

Lauren Murphy

From: Quinn, Geraldine <geraldine.quinn@tipperarycoco.ie>
Sent: Thursday, May 2, 2024 5:04 PM
To: SIDS
Subject: ABP-319013-24
Attachments: Certified Extract of Minutes.pdf; Signed C.E. Report - Medite Europe DAC.pdf
Categories: Lauren

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Please find under Section 37E(4) of the Planning and Development Act 2000, as amended, the Chief executive officers report and certified extract of the minutes in respect of application from Medite Europe DAC - your ref ABP-319013-24 refers.

Please acknowledge receipt of same.

A copy of this report has also be placed on the public file at our office.

Kind Regards,

Geraldine Quinn

Geraldine Quinn
Staff Officer
Planning Section
Tipperary County Council, Civic Offices, Nenagh, Co. Tipperary.
Ext 6977
E geraldine.quinn@tipperarycoco.ie

Tipperary County Council Disclaimer

www.tipperarycoco.ie<<http://www.tipperarycoco.ie><<https://scanner.topsec.com/?t=d5c75198641d697569dd0711945be7e022b0bbfa&u=http%3A%2F%2Fwww.tipperarycoco.ie&r=show&d=1464>



Comhairle Contae Thiobraid Árann
Tipperary County Council

Chief Executive Officer's Report

in accordance with the requirements of Section 37E (4) and 37E (5) of the Planning and Development Act 2000 (as amended)

March 2024

An Bord Pleanála Ref. No:	ABP-319013-24.
Applicant:	Medite Europe DAC
Agents:	SLR Environmental Consulting Ltd
Site Location:	Redmonstown, Clonmel, Co. Tipperary
Proposed Development:	Replacement of existing biomass-fired boilers, biomass-fired thermal fluid heater and gas-fired thermal fluid heater at Medite's manufacturing plant.

Table of Contents

PART 1.	INTRODUCTION & PURPOSE OF THE REPORT.....	1
1.1	Introduction.....	1
1.2	The Purpose of this Report	1
PART 2.	SITE LOCATION & DEVELOPMENT DESCRIPTION OVERVIEW.....	2
2.1	Site location overview	2
2.2	Proposed development.....	2
2.3	Project Timeline:.....	3
2.4	Location of Natura 2000 Sites.....	4
2.5	Archaeological, Architectural & Cultural Heritage	4
PART 3.	POLICY CONTEXT & GUIDANCE	6
3.1	EU Directives and Policies	6
3.1.1	EU Renewable Energy Directive 2009/28/EC	6
3.1.2	Revised Renewable Energy Directive II (2018/2001/EU).....	6
3.1.3	European 2020 Strategy for Growth	6
3.1.4	2030 Climate and Energy Framework	6
3.1.5	Energy Roadmap 2050.....	7
3.1.6	European Green Deal	7
3.2	National Policy.....	7
3.2.1	National Policy Statement on the Bioeconomy (2018).....	7
3.2.2	National Bioeconomy Action Plan 2023-2025.....	7
3.2.3	Climate Action and Low Carbon Development (Amendment) Act 2021.....	7
3.2.4	Climate Action Plan 2023	7
3.2.5	Climate Action Plan 2024 (Consultation Draft)	8
3.2.6	Project Ireland 2040: The National Planning Framework	8
3.2.7	Project Ireland 2040: National Development Plan 2018-2027.....	8
3.3	Regional Level.....	8
3.3.1	Southern Regional Spatial and Economic Strategy (RSES)	8

3.4	County Development Plan and Local Area Plans	9
3.4.1	Tipperary County Development Plan 2022.....	9
3.4.2	Clonmel and Environs Local Area Plan 2024.....	10
PART 4.	PLANNING HISTORY.....	13
4.1	Existing and current planning applications on site/adjoining site	13
PART 5.	INTERNAL DEPARTMENT REPORTS	16
5.1	Introduction.....	16
5.2	Roads Capital Response	16
5.3	Report of the Tramore House Roads Design Office	16
5.4	Report of the Environment and Climate Action Section	16
5.5	Report of the Municipal District Engineer.....	17
PART 6.	COMMENTS ON ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)	18
6.1	Introduction.....	18
6.2	Comments on the EIAR	18
6.2.1	Chapter 1 Introduction	18
6.2.2	Chapter 2 Project description	18
6.2.2.1	Existing Operations.....	18
6.2.2.2	Proposed Development.....	21
6.2.2.3	Comments on Chapter 2	24
6.2.3	Chapter 3 Consideration of Reasonable Alternatives	24
6.2.3.1	Alternatives considered.....	24
6.2.3.2	Comments on Chapter 3	24
6.2.4	Chapter 4 Population and Human health	24
6.2.4.1	Issues considered.	24
6.2.4.2	Comments on Chapter 4	25
6.2.5	Chapter 5 – Biodiversity	26
6.2.5.1	Issues considered.	26
6.2.5.2	Comments on Chapter 5	27

6.2.6	Chapter 6 Land, Soils and Geology	27
6.2.6.1	Issues Considered	27
6.2.6.2	Comments on impacts	28
6.2.7	Chapter 7 Water	28
6.2.7.1	Issues considered	28
6.2.7.2	Comments on water	30
6.2.8	Chapter 8 Air	30
6.2.8.1	Issues considered	30
6.2.8.2	Comments on Air	30
6.2.9	Chapter 9 Climate	31
6.2.9.1	Issues considered	31
6.2.9.2	Comments on Chapter 9	31
6.2.10	Chapter 10 Noise.....	31
6.2.10.1	Issues considered.....	31
6.2.10.2	Comments on Chapter 10.....	34
6.2.11	Chapter 11 Material Assets	34
6.2.11.1	Issues considered.....	34
6.2.11.2	Comments on Chapter 11.....	35
6.2.12	Chapter 12 Cultural Heritage.....	36
6.2.12.1	Issues Considered.....	36
6.2.12.2	Comments on Chapter 12.....	36
6.2.13	Chapter 13 Landscape.	36
6.2.13.1	Issues considered.....	36
6.2.13.2	Comments on Chapter 13.....	39
6.2.14	Chapter 14 Traffic.....	39
6.2.14.1	Issues Considered.....	39
6.2.14.2	Comments on Chapter 14.....	40
6.2.15	Chapter 15 Major Accidents and Natural Disasters	41

6.2.15.1	Issues Considered.....	41
6.2.15.2	Comments on Chapter 15.....	41
6.2.16	Chapter 16 Interaction of Effects.....	42
6.2.16.1	Issues considered and comments	42
6.2.16.2	Comments on Chapter 16.....	42
PART 7.	NATURA IMPACT STATEMENT.....	43
7.1	Designated Sites.....	43
7.2	Potential Impacts Identified in the NIS.....	43
7.3	Mitigation measures proposed to avoid/manage impacts	43
7.4	NIS Conclusion:	43
7.5	Comments on Natura Impact Statement.....	43
PART 8.	KEY ISSUES AND OVERALL CONSIDERED VIEW	45
8.1	Introduction.....	45
8.2	Principle of Development.....	45
8.3	Visual Impact	45
8.4	Traffic impacts	45
8.5	Ecology/Biodiversity.....	46
8.6	Population and human health.....	46
8.7	Land, Soils & Geology.....	46
8.8	Water & Hydrology.....	46
8.9	Air and Climate.....	46
8.10	Cultural heritage.....	46
8.11	Noise.....	46
8.12	Natura Impact Statement	46
8.13	Conclusion.....	47
PART 9.	CONDITIONS AND CONTRIBUTIONS	48
9.1	Conditions.....	48
9.2	General Contributions	48

9.3 Special Contributions.....	49
Appendix 1 – Internal Reports	50
Report of Senior Executive Engineer.....	50
Report of Roads Capital	51
Report of National Roads Design office	53
Report of the Environment Section	54

List of Figures and Tables

Figure 1 Site location.....	2
Figure 2 15km buffer zone around the proposed development site showing Natura sites	4
Figure 3 Cultural heritage	5
Figure 4 Extract from Clonmel and Environs Local Area Plan 2024.....	12
Figure 5 Planning History.....	15
Figure 6 Existing site layout	20
Figure 7 Development Areas	22
Figure 8 Proposed 3D layout view.....	23
Figure 9 Noise monitoring locations	33
Figure 10 Predicted noise levels	34
Figure 11 Landscape Character Areas	37
Figure 12 Zone of Theoretical Visibility	37
Figure 13 Viewpoint C.....	38
Figure 14 Viewpoint G	38
Figure 15 Viewpoint H	39
Table 1 Planning History	13

PART 1. INTRODUCTION & PURPOSE OF THE REPORT

1.1 Introduction

On the 25th of August 2022, An Bord Pleanála determined that a proposal by Medite Europe DAC (hereafter the applicant) for the replacement of existing biomass-fired boilers, biomass-fired thermal fluid heater and gas-fired thermal fluid heater at Medite's manufacturing plant in Redmonstown, Clonmel, Co. Tipperary would be strategic infrastructure within the meaning of Section 37E of the Planning and Development Act 2000 (as amended), hereafter referred to as the 2000 Act.

An application for permission for the proposed development was therefore submitted directly to An Bord Pleanála by the applicant. The application is available to view at www.meditesid.com.

An Bord Pleanála informed Tipperary County Council on 18th of February 2024 of the receipt of the strategic infrastructure development application.

1.2 The Purpose of this Report

As provided for under Section 37E(4) of the 2000 Act, the Chief Executive is required to submit a report to An Bord Pleanála setting out the views of the Planning Authority on the effects of the proposed development on the environment and the proper and sustainable development of the area. The report is also required to address all the issues identified in the An Bord Pleanála “Guidelines for Planning Authorities” in respect of Strategic Infrastructure. Accordingly, all the relevant issues to the proposed development have been identified and are assessed below in the report.

Section 37E (4) of the 2000 Act requires this report shall be submitted to An Bord Pleanála by 5.30 pm on the 18th of April 2024 and will be considered as part of their assessment.

Section 37E (5) of the 2000 Act requires that before this report is submitted to the Bord, the Chief Executive shall submit it to the elected members, in order to seek their views on the proposed development. The members may, by resolution, decide to attach recommendations to the report (Section 37E (6) of the 2000 Act refers).

Section 37E (6) of the 2000 Act also provides that the views expressed by the members on the proposed development during the Council meeting, can also be attached to this report i.e. the ‘meetings administrator’s record’.

PART 2. SITE LOCATION & DEVELOPMENT DESCRIPTION OVERVIEW

2.1 Site location overview

The proposed development is located at a large-scale industrial manufacturing facility in Clonmel, Clonmel Co. Tipperary. It is c. 3.6 kms to the north east of the small pocket of residential development to the south east of the site, with substantial, larger scale industrial type developments further south. The lands to the north, east and west are agricultural in nature.

The site is accessed from the L-2506 which runs along the eastern boundary. The main facility is set back from the public road. There is ample screening in place (southern and western boundaries) which restricts views of the site from the surrounding area. The River Anner flows to the east of the site and connects as a tributary to the River Suir (the River Anner forms part of the Lower River Suir SAC).

Figure 1 Site location



2.2 Proposed development

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

- the two wood biomass fired boilers (18MW each)
- the wood biomass fired Thermal Fluid Heater (19MW) serving Production Line 2.

The existing natural gas-fired Thermal Fluid Heater (TFH) (6MW) serving Production Line 1, will remain as a backup system on site.

These systems will be replaced with 2 new renewable energy plants. These renewable energy plants will have rated thermal input 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 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, H 35.3m.
- 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 Development will incorporate and modify an existing wood chip storage and conveying facility (MTX Building & associated plant) which is currently used to store and transport acetylated wood chip into the MDF production process. The system will then be used to store and transport fuel wood into the new energy systems.

2.3 Project Timeline:

The construction of the Proposed Development will comprise four main stages.

- Phase 1 which will include the development of the Line 1 Energy Plant and fuel reception, storage and conveying/screening equipment (Proposed development identified for Areas 1 and 2). The anticipated timescale for this phase is 2025 – 2027
- Phase 2 will include decommissioning of the two existing wood biomass fired boilers (18MW each) that serve Line 1 and the LPG Fuel Tank. The anticipated timescale for this phase is 2027-2029
- Phase 3 which will include the development of the Line 2 Energy Plant and associated storage area. The anticipated timescale for this phase is 2030-2033
- Phase 4 which will include the decommissioning of the existing single wood biomass fired Thermal Fluid Heater (19MW) serving Line 2. This existing Thermal Fluid Heater equipment

will be dismantled and removed from the site. The anticipated timescale for this phase is 2034-2035.

