

REASON FOR WASTE LICENCE REVIEW APPLICATION

This Waste Licence Review Application (WLRA) is being made to the Environmental Protection Agency (EPA) by Roadstone Limited, in order to facilitate the importation and recovery of naturally occurring soil and stone waste at a rate of 750,000 tonnes per annum to backfill and restore the South Quarry within the Huntstown Quarry Complex in North Dublin.

BACKGROUND

The existing parent permission for the Huntstown Quarry Complex (Planning Ref. FW12A/0022 and An Bord Pleanála Ref. No. 06F.241693) was granted in August 2014 and provides for continuation of quarrying activity for 20 years up to 2034. That permission includes provision for the restoration of all quarry voids within the Huntstown Quarry complex, including the South Quarry, by backfilling them to their former (original) ground level through the recovery of naturally occurring soil and stone waste generated by construction and development activity across the Greater Dublin Area.

The 2014 planning permission provided for a maximum soil importation and recovery rate at Huntstown of 750,000 tonnes per annum. In August 2016, in response to a significant increase in demand for soil waste recovery capacity, Roadstone submitted a planning application to increase the rate of soil importation and recovery to 1,500,000 tonnes per annum to expedite the restoration and soil recovery activities which were on going at the North Quarry and West Quarry at that time. This planning permission was granted by Fingal County Council in November 2016 (Planning Ref. No. FW16A/0120).

The restoration works at the West Quarry at Huntstown were substantially completed in September 2020 and at the current time, restoration at the North Quarry is continuing to progress rapidly. The current rate of soil and stone intake at the North Quarry is at, or close to, the maximum permitted rate of 1,500,000 tonnes per annum and it is now expected that the North Quarry will be substantially backfilled by the end of 2022 and that final restoration works (levelling, contouring and seeding) will commence shortly thereafter.

In view of the ongoing demand for soil waste recovery capacity at Huntstown and the imminent cessation of rock extraction activities at the South Quarry, Roadstone is currently planning to commence restoration / backfilling and soil recovery activities at Huntstown South Quarry early in 2023, on completion and cessation of these activities at the North Quarry.

SCOPE OF THIS LICENCE REVIEW APPLICATION

At the present time, Roadstone envisages that the South Quarry at Huntstown will be restored by backfilling with waste soils on its western side and non-waste ('by-product') soils on its eastern side. The two areas will be separated by a berm constructed of natural soils and/or crushed rock which will be raised (in stages) as the levels of imported soil and stone placed in the quarry rise over time.

In order to facilitate the imminent transfer and re-location of soil waste recovery activities from the North Quarry across to the South Quarry, this waste licence review application provides for the following:

- importation of soil and stone waste to the western side of Huntstown South Quarry at a maximum rate of 750,000 tonnes per annum (as currently permitted by Planning Ref. FW12A/0012);
- continued use of pre-existing site infrastructure to support these activities;
- re-routing of internal traffic flows to and from the backfilling / recovery area at the South Quarry across pre-existing haul roads within the quarry complex; and
- extension of the licensed site boundary to incorporate the proposed waste recovery area on the western side of the South Quarry and the pre-existing haul routes leading to / from it.

As noted above, backfilling and recovery activity at the South Quarry already has the benefit of planning permission. No new infrastructure is required to facilitate transfer and re-location of established soil waste recovery operations to the western side of the South Quarry or the extension of the licensed site area to include this area.

All pre-existing site infrastructure including weighbridges, wheelwash, site offices, welfare facilities, quarantine shed, and workshop / maintenance shed will remain in service as quarry backfilling and soil recovery activities are transferred / re-located to the South Quarry. The only notable change arising as a result will be the re-routing of HGV lorries and articulated trucks across the quarry complex to the new recovery area at the South Quarry.

NEED FOR LICENCE REVIEW

In each year since it commenced operation of the soil waste recovery facility at Huntstown North Quarry, Roadstone has had to restrict / allocate available soil waste intake capacity amongst its customer base. The facility has been unable to operate on a 12-month year-round basis as the permitted annual intake capacity has been reached weeks, and in some cases months, before the end of the calendar year and recovery activities have had to be suspended until the start of the following year, including in 2020, where no fall-off in waste intake levels was reported, notwithstanding the reduction in the level of construction activity necessitated by restrictions imposed in response to the Covid-19 pandemic.

