

CONTENTS

INTRODUCTION	1
EXISTING DEVELOPMENT	1
Planning History	1
Waste Licence.....	2
Effluent Discharge Licences	3
NEED FOR THE DEVELOPMENT	3
THE SITE	5
Site Location	5
Site Description	5
Site Access	6
Surrounding Land-Use	7
LAND OWNERSHIP	8
THE APPLICANT	8
PLANNING CONTEXT	8
Fingal County Development Plan (2011 -2017).....	8
Fingal Draft County Development Plan (2017 -2023)	10
Eastern Regional Waste Management Plan 2015-2021	11
CONSIDERATION OF ALTERNATIVES / planning gain.....	12
DIFFICULTIES ENCOUNTERED WITH EIS COMPILATION	13
CONTRIBUTORS	13
CONSULTATIONS	14

TABLES

Table 1-1 List of Contributors

FIGURES

Figure 1-1 Site Location Map
Figure 1-2 Site Location & Site Notice Map
Figure 1-3 Surrounding Landuse Map
Figure 1-4 Site Folios Map
Figure 1-5 Extract from Land Zoning Map



INTRODUCTION

- 1.1 This Environmental Impact Statement (EIS) provides supporting information to accompany a Planning Application to Fingal County Council and a Waste Licence Review Application (WLA) to the Environmental Protection Agency (EPA) by Roadstone Limited in respect of a proposed increase in the permitted intake of construction and demolition waste at the waste recovery facility at the Huntstown Quarry Complex at North Road, Finglas, Dublin 11, from a maximum of 24,950 tonnes per annum at the present time to 95,000 tonnes per annum in future years.
- 1.2 No further C&D waste will be imported to the existing waste recovery facility, located on a 1.9 hectare site in the Central Quarry. The planning application provides for processing and off-site dispatch of C&D waste stockpiled at the existing facility in the near-term (2-3 years), following publication of End of Waste criteria for recycled aggregate. It also provides for
- (i) relocation of C&D waste recovery activities to a dedicated new long-term recovery facility on a 5.2 hectare site in the north-eastern corner of the Huntstown Quarry Complex and
 - (ii) construction of a hardstanding area, waste processing shed, surface water management infrastructure and upgraded internal access road at the new waste recovery facility.
- 1.3 The application site extends to 8.3 hectares (20.0 acres) and comprises two distinct areas within the Quarry Complex; the established recovery facility at the Central Quarry and the proposed replacement facility in the north-eastern corner. The application site is indicated on an extract from the 1:50,000 scale Ordnance Survey Discovery series map in Figure 1-1.

EXISTING DEVELOPMENT

Planning History

- 1.4 The existing construction and demolition waste recovery facility at the Central Quarry in Huntstown was established in 2004 on foot of planning permission Ref. F02A/0602. The principal construction and demolition wastes recovered at the facility comprise concrete (ready-mixed, blocks, slabs, reinforced), bricks and bituminous mixtures (principally hardened returns and road planings).
- 1.5 A waste permit in respect of C&D recovery activity at the Central Quarry was issued by Fingal County Council in 2002, in accordance with the requirements of the Waste Management (Permit) Regulations of 1998 which were in force at that time. The waste permit was subsequently renewed by the Council on two separate occasions. On the first occasion, in 2006, it was renewed for a three year period in accordance with the 1998 Regulations (Ref. No. WPT 108), while on the second occasion, in 2010, it was renewed for a five year period in accordance with the Waste Management (Facility Permit and Registration) Regulations of 2007 (Ref. No. FG-WFP-09-0006-01).
- 1.6 No formal Environmental Impact Assessment (EIA) was undertaken or requested in respect of the C&D waste recovery facility at the time planning permission was applied for in 2002. As such, the waste facility permit issued in 2010 restricted C&D waste throughput at the C&D waste recovery facility to a maximum of 24,950 tonnes per annum, just below the threshold limit for EIA for waste facilities set by Part 10 of the Planning and Development Regulations (2001-2016).

INTRODUCTION 1

- 1.7 In August 2014, Roadstone secured planning permission for continuation of quarrying at Huntstown until 2034 (Fingal County Council Ref. No FW12A-0022 and An Bord Pleanála Ref. No. 06F.241693). This grant of planning permission included provision for backfilling and restoration of the existing North, West and South Quarries and a planned future Central Quarry to original ground level.
- 1.8 In the case of the Huntstown Quarry Complex, backfilling of the 4 quarries is effectively a necessity in order to prevent the formation of large open water bodies once groundwater pumping / dewatering ceases. Were such water bodies to develop, they would attract birdlife and lead to a significant increase in bird numbers in the local area. As the quarries at Huntstown all lie immediately beneath the main flight path in and out of Dublin Airport, this in turn could create a potentially significant bird hazard for any low flying aircraft overhead.
- 1.9 A waste licence issued by the Environmental Protection Agency (EPA) in February 2015 (Ref. No. W0277-01) provided for the establishment and operation of an inert soil waste recovery facility at the North Quarry at Huntstown in order to facilitate backfilling and restoration (in accordance with planning permission FW12A/0022). Soil waste recovery activity at the licenced facility commenced in October 2015. Although the permitted inert soil intake to this facility was initially limited to a maximum of 750,000 tonnes per annum, planning permission has recently been secured for an increase in the soil waste intake to 1,500,000 tonnes per annum (Planning Permission Ref. FW16A/0120) and a waste licence review application for the proposed increase in waste intake is currently under consideration by the EPA.
- 1.10 The Third Schedule of the Waste Management (Facility Permit and Registration) Regulations of 2007 (S.I. No. 821 of 2007, as amended) prohibits operation by the same corporate entity of a waste facility under a Local Authority waste permit immediately adjacent to another facility licensed by the EPA. As the existing (permitted) C&D facility at the Central Quarry is contiguous to the (licenced) soil recovery facility at the North Quarry, it was therefore necessary to suspend C&D waste recovery activities once soil recovery activity commenced at Huntstown in October 2015.

Waste Licence

- 1.11 Much of the soil and stone being imported to Huntstown for use in quarry backfilling and restoration is classified as waste. The scale of this activity is such that it requires a waste licence from the Environmental Protection Agency (EPA) and is technically classified by national and European waste management legislation as '*recovery through deposition on land*'. The existing waste site and associated development is conventionally described as a '*soil recovery facility*'.
- 1.12 The existing waste licence (Ref. No. W0277-01) only applies in respect of soil waste recovery activity at the North Quarry. The waste licence was issued by the EPA in February 2015 and provides for :
- Backfilling of up to 7,295,000 tonnes (approximately 3,840,000m³) of inert naturally occurring materials, of which approximately 7,200,000 tonnes must be imported.
 - A maximum importation rate of 750,000 tonnes of soil and stone waste per calendar year.

INTRODUCTION 1

- Provision of new infrastructure and/or shared use of existing infrastructure with the established aggregate, concrete and asphalt production businesses which are co-located at the quarry;
 - Separation of non-inert C&D waste (principally metal, timber, PVC pipes and plastic) unintentionally imported to the facility prior to its removal off-site (to appropriately licensed waste disposal or recovery facilities);
 - Restoration of the backfilled void (including placement of cover soils and seeding) and its return to agricultural grassland; and
 - Ongoing environmental monitoring of noise, dust, surface water and groundwater for the duration of the soil recovery / quarry backfilling works and for a short period thereafter.
- 1.13 A number of pre-commencement submissions in respect of the soil recovery facility, including a Closure, Restoration and Aftercare Management Plan (CRAMP) and Environmental Liabilities Risk Assessment (ELRA) were submitted to the Agency following the award of the waste licence. These submissions were approved by the EPA and the Financial Provisions required on foot of these were put in place by Roadstone during September 2015. The recovery facility commenced operations in early October 2015.
- 1.14 The existing waste licence limits the annual soil waste intake to a maximum of 750,000 tonnes. In light of the recent grant of planning permission to increase the permitted waste intake to a maximum of 1,500,000 tonnes per annum (Planning Permission Ref. FW16A/0120), a waste licence review application (Ref. No. W0277-02) was submitted to the EPA by Roadstone in early November 2016. As well as seeking an increase in the maximum permitted waste intake to the licenced soil recovery facility, the review application also seeks to extend the licenced area to facilitate backfilling and restoration of the West Quarry under licence. The waste licence review application is expected to be determined by the EPA in mid-2017.