2.4 Location of Natura 2000 Sites

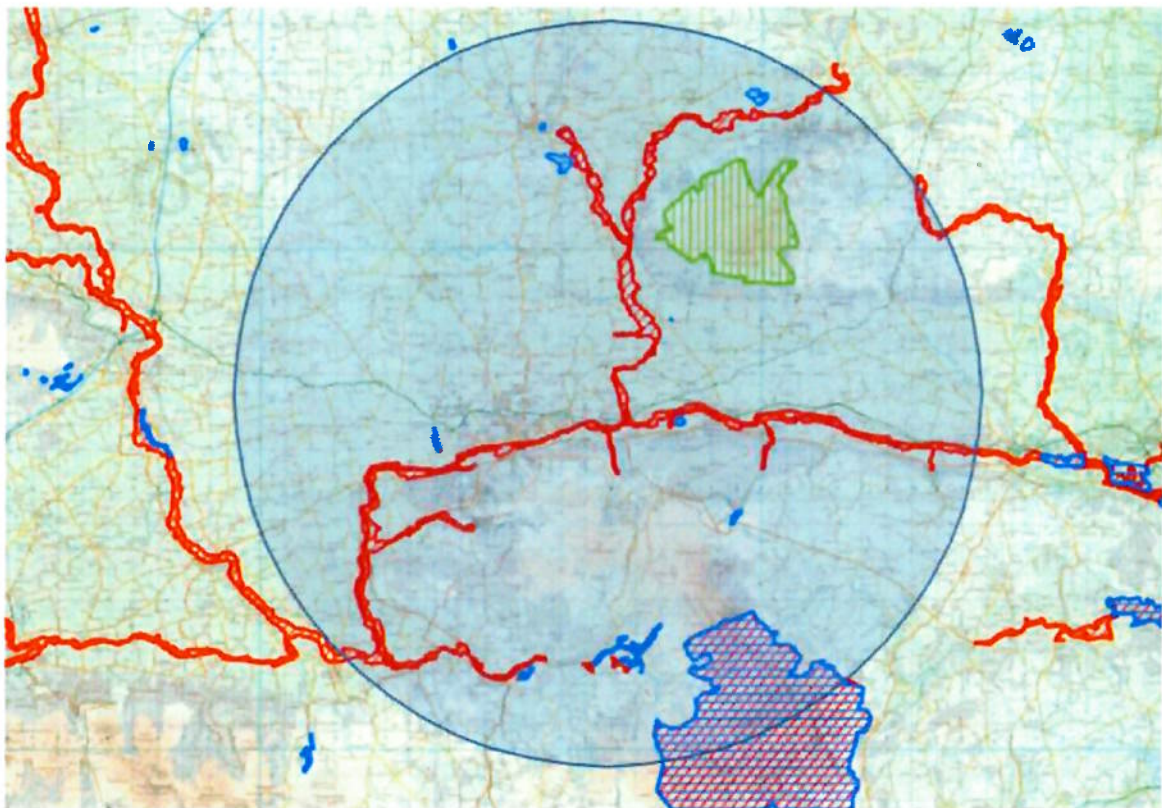
A total of three European sites within 15 kms of the proposed development, namely;

- Lower River Suir SAC
- Nier Valley Woodlands SAC and the
- Comeragh Mountains SAC.

The submitted NIS also considered the River Barrow And River Nore SAC to be of relevance. This site is located c. 21 kms to the north east of the subject site.

The NIS identified that the works and activities associated with the construction and/or operation phase of the proposal have the potential to significantly affect the four referenced European sites arising from unmitigated changes in air and water quality.

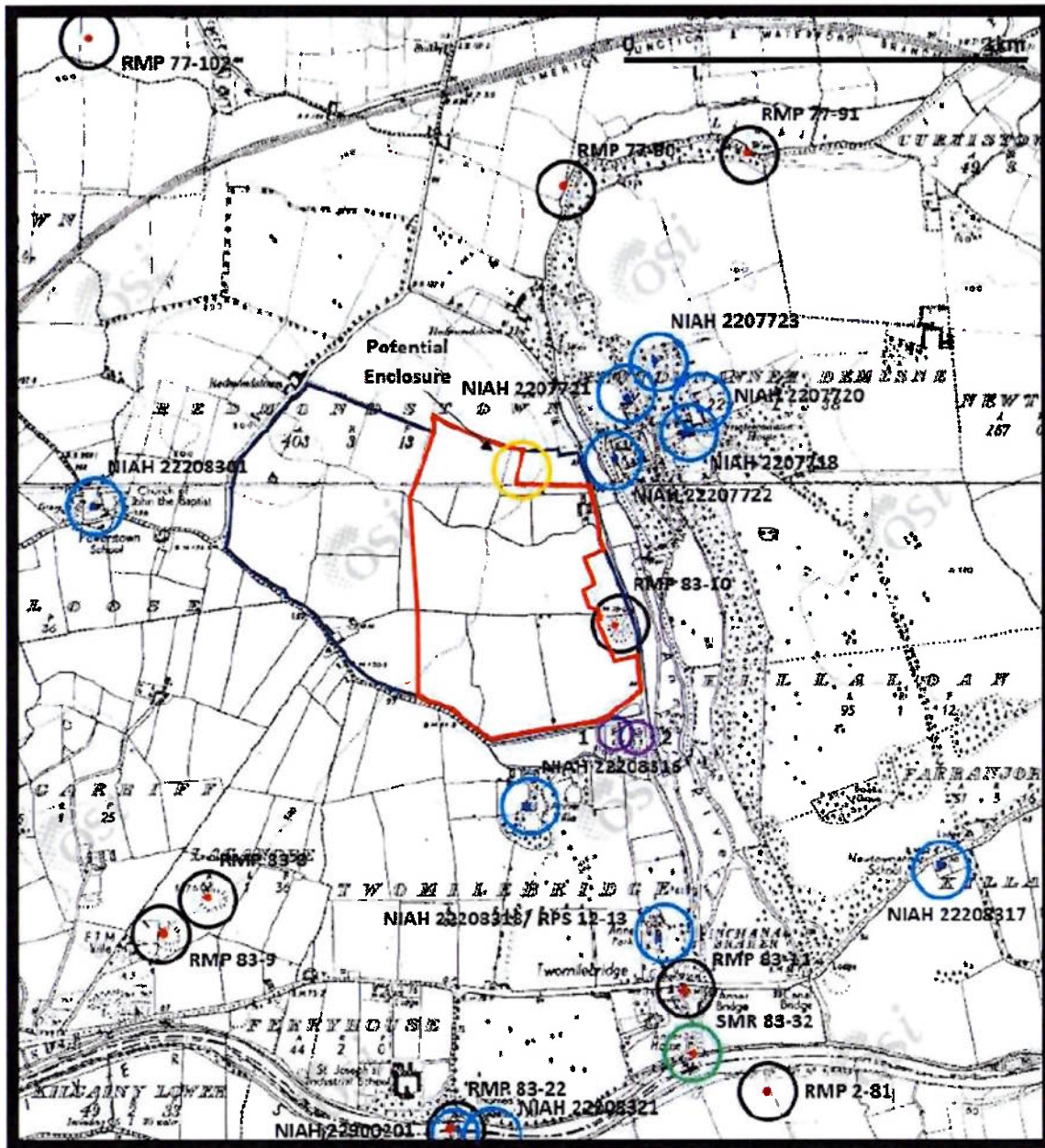
Figure 2 15km buffer zone around the proposed development site showing Natura sites



2.5 Archaeological, Architectural & Cultural Heritage

The applicant has identified those areas of archaeological, architectural and cultural heritage within a 1 km study area of the subject site. Given the extent of the screening on site, this radius is considered acceptable.

Figure 3 Cultural heritage



Recorded monuments within 1kms of the site were identified. There are ringforts known from the study area in Laganore (RMP TS083-008---- and TS083-009----), Redmondstown (RMP TS083-010-townlands and Enclosures, that may be the remains of ringforts, known from Ballyvaughan (RMP TS077-102----) and Tikincor Lower (RMP WA002-081----).

There are two Protected structures listed within the study area (No's 12 and 13 - Newtownanner Demesne Country House).

There are 10 structures listed on the National Inventory of Architectural Heritage within the study area.

PART 3. POLICY CONTEXT & GUIDANCE

3.1 EU Directives and Policies

3.1.1 EU Renewable Energy Directive 2009/28/EC

This directive promotes the use of energy from renewable resource and set targets for each EU member state that are to be achieved by 2020. Ireland has legally binding targets to meet 16 % of its energy consumption by 2020 from renewable sources. It sets a target of 20% of EU energy consumption from renewable sources by 2020 and a 20% cut in greenhouse gas emissions by 2020. The Directive also outlines methods by which member states can coordinate their activities/policies on achieving targets.

3.1.2 Revised Renewable Energy Directive II (2018/2001/EU)

This directive is an extension of the RED for the periods 2021 to 2030 and it introduced mandatory criteria for solid and gaseous biomass.

3.1.3 European 2020 Strategy for Growth

Europe 2020 is the EU's ten year growth strategy which identifies five headline targets.

One of these targets is Climate Change and Energy Sustainability:

- A reduction in greenhouse gas emissions of 20% (or even 30%, if conditions are right);
- 20% of energy from renewables;
- 20% increase in energy efficiency.

Ireland's mandatory national target is to supply 16% of its overall energy needs from renewable sources by 2020.

3.1.4 2030 Climate and Energy Framework

In October 2014 EU leaders adopted the 2030 Climate and Energy Framework (European Commission 2014) which was subsequently updated in 2018. The framework provides a long term perspective beyond 2020 targets. The 2030 Climate and Energy Framework sets out three key targets for the year 2030:

- At least 40% cuts in greenhouse gas emissions (from 1990 levels);
- At least 32% share of renewable energy;
- At least 32.5% improvement in energy efficiency.

In 2016 the European Commission published its 2030 emissions targets break down for each state.

Ireland is to reduce its emissions by 30% relative to its 2005 emissions.

3.1.5 Energy Roadmap 2050

Energy 2050 roadmap sets out a number of different scenarios for developing a decarbonised energy sector over the coming decades. It is clear under all of these scenarios that, subject to agreement between the Member States, there will be a significant increase required in renewable energy deployment in Europe well over and above the 2020 target levels.

3.1.6 European Green Deal

The European Green Deal is a growth strategy for the EU. The EU aim to become climate neutral by 2050.

3.2 National Policy

3.2.1 National Policy Statement on the Bioeconomy (2018)

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.

3.2.2 National Bioeconomy Action Plan 2023-2025

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.

3.2.3 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.

3.2.4 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.

3.2.5 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.

3.2.6 Project Ireland 2040: The National Planning Framework

The National Planning Framework is a planning framework to guide development and investment over the coming years. It sets out key goals and objectives for the state. One of the themes is the transition to a low carbon energy future.

The most relevant strategic outcomes to the proposed development are:

- National Strategic Outcome 6: A strong economy supported by enterprise, innovation and skills
- National Strategic Outcome 8: Transition to sustainable energy

National Policy Objectives:

National Policy Objectives 23, 53, 54, 55 and 56 are relevant to the proposed development.

3.2.7 Project Ireland 2040: National Development Plan 2018-2027

The National Development Plan 2018-2027 (NDP) published in February 2018, in tandem with the NPF, seeks to drive Ireland's long term economic, environmental and social progress in accordance with the spatial planning context of the NPF.

3.3 Regional Level

3.3.1 Southern Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy sets out a strategy to implement the NPF in the Southern Region.

The most relevant objectives of the Strategy are:

RPO 56 Low Carbon Economy

- Recognises urgency to transition to a low carbon future;
- Objective to develop enterprises that create and employ green technologies;
- 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 the receiving environment and existing infrastructure to serve new industries;
- 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;
- Objective to support investment in energy efficiency of existing commercial and public building stock.

RPO 57 National Policy Statement on Bioeconomy

- Objective to support the National Policy Statement on Bio-economy.

RPO 58 - Bio-economy and Rural Areas

- Objective to facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together the Bioeconomy.

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

- 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

3.4 County Development Plan and Local Area Plans

3.4.1 Tipperary County Development Plan 2022

- 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.
- Policy 11- 1 - In assessing proposals for new development to balance the need for new development with the protection and enhancement of the natural environment and human

health. In line with the provisions of Article 6(3) and Article 6(4) of the Habitats Directive, no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects). [...] Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

- Policy 11 – 2 - Ensure the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives. Where it is determined that a development may individually, or cumulatively, impact on the integrity of European sites, the Council will require planning applications to be accompanied by a NIS in accordance with the Habitats Directive and transposing Regulations, ‘Appropriate Assessment of Plans and Projects, Guidelines for Planning Authorities’, (DEHILG 2009) or any amendment thereof and relevant Environmental Protection Agency (EPA) and European Commission guidance documents.
- Policy 11 – 3 - Ensure the conservation and protection of existing, and proposed NHAs, and to ensure that proposed developments within or in close proximity to an existing or proposed NHA would not have a significant adverse impact on the status of the site as described.”

3.4.2 Clonmel and Environs Local Area Plan 2024

The site is located on lands zoned for general industrial use in the Clonmel and Environs Local Area Plan (C&E LAP) 2024, which came into effect on Monday the 25th of March 2024.