In light of the existing high level of demand for soil waste recovery capacity at Huntstown, and in order to provide some continuity and market certainty in future years, it is considered that the backfilling and restoration of the South Quarry by backfilling with using imported soil and stone waste should (subject to approval of this waste licence review application) commence on cessation of backfilling and restoration activities at Huntstown North Quarry.

At the present time, the projected start date for recovery activities on the western side of the South Quarry is early 2023. Soil waste intake and recovery at the South Quarry will be at a reduced intake rate (relative to that at the North Quarry) and will be at a maximum permitted rate of 750,000 tonnes per annum.

Policy Background

The opportunity to use inert soil and stone to operate a soil recovery facility and achieve a beneficial outcome in the process, arises due to the volume of such materials being generated by the increase in the level of construction activity across the Greater Dublin Area in recent years. The increased level of construction activity has generated sustained high demand for outlets which can accept inert soil and stone waste for beneficial use and/or for recovery purposes and thereby avoid having to dispose of it at lined landfill facilities.

Recognising these trends, the current Eastern and Midlands Region Waste Management Plan (EMRWMP) 2015-2020 states (in Section 11.2.2) 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 waste outlets / capacity or where these recovery facilities should be located.

In addressing future waste management requirements for C&D waste, the EMRWMP highlights the suitability of former extraction sites for C&D waste recovery activities, noting specifically that *'Quarries also frequently require large quantities of soil material to fill voids, and for other remediation and landscaping applications.'*

The recently published national waste plan 'A Waste Action Plan for a Circular Economy' references (in Chapter 11) the major construction projects envisaged under Project Ireland 2040, the huge potential they provide in terms of the prevention and recycling of construction and demolition waste and the challenge in ensuring there is capacity to manage the waste generated. The policy document specifically states that '*it is vital that there is sufficient capacity for the recovery and/or disposal of the envisaged increased construction and demolition waste*'.

Available / Future Soil Intake Capacity

A recently updated report on national soil and stone recovery / disposal capacity published by the Regional Waste Management Planning Offices indicated that, in the most recent year for which data is available (2018), the total licensed soil waste recovery capacity which was active and available within the Eastern Midlands was 2,411,000 tonnes / annum (across counties Fingal, Meath, Kildare and Wicklow). Of this just over 60% (1,500,000 tonnes / annum) was provided at one licensed soil facility, that at Huntstown North Quarry.

Of the licensed facilities identified in Table A-1 of Appendix A of the updated report and the information provided therein, it is noted that:

- one licenced facility which is currently active (in Kildare) will have no additional intake capacity (equivalent to 344,000 tonnes per annum) and will cease operations after 2022;
- one facility, in North Dublin / Fingal, which has yet to secure an EPA waste licence has a projected annual intake capacity of up to 532,000 tonnes per annum, but given the limited overall scale of the facility will cease operations after just 2½ years, projected at some time around 2023 / 2024;
- another facility in Kildare which has yet to secure an EPA waste licence has a projected annual intake capacity of up to 440,000 tonnes per annum, but has a limited lifespan (3 years) and its licence application is currently stalled while planning related issues are addressed / resolved;
- although the table correctly indicates an annual waste intake of 1,500,000 tonnes to Huntstown North Quarry under the current waste licence, it incorrectly identifies the closure year as 2051 rather than 2022 (as is currently projected by Roadstone);
- although 5 No. other smaller scale facilities licensed by the EPA, with an annual combined soil waste intake of 1,440,000 tonnes per annum, commenced soil waste intake / operations after 2018, there continued to be a sustained high level of demand for soil waste recovery capacity at the Huntstown North Quarry throughout 2019 and 2020. Demand for soil recovery capacity at the facility remained strong in 2020 and 2021, notwithstanding the fact that there was a reduction in the level of construction activity as a result of Covid-19 restrictions;
- the data presented in the updated report suggests that the additional soil waste capacity which came on stream at new facilities in recent years has most likely just managed to keep abreast of the growth in demand from increased levels of construction activity and the displacement of soil waste intake from other facilities (most notably the inert landfill facility at Tara Mines which required significant soil intake over 2017 and 2018 to raise the level of earth embankments and provide increased storage capacity for mine waste tailings); and
- many of the newly licensed facilities, if operated at maximum soil waste intake capacity would have a limited lifespan, of no more than 3 to 4 years. None is of a scale and potential lifespan to provide the soil waste capacity required on a continuous and sustained basis to the same degree as the approved backfilling and recovery activities at Huntstown South Quarry.

