated into larger field units and farming is the principal land use in the area, mainly sheep rearing. In addition there is a former Mushroom Farm to the south-east of the site. This consists of plastic tunnels on a hardstanding area for the former growing of mushrooms.

There is evidence locally of peat cutting for domestic use for fuel. There is little if any forestry of tree cover in the area due to the exposed nature of this part of North Mayo.

To the south of the site along the entrance road there is a former Roman Catholic chapel, now derelict and used for sheltering animals. The local GAA club and playing pitches is located to the south-west of the existing site. These pitches were created as a consequence of land improvement works. The club has provided a letter of support for the licence review.

Housing settlement is dispersed with only 1 dwelling within 500 metres of the site boundary, with three others outside 500 metres as shown on **Figure 3.8.2**.

Baseline noise and dust studies and on-going monitoring has been carried out to assess the existing noise and dust levels associated with the operation of the soil recovery facility at Tallagh and how this might have an impact on potential sensitive receptors. These surveys demonstrate that the existing operation is not impacting upon Human Beings in a negative manner and therefore there is no impairment of their amenities or a reduction in property values as a consequence of the existing and proposed site activities.

All the occupants of the closest dwelling houses have been consulted with regards to the review of Waste Licence W0256-01 and all have provided letters of support for the review. Therefore, Lennon Quarries Ltd. have demonstrated that they have the support of the local community with regards to the review of their existing Waste Licence W0256-01.

The soil recovery facility, licensed per licence W0256-01, does not have existing or proposed extraction wells from Groundwater. No groundwater wells were identified in close proximity to the site supplying water for domestic and animal needs. There is therefore no likely impact upon drinking water for Human Beings.

Based on the proposed annual intake of a maximum of 90,000 Tonnes, it is expected that there will be approximately 4,500 truckloads of soil and stone delivered to the site on an annual basis (i.e. a maximum of 90 loads per week). This equates to a maximum of 18 no. truck loads per day. As discussed earlier in this EIS, based on the proposed annual intake of a maximum of 90,000 Tonnes, it is expected that there will be approximately 4,500 truckloads



of soil and stone delivered to the site on an annual basis (i.e. a maximum of 90 truckloads per week). Such a small number of truck movements is not expected to have any effect on traffic in the area of the site.