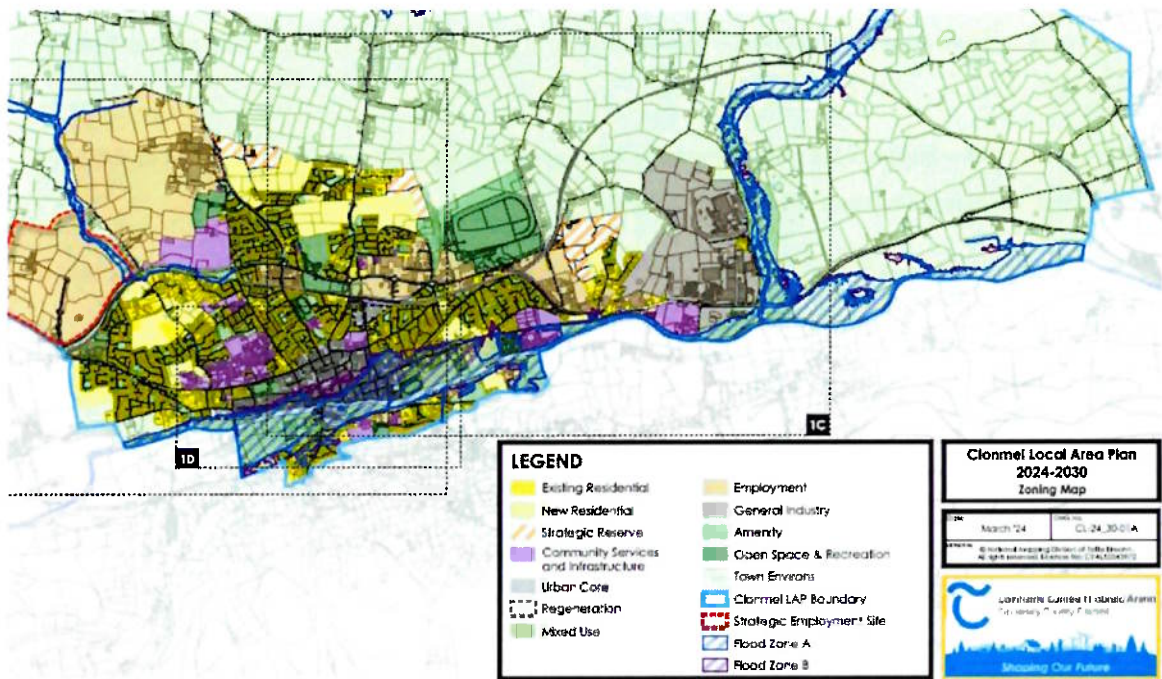
The following policies as set out in the C&E LAP are considered relevant;

- Objective 4 A - Support Clonmel’s role as a Key Town and Self-Sustaining Regional Driver and strategic employment location.
- Policy 6-1 - Support new development that will improve accessibility and movement within Clonmel, reduce dependency on private car transport, increase permeability in the town, and encourage the use of energy efficient forms of transport through the promotion of walking, cycling and public transport.
- Policy 6-2 - Support the implementation of the active travel measures identified in Figure 5 and 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 6-7 -Require new development proposals on or affecting national roads within the Plan area to have regard to national, regional and local policies and guidelines as set out in Section 6.7.
- Policy 6-8 – Support the implementation of the public transport measures identified in Table 14 and the Local Transport Plan (Appendix 2).
- Policy 6-9 - Support the implementation of the demand management and supporting measures identified in Table 15 and the Local Transport Plan (Appendix 2).
- Policy 6-10 - Support the implementation of the traffic management and road measures identified in Figure 6 and the Local Transport Plan (Appendix 2).
- Objective 6 G - Work in partnership with TII and regional stakeholders to deliver the proposed N24 Waterford to Cahir Scheme as part of the upgrade of the N24 National Route linking Limerick and Waterford.
- Policy 8-1 - Support the use of renewable energy technologies at appropriate scales in residential, commercial and community developments and support the principle of on-site energy generation for self-consumption, subject to other planning and design criteria.
- Policy 8-2 - Enable the sustainable and efficient use of existing capacity in water services and permit new connections to the Clonmel public water and waste water supply. Where local network upgrades are required, to ensure that capacity is provided to individual sites in accordance with the Uisce Éireann Connections Charging Policy and Uisce Éireann's Connections and Developer Service.
- Policy 8-3- Require new development to ensure it would not adversely affect a water body's ability to meet its objectives under the Water Framework Directive, individually, as a result of the proposed development, or cumulatively, in combination with other developments.

With respect to the land use zoning, the plan notes that it is an objective to provide for heavy/specialised industrial development on lands zoned for General industrial development. It is an aim to 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 4 Extract from Clonmel and Environs Local Area Plan 2024.



PART 4. PLANNING HISTORY

4.1 Existing and current planning applications on site/ adjoining site

The planning history on the subject site is summarised below;

Table 1 Planning History

Planning reference	Description	Decision
Within red line boundary		
PL Ref 22/228	Grant of Permission for the replacement of existing electrical building.	
PI Ref 21/1240	Grant of permission for 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 prevention and control licence.	
PI Ref 20/1256	Grant of Permission for Retention of First Aid Room (55.7m ²), 2) Warehouse (1212.28m ²), 3) LPG Storage Tank & Pump Shed (20m ²), 4) Overburden Storage area (3370m ²), 5) Log Storage Area (2.98 Ha), 6) Fuel (Wood Chips) Storage Shed (758m ²), 7) Diesel Stores (44.3m ²), 8) Contract Cabin (22.2m ²), 9) Compressor room (151.2m ²), 10) Stores Building (89.2m ²) & Fenced Storage area (44.2m ²), 11) Oil Stores (84.6m ²), 12) Maintenance Vehicle area (22m ²), 13) Bike Shed (20.45m ²), 14) Weighbridge (80m ²), 15) 6 no. Storage Containers (81m ² = 6.5 m ² X 1 & 14.9m x 5), 16) Boundary Fencing (530m Long, 2m high), 17) Recycle Chip Storage Bay (300m ²) within an application area of 7.0 hectares. This application relates to development for the purposes of an activity requiring an Industrial Emissions Licence.	
PI Ref 17601375	Grant of permission for construction of woodchip reception unit, a woodchip storage structure, woodchip mechanical conveyors and associated works (this application relates to development for the purposes of an activity requiring an integrated pollution prevention and control licence).	
PI Ref 1760021	Grant of permission to demolish structures and develop access roadways to use lands as log storage.	
PI Ref 17600210	Grant of permission to replace and relocate fencing at entrance.	

Planning reference	Description	Decision
PI Ref 15600381	Grant of permission for retention for 1. a chemical store and 2. an extension to a refiner building housing replacement refiner plant and machinery and for permission to maintain and use indefinitely a storage shed.	
PI Ref 15600016	Grant of permission to retain a Classi Cleaner plant.	
PI Ref 11/302	Grant of permission to Medite Europe Ltd for 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.	
PI Ref 12/92	Permission granted 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.	
PI Ref 00/1296	Conditional grant to Willliamette Europe Ltd for extensions and additions to the existing MEF manufacturing facility.	
PI Ref 95/478	Conditional grant to Medite Europe Ltd for the replacement of a dryer.	
PI Ref 3.12290	Conditional grant to Medite Europe Ltd for an extension to existing factory.	
PI Ref 3.12141	Conditional grant to Medite Europe Ltd for relocation of weighbridge, road realignment and fence.	
PI Ref 3.17509	Conditional grant to Medite Europe Ltd for an MDF manufacturing facility.	
PI Ref 3.8217	Conditional grant to Medite Europe Ltd for an MDF manufacturing plant.	

Planning reference	Description	Decision
PI Ref 3.9948	Conditional grant to Medite Europe Ltd for the storage and use of anhydrous ammonia.	
PI Ref 3.7963	Conditional grant to Medite Europe Ltd for a warehouse.	
PI Ref 3.7826	Conditional grant to Medite Europe Ltd for site development works at west line of plant.	
PI Ref 3.12290	Conditional grant to Medite Europe Ltd for site development works.	
Within vicinity of site		
None relevant		

Figure 5 Planning History



PART 5. INTERNAL DEPARTMENT REPORTS

5.1 Introduction

The strategic infrastructure development application was referred to the following internal departments within Tipperary County Council.

- Tramore House Roads Design Office
- Roads Capital
- Chief Fire Officer
- Municipal District Engineer
- Environment and Climate Action

No report was received from the Chief Fire Officer. A copy of each of the internal department reports is attached as Appendix 1.

5.2 Roads Capital Response

The report notes that currently there are difficulties for vehicles exiting the L2506 onto the N24. The EIAR has not assessed the level of queueing at this junction. The addition of two HGV vehicles will have some impact.

The EIAR does not include the proposed N24 Moangarriff to Twomilebridge pavement scheme. Under the pavement scheme it is proposed to remove the left filter lane from the eastbound lane of the N24 approaching the L2506 junction. In addition, consideration is also being given to narrowing the junction to prevent two vehicles waiting at the STOP line of the L2506.

A further consideration relates to the requirement for Workplace Mobility Management Plan, provision for which should be included as part of the proposed mitigations.

5.3 Report of the Tramore House Roads Design Office

The report notes that the site does not encroach on the Preferred Transport Solution Corridor currently being considered for the N24 Waterford to Cahir project. There is therefore no direct conflict with the project.

The National Roads Design Office also made the observation that junction and access improvements along the N24 may form part of the Preferred Transport Solution for the N24 upgrade. Therefore, there may be indirect impacts to the Medite plant in terms of access to the N24 should a revised junction arrangement be required.

5.4 Report of the Environment and Climate Action Section

This report considers as follows;

- The proposal will not result in pressures on the Natura 2000 sites identified.

- It is stated that the site is licenced by the EPA and mitigation measures and emission limit values for the site are conditioned in the associated EPA Licence.
- No impacts to groundwater.
- Potential dust emissions have been identified in the construction phase of the proposed development.
- Given that the nature of the development is a replacement boiler, it is considered unlikely that noise nuisance to potential receptors is likely to occur at this site.
- Given the nature of the development, it is considered unlikely that light nuisance is likely to occur from the proposed development.
- Site is not subject to flooding.
- Based on the information submitted and the desktop study performed regarding the overall plan while considering the location in relation to protected areas and sensitive receptors, there does not appear to be any environmental impediment to granting of this planning application provided the below recommendations are adhered to.
- The report recommends in conclusion that the proposal be granted planning permission subject to a condition being attached requiring that the mitigation measures identified in Chapter 8 of EIAR are implemented to limit dust emissions during the construction phase.

5.5 Report of the Municipal District Engineer

No concerns raised.

PART 6. COMMENTS ON ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)

6.1 Introduction

This part of the report comments on the content of the Environmental Impact Assessment Report included with the application. It is noted that in the introduction to the EIAR, the applicant has provided a statement of authority in relation to the author(s).

The Proposed Development 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.

6.2 Comments on the EIAR

6.2.1 Chapter 1 Introduction

The chapter appears clearly set out and gives an overview of the proposed development and introduces the applicant. It also outlines the legislative context of the EIAR and provides a synopsis of its structure. Section 1.8.2 lists the names and qualifications of the contributors to each chapter of the EIAR. It is stated in this chapter that the applicant is requesting a 10 year consent.

6.2.2 Chapter 2 Project description

6.2.2.1 Existing Operations

This chapter sets out a description of the Proposed Development i.e. 'the project' including the existing and proposed site layout and details on the dimensions of all proposed structures.

The site is composed of the main production plant building and materials storage areas. The main processes operate 24 hours per day, 7 days per week.

The area within the site where the Proposed Development will take place is divided into three areas. These are referred to as Development Areas 1, 2 and 3.

Development Area 1 includes portions of the current Logyard, the Fuelyard, and Chipyard, and contains the following structures and plant; (Cross reference with Existing site layout for item location)

- Debarker building (ITEM 1.10)
- Debarker Infeed Conveyor (ITEM 1.10A)
- Outdoor Fuel Storage / Fuel Shed (ITEM 1.11)
- Chip storage silos (ITEM 1.24)

- Dust silos (ITEM 1.27)
- Edge trim Silo (ITEM 1.26)
- MTX Building and associated plant (ITEM 1.19)

Development Area 2 includes a small area planted with trees (c. 0.42 ha) and elements of Production Line

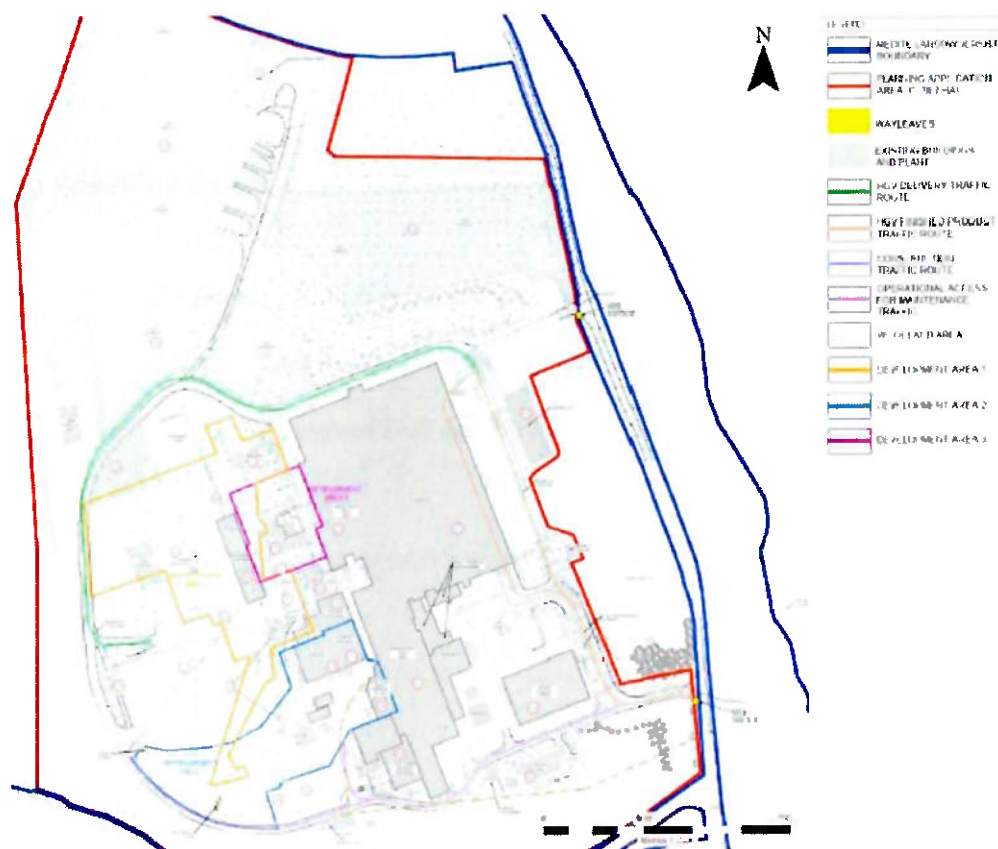
1. It also contains the following structures and plant;

- Line 1 Boiler building (in which the 2 biomass boilers area is housed) (Item 1.6)
- Line 1 Dryer building (in which the 2 dryers area is housed) (Item 1.7)
- Line 1 Ancillary building (including gas fired thermal fluid heater room)
- DAF Building
- Production Chip Screening Plant (Item 1.12 CHIP STORAGE / YARD)
- LPG tank
- Chemical Storage Building (Item 1.15)
- External laydown/storage area

Development Area 3 contains the following structures and plant;

- Line 2 Thermal Fluid Heater and associated plant (ITEM 1.25)

Figure 6 Existing site layout



The maximum production capacity of the plant of 425,000m³ is based on the capacity of production equipment and a number of commercial and technical factors. The production of MDF requires up to 715,000 tonnes of wood per annum. To manufacture MDF, wood chip residues from sawmills or chipped pulp wood are refined into a wood fibre, dried, and then combined with resin to form an MDF panel. The production process for MDF has 6 stages:

- Log & Chip Handling
- Refining
- Drying
- Forming
- Pressing
- Finishing

The manufacturing process uses a significant amount of thermal energy. Production line 1 is served by two wood biomass fired boilers (18MW each), and a natural gasfired Thermal Fluid Heater (TFH)

(6MW). Production Line 2 is served by a single wood biomass fired Thermal Fluid Heater (19MW). The production process also uses significant electrical energy.