Effluent Discharge Licences

- 1.15 Discharges from quarry dewatering and ongoing soil and stone waste recovery activities at the North Quarry are directed to the Ballystrahan Stream and Ward River catchment and are currently regulated by way of the EPA waste licence (Ref. W0277-01)
- 1.16 Roadstone also discharges process water from aggregate processing and concrete production activities at the central infrastructure area and from the recycling facility in the Central Quarry via a series of existing settlement ponds to the Ballystrahan Stream. These discharges are regulated by way of a separate discharge licence from Fingal County Council (Ref. No WPW/F/008-01) which was issued on the 24th November 2011.

NEED FOR THE DEVELOPMENT

- 1.17 Following temporary cessation of C&D waste recovery activity at the Central Quarry in late 2015, it had been intended to apply for a waste licence review which would simply incorporate the established activity into the licenced facility and bring it into compliance with legislative requirements. However, a number of factors emerged around that time which prompted an internal Roadstone review of its long-term requirements for C&D waste recovery capacity in North County Dublin.

INTRODUCTION 1

- 1.18 It was considered in the first instance that over the medium to long-term the existing limitation on C&D waste intake at the facility to 24,950 tonnes per annum was likely to be overly restrictive, particularly in light of a significant upswing in the level of construction activity across the Greater Dublin Area since 2014. In the years prior to 2014, waste intake levels (reported in Annual Environmental Reports submitted in respect of the facility) had been below permitted intake limits, albeit this was over a period when construction activity, both regionally and nationally, was at a record low ebb.
- 1.19 Roadstone, in assessing its long-term capacity requirements, recognises that national waste policy places a strong emphasis on significantly reducing the landfilling / disposal of C&D waste streams and on maximising recycling of such wastes, particularly concrete and related products, in order to increase sustainability and reduce existing pressures on natural resources. The national policy document, *Changing Our Ways* (1998), set a target of 85% recycling of all C&D waste (including soil and stones) by 2013. More recently the EU Waste Framework Directive (2008/98/EC) set a 70% target rate for re-use, recycling and/or material recovery for (non-soil and stone) C&D waste by 2020.
- 1.20 Traditionally, a significant proportion of C&D waste was recovered by using it as daily cover at municipal landfill sites. Aside from the increased level of construction activity in recent years, part of the increase in demand for C&D waste recycling capacity is due to closure of several municipal landfill facilities in the Greater Dublin Area, coupled with a reduction in the volume of municipal waste intake to any facilities which remain active. Both of these measures have largely been necessitated by the compliance requirements of the EU Landfill Directive (1999/31/EC).
- 1.21 In light of these factors, the recently published Eastern and Midlands Region Waste Management Plan 2015-2020 (Section 11.2.2) stated that *'given the sharp decrease in the number of operational landfills nationally, which have been a significant outlet for C&D waste in the past, alternative recovery options will be required to facilitate the recovery of C&D waste arising in future years'*. The plan is however silent about who specifically should be responsible for providing alternative C&D waste outlets or where such facilities should be located.
- 1.22 National news media, construction trade literature and/or professional journals have published articles in recent months identifying a looming shortage of C&D waste recovery capacity in the Greater Dublin area^{1,2}. These reports are consistent with, and corroborated by, a high level of trade enquiries about availability of recycling capacity and/or strong anecdotal evidence reported by Roadstone staff over the past 12 months.
- 1.23 Separate to the recovery capacity / demand aspects, Roadstone has recently undertaken a review of its development plan for Huntstown and its associated rock and aggregate resource requirements. In light of this review, the company has determined that the planned future development of the Central Quarry will need to be brought forward at a much earlier stage than it had envisaged heretofore. At the present time, projections are that rock extraction from the Central Quarry will need to commence within 3 to 4 years (and by 2020 at the

¹ Irish Independent 'Builders warn of looming crisis over capital rubble', 7 October 2016

² Engineers Journal. 'Threat to infrastructure and major housing projects as major builders' waste crisis looms', Engineers of Ireland, 1 November 2016

INTRODUCTION 1

latest). Accordingly, Roadstone has concluded that the existing C&D waste recovery activity at the Central Quarry will need to be wound down and the facility relocated to another location within its Huntstown landholding.

- 1.24 At the present time, waste processing / production of recycled aggregates is suspended at the recovery facility at Huntstown at the request of Fingal County Council, principally on account of the legislative restrictions mentioned previously, but also, in part, due to the absence of End-of-Waste criteria for aggregates produced from recycled construction and demolition waste. It is understood that the EPA will publish relevant End-of-Waste criteria for this waste stream in the course of 2017, and that processing / production activities and export of recycled aggregate off-site will resume shortly thereafter.
- 1.25 Partly as a result of this factor and the relatively low demand for recycled aggregate during the construction downturn in earlier years, there is now approximately 55,000m³ (110,000 tonnes) of unprocessed C&D waste held at the existing recovery facility.
- 1.26 At the current approved rate of recycling of 24,950 tonnes per annum, without any further C&D waste intake, it would take in excess of 4 years to recycle the existing waste stockpiled on site. In view of the current output restriction, it is necessary to intensify the rate of recycling of existing waste stockpiled at the Central Quarry in order to ensure that this location is cleared and made available for quarry development in the short-to-medium term future.
- 1.27 Note that there will be no further waste intake to the existing C&D waste recovery facility at the Central Quarry. There will also be no output from the existing facility until such time as
- an EPA waste licence review has been completed and the facility has been incorporated into the licenced waste area regulated under waste licence (Ref. No. W0277-01) and
 - the EPA has published and adopted End of Waste criteria for recycled aggregates produced from construction and demolition waste.

THE SITE

Site Location

- 1.28 The site to which this planning application refers straddles the townlands of Kilshane, Huntstown and Johnstown Co. Dublin, approximately 2.5km north-west of the Dublin suburb of Finglas and 2km north-west of the interchange between the N2 Dual Carriageway and the M50 Motorway. The plan extent of the lands owned by Roadstone Ltd. are outlined in blue on a 1:10,000 scale map of the area, reproduced as Figure 1-2. The plan extent of the application site is also outlined in red on the same figure.

Site Description

- 1.29 The application area covers a total area of approximately 8.3 hectares (20.0 acres) and comprises
- the existing permitted recovery facility within the Central Quarry (as per permission Ref. F02A/0602), where unprocessed and processed waste can be stockpiled and processed in the short-term (approximately 2-3 years) pending re-location of the recovery facility;