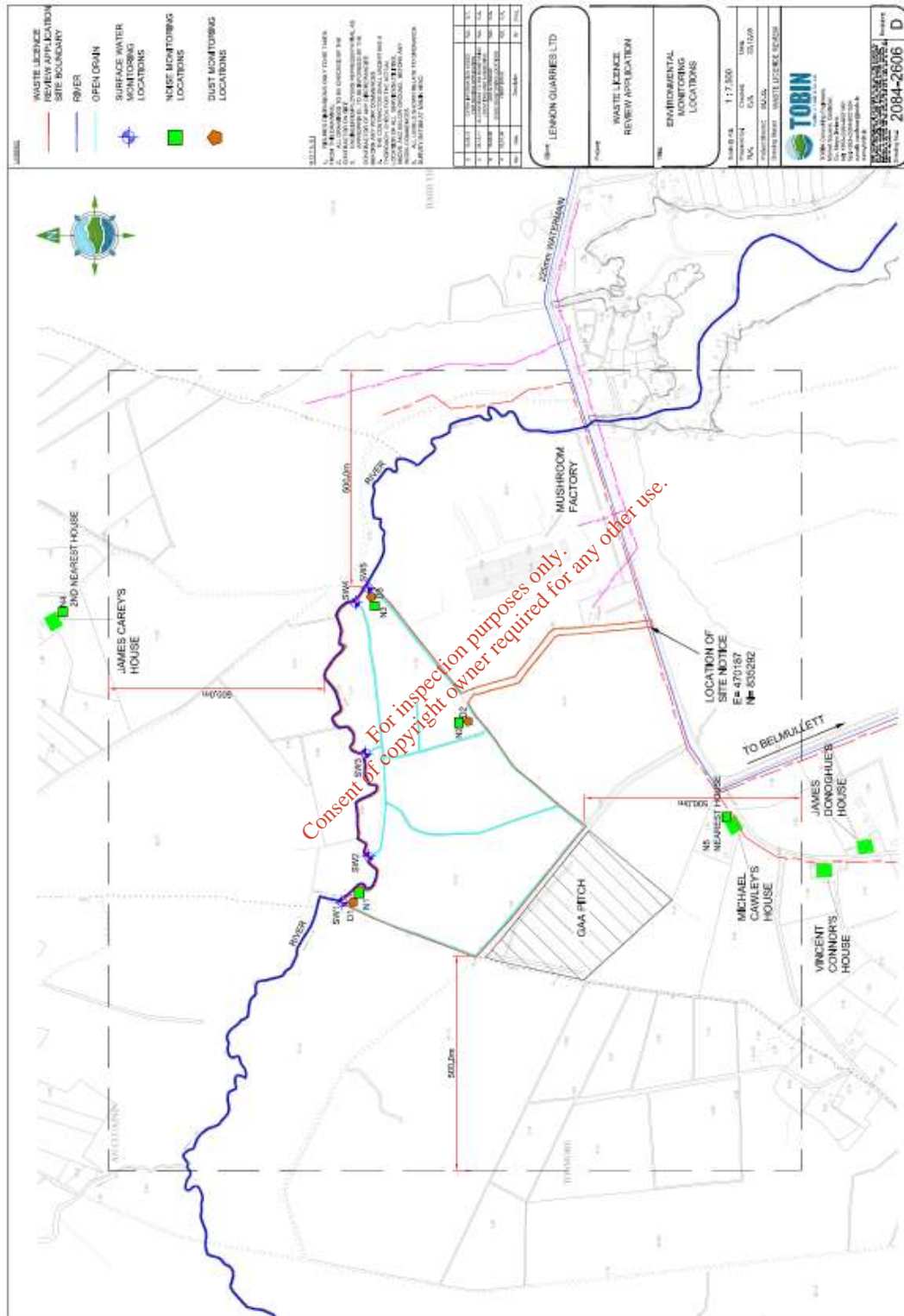


Figure 3.8.2: Map of Site Showing Main Features Relating to Cultural Heritage and Human Beings



A hardcore area (with a surface dressing of clean broken stone) has been developed close to the entrance gate of the deposition site. This allows haulage trucks to enter the site, turn, and deposit their material, along the perimeter of the hardcore area. Haulage trucks do not proceed beyond the hardcore area at the entrance to the deposition site. This avoids the situation of the wheels of the trucks coming in contact with soil deposition area. Minor debris that may be attached to the haulage trucks is expected to fall off during the trucks movement over the hardcore material on the access roadway, before the trucks move offsite onto the Belmullet-Ballyglass main road.

Based on the above, 'Road Cleansing' is not required on the site, or on the surrounding roads and there will be no change in this regard in the application for a Technical Review. The site does not and will not impact upon roads or transportation in a negative manner.

Due to the inert nature of the soil and stone recovered & reclaimed at the site, vermin do not present an environmental nuisance and there will be no change in this regard in the application for a licence review.

The existing authorised Hours of Operation during daylight hours only ensure that site operations and traffic do not cause nuisance to Human Beings. These hours are as follows:

• **Proposed Hours of Operation:**

8.00am to 6.00pm - Monday to Friday
8.00am to 2.00pm - Saturday
Closed - Sundays & Bank Holidays

• **Proposed Hours of Waste Acceptance/Handling:**

8.30am to 5.30pm - Monday to Friday
8.30am to 1.30pm - Saturday
Closed - Sundays & Bank Holidays

The difference between the 'Proposed Hours of Operation' and the 'Proposed Hours of Waste Acceptance/Handling' reflect the time allowed for set-up and clean-up works each day.

Lennon Quarries Ltd., is a local County Mayo owned/operated company, which provides employment to ca. 25 no. people in the Belmullet area. The company is primarily a quarry/rock aggregate provider, with a large quarry located in Glencastle, Bunnahowen, Ballina, County Mayo but this facility maintains additional employment and brings additional money into this area of north-west County Mayo.

The existing soil recovery at Tallagh does not contain, nor is close to, nor abuts any protected archaeological site or monument. The activity will therefore have no impact upon archaeology.

The entrance road abuts a former disused and derelict Roman Catholic Chapel but as this is not in use as a place of worship and the activity does not impact directly upon this building, there will be no impact upon historical buildings.



The landscape where the site is located does not have specific historical, cultural or archaeological significance and does not impact upon the Cultural Heritage of Human Beings.

The site has been up and running for the past ca. 2 years under a Waste Licence W0256-01 and since 2006 under a Waste Permit without any complaints or enforcement issues relating to nuisance to Human Beings or Material Assets as proven by Agency records. Furthermore, the compliance monitoring is all up to date and is all compliant with the license requirements. All in all it is considered that Lennon Quarries Ltd. operate an extremely well run and well-monitored licensed soil recovery facility.

3.8.3 Assessment of Potential Impacts

The potential impacts from the proposal to increase the annual tonnage from 24,900 tonnes to 90,000 tonnes poses no change in the scope of the activity, the nature of the activity or potential emissions from the activity (as presently licensed).

