PLANNING STATEMENT

Proposed Replacement of Renewable Energy Plant

Redmondstown, Clonmel, Co. Tipperary.

Prepared for: **Medite Europe DAC**

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CONTENTS

DOCUMENT REFERENCES

TABLES

FIGURES

1.0 Introduction

1.1 Overview

This Planning Application, accompanying EIAR and Planning Statement, has been prepared by SLR Consulting Ireland Ltd (SLR) on behalf of Medite Europe DAC (hereafter referred to as 'Medite').

The Planning Application will seek permission for the replacement of the existing three aging thermal energy systems serving Medite's two production lines with renewable energy plant, with thermal input capacity of 60MW and 30MW respectively, for each of Medite's production lines.

As the existing boilers are approaching the end of their design life, their replacements will be the best available technology that will guarantee the continued operation of the plant, secure greater energy efficiency, and reduce environmental emissions. Importantly, the project will sustain continued employment in the region. From a national and regional perspective, the project is critical to enable Medite to maintain its competitiveness internationally.

The Proposed Development will ensure that the factory's significant heat requirement is met. The new energy system will see the introduction of a new, modern combustion, air filtration, and treatment systemin line with European emissions performance for the best available technology.

The Proposed Development will bring several benefits to Medite both in terms of competitiveness and efficiency as a manufacturing facility but also in respect of its ability to meet new environmental targets for carbon emissions reductions. The benefits include:

- Reduced carbon emissions by reducing natural gas consumption and use of production residue as fuel
- Energy savings via improved thermal efficiency.

1.2 The Applicant

This Planning Application and accompanying EIAR is submitted by Medite, hereafter referred to as the Applicant. Medite commenced production of Medium Density Fibreboard (MDF) on its site in Clonmel, Co. Tipperary in 1983. In November 2006, Medite was acquired by Coillte Teoranta, which is the parent company of Medite.

The Company's facility produces a maximum of 425,000m^3 of MDF per annum, and currently employs 170 people. Medite supplies a wide range of MDF products to meet the diverse needs of users, specifiers, and designers across Europe and beyond. The extensive MDF range includes ten different families of MDF products and many variants, with over 400 possible specifications.

Through consistent commitment to research, development, and ongoing investment in technology, Medite has established itself as the leading brand in the MDF market by introducing a wide variety of quality products and customer led innovations. Medite's technological innovations have led the greater market to advances in areas such as finish quality, moisture resistance, flame retardancy and many more MDF attributes.

2.0 Background to Planning Application

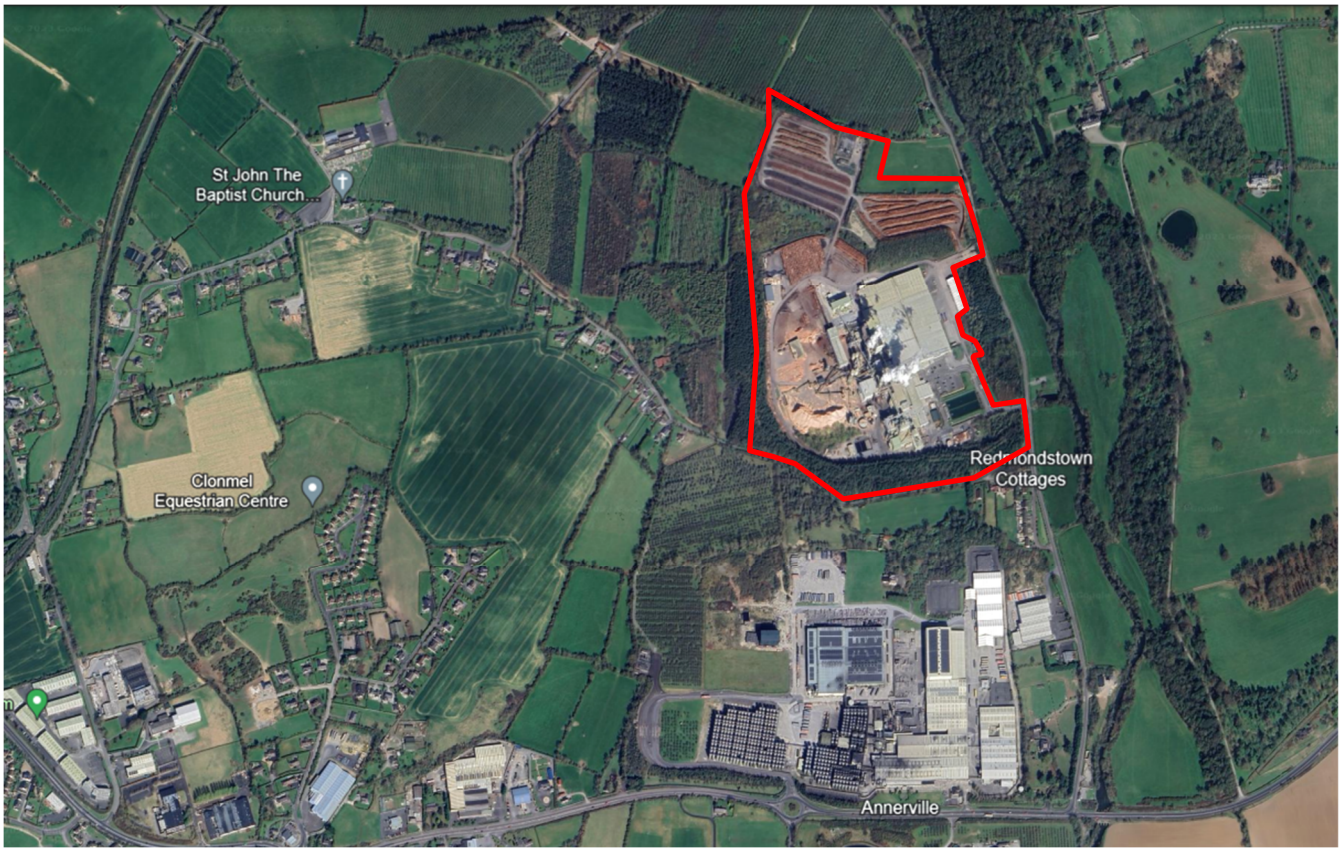
2.1 Site Location and Context

The Proposed Development Site comprises a total area of 29.7 hectares and incorporates an existing and long-established industrial facility for the manufacture of MDF. This Proposed Development Site is located at the existing Medite Europe DAC facility at Redmondstown, Clonmel, Co. Tipperary (Refer to **Figure 1** below). Initial site works and construction of the MDF plant were completed in the period between 1981 and 1983 and the development has been in situ for over 40 years. Over the intervening years, the site has developed to improve production practices at the site.

The site is situated in what can be predominantly characterised as a peri urban area, located approximately 4 km east of the centre of Clonmel town and approximately 0.9 km north of the N24. The area to the north of the site is largely rural or agricultural in nature with low density housing development. The area to the south is characterised by industrial uses.

The subject site is well screened and the existing buildings within the industrial facility are situated 50m back from the local access road and are largely obscured from view due to the presence of abundant shrub and tree plantations at the site boundaries.

Figure 1: Site context Map Highlighting the Medite Europe DAC Facility (approximate application site outlined in red (Source: Google Earth).



2.2 Site Description and Land Ownership

The Proposed Development Site has an area of 29.7 ha (Refer to Drawing PL05) which is part of the overall Medite Europe DAC landholding of 69ha. The land in the area of the subject site slopes in a south-easterly direction towards the River Anner, with an elevation range of 20m to 35mOD.

The site is composed of the main production plant building and materials storage areas. All areas associated with the facility's operations are located on hardstanding. A number of landscaped areas and bunds are located along the perimeter of the site.

Figure 2: Approximate Site Boundary of the Medite Europe DAC Landholding (source: Google Earth).

2.3 Site Access

The existing manufacturing plant and application site is accessed via a local access road off the N24.

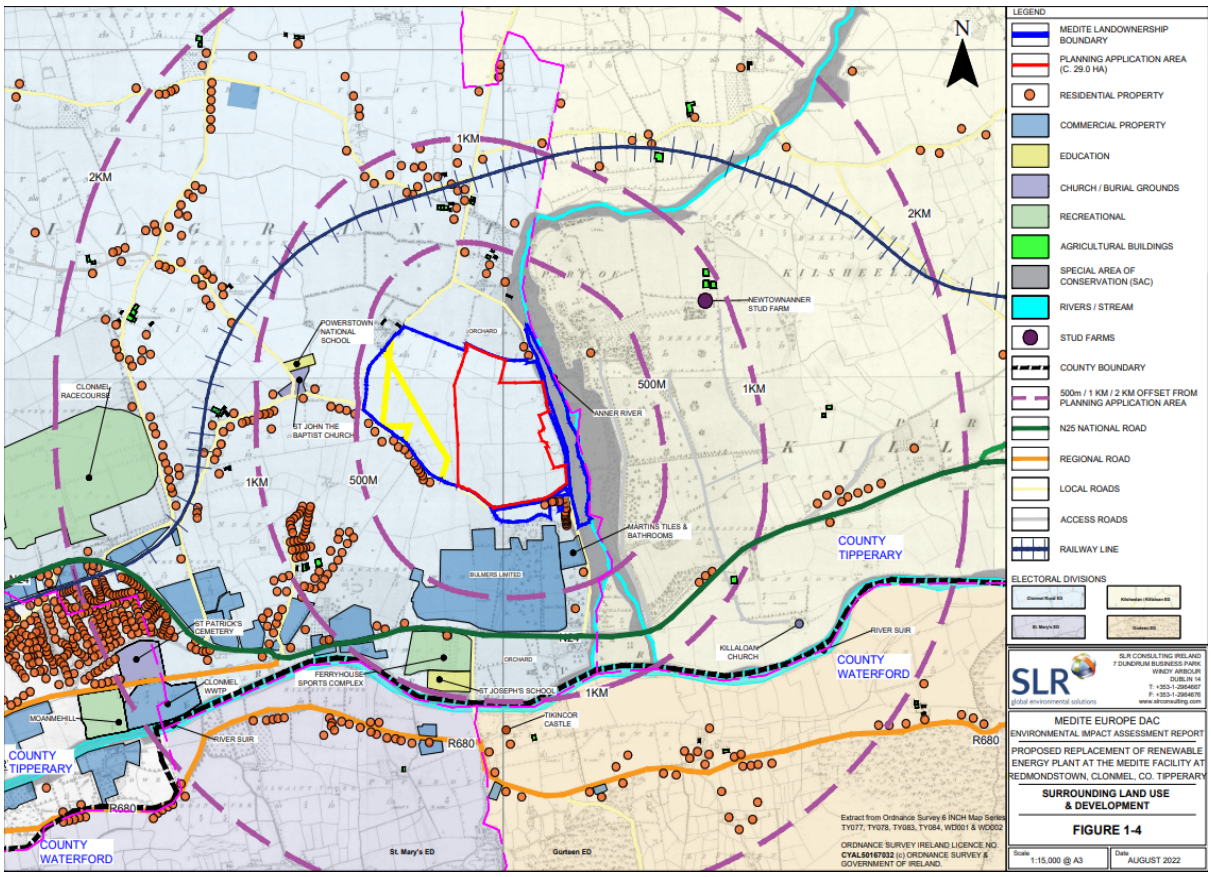
2.4 Surrounding Land Use

The lands surrounding the manufacturing plant and application site to the north are characterised as rural, predominantly low density residential and agricultural. Local fields include a mix of grassland and tillage, forestry plantation and an equine industry facility to the east of the River Anner. The area immediately south of the site is characterised by industrial uses.

The River Anner flows to the east of the site and connects as a tributary to the River Suir (it is part of the Lower River Suir SAC). Rossmore Bay is located immediately south of the site. There are no Special Protected Areas (SPAs) within 25 km of the application site.

Following a desk-based review, of the National Inventory of Architectural Heritage, the National Monuments Service and the Record of Monuments and Places, it is concluded that no protected structures or recorded monuments are located within the application site. However, it should be noted that there is a feature near the application site, which is east of application area and west of the local road. This feature recorded under record number TS083-010 is classified as a Ringfort – rath.

Figure 3: Surrounding Land Use of the Medite Europe DAC Landholding



2.5 Planning History

There is extensive planning history on the application site and a summary is provided below.

