



### Submission

Submitter:	Mr Terry Hughes
Submission Title:	Observations RE - Kilsaran waste licence application for Ballinclare – W0311-01
Submission Reference No.:	S011366
Submission Received:	01 November 2023

### Application

Applicant:	Kilsaran Concrete Unlimited Company
Reg. No.:	W0311-01

See below for Submission details.

Attachments are displayed on the following page(s).

To whom it may concern

I wish to make the following observations regarding the re Waste Permit Application Ref w0311 by Kilsaran Concrete for Ballinclare Quarry.

1. In refusing the application An Bord Pleanála have stated that they are “not satisfied, on the basis of the submissions made in connection with the planning application, that adverse impacts on water quality, habitat and species can be avoided, managed and mitigated to non-significant levels. The proposed development would have unacceptable direct and indirect impacts on biodiversity and would, therefore, be contrary to the proper planning and sustainable development of the area.” The application for a waste permit therefore I believe be reserved until such a time that An Bord Pleanála are satisfied that project would not have a detrimental affect on the ecology and biodiversity in the area.
2. My house is 40 meters from the proposed site and only 128 metres from the quarry according to figure 10.1 Local Receptors in the **Environmental noise report** but only 200 metres from the quarry area that is to be filled in and most importantly only 475 Metres from the CandD storage area and 525 metres from the storage shed (Google Earth Pro). That would put my family home in the area which would be most adversely affected by noise, especially from the C and D operations. The predictions laid out in table 10-15 of the environmental impact assessment look less than convincing and I would advocate for an entirely independent noise assessment to be carried out before consideration should be given to granting permission for this facility. C and D recovery involves the use of heavy crushing machines which run on diesel, not only causing noise pollution but also environmental pollution and this would be active in the area for the estimated 17 year operation of the site, which I would suggest is on the low side. As myself and my wife both work 50/50 in the office and at home one of us is always working from home, as many others do, the impact on the quality of life of my family and the others in the community who will invariably deteriorate because of these works.
3. The estimate that the facility would only be operational for 17-20 years is very much on the low side. With the Roadstone facility open at Callery, Co Wicklow, which has a capacity for 2.5 Million tonnes I believe it would be a number of years before the Kilsaran facility would reach anywhere near the capacity they predict of 150 trucks per day. Truck drivers and their employers coming from Dublin are unlikely to add the additional 44km round trip to their journey by bypassing the Callery facility. This would lead to the proposed Kilsaran site being in operation a good deal longer than predicted, adding to the disruption to the community and the nearby residences.
4. Unlike many of my neighbours I have not experienced the noise from the previous operational quarry as I have lived here for less than 5 years. I was aware that there was a quarry in the area when we purchased our house but also that it was not operational, I did not envisage the proposed activities occurring or I perhaps would have given the purchase more thought.
5. As a local resident who has not experienced the previous quarrying activity, and after recently moving to this location with my family to enjoy the county side and peace and tranquillity that offers, I would obviously prefer this as a choice. The report (3.48) refers to the slow revegetation of the area, I would argue with this as I have seen the quarry face and the surrounding area. I am lucky in that my neighbour (R10,R11) allows myself and my

family to walk in his woods, the edge of which overlooks the quarry, the cliff face, though artificial, is beautiful and coupled with the body of existing water is very tranquil. Revegetation has been more than slow as nature is not as quick a fix as we all look for in society but will work at its own pace.

6. Kilsaran have stated that the impact on road traffic will be comparable to that already/previously permitted in respect of the quarry activity at the application site. I believe this to be untrue. The previous quarrying activity operated in a circular route. In this case all of the truck movements will be taking place on the R1157 which will lead to an increase of dust contaminants being pushed to the side of the road and ending up untreated in Potters river, leading then to an increase in pollutants and the need for more monitoring and interventions.
7. The SLR template document does not identify the proportion of waste which will come from brownfield sites as opposed to greenfield sites. While a lined receptacle as proposed in the planning application for this site is fine for the treatment of contaminants from brownfield sites it is the transportation of waste from brownfield sites along the N11, M11, M50 and L1157 and subsequent wash off from wheels of trucks or in wet conditions which is a major worrying factor. Enforcing a covered load policy may be difficult with the volume of trucks expected. From a local standpoint this would seem to indicate that pollution affecting the status of Potters river would be unavoidable.
8. Kilsaran estimate that the site would be in operation for approximately 20 years but their estimate relies on the amount of vehicles depositing at the site, with C and D operations in place the estimates for the duration of the site become much longer as trucks could conceivably be arriving full and leaving full.
9. With the site being within 3km of an operational waste facility, the operation of this landfill facility would place another burden on the residents who have already suffered the effects and the imposition of having a quarry and a waste facility in their area for the past number of years.
10. I am fearful of contaminants such as dust from cand d operations and noise pollution having a detrimental effect on my children's health. Not to mention safety concerns over increased presence Heavy Goods Vehicles on an already narrow and unsafe road.

I would appeal to you to consider the above points when considering this application for a waste licence. The applicant has not, at this point engaged with the local community or in any way attempted to address our concerns regarding the proposed facility.

Yours sincerely,