The proposal has therefore no potential negative impacts upon Human Beings or Material Assets but rather the licensee has demonstrated to the Agency that the licence review is supported by the local community as being a positive and pro-active step with environmental gains and benefits. This is because:

- The development sequence will still be to fill the site progressively (as presently licensed).
- The lands are presently marginal agricultural land and will be restored using imported soil and stones to more productive agricultural land thereby having a consequential benefit to agriculture (as presently licensed).
- The exact same proposed activity will occur as licensed i.e. a total of 265,000 tonnes of soil and stones but over a shorter time span (i.e. ca. 2.5 – 3 years). The activity will just take a shorter time span to complete and fully restore to beneficial agricultural use.
- The site survey drawings submitted with the Waste Licence Review remain unaltered as there will be no change whatsoever in the proposed topographical levels based on the reclamation of the site occurring over a shorter time period. Therefore, there is no change to finished site survey drawings.
- Therefore, the proposed licence review creates no proposed change to the content, nature, composition or volume of materials intended for recovery by deposition at the site, and the overall tonnage of 265,000 tonnes for which the existing license was issued remains unaffected.

The reclamation of this site will have positive and beneficial impacts upon agriculture and agronomy and will provide additional grazing area for stock in the Belmullet area. Local auctioneers have confirmed the strong demand for grazing land for rental in the area, particularly for improved reseeded land (this is outlined in letters contained within the Agronomy Report included as **Figure 2.20.1**).



A number of field units in the surrounding area have been reclaimed and improved in the past as evidenced on the ground. The use range of these soils depends largely on slope and altitude but generally they are most suitable for grazing stock and production of hay and silage. The existing and proposed land reclamation works will blend in with the existing local landscape.

Farming and agriculture production nationally is carried out over 3,500,000 hectares on in excess of 200,000 farm units. The soil recovery activity at Tallagh will cause no loss of agricultural production but rather will result in greater farming activity in this immediate area. The impact on agriculture locally and nationally will be positive.

The existing licensed site at Tallagh, Belmullet, Co. Mayo, formerly operated as an authorised waste permitted facility for the purpose of the consequential benefit to agriculture under a Waste Permit No. Per 144 06/07/2005.

This Waste Permit was granted in January 2006, under the Waste Management (Permit) Regulations, 1998 and authorised the activity under Class 10 of the Fourth Class 10 of the Fourth Schedule of the Waste Management Act 1996 (as amended): "*The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system*"

During the decision process on Waste Licence W0256-01, Carton Rural Consultants were engaged to comment on the soil recovery activity and to determine whether the site met the necessary criteria of having a beneficial impact upon agriculture as a consequence of the land reclamation works.

The conclusion was that the existing and proposed land reclamation works will have a three fold beneficial impact upon agriculture:

- Firstly, the lands will be reclaimed to more productive agricultural lands which will result in a higher potential stocking rate of livestock; greater grass yields and therefore greater potential agricultural benefit.
- Secondly, the rental value of the land will increase as a consequence of the improvements to the terrain, soils and drainage which will therefore have a consequential benefit to agriculture.
- Thirdly, the value of the reclaimed land as good agricultural grazing lands will increase as a consequence of the recovery activity which will have a long term agricultural benefit.

They conclude: "*I am satisfied that the works carried out to date are recovery works for the benefit to agriculture and that the proposed works (i.e. the filling of the rest of the site as proposed in the waste licence application) will in my professional opinion have a consequential benefit to agriculture by virtue of the improved land and its increased agronomic value, as it is progressively reclaimed*". **Figure 2.20.1** Contains a copy of the Carton Rural Consultants report.

Lennons Quarries Ltd. has the support of the local community with regards to the proposed review of their existing Waste Licence W0256-01.



This is in the form of letters of support for the proposed technical amendment from all the nearest residential dwellings (which would be considered the nearest potential noise and dust sensitive receptors). See **Figures 1.13.2** (letters) and associated map **Figure 1.13.1** and **Figure 3.5.3.2** in this EIS. Furthermore, there is the full support of the local GAA Club (see **Figure 1.13.3**), an adjoining land-use and a major part of the local rural community.

Therefore the licensee has demonstrated to the Agency that the licence review is supported by the local community as being a positive and pro-active step with environmental gains and benefits.

3.8.4 Mitigation Measures

As it is concluded that there will be no direct or indirect negative impacts upon Human Beings or Material Assets of the area no mitigation measures outside those already set out in the EIS concerning the day to day operation of the site are required or are proposed.

Rather there will be positive impacts as a consequence of the Review of the existing Waste Licence W0256-01 such as continued employment; increased agricultural productivity; and increased land values. All of which is supported by the local community to the existing activity. Furthermore, the activity will occur as already licensed but over a much shorter time period which is a win-win scenario for the site operator, the local community; and the regulatory authorities (i.e. EPA)

Furthermore, the site has been up and running for the past ca. 2 years under a Waste Licence W0256-01 and since 2006 under a Waste Permit without any complaints or enforcement issues relating to nuisance to Human Beings or Material Assets as proven by Agency records. Furthermore, the compliance monitoring is all up to date and is all compliant with the license requirements. All in all it is considered that Lennon Quarries Ltd. operate an extremely well run and well-monitored licensed soil recovery facility.