Planning Ref. No.	P37509
Applicant	MEDITE of Ireland Ltd
Development Description	Outline permission for the construction of a factory to manufacture medium density fibreboard from native Irish forest thinning.
Date Received	24/03/1981
Decision	Granted with conditions attached.
Decision Date	02/05/1981

Planning Ref. No.	P37509
Planning Ref. No.	**P37801**
Applicant	MEDITE of Ireland Ltd
Development Description	Site development (consist of general site clearance, bulk excavation, site contouring and hardcore placing and rolling).
Date Received	07/08/1981
Decision	Granted with conditions attached.
Decision Date	18/08/1981

Planning Ref. No.	P37826
Applicant	MEDITE of Ireland Ltd
Development Description	Site development works Phase II - West of line AA for M.D.F. plant
Date Received	24/08/1981
Decision	Granted with conditions attached.
Decision Date	15/09/1981

Planning Ref. No.	P37963
Applicant	MEDITE of Ireland Ltd
Development Description	Erection of a warehouse 14,400m²
Date Received	05/11/1981
Decision	Granted with conditions attached.
Decision Date	31/12/1981

Planning Ref. No.	P38217
Applicant	MEDITE of Ireland Ltd
Development Description	Construction of medium density fibreboard (MDF) plant.
Date Received	14/06/1982
Decision	Granted with conditions attached.
Decision Date	30/07/1982

Planning Ref. No.	P38500
Applicant	MEDITE of Ireland Ltd
Development Description	New 110 kv electrical sub-station.
Date Received	16/08/1982
Decision	Granted with conditions attached.
Decision Date	15/10/1982

Planning Ref. No.	P39948
Applicant	MEDITE of Ireland Ltd
Development Description	Storage and utilisation of anhydrous ammonia.
Date Received	09/08/1985
Decision	Granted with conditions attached.
Decision Date	12/08/1985

Planning Ref. No.	P310162
Applicant	MEDITE of Ireland Ltd
Development Description	Retention of garage structure and workshop/store.
Date Received	21/10/1985
Decision	Granted with conditions attached.
Decision Date	08/11/1985

Planning Ref. No.	P310884
Applicant	MEDITE of Ireland Ltd
Development Description	Erection of two storey office and lab extension to plant and erection of signs.
Date Received	15/12/1986
Decision	Granted with conditions attached.
Decision Date	10/02/1987

Planning Ref. No.	P312141
Applicant	MEDITE of Ireland Ltd
Development Description	Relocation of weighbridge, road re-alignment, chain link fence.
Date Received	01/02/1989
Decision	Granted with conditions attached.
Decision Date	15/03/1989

Planning Ref. No.	P312748
Applicant	MEDITE of Ireland Ltd
Development Description	Demolition of farmhouse.
Date Received	29/11/1989
Decision	Granted with conditions attached.
Decision Date	21/12/1989

Planning Ref. No.	P312290
Applicant	MEDITE of Ireland Ltd
Development Description	Extension to existing factory and associated works.
Date Received	14/04/1989
Decision	Granted with conditions attached.
Decision Date	26/07/1990

Planning Ref. No.	95478
Applicant	MEDITE of Ireland Ltd
Development Description	Replacement of existing fibre dryer.
Date Received	18/08/1995
Decision	Granted with conditions attached.
Decision Date	28/09/1995

Planning Ref. No.	001296
Applicant	Willamette Europe Ltd. (MEDITE of Ireland Ltd)
Development Description	Building extensions and additions to the existing Medium Density Fibreboard manufacturing facility for housing the replacement of Production Line 1.
Date Received	30/11/2000
Decision	Granted with conditions attached.
Decision Date	20/12/2000

Planning Ref. No.	11302
Applicant	MEDITE Europe Ltd
Development Description	to install new plant structures within their existing facility and construct two extensions to this facility with a floor area of circa 360m.sq. These works will upgrade MDF production techniques at the facility. Permission is also sought for all associated site development works.
Date Received	07/07/2011
Decision	Granted with conditions attached.
Decision Date	18/08/2011

Planning Ref. No.	1292
Applicant	MEDITE Europe Ltd
Development Description	To construct a new chip storage area consisting of a store 450m2 and an external concrete apron. Permission is also sought for all associated site development works. No changes are required to the existing access and circulation routes within the facility.
Date Received	13/03/2012
Decision	Granted with conditions attached.
Decision Date	04/05/2012

Planning Ref. No.	15-600016
Applicant	MEDITE Europe Ltd
Development Description	Industrial plant comprising "ClassiCleaner" integrated roller screening and separation units, associated conveyors and silo.
Date Received	16/01/2015

Planning Ref. No.	15-600016
Decision	Granted with conditions attached.
Decision Date	10/03/2015

Planning Ref. No.	15-600381
Applicant	MEDITE Europe Ltd
Development Description	A chemical store and an extension to a refiner building housing replacement refiner plant and machinery and for permission to maintain and use indefinitely a storage shed (which currently avails of a planning exemption for temporary period).
Date Received	18/05/2015
Decision	Granted with conditions attached.
Decision Date	10/07/2015

Planning Ref. No.	17-600210
Applicant	MEDITE Europe Ltd
Development Description	Replace and relocate fencing adjacent to site entrance
Date Received	03/03/2017
Decision	Granted with conditions attached.
Decision Date	25/04/2017

Planning Ref. No.	17-600216
Applicant	MEDITE Europe Ltd
Development Description	Demolition of existing structures consisting of two agricultural sheds, to construct access roads in and use field adjacent to existing factory log storage areas for additional log storage.
Date Received	07/03/2017
Decision	Granted with conditions attached.
Decision Date	27/04/2017

Planning Ref. No.	17-601375
Applicant	MEDITE Europe Ltd
Development Description	Construction of woodchip reception unit, a woodchip storage structure, woodchip mechanical conveyors and associated works
Date Received	13/12/2017
Decision	Granted with conditions attached.
Decision Date	13/02/2018

Planning Ref. No.	201256
Applicant	MEDITE Europe DAC
Development Description	Retention of 1) First Aid Room (55.7m²), 2) Warehouse (1212.28m²), 3) LPG Storage Tank & Pump Shed (20m²), 4) Overburden Storage Area (3370m²), 5) Log Storage Area (2.98 Ha), 6) Fuel (Wood Chips) Storage Shed (758m²), 7) Diesel Stores (44.3m²), 8) Contract Cabin (22.2m²), 9) Compressor Room (151.2m²), 10) Stores Building (89.2m²) & Fenced Storage area (44.2m²), 11) Oil Stores (84.6m²), 12) Maintenance Vehicle Area (22m²), 13) Bike Shed (20.45m²), 14) Weighbridge (80m²), 15) 6 no. Storage Containers (81 m² = 6.5 m² x 1 & 14.9 m² x 5), 16) Boundary Fencing (530m Long, 2m high), 17) Recycle Chip Storage Bay (300m²) within an application area of 7.0 hectares.
Date Received	28/10/2020
Decision	Granted with conditions attached.
Decision Date	15/12/2020

Planning Ref. No.	211240
Applicant	MEDITE Europe DAC
Development Description	Construction of 1.8km of boundary fencing, including access gates and associated works. This application relates to development for the purposes of an activity requiring an Integrated Pollution Control License.
Date Received	19/08/2021
Decision	Granted with conditions attached.
Decision Date	11/10/2021

Planning Ref. No.	22228
Applicant	MEDITE Europe DAC
Development Description	To replace an existing electrical building. This application relates to development for the purposes of an activity requiring an integrated pollution control license.
Date Received	16/03/2022
Decision	Granted with conditions attached.
Decision Date	04/05/2022

2.6 Pre-planning Consultation

Throughout the design process, consultation has been carried out with various interested parties including An Bord Pleanála, Tipperary County Council, the EPA, Inland Fisheries Ireland, the NPWS and the Regional Design Office (Roads). Further details, including on feedback received, is summarised in **Chapter 1** of the EIAR and addressed specifically within the relevant technical chapters of the EIAR.

An informal EIA Scoping process was undertaken, during which prescribed bodies and other interested parties were provided with a Preliminary EIA Scoping Report (see **Appendix 1-1** of the EIAR Report) outlining the key issues considered to be of importance to the EIA specialist and the proposed methods of assessing the potential scale of impacts from the Proposed Development. Further details are also included in **Chapter 1** of the accompanying EIAR.

Public consultation has also been undertaken by way of door-to-door consultation including the distribution of information leaflets within the local area and creation of a project website, through which members of the public were invited to comment on the proposals. Consultation responses obtained from the informal scoping exercise and public consultation are set out in **Chapter 1** of the EIAR.

3.0 Existing Development

3.1 Existing Site Operations

The Medite industrial facility was established in 1982 and is a market-leading manufacturer of environmentally produced, sustainable timber panel boards, specifically, MDF. This is a successful and innovative export-driven business employing approximately 170 people directly in Clonmel and supporting further employment through the supply chain across the southeast region. The main processes operate 24 hours per day, 7 days per week. An aerial picture of the site is included in **Figure 4** below.

Figure 4: Aerial Photograph of the Medite Europe DAC facility in an East to west direction (Source: Medite Europe DAC).

3.1.1 Licences

Medite operates under an Industrial Emission (IE) Licence (P0027-04). They also hold a Radiation Protection Licence as required by the Radiological Protection Act, 1991.

3.1.2 Permits

Medite holds a Greenhouse Gas Permit as required by the EU ETS Directive.

3.1.3 Management systems and Certifications

Medite also operates under the following systems / certifications issued by the National Standards Association of Ireland (NSAI); Building Research Establishment UK (BRE UK); BMTrada; and REPAK.

Table 1: Systems & Certifications

System / Certification	Reference	Awarding body / Auditor
Environmental Management System	ISO14001	NSAI
Energy Management Systems	ISO50001	NSAI
Health & Safety Management	ISO 45001	NSAI
Quality Management System	ISO9001	NSAI
Environmental Product Declaration (EPD)	EN15804	BRE UK
Forestry Stewardship Council Certification	FSC-STD-01	BMTrada
REPAK Certificate	REPAK	REPAK

3.1.4 Existing Energy Infrastructure

Production Line 1 is served by two wood biomass fired boilers (18MW each), constructed in 1982, and a natural gas-fired Thermal Fluid Heater (TFH) (6MW).

The steam generated by the boilers is used in the Line 1 refining stage, where it is directly injected into the wood chip. Steam is also used in the drying stage where it indirectly heats the air stream in the Line 1 dryers. The flue gases from the boiler are also used in the drying stage where they are directly added to the Line 1 dryer air stream.

The TFH heats thermal fluid which is pumped to the Production Line 1 Press to heat the steel belt.

Production Line 2 is served by a single wood biomass fired Thermal Fluid Heater (19MW), constructed in 1995.

The flue gases from the TFH are used in the drying stage where they are directly added to the Line 2 dryer air stream to provide all the required thermal energy. This differs somewhat from Production Line 1 where steam is also used in conjunction with flue gases for drying.

The TFH heats thermal fluid which is pumped to the Production Line 2 Press to heat the steel belt and pumped to a steam generator to provide steam for the refining stage, where it is directly injected into the wood chip.

3.1.5 Other Energy Requirements for MDF Production

The production process also uses significant electrical energy (Peak 15MW approx). Diesel Fuel (approx 245,000 litres per annum) is used in the front-end loaders and Liquefied Petroleum Gas (LPG) (approx 100,000 litres per annum) in the forklifts that support the production process.

3.1.6 Ancillary Infrastructure

Additional support infrastructure to the production systems and the energy systems includes the following:

- Finished goods Warehouse.
- MTX Building for storage and transport of acetylated wood chip for the production of Medite Tricoya eXtreme, a highly water resistant MDF product;
- An activated sludge treatment plant to treat domestic sewage and process effluent (mostly water squeezed from the wood chip during the refining stage).
- Surface water interceptor settling lagoons.
- Maintenance area.

- Bulk and drum chemical storage.
- A laboratory.
- Administration offices.
- Stores.
- Fire water storage ponds.
- Medical Centre.
- Pneumatic Conveying systems, including blowers, fans & filters to capture & transport production residues.

4.0 Proposed Development

The Proposed Development will replace the existing aging thermal energy systems serving both of Medite's two production lines, specifically.

- Two wood biomass fired boilers (18MW each) serving Production Line 1.
- The wood biomass fired Thermal Fluid Heater (19MW) serving Production Line 2.

These systems will be replaced with 2 new renewable energy plants. These renewable energy plants will have rated thermal capacity of up to 60 MW for the system serving Production Line 1 and 30 MW for the system serving Production Line 2. The plants will take the form of wood biomass fired Thermal Fluid Heaters.

The existing natural gas-fired Thermal Fluid Heater (TFH) (6MW) serving Production Line 1, will remain as a back-up system on site. The new renewable energy plants will provide thermal energy to the manufacturing process in following ways.

- Treated flue gases from each of the new plants will be ducted to the existing Dryers in both production lines.
- Heated thermal fluid will be sent to the existing Presses.
- Heated thermal fluid will be sent to new Steam Generators that will form part of the development.
- Steam (generated by the new Steam Generators) will be sent to the existing refining equipment in both production lines.

The Proposed Development will include pipes/ducts and associated supporting infrastructure to transfer the thermal energy to the various heat users within each of the production lines, including the necessary modifications to the Line 1 Dryers to take all required heat in the form of flue gas, rather than the current combination of flue gas and steam.

The pipes and ducts will run from the energy plants to the heat consumers within the existing Medite plant buildings and along the corridors formed by the existing roadways.

The proposed replacement energy plants will meet the factory's significant heat requirement. The new energy system will see the introduction of a new, modern combustion, air filtration, and treatment system in line with European emissions performance for the best available technology.

This investment in new renewable energy systems will bring several benefits to Medite both in terms of competitiveness and efficiency as a manufacturing facility but also in respect of its ability to meet new environmental targets for carbon emissions reductions. The potential benefits include:

- Reduced carbon emissions by reducing natural gas consumption and increasing use of production residue as fuel.
- Reduced energy costs as the Proposed Development will allow the site to use more of its currently unviable biomass residues for heat energy generation.

4.1 Statutory Development Description

In accordance with Section 37E of the Planning and Development Act 2000, as amended, we, Medite Europe DAC give notice of our intention to make an application to An Bord Pleanála for a ten-year permission, for development comprising of the replacement of existing energy systems and all associated works on a site of c.29.7ha at the existing Medite Europe DAC facility at Redmondstown, Clonmel, Co. Tipperary.

The proposed development will consist of the following:

The replacement of the existing three wood biomass fired thermal energy systems serving MEDITE's two production lines with, 2 no. renewable energy, wood biomass fired Thermal Fluid Heaters with thermal capacity of 60MW and 30MW respectively. The proposed development will include:

- The decommissioning of the two existing wood biomass fired boilers (18MW each) that serve Production Line 1 (Existing Height 39m). This equipment will be retained on site.
- The decommissioning of the existing single wood biomass fired Thermal Fluid Heater (19MW) serving Production Line 2 (Stack Height 19.3m). This existing Thermal Fluid Heater equipment for Line 2 will be dismantled and removed from the site.
- The existing LPG Storage Tank will be decommissioned and retained on site.
- An existing silo will be dismantled and retained on site.
- The construction of 1 no. renewable energy, wood biomass fired Thermal Fluid Heater with thermal input capacity of 60MW, this Line 1 Energy Plant is 442m², with a stack height of 33m. Other infrastructure proposed to support the proposed Line 1 energy plant will include:
- 1 no. Line 1 Wet Fuel Metering Bin (254.5m²)
- 1 no. Line 1 Energy System Fuel Feed Conveyor (38.0m²)
- 1 no. Line 1 Dry Electrostatic Precipitator (286.9m²)
- 1 no. Line 1 Hot Gas Duct (286.9m²)
- 1 no. Line 1 Start Up Stack (10.8m² and height 30m)
- 1 no. Line 1 Sander Dust Silo (28.3m²)
- 1 no. Line 1 Thermal Fluid Piping (10.9m²)
- 1 no. Line 1 Steam Generator (47.5m²)
- Modifications to Line 1 Dryer System (505.7m²)
- 1 no. Line 1 Bunded Oil Storage (66.5m²)
- The construction of 1 no. renewable energy, wood biomass fired Thermal Fluid Heater with thermal input capacity of 30MW, this Line 2 Energy Plant is 109m², with a stack height of 18.5m). Other infrastructure proposed to facilitate the operation of the proposed Line 2 energy plant will include:
- 1 no. Line 2 Dry Electrostatic Precipitator (25.6 m²)
- 1 no. Line 2 Hot Gas Duct (86.9m²)
- 1 no. Line 2 Start Up stack (23.0m² and height 30m)
- 1 no. Line 2 Thermal fluid Piping (21.4m²)
- The development of new wood biomass fuel reception infrastructure adjacent to the existing wood biomass fuel reception area which will require the development of 1 no. Fuel Reception Unit (35m²), 1 no. Fuel infeed hopper (18.6m²), 1 no. Walking Floor Infeed System (202.3 m²), 1 no. conveying System(#1) (520m²), 200m in length of conveying with height varying from ground to 20.8m, Conveying Systems #2 (from Storage Building to energy Systems), (245m²) to Line 1 Energy Plant, 266m length of conveying with height varying from ground to max of 22.5m, and to Line 2 Energy Plant (77.5m²) 44m length of conveying with height varying from ground to max of 20.9m.
- Modifications to existing pneumatic (Dry Fuel) Systems, including blowers, fans & filters, and associated infrastructure. These modifications will include new pneumatic Transport Ducts, #1 Length = 161.5m x Ø150mm pipe, #2 Length = 202.9m x Ø150mm pipe, Edge Trim Silo, including associated filter plant (38.4m²). The Ø150mm pipe that currently connects the production process to the existing Edge Trim Silo which will be redirected to the new Edge Trim Silo. The existing hopper within this area will be removed.
- The development will also include:
- Any other ancillary development including all pipes/ducts and supporting infrastructure necessary to connect the renewable energy systems to the existing facility enabling the transfer of thermal energy to the production lines and the provision of a new steam generator and steam piping to connect the new energy system to the existing steam pipe infrastructure.

