

CONNINGBROOK BALLAST HOLE

Environmental Permit Application

Dust Management Plan

Prepared for: Brett Aggregates Limited

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Drawing 002	Environmental Permit Boundary
Drawing 003	Environmental Site Setting
CON/187	Proposed Restoration Contours – Ballast Hole

1.0 Introduction

Brett Aggregates Limited (Brett) has instructed SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application under the Environmental Permitting (England and Wales) Regulations 2016 (as amended) for the use of waste in the restoration of a 'ballast hole' (arising from historic removal of sand and gravel) near to the Conningbrook Recycling Facility (Ref: XP3394VP) owned and previously operated by Brett. Herein the facility will be referred to as 'the Site'.

1.1 Report Context

Conningbrook Ballast Hole currently holds a planning permission for an aggregate facility. The EP application and associated WRP seek to authorise the use of suitable imported waste materials, as a replacement for non-waste construction material in the restoration of the ballast hole.

A full description of the site activities and operations is included within Section 3 below.

The site shall operate in accordance with the EP, all associated documents and the DMP. This DMP should be read in conjunction with:

- Non-Technical Summary (ref: 416.01009.00228/NTS);
- Environmental Risk Assessment (ref: 416.01009.00228/ERA);
- Environmental Setting and Site Design (ref: 416.01009.00228/ESSD);
- Waste Acceptance Criteria and Waste Acceptance Procedure (WAC and WAP) (ref: 416.01009.00228/WAC&WAP);
- Site Condition Report (ref: 416.01009.00228/SCR); and
- Operating Techniques (ref: 416.01009.00228/OT).

The location of the Site is detailed on Drawing 001, and the Environmental Permit boundary is illustrated on Drawing 002. The Environmental Site Setting is shown on Drawings 003.

2.0 Site Setting

Conningbrook is located to the northeast of Ashford and northwest of Junction 10 of the M20 in the county of Kent. The Site is accessed via Willesborough Lane, approximately 200m to the southwest. The National Grid Reference for the Site is TR 02929 43897.

The Site is located within the existing Conningbrook Quarry complex, now being decommissioned, close to the former mineral processing area and areas of historic mineral extraction, at the location shown on Drawing 001. Directly to the north is a railway line and beyond is agricultural and open ground. To the east is the now decommissioned Conningbrook Recycling Facility and beyond lie areas of Conningbrook Lakes Country Park and the River Great Stour. Open ground is located directly to the south and beyond is the Julie Rose Stadium and the A2070. To the west of the site is the railway and A2070 with areas of open ground. Beyond to the west is residential properties within Ashford. The Site is not located with an Air Quality Management Area (AQMA).

The surrounding land uses and local receptors within 500m are identified on Drawing 003, Environmental Site Setting, in addition to the cultural and natural heritage within 1km.

A summary of the Site’s immediate surrounding land uses is identified in Table 2-1 below.

**Table 2-1
 Surrounding Land Uses**

Boundary	Description
North	A railway directly to the north, beyond which lies areas of agricultural/open land.
East	The Conningbrook Quarry Complex containing the now decommissioned Conningbrook Recycling Facility is to the east. Beyond this lies the Conningbrook Lakes Country Park which is currently undergoing development to construct residential properties and recreational facilities.
South	An area of open ground directly to the south, beyond which is the Julie Rose Stadium and the A2070.
West	The railway and the A2070 lie to the west followed by areas open ground and beyond is residential properties within Ashford.

