

ATTACHMENT L4 - PRINCIPLES OF SELF-SUFFICIENCY AND PROXIMITY

Article 16 of the Waste Framework Directive 2008/98/EC and Section 37A of the Waste Management Act 1996 (as amended) requires state bodies and agencies, in carrying out their respective functions under waste management and waste prevention legislation, to take appropriate measures to establish an integrated and adequate network of **waste disposal installations** and of **installations for the recovery of mixed municipal waste**, taking into account best available techniques.

This legislation further stipulates that the planned network of installations should enable waste to be disposed of, or mixed municipal waste to be recovered, in nearby appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

It is considered that the requirements of Section 37A of the Waste Management Act do not apply to the inert soil waste recovery facility at Huntstown Quarry as

- (i) the licensed waste activity is not a waste disposal activity and
- (ii) the waste stream to be recovered is not mixed municipal waste.

Notwithstanding this however, Roadstone considers that the existing waste recovery facility at Huntstown Quarry

- is strategically located close to, and readily accessible from, high capacity national road infrastructure (the M50 Motorway, N2 Dual Carriageway and R135 North Road, the former N2 National Primary Road) and therefore minimises the need for HGVs to travel over extended lengths of local or regional road network;
- is close to the largest urban population centre in the State and within a region in which national economic activity is concentrated;
- holds all legal permits and consents required for the activity and has existing environmental management, control and monitoring systems in place and
- provides good separation distance from surrounding commercial and residential development, thereby minimising negative environmental impacts.

Being close to construction markets, originating sites and/or relevant waste sources in Dublin City and the Greater Dublin Area helps users / hauliers to minimise fuel consumption and carbon emissions, maximise operational efficiency and exploit opportunities to reduce the overall number of transport journeys to and from construction sites through the introduction of a backloading system (whereby HGVs delivering aggregates from the adjoining quarry will return with inert soil waste from the destination site or another construction site en route).

By virtue of being co-located within an existing extractive site and maximising use / sharing of existing resources and site infrastructure, the recovery facility at Huntstown also minimises consumption of natural resources.

As such, the waste recovery facility at Huntstown comfortably addresses the requirement that waste facilities ideally be located close to population or economic centres where waste arises and/or requires treatment and also assures a high level of protection for the environment and public health.