Medite operates under an Industrial Emission (IE) Licence (P0027-04) granted by the Environmental Protection Agency (EPA).

6.2.2.2 Proposed Development

The Proposed Development will replace all three existing aging biomass fired thermal energy systems serving both of Medite's two production lines, specifically;

- the two wood biomass fired boilers (18MW each) (ITEM 1.6) serving Production Line 1.
- the wood biomass fired Thermal Fluid Heater (19MW) serving Production Line 2. (ITEM 1.9).

The Proposed Development will also provide the thermal energy currently provided by the natural gas-fired Thermal Fluid Heater (TFH) (6MW) serving Production Line 1, which will be retained for backup purposes or in the event of disruption in the biomass fuel market.

Energy will be generated from the combustion of up to 186,000 tonnes a year from a range of biomass fuels including by-products from the Medite manufacturing process and forestry and sawmill residue. This is an increase from the existing throughput of 111,000 tonnes per annum. Of the 186,000 tonnes of proposed fuel intake, 71,000 will comprise Medite production residues which are sourced on site and 115,000 tonnes will comprise forestry and sawmill residues.

The existing systems will be replaced with 2 new renewable energy plants. These renewable energy plants will have rated thermal input 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.

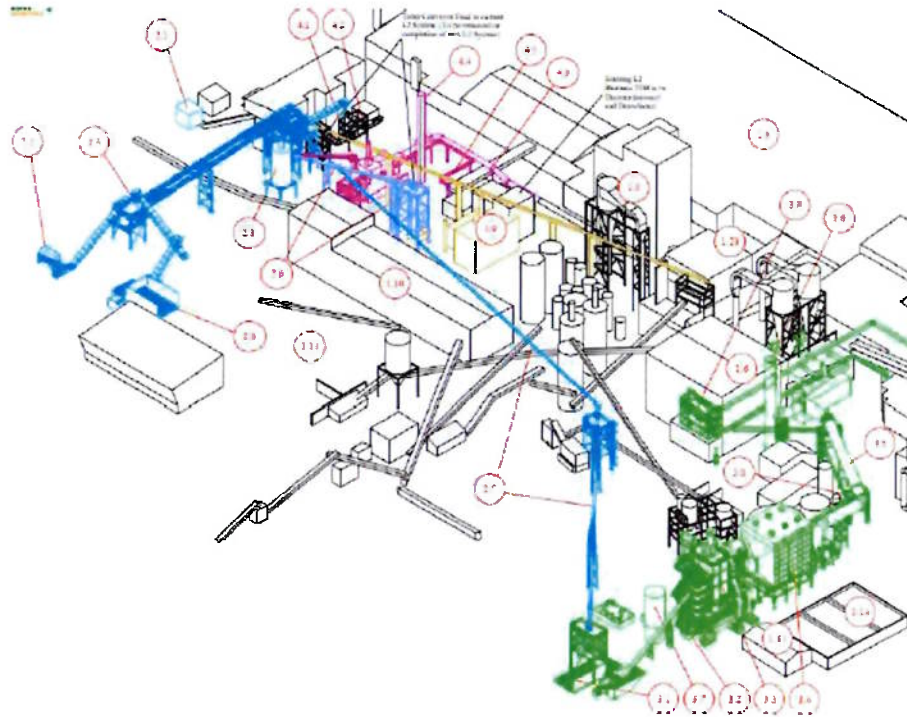
The Proposed Development will include pipes/ducts and associated supporting infrastructure to transfer the thermal energy to the various heat users within each of the production lines, including the necessary modifications to the Line 1 Dryers (Item 1.7) to take all required heat in the form of flue 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 Development will incorporate an existing wood chip storage and conveying facility (MTX Building & associated plant Item 1.19) which is currently used to store and transport wood chip into the MDF production process. The system will then be used to store and transport fuel wood into the new energy systems.

Figure 7 Development Areas



Table 2-8 of the EIAR details the varying components of the development that will be provided in each of the development areas.



- Phase 1 which will include the development of the Line 1 Energy Plant and fuel reception, storage and conveying/screening equipment (Proposed development identified for Areas 1 and 2). The anticipated timescale for this phase is 2025 – 2027
- Phase 2 will include decommissioning of the two existing wood biomass fired boilers (18MW each) that serve Line 1 and the LPG Fuel Tank. The anticipated timescale for this phase is 2027-2029
- Phase 3 which will include the development of the Line 2 Energy Plant and associated storage area. The anticipated timescale for this phase is 2030-2033
- Phase 4 which will include the decommissioning of the existing single wood biomass fired Thermal Fluid Heater (19MW) serving Line 2. This existing Thermal Fluid Heater equipment will be dismantled and removed from the site. The anticipated timescale for this phase is 2034-2035.

The Applicant is seeking a ten-year permission for the development.

6.2.2.3 Comments on Chapter 2

The Planning Authority notes the development proposed and have no comments in respect of same. The loss of a grove of trees in Development Area 2 to facilitate the proposed development at this location is noted.

6.2.3 Chapter 3 Consideration of Reasonable Alternatives

6.2.3.1 Alternatives considered.

Chapter 3 details the reasonable alternatives considered by the applicant. The applicant notes that given the significant investment to date at the facility and the long standing nature of the site, a consideration of alternative locations for the proposed development was not undertaken.

The assessment of alternatives instead focused on alternative energy generating processes.

6.2.3.2 Comments on Chapter 3

Tipperary County Council is satisfied with the approach taken to the question of the assessment of Alternative locations. Given the scale and long standing nature of the existing operation on site, the consideration of an alternative location for the entire facility is not required. The consideration of the do nothing scenario, alternative energy generating processes and the use of alternative Biomass fuel mix is considered reasonable.

6.2.4 Chapter 4 Population and Human health

6.2.4.1 Issues considered.

Chapter 4 examines the potential effects of the proposed development on Population and Human Health during construction, operations and decommissioning. It examines these under the following headings:

- Population
- Socioeconomics;
- Land use,
- Tourism, amenity and services
- Human health / health and safety and
- Cumulative impacts

The applicant engaged with both Fáilte Ireland and the Health Service Executive in order to scope the issues to be considered in the EIAR.

For the purposes of this section of the report, the applicant used data from the CSO as it related to the DEDs within the study area (within 2 kms of the subject site).

It is noted that there are 462 no. potential residential receptors within the study area. This can be separated as follows:

- Within 500m of the development site area: 40 residences
- Between 500ms and 1km of the development site area: 92 residences
- Between 1km and 2km of the development site area: 330 residences.

The closest residential receptors to the application site are located to the north and south along the local road to the east of the site, located approximately 25m, respectively.

In terms of Socio economic impacts, site preparation and construction of the proposed development will provide employment for technical consultants, contractors, and maintenance staff. Between approximately 50 and 240 staff/contractors could be employed during the construction phase of the project. Once the proposed development is constructed, it is envisaged that there will be direct and indirect employment associated with the operational phase of the proposed development.

With respect to land use, the EIAR notes that existing land-uses in proximity to the proposed development, will remain unchanged during the construction phase of the project. The operational phase of the proposed development is not expected to adversely impact on agricultural practices in the area.

The EIA has considered the impact of the works proposed on tourism. There are a number of important tourism receptors in the vicinity of the site, notably Clonmel Racecourse. The EIAR has determined that the construction, operational and decommissioning phases of the proposed development are expected to have an imperceptible effect on tourism, amenity, and services.

In terms of human health, the EIAR has identified potential impacts on air quality, water quality, impacts from noise and vibration arising from the construction phase. If unmitigated, the construction phase of the proposed project has potential for significant effect on human health and safety for construction workers and members of the public in proximity to the site.

During the operational phase, the EIAR notes that any emissions potentially arising from the Proposed Development are to be kept within acceptable limits. Appropriate site safety measures will be utilised during the operational phase by all permitted employees. Rigorous statutory and engineering safety checks imposed at the plant during design, construction, commissioning, and operation will ensure the risks posed to humans are negligible.

6.2.4.2 Comments on Chapter 4

In terms of impacts on population, socio economic impacts and land use and tourism, Tipperary County Council is satisfied that there will be no significant effect on the above arising from the works proposed. No mitigation measures are required.

The potential impacts on human health are noted and the mitigation measures are deemed acceptable.

6.2.5 Chapter 5 – Biodiversity

It is noted that in Paragraph 5.8 of the EIAR, the applicant has stated that Tipperary County Council is the competent authority in respect of the EIA. This is not the case. As this is a Strategic Infrastructure Development and the application was lodged directly with An Bord Pleanála, ABP is the competent authority for the assessment of Environmental impacts.

6.2.5.1 Issues considered.

The EIAR has identified the baseline ecological conditions on site and in the area. Details of the sampling methodology employed to determine the baseline conditions are as set out in Appendix 5-1.

A zone of influence was determined. This includes international designated sites within 10km of the application site; and National and local designated sites within 2km of the application site.

There are three European designated sites within 10 km of the subject site (Lower River Suir SAC 002137, Comeragh Mountains SAC 000688 and the Nier Valley Woodlands SAC 001952. The Anner River, c.80m west of the Site, forms part of the Lower River Suir SAC. Impacts on these sites are considered under the submitted NIS.

In terms of on site habitats, the applicant notes that a large portion of the Site is classed as ED2 - Spoil and Bare Ground. Development Area 1 and 3 are classed as BL3 – Buildings and artificial surfaces and hold no ecological value. The majority of Development Area 2 comprises a 0.42 ha plantation of broadleaved trees. This habitat is assessed as important at the Local level. An area to the north of the Site has been proposed as a native woodland planting area, to compensate for the 0.42ha of trees being removed in Development Area 2. This area currently consists of arable crop fields which are bounded by hedgerows.

There is a small area in the southeast of the Site classed as FL8 – Other Artificial Lakes and Ponds. This habitat is not considered to hold any ecological value given its location in a highly industrialised and disturbed site.

The EIAR has considered the fauna within the study area. The NBDC database was searched for records of rare and/or protected species from the 1 km grid squares S2324, S2424, S2323 and S2423 within which the Site is located. Table 5-4 sets out the results of this survey. Bird species noted on site were recorded.

The EIAR noted records of four rare or protected wetland bird species present within the 1 km grid squares within which the Site lies. Four of these species (kingfisher, little egret, mute swan and mallard) are associated with wetland habitats and are likely to be using the River Anner).

As noted earlier, a number of trees are to be removed, in development area 2 to facilitate the development. Two trees on the southern edge of this area were noted as having low-moderate bat roosting potential, both Ash trees with light-moderate ivy cover. No bats were observed entering or

leaving PRFs. Bat surveys were undertaken on site. Bats were observed commuting along the conifer plantation on the southern periphery of the Site, which is located outside of the Development Area.

Aquatic surveys were undertaken at the River Anner, directly opposite the entrance to the Medite facility. The River Anner and the species it supports are evaluated as important at the European level as it forms part of the Lower River Suir SAC.

No invasive species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011, (as amended) were recorded within the Site.

The potential impacts were identified. It is noted that approximately 0.42ha of broadleaved woodland is required to be removed in advance of ground preparation works, which is the most significant impact. As a compensatory measure, it is proposed to plant a 0.42ha area within the northern section of the application area with a diverse native woodland mix.

The loss of habitat for foraging birds and the potential for bird collisions with the stacks proposed were identified.

The loss of the woodland habitat to the south and the potential for impact on bat species was noted. Paragraph 5.96 identified the proposed mitigation measures.

6.2.5.2 Comments on Chapter 5

Tipperary County Council notes the identification of the likely significant impacts on biodiversity arising from the works proposed (direct loss of a woodland habitat, impact on woodland and urban birds, impact on bats). The compensatory planning of replacement trees to the north of the site is welcomed.