INTRODUCTION 1

- a new dedicated long-term C&D waste recovery facility located on a 5.2 hectare (12.5 acre) largely undeveloped greenfield site in the north-eastern corner of the Huntstown Quarry Complex. The site is currently used for seasonal grazing by horses.
 - provision of site drainage infrastructure, an extensive hardstanding area for stockpiling of imported C&D wastes and recycled (secondary) aggregate and upgraded internal access road at the new facility;
 - a new portal frame industrial shed structure, open on two sides, for processing (crushing) of C&D wastes;
 - use of existing ancillary site infrastructure (offices, sheds, wheelwash, weighbridges, settlement ponds, internal haul roads etc.), much of which is shared with aggregate, concrete and asphalt production and/or soil waste recovery businesses co-located at the Huntstown Quarry Complex.
- 1.30 The existing licensed soil waste recovery facility covers an area of approximately 36.1 hectares (87.0 acres) and comprises the North Quarry and adjoining site infrastructure. The void at the North Quarry which is being gradually backfilled at the present time originally covered an area of approximately 11.2 hectares (27.0 acres).
- 1.31 The recent grant of planning permission (Ref. FW16A/0120) and current waste licence review application (Ref. W0277-02) provide for an extension to the existing soil waste recovery facility of 12.55 hectares (30.2 acres) and an increase in inert soil waste intake for restoration purposes, from 750,000 tonnes per annum at present, to 1,500,000 tonnes per annum.
- 1.32 Most of the subject lands for this application lie immediately beyond the existing licensed soil waste recovery facility, or planned future extension thereto, and will ultimately provide for a further increase of 8.3 hectares (20.0 acres) in the overall plan footprint of the waste facility, up to 56.95 hectares (137.2 acres).
- 1.33 Ground levels across the existing recovery facility at the Central Quarry have been significantly disturbed by previous quarrying activities. The original ground levels around the quarry typically fall from around 85mOD on the northern side to 80mOD on the southern side. Existing quarry floor levels typically vary from 58mOD to 60mOD.
- 1.34 Ground level at the proposed location of the relocated facility, in the north-eastern corner of the quarry complex are typically around 78mOD and fall gently from to the west and south. The site largely comprises seasonal grassland which is grazed by horses. There is a thicket of semi-mature deciduous trees planted along the eastern boundary which screens much of the area from external views beyond the site. There is also a mound / screening berm located in the north-eastern corner which rises to a level of approximately 82mOD (3-4m above surrounding ground levels).

Site Access

- 1.35 Traffic access to the existing / re-located recovery facility is primarily obtained via the existing North Road (the former N2 National Primary Road). Traffic coming from Dublin City Centre or the M50 Motorway turns onto the N2 Dual Carriageway and travels a short distance north, before turning (west) off a dedicated slip road onto the R135 regional Road (known as the 'North Road') at Coldwinters. Thereafter traffic continues south for a short distance along the North Road before turning right (west) via an existing right-turn junction onto the access road leading into the Huntstown Quarry Complex.

INTRODUCTION 1

- 1.36 As well as serving Roadstone's quarries and related businesses, the access road also serves the Huntstown Power generating plant operated by Viridian and the proposed anaerobic digestion plant which has yet to be built by Stream BioEnergy (approved under Permission Ref. FW13A/0089).
- 1.37 Traffic travelling south from Ashbourne exits the N2 Dual Carriageway at the Cherryhound Interchange near The Ward and continues south along the North Road, through Kilshane Cross, to the right-turn junction with the access road leading into the Huntstown Quarry Complex.
- 1.38 There is no road access to the Huntstown Quarry complex or to the application site from Kilshane Road (also known as Cappagh Road) to the west of Roadstone's land holding. Traffic from Blanchardstown and the N3 to the west travels along the recently constructed N2 / N3 Link Road to the Cherryhound Interchange and then continues south along the North Road.
- 1.39 With a weight restriction applying to HGV movements along Kilshane Road, traffic from the Ballycoolin and Finglas suburbs of north-west Dublin travel via Kilshane Way to the N2-N3 Link Road, and from there to the quarry and application site.
- 1.40 Traffic movement within Roadstone's landholding runs over a paved road surface up to the infrastructure area in the centre of the quarry complex. Immediately past the blockyard on the left hand (southern) side, traffic travelling to the existing C&D waste recovery facility turns left and takes the first left (east) turn thereafter and follows the descent road leading down to the Central Quarry.
- 1.41 In the longer-term, traffic travelling to the relocated facility will turn right (north) past the existing wheelwash and heads north along an existing internal paved road, over the existing weighbridge and past the recovery facility offices and settlement ponds. Thereafter, traffic will continue to head northwards over an internal haul road (currently part paved, part unpaved) to the planned new C&D waste recovery facility.

Surrounding Land-Use

- 1.42 The application site is located entirely within the existing quarry complex at Huntstown. The land immediately beyond the existing Central Quarry comprises a block making facility to the north, an internal haul road and degraded grassland areas to the east and south, and a major internal access road (running north-south) and nature reserve area to the west.
- 1.43 At the planned replacement facility, the lands immediately to the west comprise the existing soil waste recovery facility and tracts of previously backfilled and restored land. Neighbouring lands immediately to the north and east predominantly comprise grassland in agricultural use. The lands immediately to the south which are within Roadstone's landholding comprise a training gallops and stabling area for horses.
- 1.44 At a greater distance, the Huntstown Power station (operated by Viridian), North Road and recently constructed N2 Dual Carriageway all lie to the east of the application site. The M50 motorway and the proposed alignment for the Metro West light rail line both lie to the south, while there is additional light industrial and commercial development on lands further to the south west. As noted above, the lands to the north are used predominantly as agricultural grassland. Existing land-use in the vicinity of the application site, including residential and industrial development, is shown on a land-use map in Figure 1-3.

LAND OWNERSHIP

- 1.45 Roadstone Ltd. is the holder of the freehold title to the lands around the quarry at Huntstown. Its total landholding extends to approximately 200.3 hectares (483 acres). The extent of the company's land ownership is indicated on Figure 1-2. Details of land folios and ownership are summarized in Figure 1-4.

THE APPLICANT

- 1.46 Roadstone Ltd. was originally founded by the Roche Brothers in the 1930's and became part of Cement Roadstone Holdings (CRH) plc in 1970, following the merger of Roadstone and Cement Ltd. The present day company was formed in 2009 by the amalgamation of CRH's three construction materials businesses in Ireland, Roadstone Dublin Ltd., Roadstone Provinces Ltd. and John A. Wood Ltd. The company is Ireland's leading supplier of aggregates, construction and road building materials and employs several hundred people at 65 locations throughout the country.
- 1.47 Although Roadstone's principal business interest is in aggregate extraction and manufacture of building materials and products, it is currently restoring a small number of quarries by backfilling with imported inert soil waste, in addition to operating construction and demolition waste recycling facilities at several of its locations across the State.
- 1.48 In addition to the licensed inert soil recovery facility it currently operates at Huntstown, Roadstone also operates an EPA licensed inert soil / C&D waste recovery facility at Fassaroe, west of Bray (Waste Licence Ref W0269-01). It was granted a waste licence for another soil recovery facility at Milverton Quarry, near Skerries in June 2015 (Waste Licence Ref. No. W0272-01). The company also operates a permitted soil recovery facility and construction and demolition waste recovery facility at two separate locations within the Belgard Quarry Complex, near Tallaght.
- 1.49 In recent months, Roadstone has also applied for planning permission for a soil recovery facility at Calary Quarry, at Kilmacanogue, in County Wicklow (Planning Ref. 16/574). This recovery facility however will largely serve as a replacement facility for that at Fassaroe, backfilling of which is complete.
- 1.50 Roadstone is committed to achieving and maintaining industry leading environmental standards. To this end, the company has established, and actively implements, an in-house Environmental Management System (EMS) at all its established waste recovery locations, including Huntstown. The EMS has achieved external accreditation to ISO 14001 standard and is subject to audit on an annual basis.

PLANNING CONTEXT

Fingal County Development Plan (2011 -2017)

- 1.51 The planning and development controls pertaining to the application site are those outlined in the current Fingal County Development Plan (2011 - 2017).
- 1.52 Under the current Fingal County Development Plan, there is a single 'RU' zoning objective for the entire application site (straddling the existing and proposed new waste recycling facility). This zonation seeks to "*protect and promote in a balanced way, the development of agriculture and rural related enterprise, biodiversity, the rural landscape, and built and cultural heritage*".