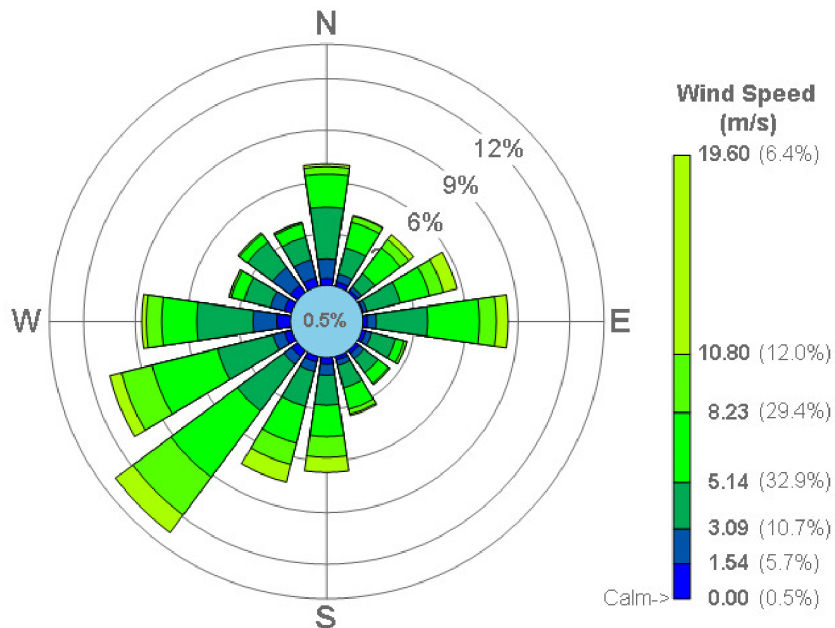
2.1 Windrose

The most important climatic parameters governing the generation and dispersal of fugitive dust are:

- Wind speed which can potentially affect the potential for dust entrainment and the distance it may travel; and
- Wind direction which determines the broad transport of the emission and the sector of the compass into which the emission is dispersed.

Figure 2-1 shows the wind patterns in 2018 as identified by the Lydd meteorological station. The most prominent wind direction is from the southwest to the northeast. Winds from the west and east are frequent with winds from all other directions being relatively infrequent.

**Figure 2-1
 Lydd Meteorological Station 2018**



2.2 Local Receptors

The surrounding land use and specific receptors are detailed in Table 2-2 below.

**Table 2-2
 Local Receptors**

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from Site Boundary (in metres)
Sources Pathways and Receptors located within 500m of the EP boundary as shown on Drawing 003.			
Railway line	Local rail network	West	Adjacent
Ares of open ground	Open ground	North and south	Adjacent
Conningbrook Lakes Country Park Development Area	Country Park	East	Adjacent
Julie Rose Stadium	Recreational Facility	South	20
A2070	Local road network	West	50
Premier Foods Batchelors Factory	Commercial and Industrial premises	Southwest	90
Surface water bodies associated with historic quarrying activities	Surface Water Feature	North, east and south	90
Willesborough Road	Residential	West	110

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from Site Boundary (in metres)
Conningbrook Manor	Residential	South	240
River Great Stour	Surface Water Feature	East	280
Principal Aquifer	Aquifer Designation	N/A	N/A
Cultural and Natural Heritage identified receptors located within 1km of the EP boundary as shown within Appendix ERA1 and on Drawing 003.			
Conningbrook Manor	Listed building	South	240
Great River Stour	LWS, Protected species and eel migratory route	East	280
Ancient Woodland	Ancient woodland	East and south east	950

It is considered that the primary receptors listed below are most likely to be affected by potential dust emissions generated at the Site. The list reflects those within the predominant wind direction and within proximity and without obstruction to the receptor:

- Conningbrook Lakes Country Park Development Area (adjacent to the northeast)
- Surface water bodies associated with historic quarrying activities (north and east); and
- River Great Stour (280m to the east).

2.2.1 Potentially Dust/Particulate Emitting Operators

A desk top study of the surrounding area indicates that the Conningbrook Lakes Country Park Development Area adjacent to the east and north of the Site could be classified as a potential dust or particulate generator. The area is undergoing development including excavation, laying foundations and constructing residential properties which are all dust producing activities.

3.0 Site Operations

Conningbrook Ballast Hole currently holds a planning permission for an aggregate facility. The EP application and associated WRP seek to authorise the use of suitable imported waste materials, as a replacement for non-waste construction material in the restoration of the ballast hole.

The ballast hole will be restored in line with surrounding contours and will incorporate imported waste materials in accordance with the following profile:

- Up to 4.5m depth imported waste materials; and
- 0.6m depth soil/soil-forming materials.

The proposed restoration of the land is illustrated on Drawing CON/187 (Proposed Restoration Contours – Ballast Hole).

Key points regarding the proposed restoration are as follows:

- Waste accepted to site may be screened or crushed on a campaign basis to create material suitable for placement into the ballast hole;
- A 0.6m capping or 'deter to dig' layer is required to be placed over the entire site. Rather than importing this material, Brett propose to strip 0.6m of material at the base of the ballast hole, before waste material is deposited. This site won material will be temporarily stockpiled in readiness for use as the capping layer once deposition is complete;
- The storage of the capping material will take place in mounds and placed around the area to be filled;
- Waste material stored at the adjacent Brett owned Conningbrook Recycling Facility is a potential source of material for the site and will be subject to the criteria detailed in the Waste Acceptance Criteria (WAC) and WAP included in Section 5 of this EP application; and
- Imported restoration materials followed by site derived capping materials will be placed progressively within the ballast hole to levels that comply with the proposed restoration profile.