- Ancillary development will also include:
- The provision of 2 no. temporary construction compounds, including hardstanding, car-parking and staff welfare facilities.
- Removal of 0.42ha. of existing mixed woodland at the western portion of the site and the planting of 0.42ha. of native woodland along the northern boundary of the Site.
- The provision of additional non-permeable hardstanding within the site covering a total area of 1.1ha.
- All associated site works including engineering, landscaping, connections to existing surface water and wastewater systems, services and boundary treatment, necessary to facilitate the development.

This application relates to development for the purposes of an activity requiring an Industrial Emissions Licence. This application is also accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS). The proposed development is located within close proximity to a site on the Record of Monument and Places RMP sites, including RMP TS083-010 Ringfort-Rath, which bounds the site to the east.

4.2 Proposed Biomass Consumption

The current system uses around 111,000 tonnes of biomass fuel for energy per year. The maximum capacity of fuel that will be consumed by the proposed development has been calculated as 169,000 tonnes per year. An extra margin of 10% to cater for variation in fuel mix and moisture content has been assessed in the design to give a potential maximum wood fuel consumption of 186,000 tonnes per year. This represents an overall increase of 75,000 tonnes (including the 10% margin). from 111,000 tonnes.

The new renewable energy plants will use 71,000 tonnes of on-site wood biomass production residues (from Medite's own MDF manufacturing processes). The additional biomass fuel will also be sourced from the secondary outputs for forestry and sawmilling, i.e. forestry residues and sawmill residues.

With the replacement of recovered fuel, this will result in an increase in:

- Medite Residues (Bark too wet for existing energy plants (19,000 tonnes))
- Sawmill Residues & Forestry Residues (81,300 tonnes)

Table 2: Comparison of Existing v Proposed Fuel Consumption

Fuel Type	Existing Biomass Boilers Line 1 + Line 2 t/y	Proposed Biomass Energy Plant Line 1 t/y	Proposed Biomass Energy Plant Line 2 t/y	Total Proposed Line 1 + 2 t/y	+10% headroom (to account for variation in fuel mix and moisture content)
Medite residues	52,000	48,000	23,000	71,000	71,000
Forestry & Sawmill Residues	33,700	67,000	31,000	98,000	115,000
Recovered wood	25,300	,	,	,	
Total	**111,000**	**115,000****	**54,000****	**169,000****	**186,000****

5.0 Review of Policy and Guidelines

5.1 European Policy

5.1.1 Renewable Energy Directive

The Renewable Energy Directive (RED) (2009/28/EC) was the first iteration that outlines responsibility for the governance of biofuels and bioliquids in the EU. For a biofuel or bioliquid to be classified as sustainable in the EU, it must meet the sustainability criteria set out in the RED and comply with the verification requirements.

Revised Renewable Energy Directive II (2018/2001/EU) is an extension of the RED for the periods 2021 to 2030 and it introduced mandatory criteria for solid and gaseous biomass. This includes three overarching sustainability criteria which relate to land for agricultural biomass, management of forest biomass, and GHG emission savings for all biomass fuels used in installations producing electricity, heating and or cooling. Those with a total rated thermal input capacity >=20 MW in the case of solid biomass, were required to comply and Member States are required to independently verify if the sustainable requirements for the biomass to count towards national obligations. However, this only applied to new installations starting from 1st January 2021.

The revised Renewable Energy Directive III (EU/2023/2413) extends the criteria of the Renewable Energy Directive to all installations with a total rated thermal input capacity >= 7.5MW including existing installations.

The RED III will apply the following changes to existing installations from at the earliest January 1st 2026 and the latest December 31st 2029:

- Apply existing sustainability and greenhouse gas saving criteria to electricity, heating and cooling production from biomass fuels used in existing installations, as opposed to only new installations.
- Apply existing sustainability and greenhouse gas saving criteria to electricity, heating and cooling production from biomass fuels used in installations over 7.5 MWth.
- Apply requirements on the cascading use of biomass to ensure woody biomass is used in the following orders; wood-based products, extended life, re-use, recycling, bioenergy and disposal.
- Strengthening of sustainability criteria (e.g. no-go areas) for forest biomass including primary, highly diverse forests and peatlands.
- Further elements included to minimise negative impact of harvesting on soil quality and biodiversity.

The sustainability criteria states that biomass fuels produced from forest biomass shall be from a country of origin that has harvesting laws, monitoring, and enforcing systems. All biomass fuels used for electricity, heating and cooling shall achieve at least an 80% GHG emissions savings, when compared with its fossil fuel alternative. The RED III has requirements for information to be collected along the supply chain to allow for independent verification of the GHG emissions and sustainability to be submitted to the Member State. There are additional requirements for Member States to endeavour to increase the penetration of renewable energy in the heating and cooling sector.

5.1.2 Sourcing of Biomass

To count towards the renewable's targets, or to be eligible for subsidies by EU countries, renewable energy sourced from biomass needs to fulfil sustainability criteria as set out in the Renewable Energy Directive as amended. The Proposed Development fulfils the sustainability criteria for the following reasons:

Medite only use non-commercial wood biomass for bioenergy where no other use is economically viable or environmentally appropriate.

Medite use and will continue to use industrial residue and forest residue biomass in its boilers. There will be strict adherence to the EU ETS and RED III legislation for sustainability and GHG savings criteria:

- Biomass will be sourced from locations that are legally harvested.
- Biomass will be sourced from locations designed with forest regeneration.
- Biomass will be sourced from locations complying with all appropriate nature protection and long-term harvesting practices and under licence from DAFM.
- Biomass used will have life cycle emissions of less than other fossil fuel alternatives.
- Biomass used for fuel will be from the bottom of the cascading use hierarchy and as such will have no other practicable commercial or environmental use.

Medite have and will continue to source the biomass residues from forests that have been felled for other commercial purposes. These residues will not be sourced from forests felled solely to supply Medite's heat production. The felling of trees is not an indirect effect of the Proposed Development.

Medite currently uses Coillte as its main supplier of biomass. Coillte is the parent company of Medite operating forests across the Republic of Ireland in compliance with legislation. Coillte also provides evidence that supplied products are from forests which have been certified to both the FSC and PEFC standards of sustainable forestry management and stewardship.

If biomass supply was not sufficient or feasible from Coillte, Medite will attain biomass from alternative sources from within the island of Ireland that also meet the EU ETS RED III guidance for sustainability criteria of biomass. In addition to being environmentally ethical, there is also a financial incentive for Medite to ensure that biomass supplies for fuelstock are sustainably sourced, as if the biomass did not meet the defined sustainability criteria it would no longer be 'zero rated' for carbon for EU ETS reporting, and Medite would therefore have to purchase EUAs to cover the associated emissions.

The Proposed Development complies with the Renewable Energy Directive for the following reasons:

Currently and on completion of the proposed development, all biomass used for feedstock and the increased fuelstock is and will be felled under and in accordance with licences designed to minimise significant effects on the environment issued by the Department of Agriculture, Food and the Marine (DAFM) or Department of Agriculture, Environment and Rural Affairs for Northern Ireland. Coillte (a major supplier) also provides evidence that supplied products are from forests which have been certified to both the FSC and PEFC standards of sustainable forestry management and stewardship.

Medite currently uses Coillte as its main supplier of biomass. Coillte is the parent company of Medite operating forests across the Republic of Ireland under licences issued by DAFM. If biomass supply was not sufficient or feasible from Coillte, Medite will obtain biomass from alternative sources that also meet the EU ETS RED III guidance for sustainability criteria of biomass.

In addition to being environmentally ethical, there is also a financial incentive for Medite to ensure that biomass supplies for fuel stock are sustainably sourced, because if the biomass did not meet the prescribed sustainability criteria, it would no longer be 'zero rated' for carbon for EU ETS reporting, and Medite would therefore have to purchase EUAs to cover the associated emissions.

Medite use and will continue to use industrial residue and forest residue biomass in its boilers. There will be strict adherence to the EU ETS and RED III legislation for sustainability and GHG savings criteria:

1 Biomass will be sourced from locations that are legally harvested.

2 Biomass will be sourced from locations designed with forest regeneration.

3 Biomass will be sourced from locations complying with all appropriate nature protection and long-term harvesting practices and under licence from DAFM. Biomass used will have life cycle emissions of less than other fossil fuel alternatives.

4 Biomass used for fuel will be from the bottom of the cascading use hierarchy and as such will have no other practicable commercial or environmental use.

Medite have and will continue to source the biomass residues from forests that have been felled for other commercial purposes. No forests will be felled solely to provide biomass for Medite's heat production. None of the wood biomass for the Proposed Development will be generated from growing and harvesting wood crops directly for energy purposes. The felling of trees is therefore not a direct or an indirect effect of The Proposed Development.

5.1.3 Cascading Use of Biomass

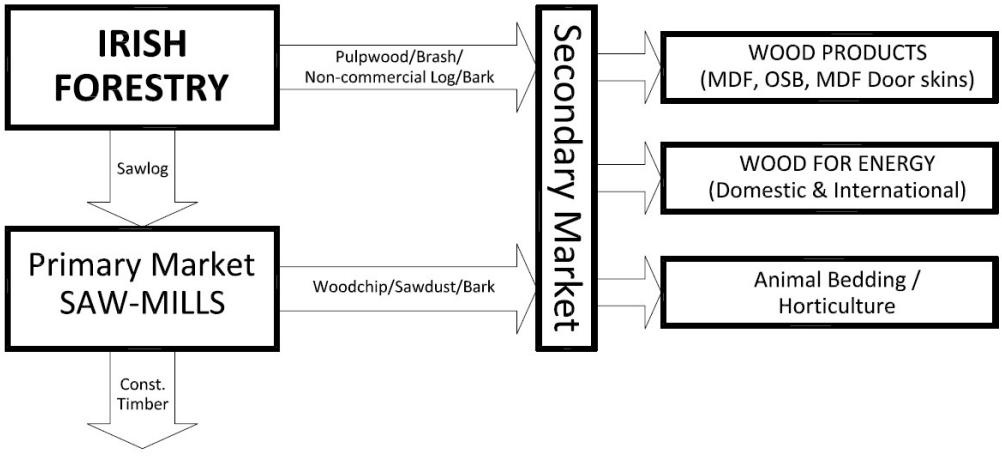
RED III also states that:

> 'in accordance with the principle of the cascading use of biomass, woody biomass should be used according to its highest economic and environmental added value in the following list of priorities: wood-based products, extending the service life of wood-based products, re-use, recycling, bioenergy, and disposal. Where no other use for woody biomass is economically viable or environmentally appropriate, energy recovery helps to reduce energy generation from non-renewable sources.'

Medite has a maximum capacity to process up to 715,000 tonnes of wood biomass arising from the forestry/sawmilling industry on an annual basis. 100% of the biomass material used in the manufacture of MDF are secondary residues from the primary forestry operations to produce construction timber. Medite procures its process feedstock from FSC and PEFC certified sources providing assurances that the forests where the material ultimately comes from are managed sustainably under the criteria set out in these standards.

Figure 5 below illustrates the primary market and demand relating to Irish forestry. The secondary market for this material in Ireland (other than very small amounts used in horticulture and for animal bedding) is the panelboard industry and the biomass energy industry.

Figure 5
Market for Irish Forestry Markets



All the wood biomass utilised by Medite, including proposed fuelstock, is a residue of either forestry operations or saw-milling. These are the secondary outputs of both forestry operations and saw-milling. The primary output of forestry operations in Ireland is Sawlog, which is milled into construction timber by sawmills. The demand for sawlog generates the demand for the primary output of forestry operations in Ireland.