INTRODUCTION 1

- 1.53 TThe rural zoning permits 'extractive industry / quarrying' in principle. Under this zonation, 'waste disposal and recovery activities' are absent from a list of activities which are explicitly 'Not Permitted'. Lands adjoining the application site are mainly zoned for 'Heavy Industry' or 'General Employment'. An extract from the land zoning map is reproduced in Figure 1-5.
- 1.54 The development plan map shows a number of local objectives in the vicinity of the application site as follows :
- Local Objective 405 seeks to facilitate development of infrastructure for waste management, including construction and demolition waste processing, biological treatment of organic waste, a sludge treatment facility and a waste transfer station at Kilshane (on a site to the east).
 - Local Objective 418 relates to provision of additional units in the area to accommodate homeless persons and
 - Local Objective 409 states that the quantum of development on Roadstone lands is to be determined by the capacity of the road infrastructure.
- 1.55 The Huntstown quarry complex is partly or fully located with the various zones associated with the safe operation of Dublin Airport. The quarry complex is close to the airport, but it is not located within the inner public safety zone. It is located, however, partly within the inner airport noise zone, the outer public safety zone and the outer airport noise zone. It is not considered that these effect the proposed development.
- 1.56 There are no designated or proposed Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or proposed Natural Heritage Areas (NHA's) within or contiguous to Roadstone's landholding at Huntstown. Huntstown Quarry is not identified as a County Geological Site. Much of the application site is identified as a Nature Development Area.
- 1.57 Records held by the National Monuments Service of the Department of Environment, Heritage and Local Government indicate that there are a number of national monuments within and in the immediate vicinity of Roadstone's landholding. At the northern end of Roadstone's landholding, to the west of the west of the proposed relocation site for the C&D recycling facility, the ruins of Kilshane Church, a graveyard and holy well (Ref. DU014-012) are identified as part of an extended archaeological site.
- 1.58 Kilshane Church is also included on the list of protected structures in the current Fingal County Development Plan (No. 663) and is identified on the development plan map. There are no visible remains of these monuments / protected structures remaining in situ. It is understood that this site was included in a recent review of the Record of Protected Structure (RPS) by Fingal County Council and that it was decided by a full council meeting on 12 September 2016 to delete it from the RPS given that the surrounding area had been extensively quarried and that there was no structural remains present to justify its inclusion.
- 1.59 Immediately east of Roadstone's landholding, the National Monuments Record (NMR) indicates that there is an enclosure (Ref. DU014-015) and ring fort (Ref. DU014-016) located in Coldwinter townland, on the opposite side of the North Road. These features are also included in the list of protected structures in the County Development Plan. A castle, motte (earthen mound) and bailey (courtyard) (Ref. DU014-013) is located north-east of the landholding in Newtown townland, while a fulacht fia (Ref. DU014-050), a Bronze Age cooking site, is located west of the landholding in Grange townland.

INTRODUCTION 1

- 1.60 The Fingal County Development Plan indicates that the Huntstown and Kilshane townlands lie within a landscape area which is characterised as low lying agricultural land. There are no protected views or prospects into or out of the application site identified in the Development Plan.
- 1.61 Section 2.6 of the of the current County Development Plan (2011-2017) deals with Enterprise and Employment in the extractive industries. Objective EE36 which is included in this section of plan seeks to
‘Encourage the recycling of builders’ rubble to reduce the need for extraction in accordance with Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects (DoEHLG 2006)’.
- 1.62 Section 4.5 of the 2011 development plan relates to waste management and notes that that a high proportion of construction and demolition waste goes directly to landfill. It states that the Council
‘recognises the resource potential of this waste and seeks to increase the level of its recycling in line with Central Government Policy. Specifically, the proportion of construction and demolition waste recycled will be increased to 85% by 2013 (in accordance with national policy guidance)’.
- 1.63 The development plan also identifies a requirement for construction and demolition (C&D) waste management plans to be prepared and submitted in support of planning applications for key development projects. It states:
“The Construction and Demolition Waste Management Plan, as a minimum, shall include provision for the management of all construction and demolition waste arising on site, and make provision for the reuse of said material and/or the recovery or disposal of this waste to authorised facilities by authorised collectors. Where appropriate, excavated material from development sites is to be reused on the proposal, for landscaping, land restoration or for preparation for development.”

Fingal Draft County Development Plan (2017 -2023)

- 1.64 Section 5.3 of the draft Fingal County Development Plan (2017-2023) discusses the Rural Economy and Enterprise and includes a sub-section on land reclamation and aggregate extraction which identifies an objective (RF85) to
‘encourage the recycling of construction and demolition waste to reduce the need for extraction’.
- 1.65 Section 7.5 of the draft plan has regard to the recent publication of the Eastern Midlands Region Waste Management Plan 2015 -2021 and the provisions contained therein in respect of minimisation, re-use, recovery, recycling and disposal of various waste streams, including C&D wastes. Objective WM03 provides an undertaking to
‘Implement the provisions of the Eastern Midlands Region Waste Management Plan 2015 -2021 or any subsequent Waste Management Plan applicable within the lifetime of the Development Plan. All prospective developments in the county will be expected to take account of the provisions of the Regional Waste Management Plan and adhere to the requirements of that Plan’.
- 1.66 In a subsequent section dealing specifically with C&D waste, the draft plan notes that the EC (Waste Directive) Regulations 2011, set a 70% target for the re-use, recycling and recovery of (non-soil) C&D waste in Ireland by 2020.

INTRODUCTION 1

- 1.67 The requirement for C&D waste management plans in the existing development plan is restated as Objective DMS149 in Chapter 12 (Development Management Standards) of the draft development plan.
- 1.68 It is considered that this proposal for intensification of established C&D waste recovery activities and the re-location / upgrading of the recovery facility is fully consistent with the stated policy objectives in the existing County Development Plan in that it provides for
- the establishment of a C&D waste recovery facility in close proximity to a major centre of economic activity in North County Dublin and
 - the recovery of C&D waste at a scale which minimises unit output costs, which in turn helps to stimulate demand for recycled C&D product(s), increase the economic viability of the activity and help achieve stated policy objectives.

Eastern Regional Waste Management Plan 2015-2021

- 1.69 Fingal is one of several counties in the Eastern Midland waste region of Ireland which is covered by the Eastern Midland Waste Management Plan (2015-2021) which was published by Dublin City Council (the lead Local Authority for the plan) in May 2015.
- 1.70 Section 7.3 of the plan addresses 'priority waste' streams, including construction and demolition waste. It is noted in Section 7.3.1 that 1.9 million tonnes of construction and demolition waste was generated in the region in 2012. The plan also notes an increase in construction related activity during 2014 and emphasises the importance of ensuring that appropriate processing facilities are in place to facilitate increased reuse, recycling and recovery of all C&D waste streams.
- 1.71 Section 11.2.2 of the plan presents an overview of construction and demolition waste management activities within the region. It identifies that in 2012, 59% of all C&D waste managed in the region (1.9 million tonnes) comprised concrete rubble and intermixed wastes (metal, timber etc.). This volume was generated at a time which corresponded with possibly the lowest point of the downturn in construction related activity following the Global Financial Crisis of 2008.
- 1.72 Section 11.2.2 notes a sharp decrease in the number of operational landfills in recent years. It also highlights growing awareness of the ecological and biodiversity value of low-lying wetlands and marginal agricultural lands which were backfilled or reclaimed using construction and demolition wastes in the past and comments that at many of these sites, the primary activity appears to have been deposition of waste rather than land improvement (also known as 'sham recovery').
- 1.73 In view of these trends and the likelihood that fewer of these facilities or sites will be available as outlets for C&D waste than in the recent past, the plan identifies a requirement for alternative recovery options to facilitate the recovery of C&D wastes generated in the years ahead.
- 1.74 The plan further notes that concrete, stone and other masonry like waste can be crushed and screened and used as a substitute for virgin quarried stone material in a variety of engineering applications if the appropriate technical criteria have been met (eg. road construction, access tracks for agricultural or forestry holdings).

INTRODUCTION 1

- 1.75 It is considered in light of the above that the intensification and relocation / upgrading of existing C&D waste recovery activity at Huntstown Quarry broadly complies with the waste management policy objectives for C&D waste outlined in the current Eastern Midland Waste Management Plan (2015-2021).