3.1 Waste Acceptance

The site-specific Waste Acceptance Criteria (WAC) and Waste Acceptance Procedure (WAP), SLR Ref: 416.01009.00228/WAP, prepared for this application will be implemented at the facility.

All vehicles arriving from outside the Site will be sheeted or enclosed. Upon arrival to the Site, the drivers shall be required to disclose the nature of the waste they are carrying and provide relevant documentation (Waste Transfer Note (WTN)).

All loads of waste delivered to Site shall be visually inspected on arrival. The objective of this inspection is to detect the presence of unauthorised waste. Vehicles that arrive at the Site sheeted shall be required to unsheet to allow this inspection to take place before they are issued with a ticket.

Once it has been confirmed that the waste matches the WTN and accompanying documentation, vehicles shall be asked to proceed to the relevant location on Site. All wastes shall undergo a further visual inspection at the point of deposit.

3.2 Quantity and Types of Permitted Wastes

The volume of material estimated to restore the Site in accordance with the proposed final landform is approximately 28,031m³. Assuming an average density of 1.75t/m³, the mass of imported material will be approximately 49,054 tonnes.

3.3 Waste Types and Storage

The proposed waste types to be accepted on site are shown in Table 3-1 below.

**Table 3-1
 Proposed Waste List**

Waste	Code Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 09	Other construction and demolition wastes
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11

3.3.1 Plant and Equipment

The typical types of plant that shall be utilised at the Site are shown below. This list is not exhaustive:

- 20 tonne excavator;
- Bulldozer D6 or 65PX or similar;
- 25 tonne Articulated Dump Truck (ADT); and
- Sheepsfoot roller.

All items of plant and equipment will be maintained in accordance with QHEST IMS procedures:

- BG3.18 Rules for Site Vehicles and Mobile Plant;
- BG4.1 Monitoring and Inspection;
- BG4.2 Plant and Equipment Maintenance; and
- BG4.3 Equipment and Instrument Calibration.

4.0 Fugitive Dust and Particulate Management

4.1 Sources of Fugitive Dust/Particulate Emissions

The following activities have been identified as potentially dust emitting operations on Site:

- Vehicles entering and/or leaving the site with mud on wheels, and tracking dust onto or off the Site;
- Debris falling off vehicles which arrive uncovered;
- Vehicles and plant moving around the Site producing dust;
- Vehicles depositing waste;
- Campaign screening of waste;
- Campaign crushing of waste;
- Site surfaces including around plant and equipment; and
- Particulate emissions from the exhaust of vehicles/plant/machinery on Site.

Table 4-1 further details the sources, pathways and receptors potentially affected by dust generation from the Site, as well as risk and proposed mitigation measures.

Table 4-1
Sources, Pathways, Receptors and Risk Management Measures

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
<p>Dust from:</p> <ul style="list-style-type: none"> - Vehicles entering and/or leaving the site with mud on wheels and tracking dust on to or off the Site; - Debris falling off vehicles which arrive uncovered; - Vehicles and plant moving around the Site; - Vehicles depositing waste; - Campaign screening and crushing of waste; - Site surfaces including around 	<p>Receptors listed in Table 2-2, including in particular:</p> <ul style="list-style-type: none"> - Conningbrook Lakes Country Park Development Area; - Surface water bodies associated with historic quarrying activities; and - River Great Stour. <p>As illustrated on Drawings 003.</p>	<p>Atmospheric / airborne dust / particulates</p>	<p>Transport of Waste:</p> <p>Speed limits shall be implemented for vehicles using the Site.</p> <p>Traffic calming measures shall be implemented to enforce speed limits & reduce emissions of dust.</p> <p>The main access road from Willesborough Road is hard surfaced for a distance of approximately 50m.</p> <p>Secondary access roads leading from the main access road to the operational area will be constructed from hardcore.</p> <p>Site access & haul roads and operational areas shall be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing.</p> <p>Surfaces of haul roads and access</p>	Medium/High	Dust emissions, including; nuisance to local residents/recreational facilities/businesses and potential enrichment and siltation to local ecological receptors.	<p>Low – due to nature of the waste and the mitigation measures implemented during operational periods.</p> <p>The Site Manager will be responsible for implementing all measures and ensuring the site operates in accordance with the environmental permit,</p>