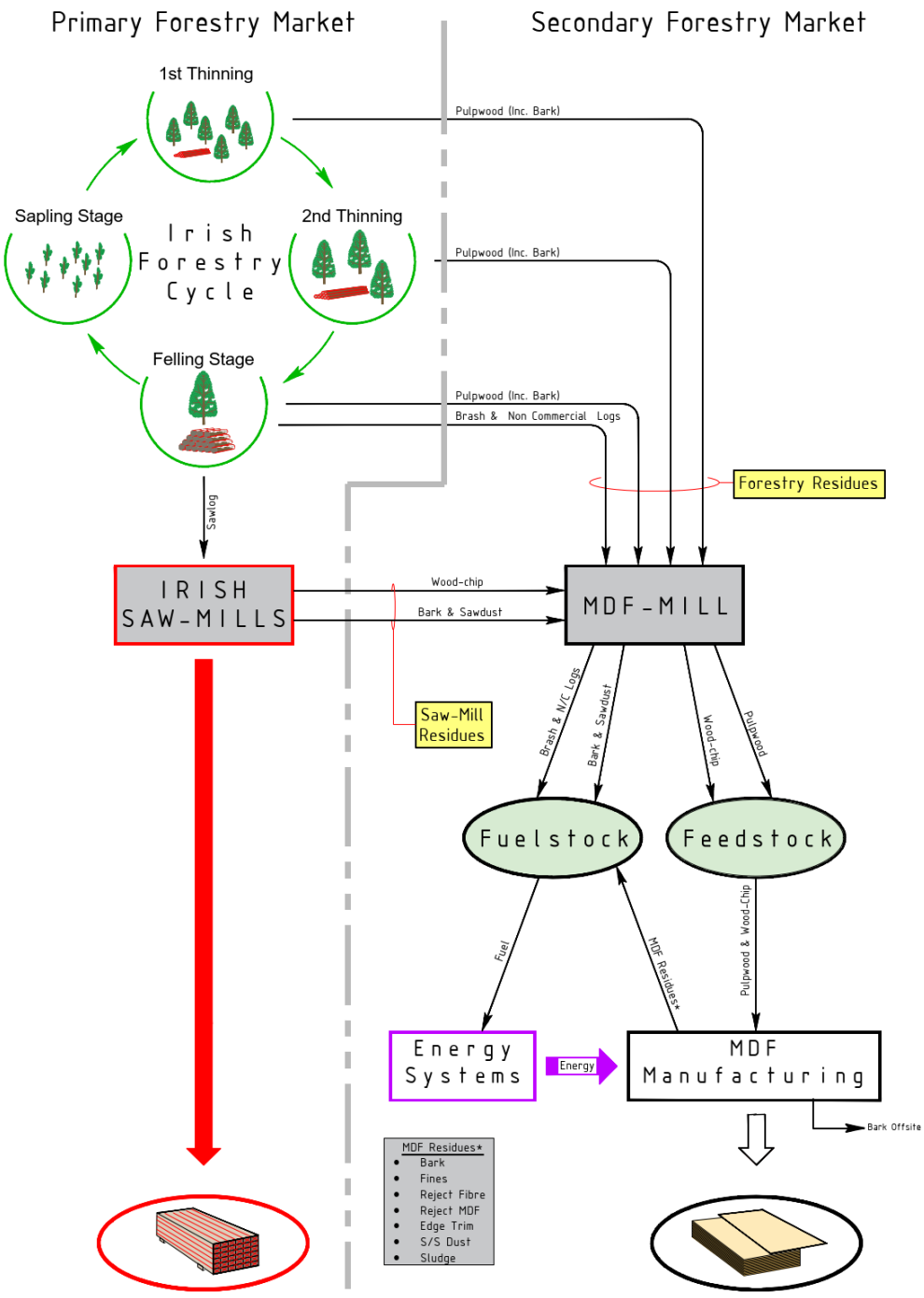
Additional forestry/ tree felling is not required to support the MDF Manufacturing process. This is because the material is derived from the secondary market and the availability of the material used to make MDF is directly linked to demand for the prime product and the volume of available commercial forestry generally. Material for MDF processing relies on the availability of secondary residues. It does not require a dedicated crop and there is no element of direct and indirect land use change associated with it.

Both the production feedstock and fuelstock are also sourced from the Island of Ireland and regulated separately under legislation and regulations that apply to the forestry sector.

The maximum capacity of wood biomass that will be consumed by the proposed development has been calculated as 169,000 tonnes per year. An extra margin of 10% to cater for variation in fuel mix and moisture content has been assessed in the design to give a potential maximum wood biomass consumption of 186,000 tonnes per year. This represents a net overall increase of 75,000 tonnes (including the 10% margin). from 111,000 tonnes.

The new renewable energy plants will use a total of 71,000 tonnes of on-site wood biomass production residues (from Medite's own MDF manufacturing processes) and this will include bark too wet for existing energy plants (19,000 tonnes). The remaining wood biomass will be sourced from the secondary outputs for forestry and sawmilling, i.e. forestry residues and sawmill residues. An additional 81,300 tonnes of Sawmill Residues & Forestry Residues will be required. Proposed biomass inputs are shown in Figure 6.

Figure 6 Proposed Biomass Inputs



In relation to Medite's own residues from the manufacturing process, no other economic and environmentally viable use of this material is available. The use of production residues complies with the principles of the circular economy as well as the cascading use principle, through energy recovery and avoids disposal. Energy recovery also helps to reduce energy generation from non-renewable sources.

Sawmill Residues are sawdust, bark, and woodchip which are a by-product of processing construction timber. Medite utilises the Woodchip from sawmills as feedstock for MDF and the sawdust and bark as fuelstock for the

energy plants. With regard to the Sawmills Residues of sawdust and bark, no other economic and environmentally viable use from this material is available. Energy recovery will also reduce energy generation from non-renewable sources.

Forest Residues comprise brash, non-commercial log, and bark. Medite uses brash, non-commercial log, and the bark from pulpwood as fuelstock for its energy systems. Brash is branches & off-cuts remaining onsite post-harvest, mostly in clear-felling situations. Non-Commercial logs are logs that cannot be used in the timber processing sector due to deformities such as size, taper and crookedness. They are segregated on the harvest site and delivered to Medite directly.

This use of Forest Residues as fuel is economically viable or environmentally appropriate, energy recovery helps to reduce energy generation from non-renewable sources and avoids disposal.

Medite currently has an installation on site that operates using natural gas and wood biomass. The Proposed Development to replace the existing energy systems and the use of gas at the Medite factory with two new wood biomass-fired energy plants, which will have the best available technology that will guarantee the continued operation of the plant, secure greater energy efficiency, and reduce environmental emissions.

The current default emission factors for natural gas used within the Republic of Ireland is 56.179gCO2e/MJ for the purpose of EU ETS. Biomass emissions for woodchips from forest residues, sourced within the island of Ireland are 6.0gCO2eq/MJ and therefore result in an emission saving of 89%, when compared with natural gas.

There are no other practicable commercial or environmental uses for the Medite Residues, Forest and Sawmill residues. Through use of medite residues as well as forestry and sawmill residues, the Proposed Development therefore complies with RED III requirements with regard to the cascading use of biomass.

5.2 National Policy

5.2.1 The National Policy Statement on the Bioeconomy (2018)

The bioeconomy, which is a facet within the circular economy, encompasses a range of activities across many sectors, including agriculture, the marine, forestry, water and **waste management**, energy, as well as biopharmaceuticals. It is described as part of the country's economy which uses renewable resources such as crops, **forestry**, and fisheries **to produce** food and **products, as well as energy, while also reducing waste**. Increasing the scope of the bioeconomy will mean diminishing reliance on fossil-based fuels and carbon intensive resources and will boost our use of renewable biological resources.

The Government's vision for the bioeconomy, as set out in the National Policy Statement on the Bioeconomy, is to grow Ireland's ambition to be a global leader for the bioeconomy through a coordinated approach that harnesses Ireland's natural resources and competitive advantage, and that fully exploits the opportunities available while monitoring and avoiding unintended consequences.

There is recognition at a European level of the potential benefits for economies and societies of adopting a circular economy that maintains the utility and value of products, components, and materials in the economy for as long as possible. The bioeconomy has a close relationship with the circular economy and represents an area where Ireland has some crucial advantages. The bioeconomy should promote circularity through solutions and innovations that reuse and recycle materials, maximising resource efficiency through the use of unavoidable wastes and environmental sustainability.

The National Policy Statement on the Bioeconomy remains the overarching policy approach for bioeconomy development in Ireland. The Bioeconomy Action Plan 2023-2025 was published in October 2023 to advance the implementation of the policy statement.

5.2.2 The National Bioeconomy Action Plan 2023-2025

The National Bioeconomy Action Plan 2023-2025 (NBAP) was published in October 2023 and is the first national action plan for an Irish bioeconomy. The purpose of this plan is to further develop Ireland's bioeconomy in delivering the vision of the 2018 National Policy Statement on the Bioeconomy; for Ireland "*to be a global leader for the bioeconomy through a coordinated approach that harnesses Ireland's natural resources and competitive advantage and that fully exploits the opportunities available while monitoring and avoiding unintended consequences*".
The Action Plan is aligned with the implementation of the National Policy Statement on the Bioeconomy including its vision, guiding principles on sustainability, cascading use, a precautionary approach, a food-first priority, and the guiding principle for an area-based focus on sustainable development.

The vision set out in the National Policy Statement on the Bioeconomy is supported by guiding principles to help translate this vision into coordinated action. An additional guiding principle on area-based local and regional development has now been added to the NBAP.

The guiding principles as set out in the NBAP are as follows:

- Sustainability: environmental sustainability is an integral, core principle of the bioeconomy and products developed must be sustainable. Feasibility assessments should include both environmental and social feasibility. The amount of biomaterial extracted should not have a negative impact on our biological resources; it should not exceed the capacity of the environment to replenish itself; and should cause no lasting damage to an environment. This should be regarded from a holistic view, which takes all biomass into account, including that in the soil. Activity in the bioeconomy should not degrade resilience or biodiversity in the ecosystem.

- Cascading: whereby higher value applications are preferentially derived from biological resources (e.g., food, bio-based materials, and chemicals) prior to their use in energy and fuel generation, which will enable all stakeholders (including biomass growers (farmers, foresters, fishing community, etc.), industry and consumers) to derive the maximum value to be derived from our bio-resources.

- Precautionary: is a risk management approach to prevent policies or actions causing harm to the public or the environment. Innovation in the bioeconomy will depend on the sensible application of this principle and it should be informed by the latest scientific information and consensus.

- Food First: gives priority to food and nutrition security by improving the availability of and access to a safe and healthy food supply for citizens.

- Area-based local and regional development: supporting integrated and multi-sectoral strategic approaches including networking, clustering, cooperation, initiatives, and partnerships to support the development of regenerative biobased innovation and solutions at local and regional levels to boost employment, business opportunities and community gains on the ground.

The NBAP recognises the critical role of the bioeconomy in reducing emissions, as part of the transition towards a net-zero society.

The proposed development and associated use of wood biomass will support the delivery of national bioeconomy objectives and complies with the guiding principles as set out in the NBAP.

The Proposed Development aligns with National Policy in diminishing the reliance on fossil fuel and converting to less carbon intensive and more environmentally sustainable materials. National Policy also seeks to increase the scope of the bioeconomy by boosting the use of renewable biological resources. The proposed development supports development of the bioeconomy.

5.2.3 Climate Action and Low Carbon Development (Amendment) Act 2021

Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. These targets are a key pillar of the Programme for Government and the Government Ministers will be responsible for achieving these targets for their own sectoral area

The Act outlines that the government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations. All forms of greenhouse gas emissions including biogenic methane will be included in the carbon budgets, and carbon removals will be taken into account in setting budgets. *The Government will determine, following consultation, how to apply the carbon budget across the relevant sectors, and what each sector will contribute in a given five-year period. These actions will be detailed in the Climate Action Plan which must be updated annually.

The Act also outlines that Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years. Local Authority Development Plans must be aligned with their Climate Action Plan and Public Bodies will be obliged to take account of Climate Action Plans in the performance of their functions.

The Proposed Development will realise carbon savings of 2951 tCO2e/yr and therefore reduce emissions, as part of the transition towards a net-zero society.

5.2.4 Climate Action Plan 2023

The Climate Action Plan 2023 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting the country on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

It is intended to put Ireland on a more sustainable path; cut emissions; create a cleaner, greener economy and society; and protect from the devastating consequences of climate change. It is considered a huge opportunity to create new jobs and grow businesses in areas like offshore wind; cutting-edge agriculture; and retrofitting, making our homes warmer and safer.

It is stated under the Climate Action and Low Carbon Development (Amendment) Act 2021, that Ireland's national climate objective requires the State to pursue and achieve, by no later than the end of the year 2050, the transition to a climate-resilient, biodiversity-rich, environmentally sustainable, and climate-neutral economy. The Act also provides for a reduction of 51% in GHG emissions by 2030, compared to 2018 levels.

Furthermore, it is noted that decarbonising industry and enterprise is vital for Ireland's economy and future competitiveness. This is due to the linkages between fossil fuel use and economic development. As a result of this, it will require a carbon-neutral heating in industry, decarbonising construction materials, fossil fuel demand reduction through energy efficiency measures, and increasing the use of zero emission gas.

The Plan lists the actions needed to deliver on our climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually to ensure alignment with the country's legally binding economy-wide carbon budgets and sectoral ceilings.

5.2.5 Climate Action Plan 2024 (Consultation Draft)

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action Plan. The Plan was approved by Government on 20 December 2023, subject to Strategic Environmental Assessment and Appropriate Assessment.

CAP24 reiterates the European Green Deal commitment to delivering net-zero GHG emissions at EU level by 2050; with Ireland committed to achieving a 51% reduction in emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050 and the need for action to reduce emissions to be significantly accelerated in the period to 2030.

Table 3.2 of CAP24 outlines the sectoral emission ceilings for each 5-year carbon budget period.

(Figures for $MtCO_2eq.$ for 2018, 2025 and 2030 have been rounded. This may lead to some discrepancies)

	2018 Baseline ($MtCO_2eq.$)[15]	Sectoral Emission Ceilings for each 5-year carbon budget period ($MtCO_2eq.$)	
Sector	**2018**	**2021-2025***	**2026-2030***
Electricity	10	40	20
Transport	12	54	37
Built Environment - Residential	7	29	23
Built Environment - Commercial	2	7	5
Industry	7	30	24
Agriculture	23	106	96
Other (F-Gases, Waste & Petroleum refining)	2	9	8
LULUCF	5	Reflecting the continued volatility for LULUCF baseline emissions to 2030 and beyond, CAP24 puts in place ambitious activity targets for the sector reflecting an EU-type approach (see chapter 17)	
TOTAL	68		
Annual unallocated Emission Savings in 2030	-	-	5.25[16]
Unallocated Savings 2026-2030[17]			26

Climate Action Plan 2024 acknowledges the importance of our bioeconomy

> "*is a powerful enabling tool which can address the key challenges that the climate transition poses while providing sustainable sources of proteins; bioactivities; energy; biobased fertiliser; locally sourced feed for our animals; nature-based building materials; and many other innovative sustainable products that displace fossil fuels, while ensuring both the continued success of our agri-food, marine, industry and forestry sectors and contributing to our emissions reduction targets and the development of a circular economy. Supporting our bioeconomy offers us the potential to modernise industries and sectors through innovation while minimising and managing the impact on our climate or environment, as often these new bio-based solutions can course-correct previously harmful practices. The bioeconomy seeks to do more with less, it seeks to cascade the use of our biological resources for higher value diversification*

opportunities, and harness waste and natural capital sustainably, displacing the use of fossil-based, fossil-reliant, or non-renewable products."