Subject to the implementation of mitigation measures set out in the EIAR, Tipperary County council is satisfied that the proposed development would not give rise to significant direct, indirect or cumulative effects on biodiversity within the site and surrounding area.

However, it may be prudent to attach a condition with respect to a further bat surveys of the wooded area to the south to be undertaken prior to the commencement of works.

6.2.6 Chapter 6 Land, Soils and Geology

6.2.6.1 Issues Considered

Chapter 6 of the EIAR considers lands, soils and geology. The regulatory background was set out. The study area was defined, it comprises the application site the surrounding area up to 5 km reflect the sensitivity of the geology.

A baseline study was undertaken to define the character of the receiving environment. The subject site is industrial in character. Land-use surrounding the site to the west and north is agricultural with dispersed residential. To the east of the site is the Anner River. The majority of the soils at the site is the soil group Acid Brown Earths, Brown Podzolics (AminDW), and is described as deep well drained and mainly

acidic. The GSI Bedrock Geology (100k) shows that the majority of the proposed site is underlain by the Waulsortian Limestone Formation from the Dinantian Series.

Site investigations works (drilling of boreholes) were undertaken between 1995 and 2017. Subsoils encountered comprised mainly sandy/gravelly CLAY. In the northeastern area of the site the subsoils comprised 10 m of SAND/GRAVEL over bedrock. To the east, a thick band of SAND/GRAVEL was encountered from 18-24 m.

Table 6.3 provides a description of potential significant effects of the construction stage on Land, Soils and Geology. A number of direct effects were identified. These were not deemed to be significant.

Table 6.4 provides a description of potential significant effects of the operational stage on Land, Soils and Geology. A number of direct effects were identified. These were again not deemed to be significant.

The EIAR identifies a number of mitigation measures to address impacts. These are set out in paragraph 6.114.

The EIAR concludes by stating that with the implementation of the proposed mitigation measures at the site, it is considered that there will be no residual adverse impacts on Land, Soil or Geology attributes during the construction stage, operational stage or decommissioning stage at the site.

6.2.6.2 Comments on impacts

Tipperary County Council is satisfied that the assessment carried out in the EIAR in respect of the impact of the proposal on land soils and geology is sufficiently robust. As a result, Tipperary County Council is satisfied that the proposed development is not likely to give rise to significant adverse direct, indirect or cumulative impacts on the receiving environment.

6.2.7 Chapter 7 Water

6.2.7.1 Issues considered

Chapter 7 of the EIAR deals with hydrology and hydrogeology. It sets out the methodology adopted for the assessment of impacts, with reference to relevant legislation and planning management guidance.

The baseline receiving environment was identified. The study area comprises the application site the surrounding area up to 5 km reflecting the sensitivity of the surface water and groundwater in the area. There are no water bodies on site. The closest water body is the River Anner directly opposite the entrance to the facility.

There is an existing water management system at the site to manage, treat and discharge storm water runoff and process water used on site. Surface Water Management will largely remain unchanged except for three additional hard standing areas (1.2 hectares) at the site to facilitate the proposed development (see fig 7.8 in EIAR).

The mains supply water is for a potable supply to the site while the main portion of water, used in processing at the site is abstracted from the Anner River. There is no plan to increase the current water usage at the site as part of the proposed development.

In terms of Waste water treatment, there is an activated sludge treatment plant to treat domestic wastewater and process effluent (mostly water squeezed from the wood chip during the refining stage).

The site is located in the River Suir Valley of the Suir catchment and sub-catchment (WFD IDs 16 and 16_23 respectively).

The local receiving water for the site runoff and discharge is the Anner River, which is classified as being of Good Ecological status. As noted earlier, this is an EPA licensed facility, so all discharges are monitored by same.

In terms of bedrock geology, the bedrock formation is classified as a Regionally Important Aquifer. The groundwater beneath the main factory site is mapped as Moderate (M) vulnerability with areas of High (H) vulnerability extending to the west. The groundwater underlying Development Area 2 and Development Area 3 is mapped as Moderate (M) vulnerability. A small area of High (H) vulnerability is located in the northwest part of Development Area 1, though the majority of this area is also mapped as Moderate vulnerability.

There is an existing historic uncapped landfill site within the application area which continues to be monitored.

The EIAR considers the construction, operational and decommissioning impacts. Direct impacts during the construction phase include the potential for sediment laden runoff entering the river Anner, accidental spillages and contaminated runoff entering the Anner. There is the potential for contaminated water discharging to groundwater.

In the operational phase, there is potential for suspended solids or fuel spillages in surface water runoff from the site areas to cause a reduction in water quality in the receiving water. In addition, there is potential for accidental spillages from vehicles or machinery to vertically migrate to the underlying locally important karstified aquifer. The potential for these impacts also arise during the decommissioning phase.

The significance of the potential impacts is set out in Table 7-12 of the EIAR. Mitigation measures are identified. The EIAR has determined that with the indicated mitigation measures in place and properly implemented and monitored at the site, the proposed development is unlikely to have a significant impact on surface water and groundwater in the area.

6.2.7.2 Comments on water

Tipperary County Council has reviewed the details submitted. It is noted that emissions from the subjected facility are monitored and managed under license issued by the EPA. Emissions to water are governed by this licensing process.

Tipperary County Council is satisfied that the impacts on water had been identified and adequate mitigation measures put in place to offset identified impacts.

6.2.8 Chapter 8 Air

6.2.8.1 Issues considered

Chapter 8 of the EIAR deals with air. It defines the regulatory background in respect to managing air quality. Paragraph 8.44 sets out the basis upon which the spatial extend of the study area was defined. It includes;

- human receptors within 250m of the site boundary and within 50m of routes used by construction vehicles up to 250m from the site entrance; and
- ecological receptors within 50m of the site boundary and within 50m of routes used by construction vehicles up to 250m from the site entrance.

Appendix 8.1 sets out details of the baseline air quality monitoring survey. Appendix 8.2 set out details explaining how the Biomass Dispersion Modelling Assessment was undertaken. Appendix 8.3 set out details of the Construction Dust Assessment.

The Construction Dust assessment has determined that there is a low risk in relation to dust soiling effects on people and property; a low risk in relation human health impacts; and a medium risk in relation to ecological impacts. Dust control measures are therefore required. The EIAR has indicated that such measures should be set out in a Construction and Environmental Management Plan.

In terms of operational impacts, predicted air quality impacts arising from the replacement of the boilers have been defined and deemed to be not significant.

No cumulative or transboundary impacts were identified.

6.2.8.2 Comments on Air

This chapter has been reviewed by the Environment Section of Tipperary County Council. No concerns were raised.

6.2.9 Chapter 9 Climate

6.2.9.1 Issues considered

Chapter 9 examines the potential impact of the proposal on climate and considers the impacts of climate change on the Proposed Development. The regulatory background was set out (section 9.30).

The EIAR considers the impacts of the proposal on greenhouse gas emissions as Carbon Dioxide (CO₂) is a by-product of the combustion process. The whole life emissions are considered from the commencement of demolition and construction phase over the 30-year lifespan of the Proposed Development. Table 9-1 sets out the specific activities considered in the assessment.

The assessment set out in the EIAR has determined that the effects on climate are minor adverse or negligible and are assessed as not significant. Table 9-16 identified a number of mitigating measures.

Chapter 9 also provides a qualitative assessment of the resilience of the proposed development to climate change. The assessment identifies a number of climatic hazards that may arise as a result of climate change including extreme rainfall events and changes to wind speeds during storm events. The EIAR has determined that the impacts arising from extreme weather events are not significant. Notwithstanding, design features (use of insulation and improved ventilation in building) have been incorporated into the design as to address any potential impacts that may arise.

6.2.9.2 Comments on Chapter 9

Tipperary County Council is satisfied that the applicant has identified potential impacts of the works proposed on climate. It is considered that no significant effects on the climate will arise as a result of the Proposed Development. The works proposed have incorporated a number of design features that will ensure the development is resilient to changes to climate in the short to medium term.

6.2.10 Chapter 10 Noise

6.2.10.1 Issues considered

This Chapter of the EIAR considers the potential noise impacts of the works proposed on the receiving environment.

As is set out in the Environment Protection Agency (EPA) Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4 Guidance), it is necessary to designate the noise environment at each sensitive receptor location as one of the following:

- A 'Quiet Area',
- A 'Low Background Noise Area' or
- 'Not an Area of Low Background Noise'.

To be designated a Quiet Area the Site must be:

- at least 3km from urban areas with a population > 1,000 people;
- at least 10km from any urban areas with a population >5,000 people;
- at least 15km from any urban areas with a population >10,000 people;
- at least 3km from any local industry;
- at least 10km from any major industry centre;
- at least 5km from any National Primary Route; and
- at least 7.5km from any motorway or dual carriageway.

The applicant has determined that the study area is not within a quiet area.

Baseline sound levels were determined following a noise survey, which was undertaken continuously between the 28th March 2022 and the 11th April 2022.

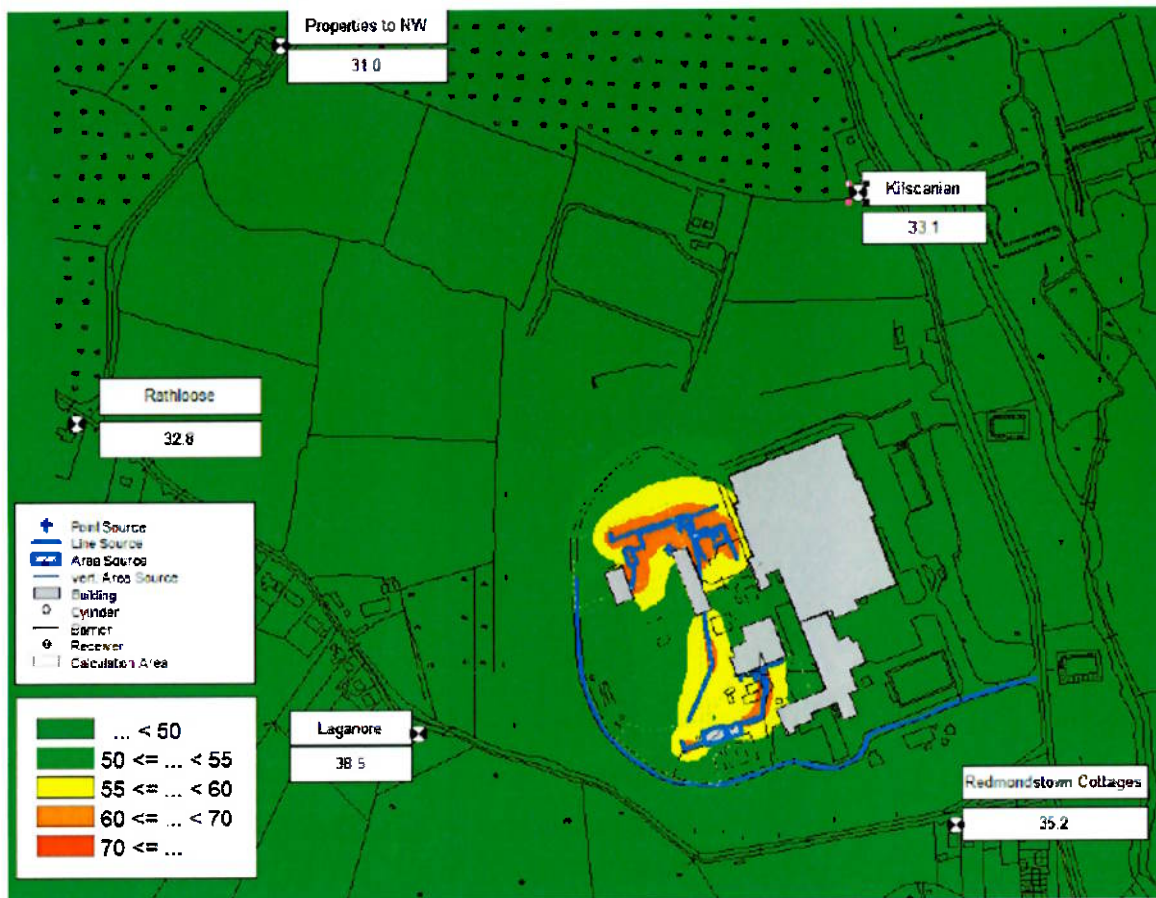
Figure 9 Noise monitoring locations



The assessment of noise impacts considered the construction and operational noise impacts at nearest noise sensitive receptors (residential properties in the vicinity of the site). Table 10-19 sets out the lowest ambient noise levels at sensitive receptors. Table 10-21 sets out the predicted noise levels for each Activity of the construction works at each of the nearest noise-sensitive receptors. The EIA has determined that the Significance of the effect is negligible; an Effect which is Not Significant at all receptors.

With respect to the operational noise impact, the EIAR has considered the impacts associated with noise in each of the development areas on noise sensitive receptors. Table 10-28 of the EIAR sets out the Predicted Specific Sound Levels for, Development Areas One, Two and Three combined.

Figure 10 Predicted noise levels



The Impact of Long-Term operational noise will be Negligible with a Negligible Effect at all Receptors except the Property to the NW at night where the 1dB(A) exceedance results in a Small Impact which at night is classed as Moderate owing to the Receptor sensitivity. However, this 1dB(A) exceedance is not considered significant.

The applicant has identified a number of mitigation measures and has committed to undertaking short term noise monitoring to validate findings set out in EIAR.