<p>plant and equipment; and</p> <ul style="list-style-type: none"> - Particulate emissions from the exhaust of vehicles/plant/machinery on Site. 			<p>road will be sprayed with water during dry weather.</p> <p>All combustion powered plant (i.e. loading shovel) will be fitted with exhausts directed vertically upwards and maintained in accordance with the manufacturer's recommendations.</p> <p>All roads and operational areas shall be swept where necessary to reduce dust emissions.</p> <p>All vehicles delivering waste to the Site shall be sheeted to minimise emissions of dust.</p> <p>In the event that mud, debris or waste arising from the Site is deposited outside the boundary, the affected area shall be cleaned, and traffic shall be isolated from sources of mud and debris within the Site.</p> <p>Vehicles shall be switched off to prevent idling on Site reducing exhaust emissions</p> <p><u>Waste Operations:</u></p> <p>The strict WAC and WAP for the Site shall ensure that non-permitted wastes shall not be accepted on Site.</p> <p>Drop heights shall be minimised to prevent emissions of dust.</p> <p>In particularly adverse weather conditions (excessively windy) operations shall be ceased until</p>			<p>operating techniques and this DMP.</p>
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		<p>such time that operations can recommence with minimal risk of wind-blown dust.</p> <p>The whole Site shall be kept free from significant quantities of mud and debris.</p> <p>Daily visual monitoring shall be carried out by all members of the staff throughout the operational day and the Site shall be left in a condition to minimise the generation of dust during weekends and overnight.</p> <p>All staff shall be trained to ensure dust emissions are minimised and mitigation measures are implemented. All drivers delivering waste to Site shall be informed of dust minimising measures as well as correct signage throughout the site.</p> <p>All equipment will be subject to planned maintenance checks.</p> <p><u>Campaign screening and crushing of waste:</u></p> <p>All equipment will be subject to planned maintenance checks.</p> <p>Daily visual monitoring will be carried out on all equipment and processing.</p> <p>Dust suppression will be used if deemed appropriate during the</p>			
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			<p>campaign screening and crushing of waste.</p> <p>Implementation of the following QHEST IMS procedures will minimise the emissions of dust from the site:</p> <ul style="list-style-type: none"> • BG3.7 Traffic Management • BG3.8 Housekeeping, Litter, Pest and Vermin control • BG4.1 Monitoring and inspection • BG5.2 Reporting and investigation of Accident and Incident and complaint • BA5 Creation and maintenance of stockpiles. <p>The Site Manager shall be responsible for implementing the DMP.</p>			
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4.2 Dust Monitoring, Management and Mitigation

4.2.1 Qualitative Methods

The Site shall undertake regular, daily visual monitoring to ensure that dust control techniques are being followed and are effective. Monitoring, management and mitigation of Site activities fulfils a number of objectives in respects of dust including:

- Assessing the performance of Site operations and effectiveness of existing control measures;
- Assessing contractor activity and their control measures;
- Response to any complaints concerning dust;
- Evaluating the potential for dust generation that day, given the above and weather conditions; and
- The selection and application of dust suppression techniques and prioritisation of dust sources for mitigation.

The whole operation will be inspected in relation to dust on a daily basis and will include the following:

- Upwind locations of the permit boundary;
- Downwind locations of the permit boundary;
- Where other business activities are in close proximity to the boundary;
- Observations of any waste materials being tipped and stockpiled wastes;
- Traffic movements; and
- General yard areas.

All monitoring results will be recorded alongside any negative findings and/or actions identified, together with the appropriate action taken to mitigate.

If the daily monitoring identifies that dust emissions are likely to migrate beyond the permit boundary or have migrated beyond, the following mitigation measures shall be immediately implemented:

- Dust suppression will be used at the source of the dust;
- Washing down of equipment;
- Road sweeping;
- Where the source of the dust is from contractors or hired in plant, the operation will cease until all onboard abatement measures have been checked and are fully operational and/or additional measures put in place; and
- Increase visual monitoring until the Site Manager is satisfied with the reduced dust levels and mitigation measures in place.

