

## WASTE HIERARCHY

The waste hierarchy set out by national and European legislation requires that the following priority apply in the development and implementation of waste management policy:

- (i) prevention
- (ii) re-use / preparation for re-use
- (iii) recycling
- (iv) recovery
- (v) disposal.

The proposed waste recovery facility provides for recovery of excavated inert, uncontaminated soil and stone waste through backfilling and restoration of the worked out pit at Usk.

Recovery is defined in the Waste Framework Directive as *'any operation, the principal result of which, is waste serving a useful purpose by replacing materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy'*.

The inert soil waste imported to the waste recovery facility at Usk is excavated at construction / development sites or for utilities installation / maintenance. Given that excavation and handling of such materials incurs a cost, it can be implicitly assumed that engineering designers and/or works contractors will avoid or minimise, insofar as possible, the volume of excess soil material excavated in order to execute the planned development or maintenance works.

It can also be implicitly assumed that excess excavated soil material will only be exported off-site where it is not possible to re-use it within the development site or to backfill temporary excavations.

Where soil waste is inert, it can be re-used at off-site locations for practical and beneficial purposes without the need for treatment, processing or other form of recycling.

It is therefore evident that where excess inert soil is generated by development or utilities related works and requires to be exported off site, the highest tier activity on the waste hierarchy to which it may be assigned is a waste recovery activity. The backfilling and restoration of the worked out pit at Usk to former ground levels using inert waste soils will

- facilitate its long-term restoration to a grassland habitat, similar to that which existed prior to sand and gravel extraction;
- better integrate the site into the surrounding natural landscape and will improve the overall visual quality and coherence of the surrounding rural landscape;
- provide for better protection of the underlying groundwater resource, which is currently assessed as vulnerable due to the absence of any protective soil cover.

In so doing, it will achieve a desirable outcome which would not otherwise be possible or would require extensive use of natural soil resources.

## EASTERN REGIONAL WASTE MANAGEMENT PLAN 2015-2021

Kildare 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 published by Dublin City Council (the lead Local Authority for the plan) in May 2015.

Section 7.3 of the plan addresses 'priority waste' streams, including construction and demolition waste. It 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.

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, 41% of all recorded C&D waste collected and managed in the region (1.3 million tonnes of a total of 3.25 million tonnes) comprised inert soil and stones. 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 / 2009.

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 land 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'). 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 signals that alternative recovery options will need to be provided to facilitate recovery of C&D wastes in the years ahead.

The plan also raises the question as to whether or not the placement of inert waste at many of the infill sites used in the past is an appropriate land use strategy or indeed the best use of a potentially recyclable material, noting that quarries in particular often require large quantities of soil material to fill voids or use it for remediation and/or landscaping purposes.

In light of the above, it is considered that the recovery of inert soil and stone waste at Halverstown complies with the policy objectives for C&D waste set out in the current waste management plan for the Eastern Midland Region.