The following sections from the Plan relevant to the Proposed Development are provided below.

Industry

With respect to Industry, the Climate Action Plan 2024 and under the sectoral emissions ceiling agreed, outlines that industry must reduce emissions by 35% by 2030 relative to 7 $MtCO_2eq$. in 2018. It outlines how decarbonising our manufacturing industry is vital for Ireland's economy and future competitiveness.

The CAP24 outlines how industry emissions arise from two main activities:

"combustion for heat required during manufacturing, including combined heat and power plants, in the case of heat produced for its own use; and process emissions. Process emissions are those generated during the manufacturing process, the majority coming from the release of carbon dioxide from limestone during cement clinker production."

According to CAP24, the Industry Sector accounted for 9.7% of Ireland's greenhouse gas emissions in 2022 and a 9.75% share in 2021, emissions have reduced by 7.2% between 2022 and 2021 with a fall of approximately 0.5 MtCO2eq.

Key Targets outlined in the CAP24 for Industry, include:

Target	2025	2030
Carbon-Neutral Heating in Industry	50-55% share of carbon neutral heating	70-75% share of carbon neutral heating
Decrease embodied carbon in construction materials	Decrease by 10% for materials produced and used in Ireland	Decrease by 30% for materials produced and used in Ireland.
Reduce Fossil fuel demand through energy efficient measures in industry	Reduce by 7%	Reduce by 10%

The Measures and Actions outlined within CAP24 to achieve targets, include:

- Expand and enhance supports from the Sustainable Energy Authority of Ireland, IDA Ireland, and Enterprise Ireland with a focus on achieving energy demand reduction, electrification, and biomass adoption in industry.
- Electrification of new and current manufacturing processes displacing the use of fossil fuels where possible and as soon as possible.
- Low and net zero carbon product substitution for construction materials and a reduction in the clinker content for cement where practical.
- Utilisation of biomass, and low and zero emission gas as key fuels for decarbonisation, noting that these are limited resources, and priority will be given to its use in areas where alternative methods of decarbonisation (e.g., electrification) are not commercially or technically viable.
- Continue to develop policies for hydrogen to support its deployment, predominantly for the third carbon budget period and beyond.
- Start to develop carbon capture, utilisation and storage policies to support its utilisation and storage policies to support its deployment, predominantly for the third carbon budget period and beyond.

Land Use, Land Use Change, Forestry (LULUCF)

Since the Climate Action Plan 2021 was published, there has been some progress with regard to the LULUCF sector, including:

- Completion of a public consultation on the Forestry Strategy 2023-2027.
- Commencement of rehabilitation works on over 10,000 hectares of peatlands damaged by extraction for energy production.
- Launch of new not-for-profit focused on attracting corporate funds to plant new native woodlands.
- Incorporation of measures aimed at tackling deforestation into other Department of Agriculture, Food and the Marine schemes.

CAP24 updates the Government's approach to emissions and reductions in the LULUCF sector, an oversight and technical taskforce was set up in 2023 to deliver Phase 2 of the Land-Use Review. CAP24 identifies the significant overlaps between agriculture and the land use, land-use change and forestry sector.

Adopting a sectoral emissions ceiling for the Land Use, Land-use Change and Forestry (LULUCF) sector was deferred pending a review of options following changes to the sector's baseline in the EPA's 2022 National Inventory Report (NIR). The 2018 emissions for LULUCF have fluctuated in the past three NIRs, this is primarily driven by changes in the emission factor for drained afforested organic soils. Numerous further inventory refinements are planned for the coming years. Reflecting this high level of uncertainty with LULUCF emissions; the series of planned inventory refinements; and the continued volatility for LULUCF baseline emissions to 2030 and beyond, CAP24 puts in place ambitious activity targets for the sector that will be kept under review in the light of emerging evidence from the inventory refinements and Phase 2 of the Land-use Review.

CAP24 outlines that reported emissions in the LULUCF sector remain in flux as experience and understanding grows., Under the EU legislation, a 2030 target and the 2026-29 carbon budget are now mandatory for Ireland's LULUCF sector so the ambition for this sector shall now be a fixed reduction of 0.626 MtCO2eq by 2030, below a baseline set at the average of the 2016-2018 emissions.
A range of activity targets for the LULUCF sector is provided, with two activity scenarios marking the higher and lower ends of emissions reduction ambition in the sector. Engagement with the EPA is underway regarding the modelling of these scenarios. The sector is to follow a reporting approach aligned with the EU regulations for LULUCF that Ireland has committed to, which provides clear and stable emissions targets.

The key targets outlined in CAP24 for this sector include 2025 KPIs of:

- Increase our annual afforestation rates to 8,000 hectares per annum.
- 45k ha of cover crops planted
- 60k ha of cereal area to incorporate straw directly into soil. 200 kha of mineral grassland managed better to improve sequestration.25 kha of grasslands on drained organic soils with reduced management intensity.
- 33,000 ha of peatlands rehabilitated as part of Bord na Móna EDRRS and LIFE People and Peatlands.

Key measures to deliver reductions in emissions for this sector as outlined in CAP24 include;

- Continuing to support sustainable production of wood biomass for energy contributing to the reduction of fossil fuels.
- Reviewing the CAP Strategic Plan following the amended EU LULUCF Regulation and Effort Sharing Regulation, and other developments such as the National Energy and Climate Plan, Nature Restoration Law, and Phase 2 of our national Land-use Review.
- Creation of an Agriculture and Land Use Inventory Refinement Group to guide inventory refinement by identifying gaps in the inventory, potential research areas and identifying trends to facilitate provision of a robust LULUCF Inventory with less uncertainty.

- Continuing to support sustainable forest management (SFM) interventions across the entire forestry sector, through the Forestry Programme 2023-2027 and the Coillte Strategic Vision.

CAP24 reiterates the European Green Deal commitment to delivering net-zero GHG emissions at EU level by 2050; with Ireland committed to achieving a 51% reduction in emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050 and the need for action to reduce emissions to be significantly accelerated in the period to 2030.

Key Targets and Measures outlined within CAP24, include the utilization of biomass for decarbonization, reduction of fossil fuel demand through energy efficiency measures in industry and continuing to support sustainable production of wood biomass for energy which will contribute to the reduction of fossil fuels.

The Proposed Development will replace the existing gas energy system with a new thermal energy system. This new system will use sustainably sourced wood biomass as fuelstock. The replacement of gas with wood biomass and the increase in energy efficiency within the new system, will result in the reduction of demand for fossil fuel and reduce GHG emissions in line with the Climate Action Plan 2024.

The Proposed Development fully complies with CAP 23 and CAP 24 as it will realise carbon savings of 2951 tCO2e/yr and therefore reduce emissions as part of the transition towards a net-zero society.

5.2.6 Draft Updated National Energy & Climate Plan 2021-2023

In accordance with the Governance of the Energy Union and Climate Action Regulation, Ireland's draft National Energy & Climate Plan (NECP) 2021-2030 was submitted to the European Commission in December 2018. The NECP is a consolidated plan which brings together energy and climate planning into a single process for the first time. It outlines the framework which within we will deliver the emissions reductions required to meet our current prescribed targets.

The 2019 NECP was prepared to incorporate all planned policies and measures that were identified up to the end of 2019, and which collectively deliver a 30% reduction by 2030 in non-ETS greenhouse gas emissions (from 2005 levels), this was before the Government committed to a higher level of ambition, and therefore does not reflect this higher commitment. Ireland is currently developing those policies and measures and intends to integrate the revision of the NECP into the process.

The current Draft is not complete, this is due to the late adoption of EU directives such as the Renewable Energy Directive III in December 2023. A focused period of public consultation on the Draft NECP will be undertaken in Q1 2024, for a period of at least six weeks. The Draft NECP will be available for comment and feedback will be captured to inform the finalisation of the Plan. In addition, all feedback received will be analysed by the Department of Environment, Climate and Communications and its consultants, in conjunction with other studies and stakeholder engagement, to inform the finalisation of the NECP, which is anticipated in June 2024.

The NECP acknowledges changes to the accounting rules for agriculture and forestry sectors (LULUCF) and the need for review as part of CAP24. The NCEP further acknowledges measures to ensure the forestry sector contributes to energy security. The following measures are included within the Plan:

- Increase the annual planting of new forests, and sustainable forest management of existing forests, including the increased use of harvested wood products.
- Implement and review roadmap for achieving afforestation rates as outlined in the Programme for Government and Forestry Programme Mid-Term Review.

- National Bioeconomy Implementation Group to examine sectoral coherence, network and awareness raising, research and innovation and the circular bioeconomy potential of harnessing the value from side-streams from both agriculture and forestry.

The NCEP also notes that

> '*Government will continue financial supports for the continued mobilisation of biomass from forests by supporting measures such as forest road construction, knowledge transfer groups and decision support tools. Wood fibre used for energy generation will continue to be used in the forest products sector to dry sawn timber reducing the dependency on fossil fuels. Use of biomass for heat and electricity generation will continue to use small diameter material which facilitates the sustainable management of forests where harvesting is regulated by the Forestry Act 2014. Forests felled are replanted ensuring that biomass is harvested from sustainable resources. The Irish Forest estate is forecasted to increase the supply of wood biomass for energy and wood-based panels from 1.8m cubic metres currently, to over 4m cubic metres by 2035".*

The NCEP states that planned increases in afforestation will take place while increasing levels of biodiversity, and as all land converted to forestry is regulated by the Forestry Act 2014, the protection of existing watercourses, biodiversity and archaeology will be adhered to.

The NECP is a consolidated plan which brings together energy and climate planning into a single process. The current Draft is not complete and the finalisation of the NECP is anticipated in June 2024.

The Plan identifies the Forestry Sector as a contributor to energy security in Ireland and an important sector in providing an alternative fuel to fossil fuel. The NCEP states that planned increases in afforestation will take place over the Plan period, this increase will be regulated under the Forestry Act 2014, to ensure the protection of the environment. "*The Irish Forest estate is forecasted to increase the supply of wood biomass for energy and wood-based panels from 1.8m cubic metres currently, to over 4m cubic metres by 2035".*

The NCEP further acknowledges measures to ensure the forestry sector contributes to energy security, including increase in annual planting and increased use of harvested wood products. The NCEP also includes a measure for the National Bioeconomy Implementation Group to examine sectoral coherence, network and awareness raising, research and innovation and the circular bioeconomy potential of harnessing the value from side-streams from both agriculture and forestry.

The Proposed Development aligns with the measures within the NCEP in that it will replace the use of fossil fuels with a wood biomass fuelstock. The planned increases, outlined in the NCEP, in 'The Irish Forestry Estate', regulated by the Forestry Act 2014, will ensure that MEDITE will have security of supply from sustainably managed sources.

5.3 Planning Policy

5.3.1 National Planning Framework (NPF 2040)

Project Ireland 2040, Ireland's National Planning Framework highlights the key national environmental challenges include the need to accelerate action on climate change, health risks to drinking water, treating urban wastewater, protecting important and vulnerable habitats as well as diminishing wild countryside and dealing with air quality problems in urban areas.

It is important to note that, since the publication of the National Planning Framework, European and National Policy has shifted towards the aim of a carbon neutral economy. The Climate Action Plan 2024, supersedes the National Planning Framework's objectives to achieve a low-carbon economy, and brings National Policy in line with European objectives to achieve net-zero emissions by 2050.

The Government intends to address our environmental challenges through the following overarching aims which include:

- Resource Efficiency and Transition to a Low Carbon Economy.
- Protecting, Conserving and Enhancing Our Natural Capital.
- Creating a Clean Environment for a Healthy Society.

In relation to Resource Efficiency and Transition to a Low Carbon Economy, the following policy areas are highlighted:

- Sustainable Land Management and Resource Efficiency: adopting the principles of the circular economy to enable more sustainable planning and land use management of our natural resources and assets.
- Low Carbon Economy: Our need to accelerate action on climate change.
- Renewable Energy: Our transition to a low carbon energy future.
- Managing Waste: Adequate capacity and systems to manage waste in an environmentally safe and sustainable manner.

National Policy Objective 23

Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.

National Policy Objective 53

Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.

National Policy Objective 54

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

National Policy Objective 55

Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

National Policy Objective 56

Sustainably manage waste generation, invest in different types of waste treatment, and support circular economy principles, prioritising prevention, reuse, recycling, and recovery, to support a healthy environment, economy, and society.

With respect to the National Planning Framework the key national environmental challenges outlined in the Plan include; the need to accelerate action on climate change, facilitate the development of the rural economy (NPO 23), support the circular and bio economy (NPO 53), reduce our carbon footprint (NPO 54), promote renewable energy use and generation (NPO 55), sustainably manage waste generation (NPO 56). These objectives can be achieved through sustainable land management and resource efficiency and the use of renewable energy in promoting a low carbon energy supply.

Medite is proposing to replace the existing boilers which are approaching the end of their design life, with energy systems which will have the best available technology that will guarantee the continued operation of the plant, secure greater energy efficiency, and reduce environmental emissions. Importantly, the project will sustain continued employment in the region. By converting to more energy efficient systems, removing the need for the use of gas, and using sustainably managed fuel sources, the Proposed Development fully aligns with the policies and objectives of the NPF.

The new energy system will see the introduction of a new, modern combustion, air filtration, and treatment systems in line with European emissions performance for the best available technology.

The Proposed Development will bring several benefits to Medite both in terms of competitiveness and efficiency as a manufacturing facility but also in respect of its ability to meet new environmental targets for carbon emissions reductions. The benefits include:

- Reduced carbon emissions by reducing natural gas consumption and use of production residue as fuel
- Energy savings via improved thermal efficiency.

In the context of Planning and Investment to Support Rural Job Creation and in relation to Forestry, the NPF states that" *The afforestation of agricultural land, supported by Government incentives, aims to increase long-term timber supply to support the development of a sustainable processing sector and offers significant carbon sequestration potential, thereby contributing to national greenhouse gas mitigation targets and the bioeconomy."* The Proposed Development will support the NPF and its aim to support rural job creation in relation to forestry.

