

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 soil and stone waste recovery facility at the Huntstown Quarries provide for recovery of excavated inert, uncontaminated soil and stone waste through backfilling to former ground level and for the subsequent restoration of the backfilled lands to agricultural use.

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 within the Huntstown Quarry Complex typically excavated at construction / development sites or in the course of utilities installation / maintenance works across the Greater Dublin Area. 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 (as waste) 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 quarries at Huntstown (including the South Quarry) 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

Dublin is one of several counties in the Eastern Midland waste region of Ireland which is covered by the Eastern and Midlands Regional Waste Management Plan (EMRWMP) 2015-2021 which was published by Dublin City Council (the lead Local Authority for the plan) in May 2015.

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 (particularly since the EMRWMP) was published in 2015. 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 EMRWMP highlights that a number of pre-existing or previously authorised C&D waste recovery facilities, would if re-assessed today, be considered unsuitable for backfilling / infilling activities. Section 11.2.2 of the plan states that *'Many sites selected for infill facilities are considered marginal agricultural land and may include wetland habitats or lands subject to flooding. There is an increasing recognition of the potential ecological and biodiversity value of these wetland sites. There is also a sense that at many of these sites, the deposition of waste material rather than improvement or development of the land was the primary purpose of the activity.'*

The EMRWMP proceeds to address future waste management requirements for C&D waste and 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'*¹ 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'*.

¹ A Waste Action Plan for a Circular Economy, Department of Environment, Climate and Communications, September 2020, Dublin