



An  
Bord  
Pleanála

## Record of 1<sup>st</sup> Meeting ABP-305252-19

<b>Case Reference / Description</b>	ABP-305252-19  Increase in annual total waste for treatment from 235,000 tonnes to 250,000 tonnes, increase in hazardous waste from 10,000 tonnes to 24,000 tonnes and associated works at Carranstown, Duleek, Co. Meath.		
<b>Case Type</b>	Pre-application consultation		
<b>1<sup>st</sup> / 2<sup>nd</sup> / 3<sup>rd</sup> Meeting</b>	1 <sup>st</sup>		
<b>Date</b>	11/12/19	<b>Time</b>	11.30 -13.15

<b>Attendees</b>
<b>Representing An Bord Pleanála</b>
Anne Marie O'Connor, Assistant Director of Planning (Chair)
Breda Gannon, Senior Planning Inspector
Kieran Somers, Executive Officer
<b>Representing the Prospective Applicant</b>
Conor Jones, Indaver Ireland
Paul Schutze, Indaver Ireland
Fiona Patterson, ARUP
Alexandra Fleming, ARUP

## **Introduction:**

The Board referred to the letter received from the prospective applicant requesting pre-application consultations and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters it wished to receive advice on from the Board.

The Board mentioned general procedures in relation to the pre-application consultation process as follows:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or any legal proceedings.

## **Prospective Applicant's Presentation:**

The proposed development involves changes to the existing waste to energy facility at Carranstown, Duleek, Co. Meath comprising:

- Increase in hazardous waste (from 10,000 tonnes per annum to 25,000). The 15,000 tpa increase would largely comprise aqueous waste from the pharma and bio-pharma sectors and solid hazardous waste such as pp clothing, liners etc also largely from the pharma sectors. It is expected that the Cork region

would account for much of this particular type of waste. This waste is currently being exported due to lack of capacity in Ireland.

- Tank farm for the storage of aqueous waste pre-treatment.
- Bottom ash storage building - IBA produced during the waste incineration process will be storage prior to transfer to a licenced waste facility or for export. 36,000 tonnes of IBA are produced at the existing facility annually.
- Hydrogen Generation Unit – This is a pilot project to extract hydrogen from water using the energy produced in the incineration process. The hydrogen gas generated would be injected into the existing gas network using the gas pipeline which crosses the site. Energy produced by the incineration process is exported to the national grid. However, during periods of curtailment (ie when sufficient wind energy is produced and has priority access to the grid) this energy is released unused. (Battery storage is considered uneconomical due to the scale.) The hydrogen generation unit is highly energy intensive and is suitable at this site because it would utilise excess energy that would otherwise be released unused.
- New office building for an additional 16 staff (following demolition of existing office building).
- Warehouse and workshop.
- Ancillary development including parking area, minor upgrades to roads and circulation areas, and a canopy for a pre-treatment area. The proposed concrete parking area will provide a logistics parking area for 10 trucks, containers and tankers. Drainage will also be provided in case of any spills or leaks.

The prospective applicant set out the policy context for the proposed development which focused on the proposed increase in hazardous waste. It said that the proposed new capacity for this waste stream would be in line with the requirements for an additional 50,000 tonnes per annum of hazardous waste treatment capacity as set out in the NHWMP. The prospective applicant said that this objective would serve to fulfil the objectives of self-sufficiency and proximity and would reduce the reliance on export whilst avoiding the transport of hazardous waste over long distances. The proposed hydrogen generation unit accords with the existing policy framework at national and regional level which underlines the pressing need to

facilitate the development of enhanced electricity and gas supplies in order to support the State's transition to a low carbon economy as set out in various plans/strategies including the National Planning Framework and the National Development Plan.

The prospective applicant considers that the proposed increase in hazardous waste (an additional 15,000 tonnes per annum) would result in the development falling under strategic infrastructure. It also referred to the proposed increase in annual total waste for treatment at the existing facility and the Board's previous SID decision which resulted in a direct planning application under case reference number 17.PA0026.

### **Discussion:**

The following matters were discussed:

- The new **office building** would provide staff with the opportunity of working at the incinerator site rather than the HQ in Dun Laoghaire. Noting the zoning of the site, the Board's representatives said that the principle of this element of the proposed development might prove to be problematic. A strong justification in planning terms would be required.
- **Residential Amenity:** The prospective applicant said that there have been no noise issues with the existing facility in recent times and that most odour complaints are often attributable to other sources; it added that any such complaints regarding odour are investigated. The Board advised that these matters should be addressed in detail in any planning application.
- **Traffic and transportation:** The prospective applicant agreed with the Board's conclusion that traffic impacts arising from the increased number of traffic movements would likely be an important matter to be addressed in any planning application.
- **Environmental Impact Assessment:** Preparation of an EIAR is underway and is expected to be completed circa March 2020. The prospective applicant acknowledged that the risk of major accidents or disasters (including fire safety issues) would have to be considered as part of its assessment. The Board's representatives advised that the EIAR should address the potential

environmental impacts likely to arise from the proposed increase in the overall volume and the specific waste types proposed. It also advised that the Climate section of the EIAR will require particular focus in light of the Climate Action Plan 2019. A wider scope should be given to the consideration of climate impacts associated with the proposed development and, in particular, to all aspects of energy use and generation at the facility.

- **Appropriate Assessment:** In relation to the Natura Impact Statement which is proposed to be prepared for the planning application, the prospective applicant said that it expects completion on this in April 2020 once the conclusions of the EIAR have been confirmed. It said that the preparation of the NIS was being done on a precautionary basis given that the construction phase of the proposed development might impact on the pathway to a SAC.
- **Other required consents:**
  - The prospective applicant advised that a connection application has been made to Gas Networks Ireland in relation to the hydrogen unit. A response is expected prior to the end of 2019. The prospective applicant said its understanding is that no other planning consents are required for this element of the project but undertook to check this with the Commission for Regulation of Utilities.
  - There is an existing IED licence for the facility which would require review. In response to the Board's query, the prospective applicant said that it has not yet consulted with the EPA but intends to do so.
  - The prospective applicant stated that the site is not an establishment for the purposes of COMAH. The prospective applicant advised that the relevant lower-tier threshold for Seveso will not be reached by either the addition of the tank farm storage element or the storage of hydrogen on site. The prospective applicant stated that there are no Seveso sites in the vicinity to the best of its knowledge but undertook to provide robust clarity on the matter as part of its planning application. The Board advised the prospective applicant to liaise with the Health and Safety Authority in relation to Seveso matters.

- **Consultation:**

- Consultations with Meath County Council is advised, with particular regard to the proposed new office building, and traffic and transport issues, and the EIAR.
- No formal consultations have taken place to date with the regional waste authority. The Board recommended such engagement prior to the lodgement of a planning application.
- Pre-application consultation with the EPA is recommended in relation to the proposed hydrogen generation unit given the nature of the facility.

**Conclusion:**

Having regard to the relevant threshold of the Seventh Schedule, the Board's representatives stated their preliminary opinion that the proposed development would likely constitute SID given the totality of development on site. The Board said it would consider the matter further prior to the holding of a further meeting.

The Board advised the prospective applicant to meet with other bodies such as Meath County Council, the EPA, the Health and Safety Authority and the Commission for the Regulation of Utilities prior to the holding of a further meeting.

It will be a matter for the prospective applicant to request this further meeting which is likely to take place in Spring 2020. The record of the instant meeting will issue to the prospective applicant in the meantime.

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**Anne Marie O'Connor**

**Assistant Director of Planning**