5.4 Regional Policy

5.4.1 Southern Regional Spatial and Economic Strategy (RSES) 2019-2031

The RSES provides for the long-term development of the Southern Region covering the period 2019 - 2031. It identifies a settlement typology which builds a framework based on the pillars of our three cities, supported by a network of strategically located key towns, strengthening our towns and villages, and supporting rural areas.

Clonmel is identified as a key town which is defined as a large or strategically located town which has an accessibility and influence in a regional or sub regional context. Its scale, County Town status and significance as an employment location are highlighted as strategic attributes. It is described as a major employment centre with total jobs of 7,306 in 2016, now 6,970 as per the (at the time) Draft Tipperary County Development Plan 2022 – 2028, including 3,500 FDI jobs and diverse employment sectors including Pharma, Life sciences and food.

The regional strategy has identified a low carbon (circular) economy and a bioeconomy as a component towards a vision for the regions for a transition to low carbon future. It describes that the transition to a low carbon future will see entire sectors of the economy undergo radical changes and create new types of enterprises and jobs. It is stated that the Region has enormous potential for renewable energy, as well as becoming a global leader in the bioeconomy. This will require investment in new skills, as well as appropriate assistance and incentives to enable enterprise to make the transition. In this regard the following regional objective has been set out:

RPO 56 – Low Carbon Economy

a. "The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund.
b. It is an objective to develop enterprises that create and employ green technologies.
c. Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of receiving environment and existing infrastructure to serve new industries.
d. Local authorities shall include objectives in statutory land use plans to promote energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings Directive (EPBD).
e. It is an objective to support investments in energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'. Local authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP)".

RPO 57 - National Policy Statement on Bioeconomy

"It is an objective to support the National Policy Statement on Bio-economy (2018), subject to the implementation of mitigation measures outlined in the SEA and AA undertaken where necessary and the exploration of opportunities in the circular resource-efficient economy including undertaking a bio-economy feasibility study for the Region to identify areas of potential growth (including opportunities presented in the EU Bio-economy Strategy updated in 2018 for urban bio-economies and piloting circular bio economy cities) to inform investment in line with the national transition objective to a low carbon climate resilient and circular economy - National Policy Statement on Bio-economy"

RPO 58 - Bio-economy and Rural Areas

"It is an objective to facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together the bioeconomy, subject to required environmental assessment processes where necessary and balanced with while at the same time noting the importance of maintaining and protecting the natural landscape".

The region has further identified decarbonisation across the southern region as key objective of its strategy. It describes the importance of electricity to achieve national and EU targets, detailing that investment will be required to develop alternative renewable energies with greater interconnection to energy resources, increased capacity **in biomass/ biofuels and reconfiguration of power generation facilities from use of fossil fuels to low carbon technical solutions.** Specific to Biomass, the regional strategy states that it will promote the efficient use of **bio-based waste resources** as part of a broader strategy to develop a Bioenergy Implementation Plan for the Region. In this regard the following Regional Policy Objectives have been set:

RPO 107 - Regional Waste Management Plan for the Southern Region 2015-2021

'It is an objective to support innovative initiatives that develop the circular economy through implementation of the Regional Waste Management Plan for the Southern Region 2015-2021 and its successor'.

RPO 108 - EU Action Plan for the Circular Economy

'It is an objective to support the work of local authorities, the Regional Waste Management Office, and all state bodies in the Region to implement the EU Action Plan for the Circular Economy-Closing the Loop to ensure sustainable patterns of consumption and production in the areas of:

- *Product Design*
- *Production processes*
- *Consumption*
- *Waste management*
- *From waste to resources: boosting the market for secondary raw materials and water reuse in line with the EU Raw Material Initiative'.*

It is also an objective of the Tipperary County Council to support the Circular Economy concept (as set out in the NPF and RSES), and the 'Waste Action Plan for a Circular Economy' (DECC, 2020) across its own services, and through development as proposed though the County Development Plan.

By utilising residues from the Medite production process, and forest and sawmill residues, this project delivers on circular economy principles. It submitted that the Proposed Development would contribute substantially to the fulfilment of the objectives in the Regional Spatial and Economic Strategy for the Southern Region.

5.5 Local Policy

5.5.1 Tipperary County Council Plan 2022-2028

The Tipperary County Development Plan 2022 – 2028 which became effective on the 22nd of August 2022, identifies policies and objectives relevant to the Proposed Development. As set out in this plan, it is the policy of the Council to deliver renewable energy objectives set out in the National Planning Framework and the Regional Spatial and Economic Strategy. To the extent that the development plan refers to national policy that have since been updated, we have set out above how the Proposed Development complies with these policies.

Specifically, the following policy of Tipperary County Council will apply:

- **10-1** Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers.

In accordance with the Tipperary County Development Plan 2022 – 2028 it is also the objective of Tipperary County Council to:

- **10 - A** Support the Climate Action Plan (DECC, 2019) as it relates to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities.
- **10 - C** To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the County Development Plan.

As set out in the Renewable Energy Strategy (Appendix 2 of the Tipperary County Development Plan 2022 – 2028) it is the Council's bioenergy strategy to encourage the sustainable development of the bio-energy sector in the county due to the positive contribution it can make to the economy and to the achievement of renewable energy targets. In accordance with the Tipperary County Development Plan 2022 – 2028 it is also an objective of Tipperary County Council to:

- **10 - B** Support the National Policy Statement on the Bioeconomy (Government of Ireland, 2018) and any review thereof, having consideration to the strategic importance of the bioeconomy to rural Tipperary and support the preparation of a Bio-energy Implementation Plan for the Southern Region in conjunction with the Local Authorities and the Southern Regional Waste Management office.

The Tipperary County Development Plan 2022 – 2028 identifies policies and objectives relevant to the Proposed Development. As set out in this plan, it is the policy of the Council to deliver renewable energy objectives set out in the National Planning Framework and the Regional Spatial and Economic Strategy. To the extent that the development plan refers to national policy that have since been updated, we have set out above how the Proposed Development complies with these policies. Specifically, the following policy of Tipperary County Council will apply: **10-1** "*Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers*."

By replacing the existing energy systems and utilising residues from the Medite production process and forest and sawmill residues, this project delivers on the renewable energy objectives. It submitted that the Proposed Development would contribute substantially to the fulfilment of the objectives in the Tipperary County Development Plan.

5.5.2 Clonmel and Environs Development Plan 2013

The Clonmel and Environs Development Plan 2013 outlines the following vision for the development of the town:

> "*To realise Clonmel's potential as the County Town of Tipperary through balanced development that showcases its natural and manmade heritage, enhances its infrastructure, and promotes it as the primary location for third level education, industry, retail and services in Tipperary and its Waterford hinterland; while ensuring that residential accommodation, environmental quality and recreational provision surpass expectation".*

One of the principal aims is to enable Clonmel to fulfil its regional role to its greatest potential and to promote and develop the town as the primary growth centre for the County by continuing to develop and perform as the primary economic development centre of the county, attracting and facilitating high end value employment initiatives, promoting, and enabling an environment of innovation and creativity including the continual support of new and expanding indigenous industries.

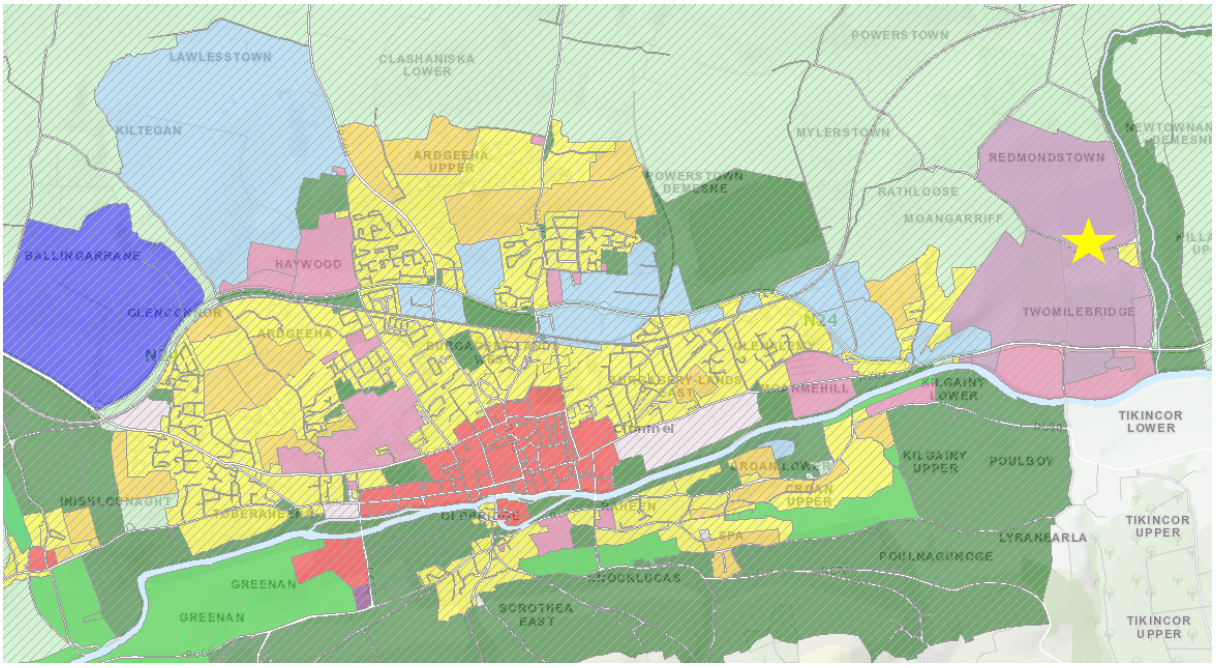
On the theme of the economy, it emphasises the town's strong tradition of employment activity and as a fast-emerging centre of excellence for the pharmaceutical industry. Engineering, healthcare, drinks production, logistics, timber production, tourist, and service industries, are other key employment areas and continue to be an important aspect to the vibrancy of the town.

Land Use Zoning

The site is zoned for general industry within the Development Plan. *Policy ECON 2: Zoning of land for Industry* states that '*It is the policy of the Council to provide for and encourage the development of industries, SME's, and offices at appropriate locations in the plan area*.'

In relation to Light and General Industry the Plan also states that it is important to retain existing traditional industry-based development and to expand this where appropriate. The industrial zonings set out in Map 1 allow for industrial and a range of related uses such as logistics development, manufacturing, and warehousing. This is to facilitate the expansion of existing industry and/or the clustering of new industry with existing which may provide for the development of business networking or linkages between industries.

Figure 7: Clonmel and Environs Zoning Map (subject site denoted by yellow star).



Transport Measures outlined within the Development Plan:

The Plan outlines that the future growth of Clonmel requires measures to reduce local congestion apparent on the N24 especially at peak traffic times.

Minimum Standards for Industrial Developments

The following Minimum Standards for Industrial Developments are set out within the Development Plan:

- Access: Multi-unit developments shall have a single access. Access roads shall have a minimum carriageway width of 7.5m with 1.3m wide grass strip and 2m wide footpath(s).
- Site Layouts: Adequate space shall be provided for the loading and unloading of goods and the manoeuvring of vehicles within the site. Turning space shall be provided for 15 metre articulated vehicles and 9 metre fixed axle vehicles. A building line set back of at least 12 metres from estate roadside boundaries shall be provided.
- Design Scheme: Multi-unit industrial proposals shall submit a detail design scheme; to set out proposed design approach and materials and finishes to be applied throughout the entire scheme. The design scheme shall ensure that the overall development implements a uniform/complimentary approach to design and finishes.
- Boundary treatment/ Landscaping: A comprehensive boundary treatment and landscape plan providing for details of uniform approach to boundary treatment and planting shall accompany applications. Existing trees and hedgerows shall be incorporated where practicable and new planting shall utilise trees and shrubs that are indigenous to the area. All services shall be laid underground.
- Use: Full details of the proposed use, including industrial processes involved, any toxic materials, chemicals or solvents used, shall be submitted with the planning application if known. Changes in use may require the grant of a new planning permission in accordance with the Planning & Development Regulations.
- Storage of Goods & Fuels: Goods, including raw materials, manufactured goods, packaging, crates etc., shall be stored or displayed only within the enclosed factory or industrial unit area behind the front

building line. All over-ground oil, chemical storage tanks shall be adequately bunded to protect against spillage. Provide adequate storage to facilitate the segregation & storage of waste materials at source.

- Signage: Within the curtilage of industrial estates, signage shall be restricted to a single sign identifying all occupiers of the site at the entrance and to fingerpost signs at junctions throughout the estate where the Council considers such necessary.

The Minimum Standards for Industrial Developments do not apply as the main plant is existing development.

5.5.3 Draft Clonmel and Environs Local Area Plan 2024-2030

Tipperary County Council compiled and published the 'Draft Clonmel and Environs Development Plan 2024', in July 2023. The LAP when adopted, will replace the Clonmel and Environs Development Plan 2013 (as extended).

The existing Clonmel and Environs Development Plan 2013, as varied remains in force until the Clonmel LAP takes effect. The Clonmel LAP is to be brought to the Council meeting on 12th Feb 2024 for finalization and (if adopted) will take effect 6 weeks after.

The LAP outlines the focus of renewed approach to compact growth and regeneration, with a clear consideration of climate change mitigation, consideration of quality of life and commitments for future economic development and growth. The Draft LAP has identified an increase in population from 17,140 in the Census 2016, to 18,369 in the Census 2022 in the BUA (Built-up Area).