CONSIDERATION OF ALTERNATIVES / PLANNING GAIN

- 1.76 Policy objective EE36 of the existing County Development plan and Objective RF84 of the Draft County Development Plan both promote / encourage the recycling of construction and demolition waste in order to reduce the need for mineral extraction.
- 1.77 The proposed development offers clear environmental and economic advantages relative to other locations and/or greenfield sites. Although they may differ in magnitude, the environmental impacts arising from the proposed intensification and relocation of C&D waste recovery activities are essentially similar to those arising from adjoining land use within the quarry complex, which principally comprise
- rock extraction and processing to produce virgin, construction grade aggregates;
 - production of construction materials (principally concrete blocks, readymix concrete and asphalt);
 - inert soil waste recovery at the North Quarry.
- 1.78 The proposed intensification and relocation / upgrading of existing C&D waste recovery activities at Huntstown Quarry not only has the advantage of being compatible with established on-site production activities, it represents a logical, progressive evolution of these activities, in a manner which is fully consistent with the principles of sustainable development and related public policy objectives.
- 1.79 Locating the recovery facility within the Huntstown Quarry Complex also offers the advantages that
- it lies close to a large economic centre (northern fringe of Dublin City and north County Dublin);
 - it generally provides good separation distance from surrounding commercial and residential development, thereby minimising negative environmental impacts
 - it offers the benefits of having established environmental management and monitoring programmes in place;
 - and is accessed via high capacity national road infrastructure (the N2 Dual Carriageway and M50 Motorway and the R135 North Road, the former N2 National Primary Road), thereby minimising the need for HGVs to travel over extended lengths of local or regional road networks.
- 1.80 The intensification and proposed upgrading / relocation of C&D waste recovery activities at Huntstown facility is generally consistent with the principles of sustainable development in that:
- it is located close to construction markets, originating sites and/or relevant waste sources in Dublin City and the Greater Dublin Area, thereby minimising fuel consumption and carbon emissions by haulage lorries;

INTRODUCTION 1

- by virtue of being co-located within an existing extractive / waste recovery site and maximising use of available resources and site infrastructure, it also minimises consumption of natural resources;
- it maximises operational efficiencies and in particular offers 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 C&D waste from the destination site or another construction site *en route*);
- it minimises the potential development footprint; and
- it minimises impacts on the natural environment and residential amenity.

DIFFICULTIES ENCOUNTERED WITH EIS COMPILATION

1.81 This Environmental Impact Assessment was compiled on the basis of published regional and local data and site-specific field surveys. No difficulties were encountered in compiling the required information.

CONTRIBUTORS

- 1.82 Roadstone Limited appointed SLR Consulting Ireland to prepare this Environmental Impact Statement (EIS) in support of its Planning and Waste Licence Review Applications for the proposed intensification of C&D waste recovery activity and the upgrading / relocation of its existing recovery facility at Huntstown Quarry, North Road, Finglas, Dublin 11.
- 1.83 Section 1 of this Environmental Impact Statement comprises an introduction while Section 2 provides a detailed description of the proposed development and has been prepared by SLR Consulting Ireland in consultation with Roadstone Limited.
- 1.84 Sections 3 to 14 of the EIS provide details of existing environmental receptors, and for each receptor, provide an assessment of the potential environmental impact of the proposed development and details of mitigation measures, where these are considered necessary.
- 1.85 The contributors who have assisted in the preparation of this EIS are identified in Table 1-1 below:

**Table 1-1
List of Contributors**

TOPIC	CONTRIBUTOR	COMPANY
Introduction	Aoife Byrne BSocSc(int), MRUP, MRTPI, MIPI Derek Luby BE, MSc, DIC, MIEI	SLR Consulting Ireland
Description of Development	Derek Luby BE, MSc, DIC, MIEI	SLR Consulting Ireland
Human Beings	Aoife Byrne BSocSc(int), MRUP, MRTPI, MIPI	SLR Consulting Ireland
Flora and Fauna	Steve Judge BSc (Hons)	SLR Consulting Ireland
Soils and Geology	Tom Moore BSc., PGeo, EurGeol	SLR Consulting Ireland
Water	Dr. Peter Glanville BA PhD. PGeo EurGeol	SLR Consulting Ireland
Climate and Air Quality	Aldona Binchy MSc. (Eng)	SLR Consulting Ireland
Noise and Vibration	Aldona Binchy MSc. (Eng)	SLR Consulting Ireland
Landscape	Anne Merkle Dipl. Ing (FH) MILI	SLR Consulting Ireland
Cultural Heritage	Dr. Charles Mount MA	Consultant
Material Assets	Aoife Byrne BSocSc(int), MRUP, MRTPI, MIPI	SLR Consulting Ireland
Traffic	Richard Frisby BS (Ops. Engineering)	Roadplan Consulting Ltd.
Co-ordination of EIA	Derek Luby BE, MSc, DIC, MIEI	SLR Consulting Ireland

1.86 Each contributor has been fully briefed about the proposal and the background to it. They have also visited the site and are familiar with the local environment.

CONSULTATIONS

1.87 In preparing this Environmental Impact Statement, consultations were had with a number of organisations and agencies including

- Environmental Protection Agency (Office of Licensing and Guidance)
- Fingal County Council (Planning Section)
- Fingal County Council (Environment Section)
- Fingal County Council (Heritage Officer)

INTRODUCTION 1

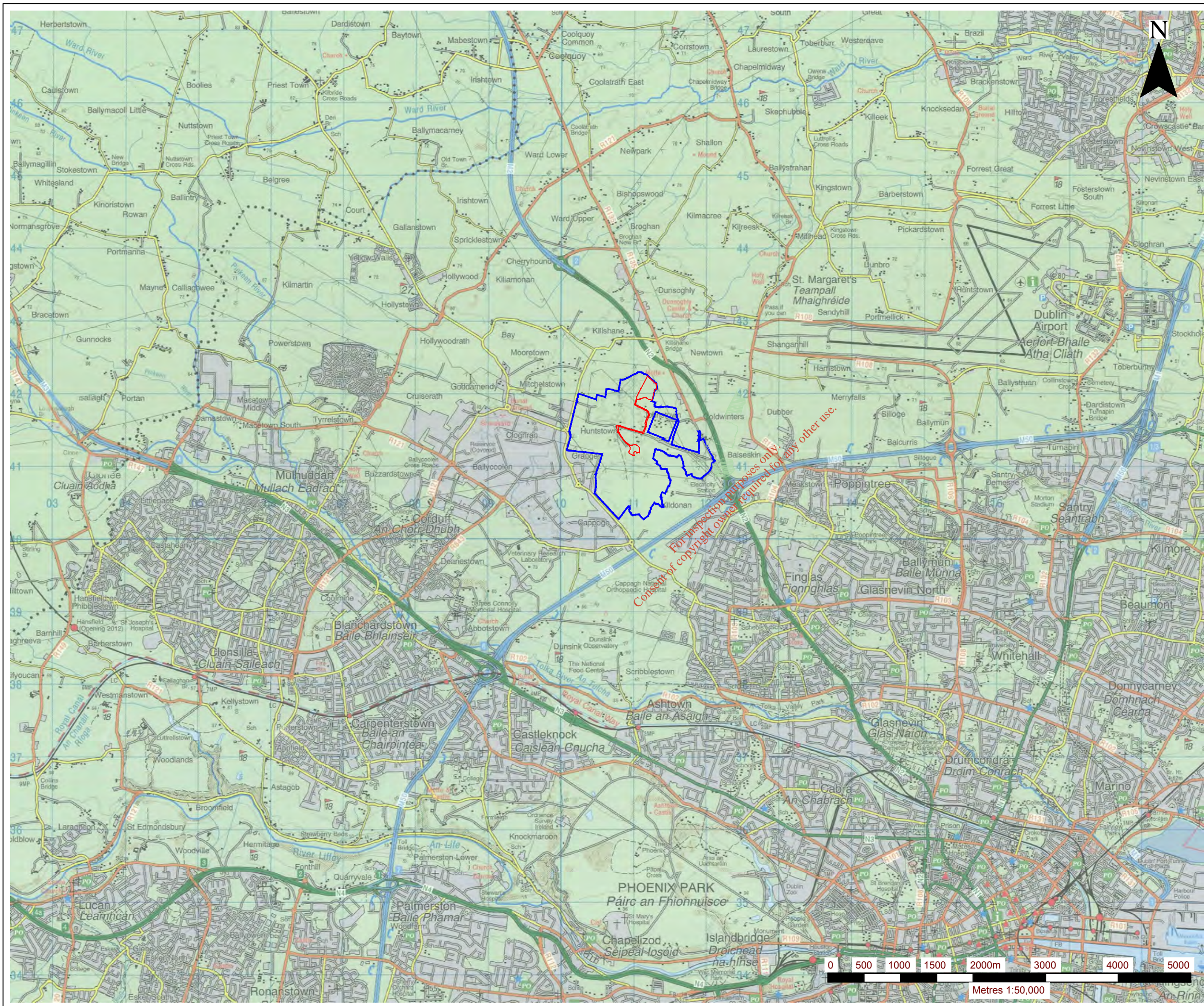
- Fingal County Council (Roads Section)
 - Geological Survey of Ireland (to discuss geological heritage and aquifer classification)
- 1.88 Other consultations and informal discussion held by contributors in undertaking their environmental impact assessments are detailed in the specialist environmental sections of the EIS, together with details of relevant archives and documentation held by state agencies and organisations.