6.2.10.2 Comments on Chapter 10

The noise chapter has been reviewed by the Environment Section of Tipperary County Council. No concerns were raised.

6.2.11 Chapter 11 Material Assets

6.2.11.1 Issues considered

This section of the EIAR considers impact of the proposal on built services and waste management. Impacts on roads and built heritage are considered separately in the EIAR.

The applicant identified the relative utility providers in the area using publicly accessible information

In terms of waste generation, the IE license for the facility requires annual reporting by the applicant on waste generation and management. In 2022, 44.5 tonnes of hazardous waste, 34,105 tonnes of non-hazardous waste and 1,323 tonnes of inert waste was reported.

There is an existing dedicated Wastewater Treatment Plant (WWTP) on site. Foul wastewater from the existing permitted manufacturing facility goes to the onsite WWTP.

There is an existing water management system at the site to manage, treat and discharge storm water runoff and process water used at the site. Discharges from the onsite WWTP is monitored under their IE Licence P0027-04. The treated water is discharged to the Anner River at two locations.

Water is abstracted from the River Anner for processing operations at the site. The abstraction rate is c. 1,154 m³/day. The surface water abstraction from the river, which amounts to 421,374m³ per annum is registered with the EPA.

In terms of electricity supply infrastructure, there is an underground 10KV/20KV/400V/230V cable route within the southeastern portion. The main uses of the electricity are as follows:

- Motor control centre distribution;
- Plant lighting and utilities;
- Process drives.

There is a 110KV substation (Anner) approximately 250m north of the site.

There is a medium pressure distribution gas pipe present within the application site.

The EIAR considers the impact of the proposal on these assets. No significant impacts were identified.

The most notable change relates to the fuel supply for the combustion process. Energy will be generated from the combustion of up to 186,000 tonnes a year from a range of biomass fuels including by-products from the Medite manufacturing process and wood biomass. This increase from the existing throughput of c. 111,000 tonnes per annum will not result in an increase in the production of MDF but is required to reflect a change in the fuel inputs.

There will be no increase in current process water usage of 421,374m³ per annum or the potable (mains) water usage of 15,000m³ per annum at the site.

6.2.11.2 Comments on Chapter 11

Having reviewed the details presented, Tipperary County Council does not consider that the works proposed will have a significant impact on material assets identified.

6.2.12 Chapter 12 Cultural Heritage

6.2.12.1 Issues Considered

Chapter 12 of the Environmental Impact Assessment Report and associated appendices describes the potential impacts on Cultural heritage arising from the development. The receiving environment was defined.

There are no Protected Structures within the application area. There are two Protected structures listed within the study area. These are associated with Newtownanner Demesne (detached Country House). There are no additional structures included in the NIAH situated within the application area. There are ten structures listed in the NIAH in the study area. There are no Recorded Monuments located within the application area. The closest Recorded Monument externally to the application area is a Ringfort – rath in Redmondstown townland RMP TS083-010. This is located on the eastern site boundary.

There is one SMR included within the study area SMR TS083-032---- Inchnabraher, Twomilebridge is a bridge that crosses the Anner River.

The EIAR considered the direct and indirect impacts of all four phases of the development on features of cultural heritage in the vicinity of the site. No effects on any structures of heritage interest in the study area have been identified that require mitigation. No indirect effects warranting specific mitigation were identified during the course of the cultural heritage assessment.

6.2.12.2 Comments on Chapter 12

Tipperary County Council is satisfied the applicant has considered all relevant direct and indirect impacts on cultural heritage. Tipperary County Council is satisfied that no significant effects on other material assets will arise, directly, indirectly or in combination with other permitted or proposed development in the area of the site.

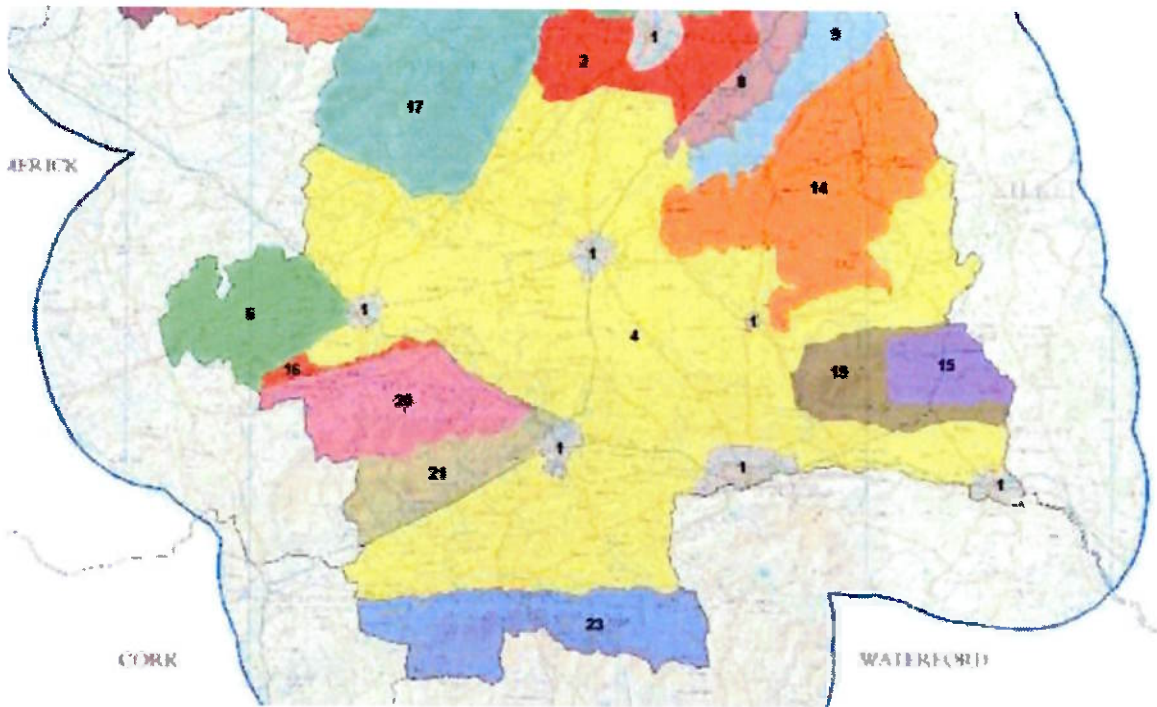
6.2.13 Chapter 13 Landscape.

6.2.13.1 Issues considered

Chapter 13 of the submitted Environmental Impact Assessment and associated appendices describes the assessment undertaken of the potential impact of the proposal on the receiving landscape. The EIAR describes the baseline visual character of the receiving environment (within 5kms of the site).

The proposed development site is fully located within The Plains Archetype, within LCT A1 Lowland Pasture & Arable and within LCA 1 Urban and Fringe Areas. LCA 1 is considered a sub-area of the surrounding LCA 4 River Suir Central Plan. The site is close to (3.3 kms) from a designated Primary Amenity Area.

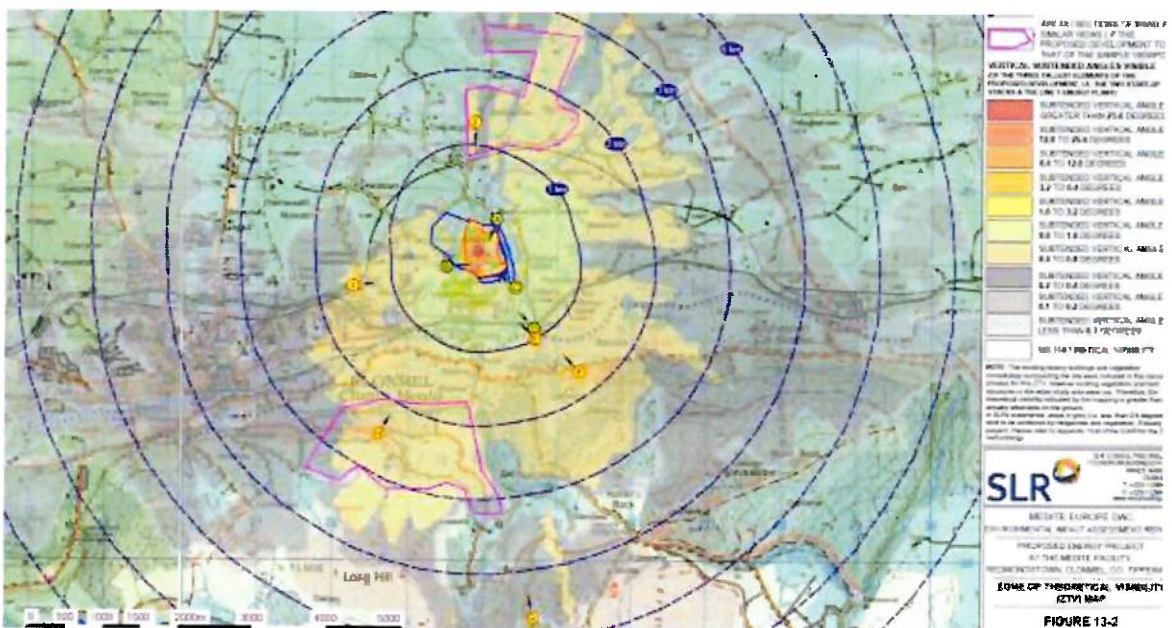
Figure 11 Landscape Character Areas



The EIAR has identified nine scenic routes in the study area. None of the views from the above listed Scenic Routes and Viewpoints are directed towards the proposed development site and the proposed development would therefore not become visible in any of these protected views.

In order to consider the visual impact of the works proposed on the character of the receiving environment, the EIAR has determined a Zone of Theoretical Visibility (ZTV), in accordance with the methodology provided in Appendix 13-B.

Figure 12 Zone of Theoretical Visibility



The applicant considered the visual impact of the proposal from nine different viewpoints, eight of which are within 2 kms of the site.

The submitted section drawings of each development phase are noted. The height of the line 1 energy plant (33 metres) is noted. The height of the start up stacks is also noted.

Of particular significance is viewpoint C, the view from the neighbouring residential development to the south east of the site.

Figure 13 Viewpoint C



The applicant has indicated that none of the works proposed will be visible from this viewpoint.

Additional viewpoints of note are Viewpoints G and H. With respect to Viewpoint G, which is taken from Co. Waterford, this view is taken from an elevated vantage point.

Figure 14 Viewpoint G

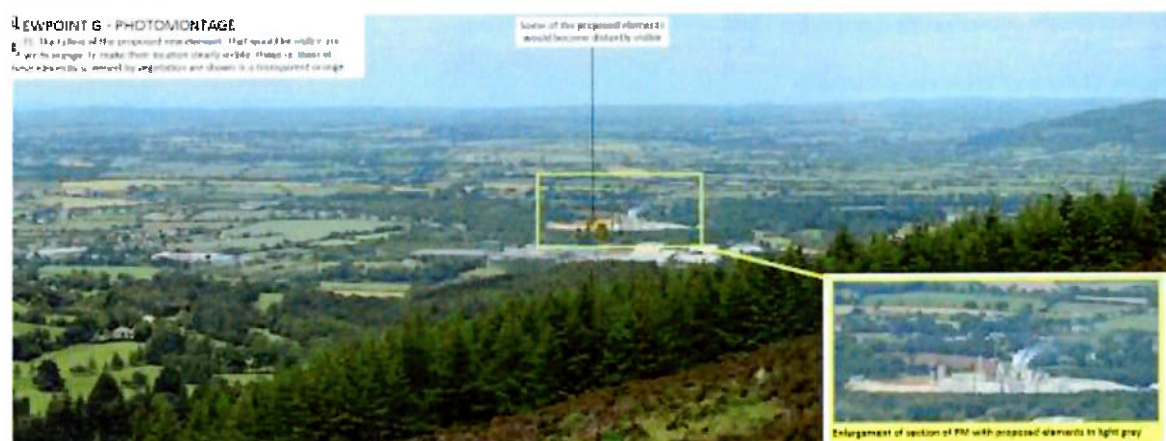


Figure 15 Viewpoint H



The applicant has indicated that the works proposed are difficult to discern at a distance, despite the open view into the site, due to the elevated location of viewpoint G. Likewise from viewpoint H, the applicant has indicated that the visual changes within the Medite facility would be inconspicuous and would appear as a continuation of the existing development.

The EIAR has determined that the Proposed Development is not considered to result in significant effects on any landscape receptors within the study area, or rather it is not going to result in any landscape effects. Likewise in terms of the visual impacts, while there will be some negative impacts arising for the provision of additional man-made structures in the receiving environment, these impacts are not deemed to be significant.

6.2.13.2 Comments on Chapter 13

The applicant has undertaken a robust visual analysis of the works proposed. Tipperary County Council does not consider that the works will have a significant impact on the receiving landscape.

The visual impacts are noted. The visual impact on sensitive residential receptors, viewpoints H and J are not considered to be significant. The works sit within the visual envelope of the existing buildings on site and present as the orderly expansion of same.

6.2.14 Chapter 14 Traffic

6.2.14.1 Issues Considered

Chapter 14 of the EIAR provides an assessment of the likely effect of the development on traffic and transport. The regulatory background and study area were defined. A 10km study was identified which includes the site access junction, the local road marked as L2506, and the N24 Redmondstown junction.

Traffic counts were undertaken to determine baseline traffic levels. It was determined that the road network is not currently experiencing congestion at peak times. Table 14-2 of the EIAR sets out average weekday traffic flows. The average weekday traffic flows show that the L2506, also the site access road, to the south of the Site supports approximately 1,650 vehicles (two-way flow) during an average weekday.