If the above mitigation measures do not rapidly minimise dust emissions, or if significant amounts¹ of dust continue to escape the Site boundary, it shall be the responsibility of the Site Manager to determine what further mitigation measures shall be required and / or whether operations need to cease until these measures are implemented.

¹ Significant amounts are considered amounts capable of forming a visible layer of deposit onto surfaces directly surrounding the Site or continuous visible emissions of dust obviously leaving the Site boundary.

4.2.2 Quantitative methods

If dust is observed beyond the permit boundary and in the vicinity of local receptors, on a repeated basis, or where complaints have been received, quantitative monitoring may be required. Quantitative methods would be carried out by an accredited laboratory and monitoring services organisation. Each possible type of monitoring and the assessment criteria is shown in Table 4-2 below:

**Table 4-2
 Quantitative Assessment Criteria for Dust**

Type of Monitoring	Assessment Criteria
Sticky Pads	% Effective area covered relative to potential 'complaint' thresholds'.
Dust Deposition Gauge	Particulates PM10 50µg m-3 not to be exceeded daily more than 35 times per calendar year and 40 µg m-3 as a mean per calendar year.
Dust Deposition Gauge	Total deposition rate 200mg/m2/day.
Personal or Ambient Gauge	10mg/m3 (8hrTWA) inhalable dust, 4mg/m3 (8hrTWA) respirable dust, and 0.3mg/m3 crystalline respirable silica.

If the quantitative methods confirm an exceedance of relevant assessment criteria, then one or more of the following steps will be undertaken:

- The dust risk assessment will be reviewed based on the results of the monitoring;
- Operational practices and procedures will be reviewed; and
- Review whether quantitative monitoring is repeated and how often.

4.3 Training

All personnel on Site shall understand their responsibility to ensure the generation of dust is minimised. Each employee shall be made aware of the importance of dust control, the most effective measures available to minimise such emissions and the requirement to report any dust emissions. Such training shall be provided as part of the induction process for all new employees.

Site personnel will be made aware of the following site procedures, which form part of the QHEST Management system:

- BG3.7 Traffic Management;
- BG3.8 Housekeeping, Litter, Pest and Vermin Control;
- BG4.1 Monitoring and Inspection;
- BG5.2 Reporting of Accident, Incident and Complaint;
- BA5 Creation and Maintenance of Stockpiles; and
- BA12 Control and Operation of Landfill and Recovery Facilities (Deposits of Waste).

5.0 Reporting and Complaints Response

All Site operatives shall be responsible for ensuring operations occur on Site with a minimal risk of dust emissions. The Site Manager shall be responsible for implementing the DMP and ensuring all management and mitigation measures are upheld at all times. The Site Manager shall be responsible for recording and investigating any complaints received regarding dust issues on Site.

All reported complaints shall be investigated, and steps shall be taken to prevent any continuing issue by putting in place additional control or management measures to prevent re-occurrence of the incident and updating the DMP. The complaint system includes:

- All complaints are logged, considered and investigated;
- The outcome of an investigation is recorded and communicated back to the complainant in a timely and appropriate manner; and
- Investigations of complaints include a review of trends in performance and the management systems to identify areas for improvement in operational controls as well as improving customer services in the future.

The following are details that would be considered during an investigation:

- A visit by the Site Manager to the location of complainant to verify issue (if the complaint is made 'after' rather than 'during' a dust event this may not be possible);
- A review of Site activities at the time of the incident to investigate potential sources;
- If the dust event is occurring or a recurring event, more frequent on-site and off-site visual monitoring and record findings shall be undertaken;
- A review of control measures and management actions at the time of the incident; and
- A review of the meteorological conditions at the time of incident.

6.0 Summary

It is considered that the following potential receptors could be affected by potential dust emissions, namely:

- Conningbrook Lakes Country Park Development Area (adjacent to the northeast);
- Surface water bodies associated with historic quarrying activities (north and east); and
- River Great Stour (280m to the east).

The full receptor list is included within Table 2-2 and illustrated on Drawing 003.

However, with the implementation of this DMP, and the management/mitigation methods detailed in Section 4, the risk of the release of fugitive emissions of dust shall be minimal.

APPENDIX DMP1

Dust Complaint Form

Customer Details	
Customer Name -	
Address –	
Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	
Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a reoccurrence -	

Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

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