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

FIGURES

- Figure 1-1
Site Location Map
- Figure 1-2
Site Location and Site Notice Map
- Figure 1-3
Surrounding Landuse Map
- Figure 1-4
Site Folios Map
- Figure 1-5
Extract from Land Zoning Map

0180.00166.0.FIG_1-1_Site Location Map.dwg



NOTES

1. EXTRACT FROM 1:50,000 O.S DISCOVERY MAP NO. 50
2. ORDNANCE SURVEY IRELAND LICENCE NO. SU 0000716 (C)
ORDNANCE SURVEY & GOVERNMENT OF IRELAND

LEGEND

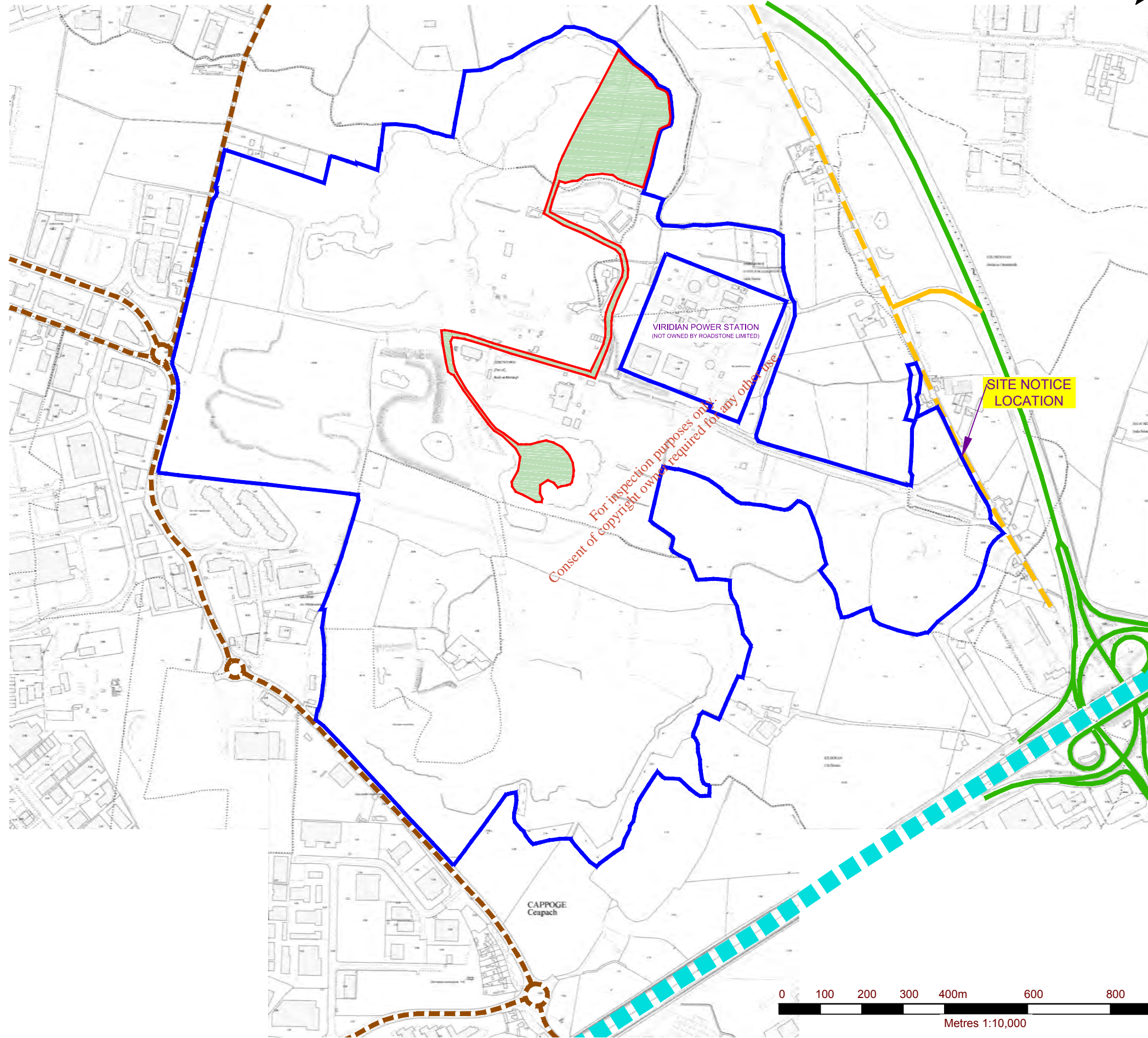
- ROADSTONE LIMITED LAND INTEREST (c. 200.3 ha)
- APPLICATION AREA (c. 8.27 ha)

SLR SLR CONSULTING IRELAND
7 DUNDRUM BUSINESS PARK
WINDY ARBOUR
DUBLIN 14
T: +353-1-2964667
F: +353-1-2964676
www.slrconsulting.com

ROADSTONE LIMITED
ENVIRONMENTAL IMPACT STATEMENT
C&D WASTE RECOVERY FACILITY
HUNTSTOWN QUARRY, FINGLAS, DUBLIN 11
SITE LOCATION MAP

FIGURE 1-1

Scale: 1:50,000 @ A3 Date: DECEMBER 2016



NOTES

1. EXTRACT FROM 1:2,500 ORDNANCE SURVEY DIGITAL SHEET NO'S. 3062-A, 3062-B, 3062-C, 3062-D, 3063-A, 3063-C, 3130-A & 3130-B.