There is a relatively high presence of HGVs recorded within the survey of the L2506 making up between approximately 7-19% of traffic.

Based on current work patterns, there are a total of 260 days of deliveries per year. This equates to 15 HGV trips per day (30 two-way HGV movements per working day). It is also noted there will be no additional light vehicular trips associated with staff as no additional staff members will be employed from the proposed development, once the new development is operational. There are currently 120 employees on site each day.

It is expected that there will be average of 50 construction workers on site at any one time during the construction phase, rising to a peak of 240 construction workers over a period of 14 months of Phase 1.

The increase in traffic flow along the L2506 has been calculated and presented in Table 14-5 of the EIAR. The additional HGV movements (2 per day) are not considered to have a significant effect. The level of peak hour and daily traffic impacts are not deemed to be significant.

The EIAR has concluded that the proposed development would create a marginal increase to HGV traffic levels within the study area, and these levels would remain well within the design capacity of the local road network.

A review of committed developments was also undertaken in order to consider cumulative impacts.

The EIAR has indicated that a Traffic Management plan will be submitted for the agreement of the local authority in order to address construction related traffic impacts. Table 14-11, which is incorrectly labelled as table 14-4, sets out a number of mitigation measures to address concerns raised by local residents.

6.2.14.2 Comments on Chapter 14

The EIAR was reviewed by the District Engineer, Roads Capital and the National Roads Design Office (Tramore House).

The correspondence from the District Engineer raised no concerns.

The submission from the Roads Capital Section is noted. While the EIAR has deemed the increase in HGV traffic to be insignificant, Roads Capital have noted that there are currently difficulties for vehicles exiting the L2506 onto the N24. The EIAR has not assessed the level of queueing at this junction. The addition of two HGV vehicles will have some impact. This impact needs to be assessed.

In addition, it is noted that the EIAR does not include the proposed N24 Moangarriff to Twomilebridge pavement scheme. Under the pavement scheme, it is proposed to remove the left filter lane from the eastbound lane of the N24 approaching the L2506 junction. In addition, consideration is also being given to narrowing the junction to prevent two vehicles waiting at the STOP line of the L2506.

Tipperary County Council also notes that no consideration of workforce mobility management was provided in the EIAR. This should be included as a mitigation measure to address potential traffic impacts.

The submission from the National Roads Design Office is noted. The proposed development is located within the existing Medite site and does not encroach on the Preferred Transport Solution Corridor currently being considered for the N24 Waterford to Cahir upgrade project. As such there is no direct conflict between the subject proposal and the N24 upgrade project.

The report from the National Roads Design office notes that junction and access improvements along the N24 may form part of the Preferred Transport Solution for the N24 upgrade. Therefore, there may be indirect impacts to the Medite plant in terms of access to the N24 should a revised junction arrangement between the N24 and the L2506 be required.

6.2.15 Chapter 15 Major Accidents and Natural Disasters

6.2.15.1 Issues Considered

Chapter 15 of the EIAR deals with the vulnerability of the project to major accidents and natural disasters and the potential of the project to cause major accidents or disasters, that pose a risk to the environment. The chapter has been compiled in accordance with national and European guidelines (including relevant guidelines for risk assessment). Classification of likelihood and consequence are set out in Tables 15-6 and 15-7 respectively and overall risk in Table 15-10.

Mitigation measures are referred to in section 15.4.2 and these are described as embedded, with the development designed and built in accordance with best practice measures set out in the EIAR, which includes an CEMP and an Emergency Response Plan. No significant residual effects associated with the construction, operation and decommissioning of the development are therefore identified.

No cumulative impacts are predicted for the development in conjunction with projects identified for cumulative impact assessment, with mitigation measures in place.

6.2.15.2 Comments on Chapter 15

Tipperary County Council is satisfied that the assessment carried out in the EIAR in respect of the vulnerability of the project to disaster and the potential to cause accidents and/ or disasters during construction, operation and decommissioning and the proposed mitigation measures in respect of these effects, is sufficiently robust. As a result, Tipperary County Council is satisfied that the proposed development is not likely to give rise to significant adverse direct, indirect or cumulative impacts on the environment deriving from its vulnerability to risks of major accidents and/or disasters which are relevant.

6.2.16 Chapter 16 Interaction of Effects

6.2.16.1 Issues considered and comments

Chapter 16 of the EIAR outlines interactions and inter-relationships of various environmental aspects and details these in a matrix format (Table 16-1). It states that the potential for interaction of effects has been assessed throughout this EIAR.

6.2.16.2 Comments on Chapter 16

Tipperary County Council is satisfied that all key interactions have been identified and have been adequately assessed in the EIAR.

PART 7. NATURA IMPACT STATEMENT

7.1 Designated Sites

A total of three European sites within 15 kms of the proposed development, namely;

- Lower River Suir SAC
- Nier Valley Woodlands SAC and the
- Comeragh Mountains SAC.

The submitted NIS also considered the River Barrow And River Nore SAC to be of relevance. This site is located c. 21 kms to the north east of the subject site. It is noted that in the AA screening report, this protected site is stated as being 44 kms to the south east of the site. This is the point at which the lower river suir joins with the Barrow and Nore

The NIS identified that the works and activities associated with the construction and/or operation phase of the proposal have the potential to significantly affect the four referenced European sites arising from unmitigated changes in air and water quality.

7.2 Potential Impacts Identified in the NIS

Although the proposed development is not located within the boundary of any European site, its construction and operational phase could potentially affect hydrologically connected watercourse habitats that support the European sites Qualifying Interests (QIs) and /or Species of Conservation Interests (SCIs), through a deterioration in river water quality.

7.3 Mitigation measures proposed to avoid/manage impacts

The NIS includes details of measures and procedures to be implemented on site to provide for the protection of water quality and prevent the release of sediment and toxic contaminants during construction. Specific details of surface water management mitigation measures for the proposal has been detailed in the Chapter 7 of the EIAR.

Examples of proposed mitigation measures are detailed in Section 6.2 of the NIS.

7.4 NIS Conclusion:

The conclusions of the NIS states that the *‘the proposed project at the Medite facility will not result in adverse impacts on the integrity of Lower River Suir S.AC, Nier Valley Woodlands S.AC, Comeragh Mountains S.AC, River Barrow and River Nore S.AC or any other European site, either alone or in-combination with other projects or plans.’*

7.5 Comments on Natura Impact Statement.

Tipperary County Council is not of the opinion that the proposed development will have a significant negative effect on the ecology of the area and does not represent a significant threat to protected or qualifying species of nearby SAC.

However, given the proximity of the suite to the River Anner, details of environmental monitoring and surface water monitoring programs should be assessed and confirmed by competent person from a technical point of view in terms of specification and design.

PART 8. KEY ISSUES AND OVERALL CONSIDERED VIEW

8.1 Introduction

All of the foregoing information forms the basis of the content of this part of the report. Below is a summary of the key issues and considered views. This part of the report should be read in conjunction with Parts 5 and 6 of this report. The key issues are set out as points of note, which the Board may wish to investigate further.

8.2 Principle of Development

- The proposed development is consistent with the current energy and planning legislation and policy, which seeks to realise cuts in greenhouse gas emissions and increase the share of electricity generation from renewable sources to address concerns with regards to climate change. Due to the scale of the proposal, the project is of strategic economic and social importance to the Region and the State. The project will assist in meeting national renewable energy targets and will also result in significant reductions in carbon emissions from electricity generation and reduce the reliance on imported fossil fuels and will assist in the transition from the dependency on fossil fuels to energy generation from renewable sources.
- At a local level, the site is located within an area which is zoned for general industrial use in the Clonmel and Environs Local Area Plan 2024. As such, there is no land use objection to the proposal as it is consistent with the land use zoning objective for the site.

8.3 Visual Impact

- Notwithstanding the scale of the works proposed and the height of the structures proposed, Tipperary County Council is satisfied that the proposal will not give rise to significant impacts on the visual character of the receiving environment.

8.4 Traffic impacts

- Having reviewed the details submitted in the EIAR, Tipperary County Council notes that there are currently difficulties for vehicles exiting the L2506 onto the N24. The EIAR has not assessed the level of queueing at this junction. The addition of two HGV vehicles will have some impact. This impact needs to be assessed.
- In addition it is noted that the EIAR does not include a consideration of the proposed N24 Moangarriff to Twomilebridge pavement scheme, which includes a proposal to remove the left filter lane from the eastbound lane of the N24 approaching the L2506 junction.
- No consideration of workforce mobility management was provided in the EIAR. This should be included as a mitigation measure to address potential traffic impacts.

The National Roads Design Office notes that there may be indirect impacts to the Medite plant in terms of access to the N24 should a revised junction arrangement between the N24 and the L2506 be required as part of the N24 Upgrade project.

8.5 Ecology/Biodiversity

- Tipperary County Council is not of the opinion that the proposed development will have a significant negative effect on the ecology of the area. However prior to the commencement of development, a more comprehensive bat survey should be undertaken to ascertain the extent of bat activity in the woodland area to be removed in Development area 3.

8.6 Population and human health

- Tipperary County Council is satisfied that the works proposed will not give rise to adverse impacts on the residential amenity of nearby third party properties.

8.7 Land, Soils & Geology

- Tipperary County Council is satisfied that subject to standard site mitigation measures, the Land, impacts on Soil and Geology at the site will be negligible

8.8 Water & Hydrology

- Tipperary County Council is satisfied that subject to identified mitigation measures proposed, the residual risk to the surface water and groundwater receptors is not significant.

8.9 Air and Climate

- Subject to appropriate monitoring, Tipperary County Council is satisfied that the risk to air and climate is not significant.

8.10 Cultural heritage

- Subject to appropriate mitigation including archaeological monitoring, Tipperary County Council is satisfied that the risk to Cultural heritage is not significant.

8.11 Noise

- Subject to appropriate mitigation and monitoring, Tipperary County Council is satisfied that the noise impacts associated with the proposal are not significant.

8.12 Natura Impact Statement

- Tipperary County Council is not of the opinion that the proposed development will have a significant negative effect on the ecology of the area and does not represent a significant threat to nearby designated sites.

8.13 Conclusion

It is the considered view of Tipperary County Council, based on the information submitted and the detailed assessment provided above, that permission be granted for the subject development. The key issues which the Planning Authority deem relevant are set out as points of note listed above, which the Board may wish to investigate further.

PART 9. CONDITIONS AND CONTRIBUTIONS

9.1 Conditions

As required by Section 7 of the Guidelines for Planning Authorities.

- Requirement for a Resource and Waste Management Plan;
- Requirement for a Construction Management Plan;
- Limits on hours of operation of construction activities to mitigate noise and traffic congestion;
- Dust monitoring, limits and controls during construction phase;
- Limits on Noise levels at the operational stage;
- Noise monitoring programmes to be submitted;
- Designated member of company's staff to interface with Planning Authority and Public regarding complaints or queries in relation to environmental emissions;
- Surface water and ground water protection measures to be included.
- Advanced notice of requirement for road closures and speed limit restrictions;
- No dust, mud or debris from the site carried onto the public footpath or road and road cleansing;
- Requirement for an Operational Stage Traffic Management Plan, which specifically addresses concerns raised by Roads Capital Section.
- All surface water to be contained within the site and no surface water to flow onto the public road from the site.
- Requirement for comprehensive Bat survey of wooded area to be removed in Development Area 3.
- Community gain consideration are not considered to arise in this instance.

9.2 General Contributions

The relevant sections of the Tipperary County Council Development Contribution Scheme 2020 are as follows;


- Class 8 – Industrial – levied at a rate of €22/sq m
- Section 10 (Exemptions and Reductions), states under Energy Development that energy developments have differing demands on public infrastructure and as such the base levy will be applied at differing rates. Biomass CHP is levied at 0%.
- Section 10 of the scheme also includes for a 50% reduction for economic development where it is considered by the Planning Authority that the development constitutes economic

development on lands zoned for commerce/ industry/ enterprise and/or economic development (save for specified exceptions which the proposal would not fall under).

- It is considered that the proposal should be considered as Biomass CHP and should therefore not attract development contributions.

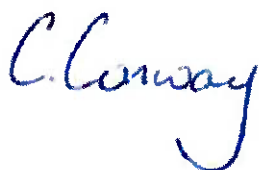
9.3 Special Contributions

None required.

Signed: 

Date: 27.03.2024

District Planner

Signed: 

Date: 27.03.2024

Senior Executive Planner

Signed: 

A/Senior Planner

Date: 28/03/2024

Signed: 

A/Director of Services

Date: 02/04/2024

Appendix 1 – Internal Reports

Report of Senior Executive Engineer

From: Keating, Nicola

Sent: 23 February 2024 16:38

To: Morgan, William <william.morgan@tipperarycoco.ie>; Planning Group
<planning@tipperarycoco.ie>

Subject: RE: Consultants Report Request from Tipperary County Council, Ref. No. ABP-319013-24
(SID Application)

Dear Planning,

Having reviewed the proposed the documentation submitted, I do not have any comments from a Roads perspective.