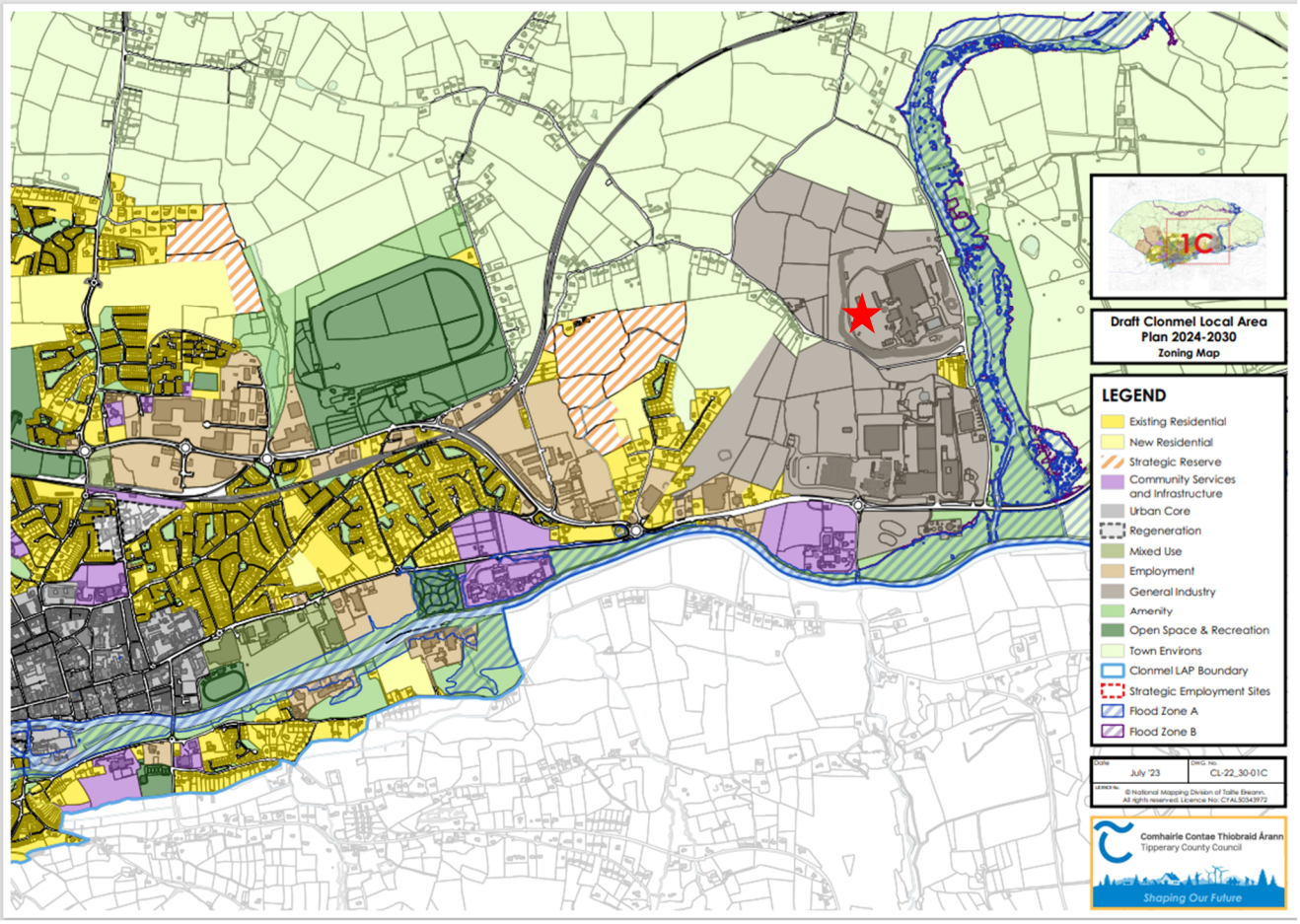
The Southern Region RSES and the Tipperary County Development Plan 2022-2028 designates Clonmel as a 'Key Town' and 'Self-Sustaining Regional Driver'. Clonmel is a host to a range of companies, *"collectively employing over 4,000 people*" in manufacturing.

Land Use Zoning

Within the Draft LAP, the site remains zoned as '*GI-General Industry: Provide for heavy/specialised industrial development'.* This land-use zoning is described as follows:

> '*Facilitate industry that may be associated with environmental emissions, including noise and odour (e.g., waste processing, aggregate processing, etc) and with intensive processing'.*

Figure 8: DRAFT Clonmel & Environs Development Plan Zoning Map (site denoted by red star).



Local Transport Plan

A Local Transport Plan (LTP) for Clonmel Town and its environs has been prepared and this report is listed as Appendix 2 within the Draft Local Area Plan. The key purpose of the Local Transport Plan is to guide the future needs of the Clonmel area. With regard to the subject site, there are a number of active travel measures listed in Table 6.2 of the LTP, as follows in Table 3 below:

Table 3: Active Travel Measures

Option	Location	Intervention
AT143	N24 east of the Moangarriff Roundabout	Segregated cycle facilities along the N24 east of Clonmel from the Moangarriff Roundabout connecting to large employers including Bulmers and Medite
DM5	Workplace Mobility Management Plans (MMPS)	Clonmel has a number of significant employment centres: Abbott, Boston Scientific, Bulmers, Medite, Carrigeen Business Park etc. Travel Plans should be developed for these employment centres to encourage more sustainable trip making.

Other General Policies and Objectives

- **Policy 6.2** Support the implementation of the active travel and demand measures identified in the Local Transport Plan (Appendix 2) and require proposals for new development to compliment and demonstrate how they will integrate with the provisions of the Local Transport Plan.
- **Policy 6.5** Preserve the study area and option corridors, or, when it emerges, the preferred transport solution, for the proposed N24 Waterford to Cahir Road Project as part of the upgrade of the N24 National Route linking Limerick and Waterford (Major Roads Project), including the proposed Road Links.
- **Objective 8E** Support the sustainable management of waste and enable a significant reduction in the production of waste in Clonmel, in line with the principles of the Waste Action Plan for a Circular Economy (DECC, 2021).
- **Objective 2A** Support the local community to identify and implement measures and actions to reduce energy consumption, produce renewable energy from local resources and to adapt to a changing climate, in accordance with the Tipperary Climate Action Plan 2023 (when complete).
- In line with the objectives of the national Climate Action Plan (DECC, 2023), the Council and its stakeholders will support the transition to renewable energy for heating and transport and will encourage and support the transition to renewable energy generated locally in tandem with the energy efficiency upgrading of built fabric throughout the town.
- It is a key objective of the Council to support the sustainable management of waste and the reduction in the production of waste in Clonmel in line with the National Waste Management Plan for a Circular Economy (Government of Ireland, 2022) and associated guidance across the delivery of its services and in the management of new development.

The Clonmel and Environs Development Plan 2013 has been extended until such a time as the Draft Clonmel and Environs LAP 2024-2030 comes into force. Under the C&EDP 2013, the Proposed Development Site is zoned 'general industrial', and the Plan outlines the need to, "*retain existing traditional industry-based development and to expand this where appropriate*". The Proposed Development accords with this land use zoning, Medite has been in place since 1983 and the Proposed Development seeks to replace the existing renewable energy plants with more energy efficient systems, in order to ensure the continued operation of the Company in Clonmel.

The Draft Clonmel and Environs LAP 2024-2030 outlines the focus of renewed approach to compact growth and regeneration, with a clear consideration of climate change mitigation, consideration of quality of life and commitments for future economic development and growth. Within the Draft Plan, the site remains zoned as '*GI-General Industry: Provide for heavy/specialised industrial development'.* This land-use zoning is described as follows: "*Facilitate industry that may be associated with environmental emissions, including noise and odour (e.g., waste processing, aggregate processing, etc) and with intensive processing".*

The Medite facility will continue to be in accordance with the land use zoning as set out in the Draft LAP and support the policies and objectives as outlined therein. The proposed development is in line with the Local Transport Plan objectives insofar as the delivery of fuelstock and feedstock is concerned.

6.0 Planning Considerations

6.1 Principle of and Need for the Development

The continuation of Medite's operations in the most energy efficient manner possible, in alignment with the Climate Action Plan 2023 and 2024, the National Bioeconomy Action Plan 2023-2025, the National Planning Framework 2040, the RECES 2019-2031 and the Tipperary County Council Development Plan 2022-2028, is of strategic economic importance to Southern region and the State by virtue of its extensive regional supply chain and the high value of product which is exported to the UK and Europe. The Proposed Development will enable this. It will also support the continued role of Clonmel as a location for large-scale industry providing employment for the surrounding area. The Proposed Development will therefore be of strategic economic importance to the State and the region in which it would be located.

National Planning Framework policies have adopted the principles of the circular economy to enable more sustainable planning and land use management of our natural resources and assets. With regard to Medite's own residues from the manufacturing process as well as forestry and sawmill residues, no other economic and environmentally viable use from these materials is available and their use also adheres to the principles of the circular economy. Energy recovery will also reduce energy generation from non-renewable sources.

6.2 Security and Sustainability of Biomass Fuel Supply

The sustainability of the proposed biomass supply has been considered in detail to demonstrate compliance with the provisions of the Renewable Energy Directive and also the availability of a sustainable biomass fuel supply over the lifetime of the development.

The Renewable Energy Directive III (RED III), states that

> "*in accordance with the principle of the cascading use of biomass, woody biomass should be used according to its highest economic and environmental added value in the following list of priorities: wood-based products, extending the service life of wood-based products, re-use, recycling, bioenergy, and disposal. Where no other use for woody biomass is economically viable or environmentally appropriate, energy recovery helps to reduce energy generation from non-renewable sources.*"[1]

The total amount of Fuelstock, comprising existing and proposed, that will be consumed by the Proposed Development is **186,000** tonnes per annum up from the current requirement of 111,000 tonnes. The figure of 186,000 is inclusive of a 10% margin to cater for variation in fuel mix and moisture content. A comparison of the existing versus the proposed fuel consumption is presented in the Table 4 overleaf.

When the new energy plants are fully commissioned, Medite will need to source 100,300 tonnes of additional fuel and this will be sourced from an increase in:

- Medite Residues (Bark too wet for existing energy plants (19,000 tonnes))
- Sawmill Residues & Forestry Residues (81,300 tonnes)

[1] *The revised Directive EU/2023/2413 entered into force on 20 November 2023. There will be an 18-month period for member states to transpose most of the directive's provisions into national law, with a shorter deadline of July 2024 for some provisions related to permitting for renewables.*

Table 4: Comparison of current and proposed fuelstock

Fuel Type	Existing Biomass Boilers Line 1 + Line 2 t/y	Proposed Biomass Energy Plant Line 1 t/y	Proposed Biomass Energy Plant Line 2 t/y	Total Proposed Line 1 + 2 t/y	+ 10% headroom (to account for variation in fuel mix and moisture content)	Increase
Medite residues	52,000	48,000	23,000	71,000	71,000	19,000
Forestry/Sawmill residues	33,700	67,000	31,000	98,000	115,000	81,300
Recovered wood	25,300					
Total	**111,000**	**115,000**	**54,000**	**169,000**	**186,000**	**100,300**

With respect to Medite Residues it is clear that the use of this by-product is consistent with the cascading use of biomass, in that the highest value has been extracted before putting this material to use as energy recovery. The use of production residues also complies with the principles of the circular economy, through energy recovery and avoids disposal. The highest value (MDF production) has been extracted before putting this material to use as energy recovery. Energy recovery in this context also helps to reduce energy generation from non-renewable sources.

In addition to Medite Residues, the remaining wood biomass utilised by Medite will be a residue of either forestry operations or saw-milling. These materials are the secondary outputs of both forestry operations and saw-milling and through both processes, the highest value has been extracted before putting this material to use as energy recovery.

6.3 Policy Compliance

6.3.1 European Policy

The Proposed Development and associated increase in fuelstock is considered against the requirements of the Sustainability Criteria outlined in RED 11 and RED III.

Medite Residues

With respect to Medite Residues it is clear that the use of this by-product is consistent with the cascading use of biomass, in that the highest value has been extracted before putting this material to use as energy recovery.

No other economic and environmentally viable use from this material is available. The use of production residues therefore complies with the principles of the circular economy, through energy recovery and avoids disposal. Energy recovery in this context if also helps to reduce energy generation from non-renewable sources.

Sawmill Residues

Similarly, it is clear that this is a by-product of the sawmill industry and its use is consistent with the cascading use of biomass, in that the highest value has been extracted before putting this material to use as energy recovery.

Forestry Residues

In the case of Forestry Residues, similarly, it is clear that this is a by-product of the forestry industry and its use is consistent with the cascading use of biomass, in that the highest value (sawlog) has been extracted before putting this material to use as energy recovery.

Medite have and will also continue to source the biomass residues from forests from within the island of Ireland that have been felled for other commercial purposes. No forests will be felled solely to provide biomass for Medite's heat production. These residues will not be sourced from forests felled solely to supply Medite's heat production. None of the wood biomass for the Proposed Development will be generated from growing and harvesting wood crops directly for energy purposes. The felling of trees is therefore not a direct or an indirect effect of The Proposed Development.

6.3.2 National Planning Framework

With respect to the National Planning Framework the key national objectives outlined in the Plan include; the need to accelerate action on climate change, facilitate the development of the rural economy (NPO 23), support the circular and bio economy (NPO 53), reduce our carbon footprint (NPO 54), promote renewable energy use and generation (NPO 55), sustainably manage waste generation (NPO 56) and transition to a Low Carbon and Climate Resilient Society, (NSO 8). These objectives can be achieved through sustainable land management and resource efficiency and in the case of the Proposed Development, through the use of sustainably sourced biomass for the development of renewable and low carbon energy supply.

Medite is proposing to replace the existing boilers which are approaching the end of their design life, with energy systems which will have substantially better technology that will guarantee the continued operation of the plant, secure greater energy efficiency, and reduce environmental emissions. Importantly, the project will sustain continued employment in the region. By converting to more energy efficient systems, removing the need for the use of gas, and using sustainably managed fuel sources, the Proposed Development fully aligns with the policies and objectives of the NPF.

The new energy system will see the introduction of a new, modern combustion, air filtration, and treatment systems in line with European emissions performance for the best available technology.

The Proposed Development will bring several benefits to Medite both in terms of competitiveness and efficiency as a manufacturing facility but also in respect of its ability to meet new environmental targets for carbon emissions reductions. The benefits include:

- Reduced carbon emissions by reducing natural gas consumption and use of production residue as fuel
- Energy savings via improved thermal efficiency.

In the context of Planning and Investment to Support Rural Job Creation and in relation to Forestry, the NPF states that:

> '*The afforestation of agricultural land, supported by Government incentives, aims to increase long-term timber supply to support the development of a sustainable processing sector and offers significant carbon sequestration potential, thereby contributing to national greenhouse gas mitigation targets and the bioeconomy.'*

The Proposed Development will support the NPF and its aim to support rural job creation in relation to forestry through the sustainable use of secondary material arising from this industry.