2. ORDNANCE SURVEY IRELAND LICENCE NO. SU 0000716 (C) ORDNANCE SURVEY & GOVERNMENT OF IRELAND

LEGEND

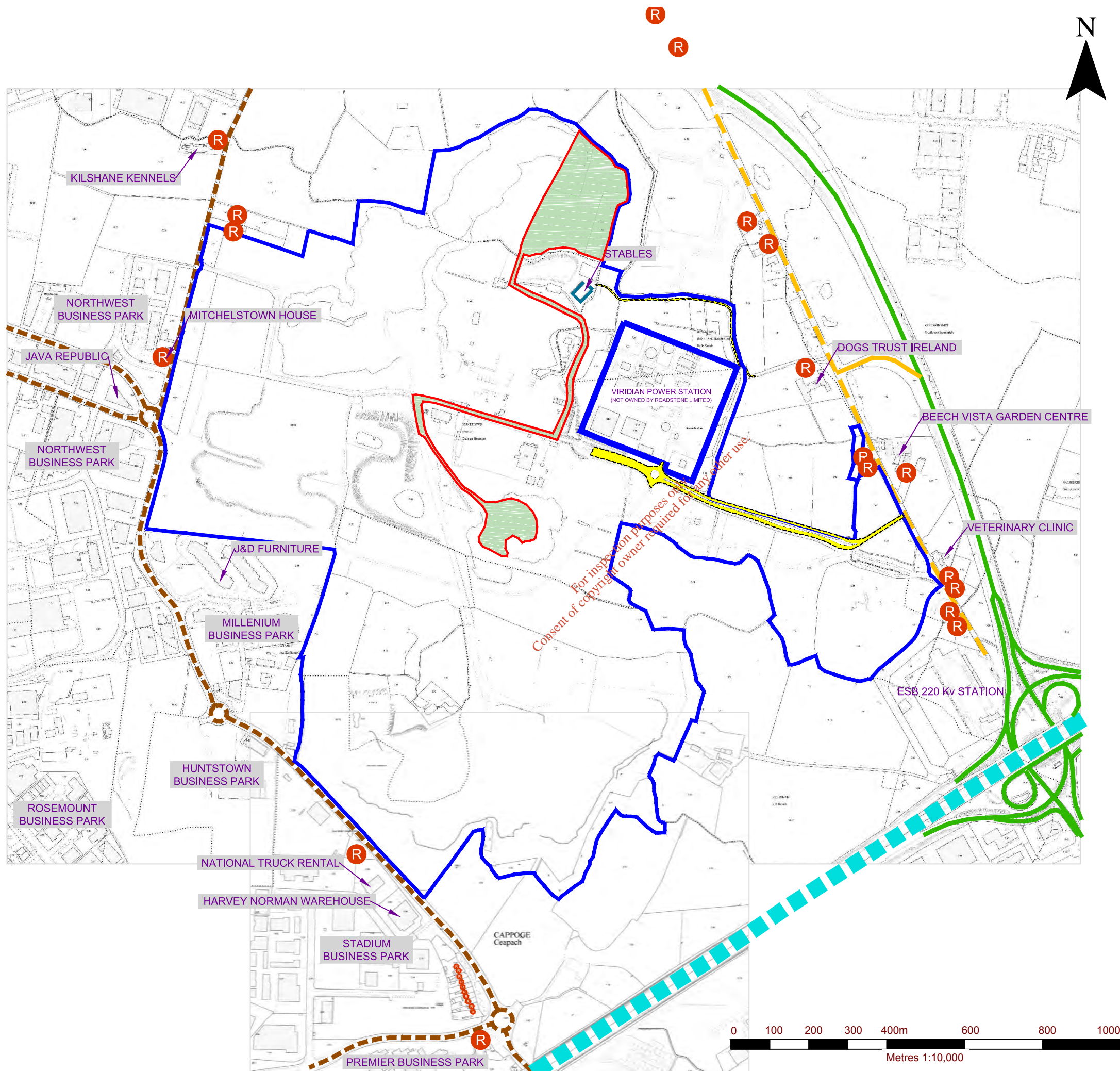
	ROADSTONE LIMITED LAND INTEREST (c. 200.3 ha)
	APPLICATION AREA (c. 8.27 ha)
	N2 DUAL CARRIAGEWAY
	NORTH ROAD (R135)
	LOCAL ROAD
	M50 MOTORWAY

SLR SLR CONSULTING IRELAND
 7 DUNDURM BUSINESS PARK
 WINDY ARBOUR
 DUBLIN 14
 T: +353-1-2964667
 F: +353-1-2964676
 www.slrconsulting.com

ROADSTONE LIMITED
 ENVIRONMENTAL IMPACT STATEMENT
C&D WASTE RECOVERY FACILITY
 HUNTSTOWN QUARRY, FINGLAS, DUBLIN 11
SITE NOTICE LOCATION MAP

FIGURE 1-2

Scale: 1:10,000 @ A3 Date: DECEMBER 2016



NOTES

1. EXTRACT FROM 1:2,500 ORDNANCE SURVEY DIGITAL SHEET NO'S. 3062-A, 3062-B, 3062-C, 3062-D, 3063-A, 3063-C, 3130-A & 3130-B.

2. ORDNANCE SURVEY IRELAND LICENCE NO. SU 0000716 (C) ORDNANCE SURVEY & GOVERNMENT OF IRELAND

LEGEND

	ROADSTONE LIMITED LAND INTEREST (c. 200.3 ha)
	APPLICATION AREA (c. 8.27 ha)
	N2 DUAL CARRIAGEWAY
	NORTH ROAD (R135)
	LOCAL ROAD
	M50 MOTORWAY
	RIGHT OF WAY
	LOCATION OF NEAREST RESIDENCES

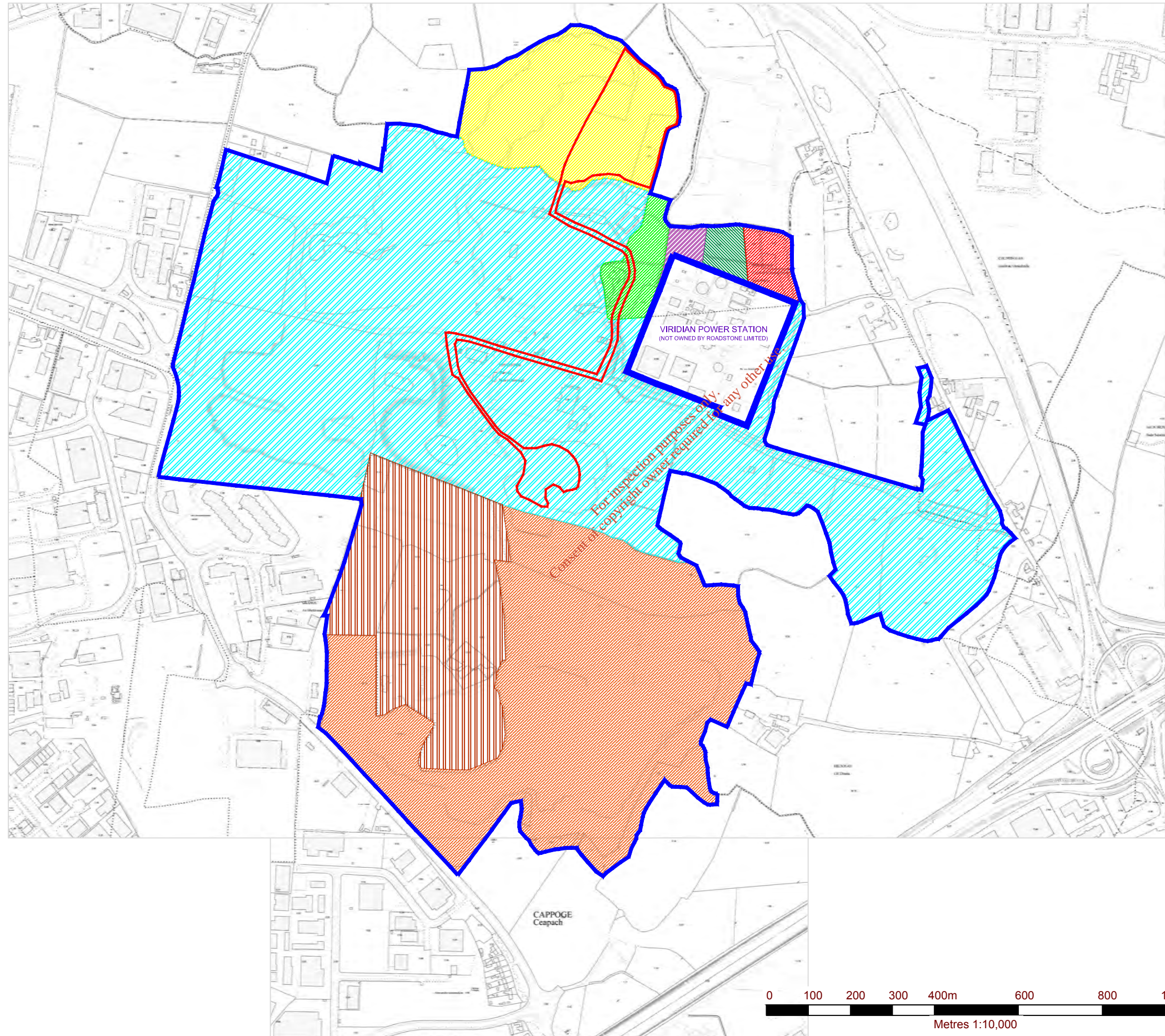
SLR SLR CONSULTING IRELAND
 7 DUNDUM BUSINESS PARK
 WINDY ARBOUR
 DUBLIN 14
 T: +353-1-2964667
 F: +353-1-2964676
 www.slrconsulting.com

ROADSTONE LIMITED
 ENVIRONMENTAL IMPACT STATEMENT
C&D WASTE RECOVERY FACILITY
 HUNTSTOWN QUARRY, FINGLAS, DUBLIN 11
SURROUNDING LAND USE

FIGURE 1-3

Scale 1:10,000 @ A3 Date DECEMBER 2016

0180.00166.0.FIG_1-3.Surrounding Land Use.dwg



NOTES

1. EXTRACT FROM 1:2,500 ORDNANCE SURVEY DIGITAL SHEET NO'S. 3062-A, 3062-B, 3062-C, 3062-D, 3063-A, 3063-C, 3130-A & 3130-B.