Aside from any projected future increase in demand from construction activity, it is conceivable that there will be a further increase in demand for licensed soil waste recovery capacity as a result of several other factors including:

- a further reduction in demand for soil cover at municipal or industrial landfill facilities;
- a future increase in enforcement activity to tackle unauthorised waste disposal activity;
- the reduction in soil waste intake capacity being provided at the Huntstown facility (which will reduce from 1,500,000 tonnes per annum to 750,000 tonnes per annum after 2022, assuming the waste licence review application under consideration is ultimately approved by the EPA); and
- the possible reduction in waste recovery capacity at permitted and registered waste facilities as a result of enhanced regulation and the stated policy objective in waste management plans to preferentially support the development of larger capacity waste facilities rather than a myriad of smaller ones.

Conclusion

In light of the foregoing, it is considered that this application which provides for soil waste recovery activity at Huntstown South Quarry, at the rate of 750,000 tonnes / annum (in line with existing planning permission), merits licensing on the basis that :

- it complies with stated national and regional waste policy objectives, in particular the objective to preferentially develop / promote large scale soil recovery facilities in all waste management regions;
- the facility will provide baseline capacity for soil waste recovery within the Greater Dublin Region over the medium to long-term and give some certainty around the provision of such capacity over an extended period (in excess of 10 years); and
- Roadstone has a proven track record in providing significant soil recovery capacity at large scale, well managed recovery facilities at strategically located quarry sites.

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Licence Alteration Request

Alteration Details	
Licence	W0277-03 Huntstown Inert Waste Recovery Facility
Licensee	Roadstone Limited
Title of Alteration	Huntstown WRF Extension to South Quarry

Screening Report

No.	Question	Answer
1	Does the proposed alteration require a new class of activity or process?	No
2	Does the proposed alteration cause a new / additional main emission point?	Yes
3	Does the proposed alteration increase the total specified emissions for any emission parameter? significantly ?	No
4	Does the proposed alteration increase significantly the overall total emission from the installation/facility?	No
5	Does the proposed alteration involve development or proposed development that has already been granted planning permission or requires a grant of planning permission and was/is subject to EIA by the Planning Authority or An Bord Pleanála?	Yes
6	Did the proposed alteration require the preparation of a Natura Impact Statement (NIS) for consideration by any Planning or Public Authority?	No
7	Does the proposed alteration indicate that the EPA should conduct an Appropriate Assessment (on foot of a screening for Appropriate Assessment)?	No
8	Does the proposed change conflict with BAT as set out in the relevant BAT Conclusions? See here	No
9	Does the proposed alteration adversely affect the energy efficiency of the installation/facility?	No
10	Does the proposed alteration adversely affect the environmental risk of the installation/facility significantly ?	No

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11	Does the proposed alteration cause an increase above the capacity limitations specified in the licence?	Yes
12	Does the proposed alteration require an extension of operating hours (where controlled by the licence) for an installation/facility where the public is likely to have an interest in such an extension?	No
13	Does the proposed alteration involve the incineration or co-incineration of waste materials displaying hazardous properties that were not previously authorised (as per the WID/IED)?	No
14	Does the proposed alteration introduce materials or techniques which adversely alter the probability, magnitude and duration or complexity of the site transboundary impact?	No
15	Does the proposed alteration constitute a substantial change?	Yes
16	Does the proposed alteration regularise an on-going breach of a licence condition?	No
17	Does the proposed alteration require a change to a condition or schedule of the Licence?	Yes

Recommendation

Based on your responses to the forgoing questions the recommended option is for you to submit a 'Licence Review' application for this proposed alteration.

To progress this request you are required to go to the EPA website (www.epa.ie), complete the relevant Licence Application Form and follow the licensing application process. The application should be submitted to the EPA as specified in the licence application form or any associated instructions for applicants.

Recommendation Date: 03/12/2021