

**An  
Bord  
Pleanála**

## **Record of Meeting ABP-315084-22 1<sup>st</sup> meeting**

<b>Case Reference / Description</b>	ABP-315084-22 Modifications to the Waste Treatment Facility to manage an additional 24,000 tonnes per annum of Healthcare Risk Waste. 402 Grants Drive, Greenogue Business Park, Greenogue, Rathcoole, Co. Dublin.		
<b>Case Type</b>	Pre-application consultation		
<b>1st / 2nd / 3<sup>rd</sup> Meeting</b>	1 <sup>st</sup>		
<b>Date</b>	07/02/23	<b>Start Time</b>	14.30 p.m.
<b>Location</b>	N/A	<b>End Time</b>	15.25 p.m.

<b>Representing An Bord Pleanála</b>
Ciara Kellett, Assistant Director of Planning (Chair)
Kevin Moore, Senior Planning Inspector
Niamh Thornton, Executive Officer
<b>Representing the Prospective Applicant</b>
Conor McGovern, RPS
Michael Higgins, RPS
Kevin McCarthy, Envva Ireland Ltd

The meeting commenced at 14.30 p.m.

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.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- 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.

### **Presentation by the prospective applicant:**

The prospective applicant opened its presentation with an introduction to the applicant company Enva Ireland Ltd. The site of the proposed development is located centrally within the Greenogue Business Park and has been in use as a waste transfer station since 2003. The facility currently operates under an EPA waste licence which the prospective applicant stated would need to be reviewed as part of the proposed development. The site is zoned Objective EE – to provide for enterprise and employment related uses.

The proposed development would comprise modifications to the existing waste treatment and transfer facility to manage 24,000 tonnes per annum of Healthcare Risk Waste (HRW), prior to onward consignment to energy recovery treatment. Total site tonnage will remain unchanged at 111,000TPA. The new operation will displace an existing contaminated soil recovery facility and occupy its footprint. There will be no change to the overall site footprint. Works will include a change in traffic volume, relocation of existing office, demolition of an existing office and construction of a trailer loading area.

The prospective applicant presented a table of the composition of the 24,000TPA of healthcare risk waste intended to be brought on site.

Three treatment processes are proposed to be undertaken on site, as follows:

- Process 1 - shredding and steam disinfection of soft risk waste, which will then be sent off-site for thermal recovery.
- Process 2 - automated emptying of reusable sharp containers carrying sharp healthcare risk waste. The waste will then go through Process 1 and the containers disinfected and sent out for reuse.
- Process 3 - storing and bulking up of unused medicines and wastes, which do not need disinfection, which will be transferred off-site for appropriate treatment.

The prospective applicant presented aerial images and drawings detailing the proposed development boundary line and site layout plan. The prospective applicant also presented images depicting the disinfection plant (Process 1) and the sharps

container plant (Process 2). It was stated that sharps containers are typically single-use, disposable units and that the introduction of this proposed plant will allow containers to be reused up to 600 times.

The prospective applicant held a pre-planning consultation meeting with South Dublin County Council in April 2022. The Council advised that consideration as to whether the development is / is not Strategic Infrastructure Development must take account of all existing waste management uses on site, not just those within the redline and advised the prospective applicant to enter into pre-application consultations with the Board.

The prospective applicant stated that it considers the proposed development meets criteria (a) and (b) outlined in section 37A(2) of the Planning and Development Act, 2000, as amended, and falls within the Seventh Schedule of the Act, as

- an installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes, and
- a waste disposal installation for chemical treatment (within the meaning of Annex IIA to Council Directive 75/442/EEC1 under heading D9).

The prospective applicant gave examples of sources from which its understanding of D9 designation is based, including EPA description and examples of Code D9 in “Guidance on use of Disposal and Recovery Codes”, the Third Schedule of the Waste Management Acts, and National Hazardous Waste Management Plan 2014-2020 consideration of physico-chemical treatment. The prospective applicant stated that the two other healthcare risk waste facilities in Ireland operate under the D9 designation.

#### **Discussion:**

A discussion was had around whether the proposed development falls within development listed in the Seventh Schedule. The Board’s representatives stated their opinion that the proposed development may not constitute an installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes, as the facility is already existing and permitted. The Board’s representatives gave examples of previous cases where increases in intake/capacity

to existing facilities were not deemed to be SID, where the increase itself was lower than the SID threshold.

The Board's representatives questioned whether the proposed development would constitute a waste disposal installation for chemical treatment, as there is no chemical treatment proposed. The prospective applicant re-iterated that other existing facilities have been designated D9 and that other processes are incorporated within the D9 designation.

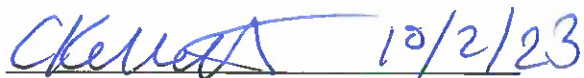
The Board's representatives gave their preliminary opinion that the proposed development is not SID. The final decision however is for the Board. It was agreed that the Inspector would seek a preliminary view from the Board as to whether it considers the proposed development to be SID or not.

Once this preliminary view has been obtained the prospective applicant can either request to close the consultation process or request further meetings.

**Conclusion:**

The record of the instant meeting will issue in due course and the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting. The onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process.

The meeting concluded at 15.25 p.m.



**Ciara Kellett**

**Assistant Director of Planning**