2. ORDNANCE SURVEY IRELAND LICENCE NO. SU 0000716 (C) ORDNANCE SURVEY & GOVERNMENT OF IRELAND

LEGEND

	ROADSTONE LIMITED LAND INTEREST (c. 200.3 ha)
	APPLICATION AREA (c. 8.27 ha)
	FOLIO DN2889
	FOLIO DN18240
	FOLIO DN3291
	FOLIO DN132971F
	FOLIO DN18734
	FOLIO DN8115
	FOLIO DN19138
	FOLIO DN8118
	FOLIO DN8999

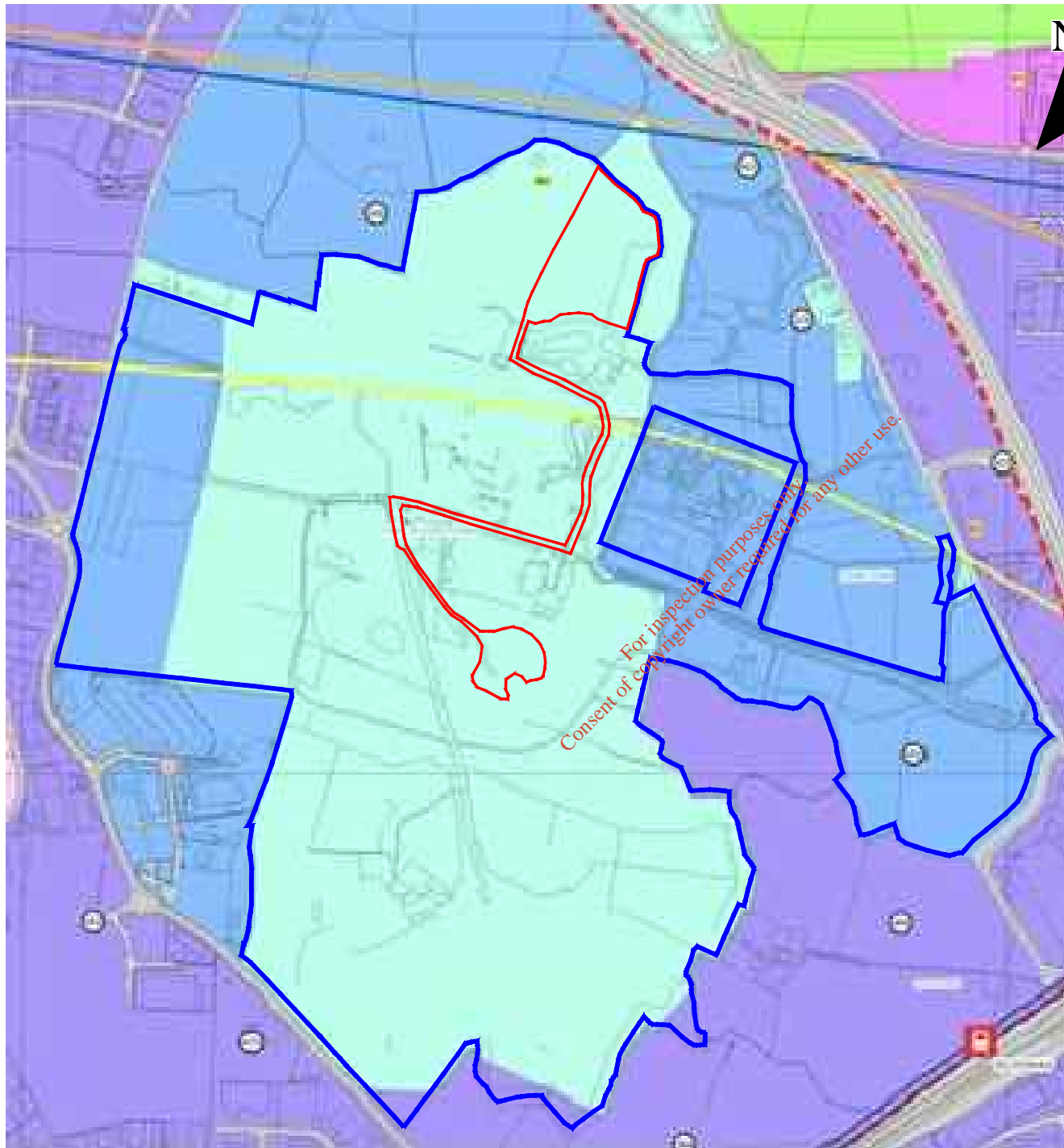
SLR SLR CONSULTING IRELAND
 7 DUNDRUM BUSINESS PARK
 WINDY ARBOUR
 DUBLIN 14
 T: +353-1-2964667
 F: +353-1-2964676
 www.slrconsulting.com

ROADSTONE LIMITED
 ENVIRONMENTAL IMPACT STATEMENT
C&D WASTE RECOVERY FACILITY
 HUNTSTOWN QUARRY, FINGLAS, DUBLIN 11
LAND OWNERSHIP DETAILS

FIGURE 1-4

Scale: 1:10,000 @ A3 Date: DECEMBER 2016


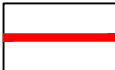
0180.00166.0.FIG_1-4.Land Ownership Details.dwg



NOTES

1. EXTRACT TAKEN FROM FINGAL DEVELOPMENT PLAN 2011 - 2017

LEGEND

-  ROADSTONE LIMITED LAND INTEREST (c. 200.3 ha)
-  APPLICATION AREA (c. 8.27 ha)

	Objective CI	Provide for and protect civic, religious, community, education, health care and social infrastructure
	Objective GB	Protect and provide for a Greenbelt
	Objective GE	Provide opportunities for general enterprise and employment
	Objective HA	Protect and enhance high amenity areas
	Objective HI	Provide for heavy industry
	Objective HT	Provide for office, research and development and high technology/high technology manufacturing type employment in a high quality built and landscaped environment
	Objective IC	Protect, provide for and/or improve local centre facilities
	Objective OS	Preserve and provide for open space and recreational amenities
	Objective RA	Provide for new residential communities in accordance with approved local area plans and subject to the provision of the necessary social and physical infrastructure
	Objective RR	Provide for and facilitate rural-related business which has a demonstrated need for a rural location
	Objective RS	Provide for residential development and protect and improve residential amenity
	Objective RU	Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage
	Objective RV	Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved local area plan, and the availability of physical and community infrastructure
	Objective WD	Provide for distribution, warehouse, storage and logistics facilities which require good access to a major road network within a good quality environment

SLR  SLR CONSULTING IRELAND
 7 DUNDRUM BUSINESS PARK
 WINDY ARBOUR
 DUBLIN 14
 T: +353-1-2964667
 F: +353-1-2964676
 www.slrconsulting.com

ROADSTONE LIMITED
ENVIRONMENTAL IMPACT STATEMENT
C&D WASTE RECOVERY FACILITY
HUNTSTOWN QUARRY, FINGLAS, DUBLIN 11
EXTRACT FROM LAND ZONING MAP

FIGURE 1-5

Scale 1:12,500 @ A4	Date DECEMBER 2016
------------------------	-----------------------