



20th September 2021

Reg No. E0010-01

PA Reg. Ref: AP20-01

Appeal – Air Licence Application AP20-01, Granted by Kerry Co. Co.to Roadstone to operate an Asphalt Plant at Clasheen, Killarney, Co Kerry.

Dear Sir,

I refer to your letter of 6th September and previous correspondence in relation to the above-mentioned matter.

We, the residents of Minish wish to respond to the observations made by SLR on behalf of Roadstone.

1. Concerns re the large quantities of SO₂, NO_x and other pollutants emitted from the Asphalt plant.

We stand by our original statement that this plant will result in major pollution in our locality which will adversely affect the health of residents. On the day we received your letter the first item on the RTE news was that “pollution is the cause of premature death of 1,300 people every year in Ireland”. This was a report produced by the EPA (i.e yourselves). According to this report recent health research in Ireland shows that if you are in an area that is high in nitrogen dioxide (one of the polluting emissions from an asphalt plant) and are over 50 you are most likely to develop asthma.

Furthermore, SLR state “it is accepted that residents have concerns of potential adverse community health issues”. Their modelling study does absolutely nothing to reassure us, in fact it reinforces our belief that the pollutants that will be emitted from the asphalt plant will do precisely that and adversely affect our health, the EPA report supports our views on this as it is based on facts and studies of the existing situation not some desk study done to suit Roadstone’s objective.

Regarding dust deposition - Roadstone claim to undertake dust deposition surveys on a monthly basis. Again, by their own admission they admit that on at least one occasion in a 10 month period it exceeded the limit, four other samples were deemed unsuitable, one wonders why, local residents believe it was that they would have exceeded the limit so they were discarded. Surely the method of these surveys (jars sitting on top of stands) is outdated in 2021. We need Roadstone to have much more sophisticated equipment, jars on top of stands and

a leaking water main inside the main entrance to keep down the dust is totally unacceptable for a company in their line of business. We note from the EPA report that air pollutant levels breached World Health Organisation (WHO) guidelines at 33 monitoring stations around Ireland.

- 2. Killarney Area and Air Pollution Act (Marketing, Sale, Distribution and burning of specified Fuels) Regulations. To state that the granting of the licence is unaffected by this regulation defies logic. How can anyone believe anything from Roadstone or their Consultants when they make a statement like that. Not only that but as we now know the Government has recently announced that this act will now apply to all the country from September 2022 the aim of which is to improve air quality. Meanwhile Roadstone intend to add to the air pollution.**
- 3. Effect on Lissivigeen N.S, - Roadstone claim predicted concentrations will be minor or insignificant, they also told us they were not exceeding the dust levels but now we know they are. Even if we accept that the effect is minor this is not acceptable for children attending National school.**
- 4. Loss of Amenity on local road north of site - to claim that the plume dispersion from the exhaust stack will not affect this amenity is ludicrous, we have plenty of evidence form other asphalt plants. Another claim is that the odour will be contained within the quarry boundary. How can such a claim be credible, odours recognising a boundary ?**
- 5. Asphalt Plant Stack - I would ask that a qualified person from the EPA visit the site to examine this as we simply do not accept the view from Roadstone.**
- 6. Potential effects of emissions at Sheheree Bog SAC. – pollution, no matter how insignificant, is not acceptable in an SAC. It is widely accepted that acid rain has serious implications for ecologically sensitive areas. A resident of Minish recently cut down Leylandi trees as they were turning brown, he was informed this was a result of acid rain. We are in no doubt that the plant will result in acid rain.**
- 7. Need for asphalt plant in Clasheen - yes, the residents of Minish are aware that planning permission was granted by KCC. This permission was originally granted in 2010, the residents of Minish were unaware of this at the time. This planning permission was renewed in 2015 and 2020. There was no public notification that planning permission was being renewed. We would also state that the emissions from the asphalt plant has a huge impact on Climate Change one of the biggest problems facing the world at present. The effect of pollution and in particular releasing of SO₂, NO_x and NO₂ into the atmosphere is a major contributor to Climate Change. The fact that it will be below the limits set in a particular area does not mean it is not affecting Climate Change and as already stated one the**

biggest issues facing the world at present is Climate Change, Governments all over the world now recognise this fact.

- 8. Use of Cork Airport climatological data - as stated previously Cork Airport is 80klms from Killarney. Roadstone accepts that rainfall and wind speed and direction is different therefore their calculations used in their modelling are incorrect.**

- 9. Traffic associated with the requirement for importation of raw material for use at the plant – Roadstone state that the traffic generation was addressed through the planning process, as pointed out already this planning permission was granted in 2010, we are now in 2021 and the traffic on the N22 has substantially increased in 11 years. Indeed, I walk the circular route around the Roadstone quarry daily, (sometimes twice a day). I observed during the months of June, July and August this year that there was a continuous stream of lorries delivering sand to the pit at Clasheen, not once did I observe covering on these lorries, and during this period there would have been hundreds of deliveries and the weather was extremely fine with the result a lot of dust was created. Roadstone do not seem to be concerned about the requirement to have these loads of sand covered nor have they addressed the traffic issues that will be generated as a result of this plant. All materials used at this quarry have to be drawn into the site as it has been completely exhausted for a number of years. There is no doubt but that traffic both into and exiting from site will be substantially increased as a result of the addition of an asphalt plant.**

We would like to make a number of general points also. SLR stated in their response to Chris Wright/Joan Wright & Buckleys that operating hours were 04.00 to 19.00 Monday to Saturday. According to the planning permission, condition 1.4 the operating hours are stated as 06.00 to 19.00 Monday to Friday and 12.00 on Saturday. This just goes to show what little regard Roadstone have for the conditions under which they were granted permission by KCC.

The residents of the greater Killarney area and in particular of Minish, Clash and Clasheen are the people who will have to live with this plant and the effect it will have on their health.

In view of the serious health issues and the adverse effect on Climate change we sincerely ask you not to grant an air emissions licence for this plant


Dave Murphy & Others

Others include all those that signed original objection and observations