

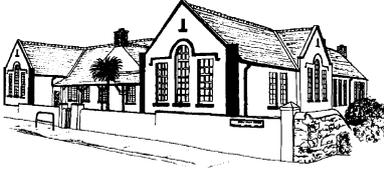
The Skerries Community Association Limited

CRO 100983; Muintir na Tíre registered charity CHY 6865

Established 1934

Making a great town even better!

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Registered Office:
Skerries Community Centre
Dublin Road
Skerries
Co. Dublin

Hon. Secretary: Zaneta Wright
01-8490888 info@skerriesca.com

Environmental Protection Agency,
Licensing Unit,
PO Box 300
Johnstown Castle Estate,
Wexford.
Attn: Noeleen Keavy

11 February 2015

re: Waste License Registration No: W0272.01

Applicant: Roadstone Ltd. Fortunestown, Tallaght, Dublin 24

CRO Number: 11035

Facility: Milverton Waste Recovery Facility, Milverton, Skerries Co Dublin

Dear Ms Keavy,

I am writing to you on behalf of the Skerries Community Association (SCA) to express our objection to the decision to grant the above license.

The SCA is the umbrella organisation for many of the town's community groups, including the Board of Management of Skerries Community Centre, Skerries Tidy Towns Committee, Skerries Town Twinning Association, Skerries Reaching Out, Skerries Cycling Initiative, Skerries Soundwaves Festival, Skerries Rás End Stage Committee, Crann Padraig, Sustainable Skerries, Skerries Guerrilla Gardeners, Skerries CoderDojo, Age Friendly Skerries Committee and Skerries Skatepark Committee. We object to the granting of this licence on the following grounds:

1. The Mill Stream flows from the quarry, through the centre of the town park, to the sea. The park and the sea, including the Blue Flag beach, are of crucial importance to the ecology, community and tourism infrastructure of the town. Therefore the SCA feels that insufficient controls have been put in place to ensure that non-inert material will not contaminate material being deposited at the quarry. It is possible for inert material to be stored offsite and contaminated at the point of storage before being transported to the Milverton Quarry. Given that even a very small amount of hazardous material could be sufficient to contaminate the Mill Stream, the potential consequences of such contamination could be disastrous to the local ecology. There could also be serious health risks as the stream flows through the town

Directors: John Coleman; Mary Conway (*Hon Treasurer*); Karen McCaffrey; Jane Landy; Dee Langton; Ciara Leonard (*Chair*); Nunce McAuley; George McCormack; Geoff McEvoy; Michael McKenna; Sabine McKenna; Martin Russell; Brendan Sherlock; Ernestine Woelger; Zaneta Wright.

park where children's playing pitches are located. **Therefore the SCA requests assurances that all material will be fully tested offsite before being transported to the quarry prior to granting of the licence.**

2. The volume of traffic on the road to the quarry will be significantly increased during the proposed operation of the facility. It is likely that the road is incapable of serving this level of traffic. **The licence should not be granted until a more detailed investigation of the impact on traffic can be made.** Since the quarry was last in operation the town has grown considerably and as a result there is an increased number of road users commuting to Dublin on a daily basis. There are serious safety concerns resulting from this increase in traffic that also need to be investigated before granting the licence. For instance, there are no conditions proposed relating to traffic other than the hours of operation, minor signage changes and hedge trimming. At first sight, it would seem that the increase in the level of vehicle traffic is moderate (estimated to be less than 10% overall). However, this will be very different at certain times. According to the EPA documentation, this could mean an extra (relative to current traffic levels) 26 HGV movements per hour at busy periods on winding and undulating roads extending for over 10 kilometres (Skerries to Blakes Cross). Busy periods will definitely include harvest times when there are also a lot of agricultural vehicles on the roads. Large slow moving vehicles will mean a lot of dangerous overtaking on a road that is very winding, undulating with white line stretches that are unlikely to be respected by drivers eager to overtake slower large vehicles. Pedestrians and cyclists will be even more vulnerable along this road than they are at present. Furthermore no restrictions have been put in place to prevent trucks being overloaded and spilling material onto the road surface.
3. The quarry itself is listed as being of special geological significance by Fingal County Council. Given its geological importance, **further study of the impact of the works on the local ecology needs to be made before granting the licence.** We are concerned that the Environmental Impact Statement submitted by Roadstone did not adequately address this issue. Many passages, for instance those referring to nesting falcons, were repeated verbatim from an earlier Environmental Impact Statement. The geological significance of the site was dismissed by Roadstone in their Statement. In this regard, and in relation to the above points, the SCA feel that the Environmental Impact Statement is neither fair nor reasonable.
4. Finally, given the significant impact the activity at the quarry will have on traffic, noise levels and the local environment, and the increasing likelihood of accident or error with the passing of time, **the licence should not be granted without some clearly defined limit being in place in relation to the duration of activity at the site.**

Until assurances can be made to the local community on all these points, the Skerries Community Association objects to the granting of this licence.

Yours sincerely



Geoff McEvoy
Vice-Chairperson
Skerries Community Association