6.3.3 Regional Policy

The RSES provides for the long-term development of the Southern Region covering the period 2019 - 2031. The regional strategy has identified a low carbon (circular) economy and a bioeconomy as a component towards a vision for the regions for a transition to low carbon future.

Specific to Biomass, the regional strategy states that it will promote the efficient use of **bio-based waste resources** as part of a broader strategy to develop a Bioenergy Implementation Plan for the Region. In this regard the following Regional Policy Objectives have been set:

RPO 107 - Regional Waste Management Plan for the Southern Region 2015-2021

> *'It is an objective to support innovative initiatives that develop the circular economy through implementation of the Regional Waste Management Plan for the Southern Region 2015-2021 and its successor'.*

The Proposed Development will support regional policy by supporting the circular economy and bioeconomy through utilising Medite residues, sawmill residues and forest residues. Medite residues will be sourced on site and both sawmill residues and forest residues will be sourced from the island of Ireland. The use of these materials as fuelstock is supportive of furthering the circular economy and bioeconomy.

6.3.4 Local Policy

The Tipperary County Development Plan 2022 – 2028 which became effective on the 22nd of August 2022, identifies policies and objectives relevant to the Proposed Development. As set out in this plan, it is the policy of the Council to deliver renewable energy objectives set out in the National Planning Framework and the Regional Spatial and Economic Strategy. By replacing the existing energy systems and utilising residues from the Medite production process, the Proposed Development delivers on the renewable energy objectives of the CDP. It is submitted that the Proposed Development would contribute substantially to the fulfilment of the objectives in the Tipperary County Development Plan.

Within the Clonmel and Environs Development Plan 2013, the subject site is zoned for general industry. In relation to Light and General Industry, the Plan states that it is important to retain existing traditional industry-based development and to expand this where appropriate. Medite commenced production of Medium Density Fibreboard (MDF) on its 29.7 ha site at Clonmel, Co. Tipperary in 1983. The Company's facility produces on average 425,000m^3 of MDF per annum, and currently employs 170 people. The Proposed Development will replace the existing aging wood biomass fired thermal energy systems serving MEDITE's two production lines with, 2 no. renewable energy, wood biomass fired Thermal Fluid Heaters with thermal capacity of 60MW and 30MW respectively, one for each of Medite's production lines.

One of the principal aims of the Clonmel and Environs Development Plan 2013 is to enable Clonmel to fulfil its regional role to its greatest potential and to promote and develop the town as the primary growth centre for the County. On the theme of the economy, it emphasises the town's strong tradition of employment activity and as a fast-emerging centre of excellence for the pharmaceutical industry. Engineering, healthcare, drinks production, logistics, timber production, tourist, and service industries, are other key employment areas and continue to be an important aspect to the vibrancy of the town.

The Draft Clonmel and Environs LAP outlines the focus of renewed approach to compact growth and regeneration, with a clear consideration of climate change mitigation, consideration of quality of life and commitments for future economic development and growth. Within the Draft Plan, the site remains zoned as '*GI-General Industry: Provide for heavy/specialised industrial development'.* This land-use zoning is described as follows: "*Facilitate industry that may be associated with environmental emissions, including noise and odour (e.g., waste processing, aggregate processing, etc) and with intensive processing".*

The replacement of these energy systems will allow Medite to maintain its operations on site and the employment of 170 people. This Proposed Development is in accordance with the zoning objective for the site and the policies and objectives of the Clonmel and Environs Plan 2013 and the Draft Clonmel and Environs LAP which is due to be adopted in February 2024.

6.3.5 Effect on Designated/Proposed Conservation Sites

Natura 2000 European Designated Sites

There are no designated Natura 2000 conservation sites within the vicinity of the application site. There are no Special Protected Areas (SPAs) within 25 km of the application site. There is one Special Area of Conservation (SAC) with the Anner River forming part of the Lower River Suir Special Area of Conservation (SAC).

- Lower River Suir SAC (site code 002137)

The conservation objectives for the SAC are for:

- *Freshwater pearl mussel Margaritifera margaritifera.*

Further details on the designated SAC and SPA and an assessment of the likely significant effects on the environment of the Proposed Development thereon is provided in the Environmental Impact Assessment Report (EIAR) and an assessment of the likely significant effects specifically on any European sites of the Proposed Development is provided in the Appropriate Assessment Screening Report and Natura Impact Statement which accompany this planning application.

Recorded Monuments

There are no recorded monuments located within the application site. It should be noted that there is a feature, east of application area and west of the local road. This feature recorded under record number TS083-010 is classified as a Ringfort – rath. Due to its location, size and nature, the elements of Proposed Development will not result in an adverse environmental effect on this feature.

Additional detail on national monuments within the local area is provided in **EIAR Chapter 12** – Cultural Heritage.

Built Heritage

There are no structures identified on the National Inventory of Architectural Heritage within the application site. However, there is a Demense Landscape, associated with Newtownanner House, located to the east of the Proposed Development site. At the centre of this landscape lies Newtownanner House, a protected structure as well as several associated structures which are recorded on the National Inventory of Architectural Heritage.

Additional information on the built heritage of the area can be found in **EIAR Chapter 12 –** Cultural Heritage.

Landscape

Relevant designations and policies in relation to protected views, scenic routes, development management guidelines, the landscape, primary and secondary amenity areas, and visually vulnerable & sensitive areas were identified.

Additional information on the landscape of the area can be found in **EIAR Chapter 13** – Landscape & Visual. In summary, the proposed development will have no effects on landscape receptors and no significant effects on visual receptors. Further to that, no designated landscapes, protected views or scenic routes will be significantly affected.

Geological Heritage

The current Tipperary County Development plan lists sites of County geological importance. The plan recognises the importance of Geological Heritage and lists the important geological features within the County with the intention of maintaining their possible conservation value. The list of Geological Heritage Sites is set out in the 'Geological Heritage of County Tipperary' (GSI/Tipperary County Council, 2019).

Policy 11 - 1 of the County Development Plan states the importance in assessing proposals for new developments to seek to protect, support and conserve the geological heritage sites of Tipperary and their value as outlined in the Tipperary Audit of Geological Heritage Sites, (GSi/TCC, 2019).

A primary objective for Geological Sites is to 'Maintain the conservation value of those features or areas of geological interest that are listed in Volume 2, Chapter 3 Nature Conservation Areas of the plan, and to protect them from inappropriate development.'

There are no designated Irish Geological Heritage sites at Redmondstown and there are no sites of County Geological Interest within or immediately adjacent to the Proposed Development, as indicated in the Tipperary Audit of Geological Heritage Sites. Additional information on geology is provided in **EIAR Chapter 6** – Land, Soils & Geology.

7.0 Strategic Infrastructure Development

This Planning Application is submitted under Section 37B of the Planning and Development Act 2000 (as amended) to replace the existing energy systems at the Medite factory.

7.1 Confirmation that the Proposed Development is Strategic Infrastructure

The Proposed Development comprises a Seventh Schedule development under the Planning and Development Act 2000, as amended as it will exceed the threshold of 100,000 tonnes in Class 3 of that schedule.

A pre application request was made to An Bord Pleanála under *section 37B of the Planning and Development Act 2000 as amended* (ABP-311991-21) for a determination that an application of this scale would be considered to be Strategic Infrastructure Development. In ABP's response letter dated 1st of September 2022, it was confirmed that

> *the proposed development falls within the scope of paragraphs 37A (2) (a) and (b) of the Act. Accordingly, the Board has decided that the proposed development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act, 2000, as amended. Any application for permission for the proposed development must therefore be made directly to An Bord Pleanála under section 37E of the Act.*

Section 37E (1) of the Planning and Development Act, 2000 as amended also states that:

> *'an application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Board and* ***shall be accompanied by an environmental impact assessment report*** *in respect of the Proposed Development'. (Emphasis added)*

7.1.1 Pre-planning with An Bord Pleanála

A pre-planning consultation took place with An Bord Pleanála on the 8th of February 2022. Attendees included key staff members from An Bord Pleanála and representatives for the Client and appointed consultants. This meeting was an information gathering exercise for the Board to establish an understanding of the Proposed Development and for the Client to highlight any matters it wished to receive advice on from the Board. The main items discussed were the proposed development, potential pathways to the SAC and the need for a comprehensive analysis of the area, assessment of any potential impacts on the greenway along the River Suir, cumulative impacts in the EIAR and in-combination effects on the NIS should take account of relevant developments within the area and the prescribed bodies which the applicant might engage with.

With regard to the possible options available in respect of technologies which might be employed in relation to the proposed development, the Board advised that each option should be robustly addressed within the EIAR and other relevant documents. ABP advised that the Client should seek advice from the Board's staff on matters such as draft public notices.

7.1.2 List of Prescribed *bodies*

Within this confirmation letter, An Bord Pleanála outlined the following list of prescribed bodies which are to be notified of the application for the Proposed Development, as follows:

- Minister for Housing, Local Government and Heritage (Development Applications Unit)
- Minister for Environment, Climate and Communications
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport, and Media
- Minister for Agriculture, Food, and the Marine
- Tipperary County Council
- Waterford City and County Council
- The Southern Regional Assembly
- Environmental Protection agency
- Transport infrastructure Ireland
- Fáilte Ireland
- An Taisce
- The Heritage Council
- Inland Fisheries Ireland
- Irish water

7.2 The Contents of the Planning Application

This Planning Application to An Bord Pleanála comprises the following documentation:

- Cover Letter.
- Completed Planning Application Form.
- Site Notice.
- Newspaper Notice.
- Planning Drawings - refer to Drawing Schedule.
- Planning Statement
- Application Fee- Receipt of Electronic Funds Transfer Payment.
- Record of Pre-Planning Meeting Minutes.
- Copy of the letters to prescribed bodies.
- Copy of the letter to Tipperary County Council.
- AA Screening Report
- Natura Impact Statement.
- EIA Portal: Copy of the email confirming receipt of notification by the DHLGH EIA Portal.
- Electronic copy.
- Volume 1 - EIAR Non-Technical Summary
- Volume 2 - Environmental Impact Assessment Report
- Volume 3 – EIAR Appendices

7.3 Environmental Impact Assessment

The requirement for Environmental Impact Assessment is mandatory on specified project types which have a high likelihood of impacting on the receiving environment. These projects are listed in detail in the EIA Directive, Annex I, (Directive 2011/92/EU as amended by Directive 2014/52/EU), as well as in the Planning and Development Regulations, Schedule 5, Development for the purposes of Part 10.

The Proposed Development, as described in Chapter 2 of this EIAR, is considered EIA development as it falls within the following class of Schedule 7 of the Planning and Development Act 2000, as amended and exceeds the threshold stated therein.

> *3 - An installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes.*

7.3.1 Requirement for EIA in the context of Strategic Infrastructure Development

A pre application request was made to An Bord Pleanála under *section 37B of the Planning and Development Act 2000 as amended* (ABP-311991-21) for a determination that an application of this scale would be considered to be Strategic Infrastructure Development. In ABP's response letter dated 1st of September 2022, it was confirmed that

> *'the proposed development falls within the scope of paragraphs 37A (2) (a) and (b) of the Act. Accordingly, the Board has decided that the proposed development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act, 2000, as amended. Any application for permission for the proposed development must therefore be made directly to An Bord Pleanála under section 37E of the Act.'*

Section 37E (1) of the Planning and Development Act, 2000 as amended also states that:

> *'an application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Board and **shall be accompanied by an environmental impact assessment report** in respect of the Proposed Development'. (Emphasis added)*

7.3.2 Environmental Impact Assessment Report

An Environmental Impact Assessment Report (EIAR) is a "report of the effects, if any, which proposed development, if carried out, would have on the environment and shall include the information specified in Annex IV of the Environmental Impact Assessment Directive'. An EIAR was prepared in accordance with the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU and submitted with this Planning Application.

The principal objectives of an Environmental Impact Assessment Report are to:

- Identify and / or predict the likely significant effects of a development.
- Identify what mitigation measures should be incorporated into the development to eliminate or reduce the perceived effects, refer to Error! Reference source not found..
- Interpret and communicate the above information on the impact of the proposed development, in both technical and non-technical terms.
- Assist the Local Planning Authority in the decision-making process with respect to the associated planning application.
- Cumulative assessment
- Assessment of residual effect post application of mitigation measures
- Monitoring.

7.4 Appropriate Assessment

With respect to designated Natura 2000 conservation sites within the vicinity of the application site, there are no Special Protected Areas (SPAs) within 25 km of the application site. There is one Special Area of Conservation (SAC) with the Anner River forming part of the Lower River Suir Special Area of Conservation (SAC).

- Lower River Suir SAC (site code 002137)

The conservation objectives for the SAC are for:

- Freshwater pearl mussel Margaritifera margaritifera.

Further details on the designated SAC and SPA and an assessment of the likely impact of the proposed development thereon is provided in the Environmental Impact Assessment Report (EIAR) and Appropriate Assessment which accompany this planning application. The screening concludes that, based on the best

available scientific information, the proposed project at the Medite facility will not undermine the conservation objectives for Lower River Suir SAC, Nier Valley Woodlands SAC, Comeragh Mountains SAC, River Barrow and River Nore SAC or any other Natura 2000 site, either alone or in-combination with other projects or plans.

Based on the information set out in this AA Screening Report and Natura Impact Statement report, we submit that the competent authority has sufficient information to allow it to determine that the proposed replacement of the existing biomass-fired boilers, biomass-fired thermal fluid heater, and gas-fired thermal fluid heater at the Medite facility, individually or in combination with other plans or projects, will not have an adverse effect on the integrity on any Natura 2000 sites.

8.0 Summary and Conclusions

Having regard to:

- The planning history of the site and the long-established manufacturing use of medium-density fibreboard (MDF).
- National, Regional and Local policy including the Proposed Development's contribution to the economy, the bioeconomy and the circular economy.
- The provisions of the current Tipperary County Development Plan.
- The Environmental Impact Assessment Report (EIAR)
- Appropriate Assessment (AA) Screening Report and Natura Impact Statement submitted with the planning application.

It is concluded that the Proposed Development with appropriate mitigation would not result in any significant adverse effects on the environment, would not adversely affect the integrity of any European Site having regard to the conservation objectives of those sites; and would, therefore, be in accordance with the proper planning and sustainable development of the area.

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