

9 June 2022

Ms. Marie O'Connor
Programme Manager – Environmental Licensing
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

Our Ref : 501.00180.00313
Your Ref : W0277-04

Dear Ms. O'Connor,

**RE: ROADSTONE LTD, HUNTSTOWN SOIL WASTE RECOVERY FACILITY, FINGLAS, DUBLIN 11
WASTE LICENCE REVIEW APPLICATION (REFERENCE W0247-04)
REQUEST FOR EXPEDITED DECISION / DETERMINATION OF LICENCE REVIEW APPLICATION**

We, SLR Consulting Ireland, submitted an application to the EPA Licensing Programme on 17 December 2021 last on behalf of Roadstone Limited which provided for a review of its existing waste licence in respect of soil / C&D waste recovery activities at Huntstown Quarry, to the north of Dublin. The waste licence review application (Ref. W0277-04) provides for the following:

- (i) future 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 Fingal County Council Planning Ref. FW12A/0012 / An Bord Pleanála Ref. No. 06F.241693);
- (ii) extension of the licensed waste site boundary to incorporate the proposed waste recovery area on the western side of the South Quarry and the haul roads leading to / from it;
- (iii) an increase in the total permitted (lifetime) soil and stone waste intake to the (extended) waste recovery facility to 18.76 million tonnes;
- (iv) continued use of pre-existing site infrastructure to support future soil waste recovery activities; and
- (v) re-routing of internal traffic flows within the quarry complex, to and from the backfilling / recovery area at the western side of the South Quarry.

As of the time of writing, we have yet to receive any communication, feedback or request for further information / clarification from the Licensing Programme in respect of the licence review application. As a consequence, Roadstone is very concerned that a Final EPA Decision will not be made in sufficient time to permit soil waste recovery activities to continue at Huntstown Quarry in early 2023.

Background to Licensee's Concern

As is explained in the EIAR which accompanied the licence review application, the existing licensed soil waste recovery facility located at Huntstown North Quarry, currently has a maximum permitted annual soil waste intake of up to 1,500,000 tonnes per annum. Demand for soil waste recovery capacity at the existing recovery facility at the North Quarry has been so strong that in each year since 2016, including the pandemic years of 2020 and 2021, Roadstone has been unable to operate on a 12-month, year-round basis as the maximum annual intake capacity was reached weeks, and in some instances, months, before the end of the calendar year.

Roadstone estimates that, up to this year (2022), the existing licensed facility at Huntstown North Quarry provided up to 50% of the available recovery capacity for all soil waste generated by construction and development activity across the Eastern Region since 2016.

At the current rate of soil waste importation, backfilling of the North Quarry with imported soil waste will be complete by some time around September / October of this year (2022). **In the absence of a timely decision by the EPA on the current licence review application, there will be no replacement waste intake capacity at Huntstown in 2023 to offset the loss of the 1,500,000-tonne annual intake capacity which has heretofore been provided at the North Quarry.**

In such circumstances, some of the soil waste generated across the Eastern Region could be diverted to other licensed Roadstone recovery facilities further beyond Dublin, specifically to Milverton Quarry, near Skerries (Licence Ref. W0272-01) or to Calary Quarry, near Kilmacanogue, Co. Wicklow (Licence Ref W0293-01). The combined intake of these two facilities, at 550,000 tonnes per annum, would however still leave a significant shortfall of 950,000 tonnes per annum in soil recovery capacity across the Region (equivalent to one-third of that required), with consequent challenges for cost-effective and sustainable management of this waste stream in 2023 (and possibly also in subsequent years).

Future soil waste intake at the replacement facility at Huntstown South Quarry is currently restricted by the terms of the existing planning permission to 750,000 tonnes per annum. **Even if** a timely decision is made in respect of the current EPA licence review application and the planned South Quarry facility does become operational early in 2023, it will only provide 25% of the required soil waste recovery capacity for the Eastern Region for the foreseeable future. In such circumstances, there will still be a requirement for additional recovery capacity to be provided at other authorised facilities located further outside Dublin.

Request

In light of looming constraints on available soil waste recovery capacity across the Eastern Region from early 2023 as outlined above, Roadstone respectfully requests that the Agency

- (i) prioritise processing of the waste licence review application (Ref. W0277-04) submitted by Roadstone in December 2021 in respect of (approved) quarry restoration and soil waste recovery activities at Huntstown South Quarry;
- (ii) expedite requests for further information and/or clarification (if any) on documentation or information previously provided to it in support of the application; and
- (iii) make every effort possible to expedite both the Proposed and Final Decision in respect of this licence review application to facilitate its coming into operation in early 2023.

Yours sincerely,

FOR SLR CONSULTING IRELAND



Derek Luby
Technical Director

cc. Mr. John Glynn / Mr. Leonard Grogan – Roadstone Ltd.
Mr. Hugh Coughlan / Ms. Una Fitzgerald - Eastern Midland Regional Waste Office