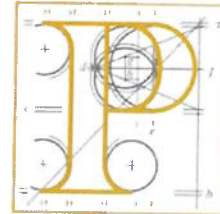


**Our Case Number:** ABP-317292-23

**Your Reference:** Bord Na Móna plc



An  
Bord  
Pleanála

John Staunton  
TOBIN Consulting Engineers  
Block 10-4  
Blanchardstown Corporate Park  
Dublin 15  
D15 X98N

**Date:** 15th December 2023

**Re:** Proposed development of an extension to the existing Drehid Waste Management Facility to provide for acceptance of up to 440,00 TPA of non-hazardous waste material in the townlands of Timahoe West, Coolcarrigan, Killinagh Upper, Killinagh Lower, Drummond, Drehid, Kilkeaskin, Loughnacush, and Parsonstown, County Kildare.

Dear Sir,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

CH08

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Shaun McGee

---

**From:** Eimear Reilly  
**Sent:** Tuesday 5 December 2023 12:58  
**To:** John Staunton; SIDS  
**Cc:** Shaun McGee  
**Subject:** RE: ABP-317292-23 - Proposed development of an extension to the existing Drehid Waste Management Facility

Hi John

I acknowledge receipt of your email. A formal acknowledgement will issue via post.

Kind regards

Eimear

---

**From:** John Staunton <[john.staunton@tobin.ie](mailto:john.staunton@tobin.ie)>  
**Sent:** Wednesday, November 29, 2023 4:12 PM  
**To:** SIDS <[sids@pleanala.ie](mailto:sids@pleanala.ie)>; Eimear Reilly <[e.reilly@pleanala.ie](mailto:e.reilly@pleanala.ie)>  
**Subject:** ABP-317292-23 - Proposed development of an extension to the existing Drehid Waste Management Facility

Hello Eimear,

Please see attached the response to the observation made by The Eastern-Midlands Regional Waste Management Planning Office. If you need a physical copy of this posted to you, we can do so tomorrow – just let me know.

Many thanks,

John

**Dr. John Staunton B.Sc. PhD.**  
**Senior Project Manager & Environmental Scientist**

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 91 565211  
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**TOBIN**



*2022 Engineers Ireland Awards Winner: CPD Employer of the Year*  
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*2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management*  
*2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*  
*2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year*

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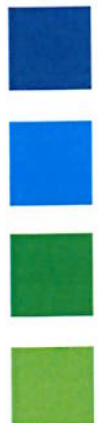
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# Bord na Móna

## Drehid Waste Management Facility – Further Development Response to RWMPO Observation



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## **1. INTRODUCTION**

### **1.1 PREFACE**

On behalf of the applicant, Bord Na Móna, TOBIN Consulting Engineers (TOBIN) hereby submit a response to an additional third party joint observation from the Eastern-Midlands, Connaught-Ulster and Southern Regional Waste Management Planning Offices (RWMPOs).

Responses to other third party submissions were provided as part of an earlier response document in September 2023. This document only addresses the subsequent observation received from the RWMPOs.

Most of the points raised in this observation are supportive of the proposed development.

### **1.2 BACKGROUND TO APPLICATION**

A brief background to the current application is provided in the previous response document submitted in September 2023, with detailed information in the originally submitted EIAR (June 2023).



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## 2. RESPONSE TO THIRD-PARTY OBSERVATIONS

### 2.1 RESPONSE TO AN BORD PLEANÁLA

In November 2023, An Bord Pleanála provided a copy of the observation received from the RWMPOs to the applicant (and TOBIN) for review.

The points raised in the observation are responded to in the following sections.

#### 2.1.1 Observation Content

The RWMPOs submitted an observation to An Bord Pleanála setting out their views on the proposed development, and the need for it. Having considered the proposed development the RWMPO submission states that the proposed activities are consistent with a number of the policies set out in the draft National Waste Management Plan (dNWMP), including Core Policy 12, Targeted policies TP11.2, TP11.3, TP14.4, TP14.5, TP15.1 and TP 15.2, each of which is provided in their observation.

They note that currently treatment options for Municipal Solid Waste (MSW) within the state are disposal at landfill and thermal treatment. Disposal at landfill remains the most viable treatment option within the state for residual Construction & Demolition (C&D) waste (after recycling/recovery). Shortfalls in this treatment capacity have meant that Ireland relies heavily on export options for these wastes, with 286,551 tonnes of MSW and 207,805 tonnes of C&D waste being exported in 2022. They also state that *“Ireland needs to reduce its reliance on export which is high risk in terms of security of supply and is also contrary to the proximity principle resulting in a higher carbon footprint”*.

