

## 21.0 DIFFICULTIES ENCOUNTERED

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There have been no significant difficulties encountered during the preparation and compilation of the majority of this Environmental Impact Assessment Report.

Chapter 14 'Material Assets-Waste Management' prepared by AWN Consulting notes the following difficulty:

*'Until final materials and detailed construction methodologies have been confirmed, it is difficult to predict with a high level of accuracy the construction waste that will be generated from the proposed works as the exact materials and quantities may be subject to some degree of change and variation during the construction process.'*

*While it is possible to initially select a licensed waste facility for soil disposal, there is potential to encounter contaminated material or material with naturally occurring variations in minerals and chemicals that necessitates sending it to a different suitably licensed facility. The sampling and testing carried out in the Site Investigation (SI) (included within the application documentation) process provides spot samples, and further testing may be required during the excavation process, as the true condition of all excavated materials cannot be ascertained with certainty until this is undertaken.*

*There is a number of licensed, permitted and registered waste facilities in the Dublin region, in the surrounding counties, the eastern midlands waste region and in Ireland and Northern Ireland. However, these sites may not be available for use when required or may be limited by the waste contractor selected to service the development in the appropriate phase. In addition, there is potential for more suitably placed waste facilities or recovery facilities to become operational in the future which may be more beneficial from an environmental perspective.*

*Licensed waste facilities have annual limitations on material that they can import as part of their license agreements. Because of this it would not make it possible to commit to a singular specific receiving facility as it is not available throughout the excavation phase. It would not be viable to cease a development and wait until a receiving facilities annual receiving quotas are reset. In a normal development waste facilities would switch between facilities with available capacity.*

*The waste types generated by this development would be normal C&D waste and it is not envisaged there will be any difficulty allocating receiving waste facilities.*

*The ultimate selection of waste contractors and waste facilities would be subject to appropriate selection criteria, including minimal environmental impacts, proximity, competency, capacity, serviceability, and cost.*

Appendix 5.1 'Review of BRE Sunlight & Daylight Assessment' prepared by 3D Design Bureau notes the following difficulty:

*"It was neither possible nor practical for the Design Team to gain unfettered access to every parcel of private property within the study area surrounding the application site in order to carry out measured building survey. Therefore, while 3DDB has confidence that the three dimensional model used in the assessment of the impact of the proposed development on sunlight & daylight access achieves a high degree of accuracy, it should be noted that some level of assumption was necessary in completing the model."*