Importantly, the observation states in relation to the proposed development that *“Under the dNWMP, the existing Drehid facility and its proposed development is considered to be ‘nationally important infrastructure’. It follows that this facility, with the increased quantities applied for, will need to continue to operate beyond 2028”*.

It is noted in their observation that they are supportive of the proposed extension and reconfiguration of the existing composting facility to form a Composting and MSW processing facility. They also generally support the proposed soil and stone processing facility as it would reduce the use of primary raw materials, and would contribute to the expansion of the circular economy.

#### **Proposed Conditions**

The observation outlined a small number of proposed planning conditions which were:

##### **Proposed Condition 1.**

*A condition should be formulated to limit the acceptance of residual MSW for disposal to 120,000 TPA (tonnes per annum). This restriction would not apply in instances requiring the acceptance for disposal of residual MSW as a result of the activation of contingency capacity provisions.*

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Response:

The developer agrees to comply with any such condition which An Bord Pleanála attaches to a grant of planning permission. The currently proposed development is in line with this.

Proposed Condition 2.

*A condition should be formulated to oblige the applicant to set aside a proportion of their annual landfill capacity as contingency disposal capacity up to a maximum of 30,000 TPA.*

Response:

The developer agrees to comply with any such condition which An Bord Pleanála attaches to a grant of planning permission. The currently proposed development is in line with this.

Following on from the above, there were two suggested conditions included together, with a discussion relating to both. Therefore, we will address both of them together in this response document.

Proposed Condition 3.

*A condition should be formulated to impose a restricted timeline of five years (as opposed to 25 years applied for) on the acceptance of IBA (Incinerator Bottom Ash) for disposal, with the flexibility of this being extended for a further period.*

Proposed Condition 4.

*That condition should be formulated to oblige the applicant to operate a dedicated cell for the acceptance of IBA.*

Response:

Firstly, it is worthwhile to note that the RWMPO's in the observation appear to support the development of domestic landfill outlets for IBA in the short to medium term.

It is estimated, based on the current market and the volumes of waste being accepted at the site, that the amounts of IBA accepted at the proposed development will be quite small, at approximately 1,000 TPA. At this volume, it would not be feasible to construct a dedicated cell for its disposal, particularly over potentially just five years, as there would be an insufficient volume of waste to do so. A partially filled cell with IBA would need to be filled with other wastes to ensure the cell can be capped in order to reduce the volume of leachate generated and made safe for the long term. Currently this IBA is being used as a suitable material for providing daily cover on the working face of the landfill and also as a top dressing on the internal haul roads within the landfill body. Therefore, on the basis of the relatively small volume being handled, it is not considered worthwhile or appropriate to use a dedicated cell for IBA at this site.

The RWMPO's also note that IBA has good potential for secondary use as a raw material in civil engineering applications, and the long term management of this material should be carried out to ensure that it is used in a beneficial way to maximise the circular economy. It is currently not



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known when it will be possible to recover and use this material outside of a lined landfill cell in place of primary raw material. As noted above, currently, the IBA is being partially 'recovered' as a suitable engineering material within the landfill body, and if not used for this purpose, then additional other raw materials may be required. It is proposed to continue with this approach (i.e. recovery of the waste), so it is therefore argued that these circular economy aims are being achieved.

The developer is of the view that in the event that Proposed Conditions 3 and 4 are both imposed as written, it may render the acceptance of IBA at the facility to be unviable. The preference of the developer in this case would be to not include either of these two conditions, but should An Bord Pleanála see it as necessary to address the general concern of the RWMPO's here, it is requested that the Proposed Condition 3 (relating to the implementation of reviews of IBA acceptance every five years) be included without Proposed Condition 4 (relating to the use of a dedicated IBA cell). This would ensure that the disposal of IBA can be reviewed at regular intervals so that once the appropriate recycling or recovery is possible, it can be diverted from landfill. If deemed appropriate, the consent for reuse or 'recovery' within the landfill can be extended.



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### 3. CONCLUSION

This response to this third-party observation from the RWMPO's is submitted on behalf of the applicant, Bord na Mona.

Most of the points raised in this observation are supportive of the proposed development.

We trust the arguments put forward in this response to deal with the small number of other issues will be considered in full in determining a positive outcome for this application. If there is a requirement for further clarification, please do not hesitate to contact the applicant or TOBIN.



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 TOBIN Consulting Engineers

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