Yours sincerely,

Nicola Keating, CEng

Senior Executive Engineer, Clonmel Borough District

Tipperary County Council, Civic Offices, Clonmel, Co. Tipperary E91 N512

T: 0818 06 5000

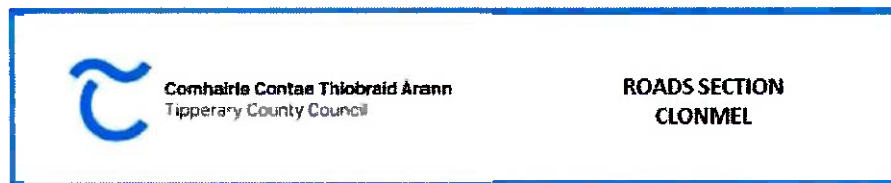
E: nicola.keating@tipperarycoco.ie

W: www.tipperarycoco.ie



Comhairle Contae Thiobraid Árann
Tipperary County Council

Report of Roads Capital



Memo

To: John Nolan SE

Date: 22/02/2024

From: O Tierney SEE

Our Ref: PL ABP-319013-24\Memo001

RE: Planning Ref ABP-319013-24 (SID Application)

John,

This application relates to development at the Medite site at Redmonstown, located on the L2506, approximately 950m north of the N24.

The development consists of replacement of three aging thermal energy systems with two biomass boilers. The Development is seeking permission as Strategic Infrastructure Development under Section 37E of the P&D Acts, with the application direct to ABP.

The developers have submitted an EIAR which includes an assessment of Traffic Impacts. During the preparation of the EIAR the developer's consultants have consulted with THRDO, TII and DoT. They have been advised that the development will have no impact on the N24 Cahir to Waterford Scheme.

In their assessment they indicate that there will be no increase in staff numbers however there will be an increase of 2 HGVs during the am and pm peak hours from the development due to increased fuel deliveries. These will likely join the N24. This has been deemed to be insignificant impact.

As you are aware, currently there are difficulties for vehicles exiting the L2506 onto the N24. The EIAR has not assessed the level of queueing at this junction. The addition of two HGV vehicles will have some impact.

Also, the EIAR does not include the proposed N24 Moangarriff to Twomilebridge pavement scheme, even though they have had discussions with TCC (not the Roads Capital Office). It does mention Active Travel proposals extending to the gateway sign on the N24. Under the pavement scheme it is proposed to remove the left filter lane from the eastbound lane of the N24 approaching the L2506 junction. In addition, consideration is also being given to narrowing the junction to prevent two vehicles waiting at the STOP line of the L2506.

A further consideration relates to the Clonmel Local Transport Plan, in particular the requirement for Workplace Mobility Management Plans. I do not see such a Plan within the submission as part of the proposed mitigations.

I recommend that the Applicant be requested to demonstrate that:

- 1) they have taken the proposed N24 Moangarriff to Twomilebridge Pavement Scheme into consideration when assessing impacts, and that;
- 2) they have assessed the impact of queueing at the N24/L2506 junction for vehicles turning to/from the N24 with the modifications from the N24 Pavement Scheme, and that;
- 3) they have developed and will implement a Mobility Management Plan for employees and also during the construction stage of the development.



O Tierney SEE
Roads Capital Office

Report of National Roads Design office

REGIONAL DESIGN OFFICE
TRAMORE HOUSE
TRAMORE, CO. WATERFORD

TRAMORE HOUSE



TEL: 00 353 (051) 390130
EMAIL: natroads@trdo.com
STAFF
EMAIL: mgrennan@trdo.com
Date: 23/02/2024

Your Ref: ABP-319013-24

Our Ref: ABP-319013-24 Response 2024-02-23

Planning Section
Tipperary County Council,
Civic Offices,
Clonmel
County Tipperary

Received 26/02/2024

RE: N24 Waterford to Cahir. Application Register Reference ABP-319013-24 (SID):
Replacement of existing biomass-fired boilers, biomass-fired thermal fluid heater
and gas-fired thermal fluid heater at Medite's manufacturing plant:- Medite
Europe DAC.

Dear Sir,

The proposed development consists of the replacement of existing biomass-fired boilers, biomass fired thermal fluid heater and gas-fired thermal fluid heater at Medite's manufacturing plant.

The proposed development is located Redmondstown, Clonmel, Co. Tipperary.

The proposed development is located within the existing Medite site and does not encroach on the Preferred Transport Solution Corridor currently being considered for the N24 Waterford to Cahir project. We therefore see no direct conflict with the project.

However, we would make the observation that junction and access improvements along the N24 may form part of the Preferred Transport Solution. Therefore, there may be indirect impacts to the Medite plant in terms of access to the N24 should a revised junction arrangement be required.

Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001, as amended.

Yours Sincerely,

Michael Grennan

Michael Grennan MIEI
Client Project Manager N24 Waterford to Cahir,
Tramore House Regional Design Office

Report of the Environment Section

MEMO ENVIRONMENT SECTION



Approved under the Sustainable Development Act 2014
The Sustainable Development Act 2014

To: Senior Executive Planner - Environment
From: Colette Moloney / Dermot Leahy - Environment
Re: ABP-319013-24 Medite Europe DAC, Redmondstown, Clonmel Co. Tipperary.
Date: 25/03/2024

With regard to the proposed development, I wish to report as follows;

1. Description of Development:

Replacement of existing biomass-fired boilers, biomass-fired thermal fluid heater and gas fired thermal fluid heater at Medite's manufacturing plant

2. Description of Environmental Impacts

2.1. Drinking Water Source Protection

Is the proposed development located within a drinking water source protection area?

yes/no

2.2. Other Protected Areas Is the proposed development located in a protected area?

- Special Area of Conservation yes/no
- Freshwater Pearl Mussel yes/no
- National Heritage Area yes/no
- Other (e.g. SPA) yes/no

2.3. Natura Impact Assessment considerations:

NATURA Impact Statement supplied with application. No pressures from the proposed development on adjacent NATURA sites identified

2.4. Surface Water

2.4.1. Is a Discharge Licence Required?

This site is currently licenced by the EPA.

2.4.2. Assessment of Impacts to Surface Waters

The closest water source is the River Anner_060, mitigation measures and emissions limit values for the site have been condition in the associated EPA licence.

2.4.3. Aquifer Type

Regionally important aquifer- Karstified diffuse

2.4.4. Vulnerability

Medium

2.4.5. Assessment of Impacts to Ground Waters

No impact to groundwater.

2.5. Air/ Dust

2.5.1. Direct Emissions

Potential dust emissions have been identified in the construction phase of the proposed development.

2.6. Waste Management Issues

2.6.1. Is a Waste Permit Required?

No.

2.6.2. Is a Waste Management Plan Required?

No.

2.7. Odour

2.7.1. Potential for Odour Nuisance

No.

2.8. Noise

2.8.1. Potential for Noise Nuisance

Given that the nature of the development is a replacement boiler, it is considered unlikely that noise nuisance to potential receptors is likely to occur at this site.

2.9. Lighting

2.9.1. Potential for light Nuisance

Given the nature of the development, it is considered unlikely that light nuisance is likely to occur from the proposed development

2.10. Flooding

Site is not prone to flooding.

2.11. Other Issues Identified

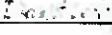
No.

Recommendation

Based on the information submitted and the desktop study performed regarding the overall plan while considering the location in relation to protected areas and sensitive receptors, there does not appear to be any environmental impediment to granting of this planning application provided the below recommendations are adhered to.

The Environment & Climate Action section is recommending this proposal to be granted planning permission with the following conditions:

- Mitigation measures identified in Chapter 8 of EIAR are implemented to limit dust emissions during the construction phase.

Signed: 
Date: 25/03/2024
Dermot Leahy
Executive Scientist,
Environment

Signed
Date:
Colette Moloney
SES, Environment

Item 5.3

**Strategic Infrastructure
Application - Medite,
Redmondstown, Clonmel,
Co. Tipperary**

The Chief Executives Report had been circulated to the members on Strategic Infrastructure Application (ref ABP-319013-24) in accordance with Section 37E of the Planning and Development Act 2000, as amended.

Ms. A.M. Devaney, A/S.E.P., advised members that on the 25th of August 2022, An Bord Pleanála determined that a proposal by Medite Europe DAC for the replacement of existing biomass-fired boilers, biomass-fired thermal fluid heater and gas-fired thermal fluid heater at Medite's manufacturing plant in Redmondstown, Clonmel, Co. Tipperary would be strategic infrastructure within the meaning of Section 37E of the Planning and Development Act 2000 (as amended),

As provided for under Section 37E(4) of the 2000 Act, the Chief Executive was required to submit a report to An Bord Pleanála setting out the views of the Planning Authority on the effects of the proposed development on the environment and the proper and sustainable development of the area. The report was also required to address all the issues identified in the An Bord Pleanála "Guidelines for Planning Authorities" in respect of Strategic Infrastructure. Accordingly, all the relevant issues to the proposed development had been identified and were assessed in the report. Section 37E (4) of the 2000 Act required that this report should be submitted to An Bord Pleanála by 5.30 pm on the 18th of April 2024 and would be considered as part of their assessment. Section 37E (5) of the 2000 Act required that before the Chief Executives report was submitted to the Bord, the Chief Executive shall submit it to the elected members, in order to seek their views on the proposed development. The members may, by resolution, decide to attach recommendations to the report (Section 37E (6) of the 2000 Act refers). Section 37E (6) of the 2000 Act also provides that the views expressed by the members on the proposed development during the Council meeting, be attached to this report.

The report noted that the developer was seeking a 10-year timeline to the permission and the construction would be over three phases with a completion date of 2035. The works proposed would assist the facility in meeting its climate action obligations.

It was the considered view of Tipperary County Council, based on the information submitted and the detailed assessment provided above, that permission be granted for the subject development. The key issues which the Planning Authority deem relevant are listed below, which the Board may wish to investigate further.

Summary of the key issues and considered view which should be read in conjunction with Parts 5 and 6 of the report circulated to the members.

8.2 Principle of Development

- The proposed development is consistent with the current energy and planning legislation and policy, which seeks to realise cuts in greenhouse gas emissions and increase the share of electricity generation from renewable sources to address concerns with regards to climate change. Due to the scale of the proposal, the project is of strategic economic and social importance to the Region and the State. The project will assist in meeting national renewable energy targets and will also result in significant reductions in carbon emissions from electricity generation and reduce the reliance on imported fossil fuels and will assist in the transition from the dependency on fossil fuels to energy generation from renewable sources.

- At a local level, the site is located within an area which is zoned for general industrial use in the Clonmel and Environs Local Area Plan 2024. As such, there is no land use objection to the proposal as it is consistent with the land use zoning objective for the site.

8.3 Visual Impact

- Notwithstanding the scale of the works proposed and the height of the structures proposed, Tipperary County Council is satisfied that the proposal will not give rise to significant impacts on the visual character of the receiving environment.

8.4 Traffic impacts

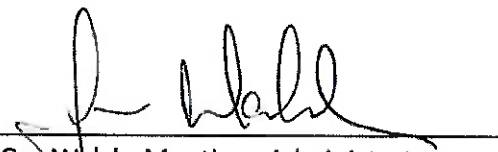
- Having reviewed the details submitted in the EIAR, Tipperary County Council notes that there are currently difficulties for vehicles exiting the L2506 onto the N24. The EIAR has not assessed the level of queueing at this junction.

	<p>The addition of two HGV vehicles will have some impact. This impact needs to be assessed.</p> <ul style="list-style-type: none"> • In addition, it is noted that the EIAR does not include a consideration of the proposed N24 Moangarriff to Twomilebridge pavement scheme, which includes a proposal to remove the left filter lane from the eastbound lane of the N24 approaching the L2506 junction. • No consideration of workforce mobility management was provided in the EIAR. This should be included as a mitigation measure to address potential traffic impacts. The National Roads Design Office notes that there may be indirect impacts to the Medite plant in terms of access to the N24 should a revised junction arrangement between the N24 and the L2506 be required as part of the N24 Upgrade project. <p>8.5 Ecology/Biodiversity</p> <ul style="list-style-type: none"> • Tipperary County Council is not of the opinion that the proposed development will have a significant negative effect on the ecology of the area. However, prior to the commencement of development, a more comprehensive bat survey should be undertaken to ascertain the extent of bat activity in the woodland area to be removed in Development area 3. <p>8.6 Population and human health</p> <ul style="list-style-type: none"> • Tipperary County Council is satisfied that the works proposed will not give rise to adverse impacts on the residential amenity of nearby third-party properties. <p>8.7 Land, Soils & Geology</p> <ul style="list-style-type: none"> • Tipperary County Council is satisfied that subject to standard site mitigation measures, the Land, impacts on Soil and Geology at the site will be negligible <p>8.8 Water & Hydrology</p> <ul style="list-style-type: none"> • Tipperary County Council is satisfied that subject to identified mitigation measures proposed, the residual risk to the surface water and groundwater receptors is not significant.
--	--

	<p>8.9 Air and Climate</p> <ul style="list-style-type: none"> • Subject to appropriate monitoring, Tipperary County Council is satisfied that the risk to air and climate is not significant. <p>8.10 Cultural heritage</p> <ul style="list-style-type: none"> • Subject to appropriate mitigation including archaeological monitoring, Tipperary County Council is satisfied that the risk to Cultural heritage is not significant. <p>8.11 Noise</p> <ul style="list-style-type: none"> • Subject to appropriate mitigation and monitoring, Tipperary County Council is satisfied that the noise impacts associated with the proposal are not significant. <p>8.12 Natura Impact Statement</p> <ul style="list-style-type: none"> • Tipperary County Council is not of the opinion that the proposed development would have a significant negative effect on the ecology of the area and does not represent a significant threat to nearby designated sites <p>Cllr Pat English made the following comments in relation to the proposed development which were noted.</p> <ul style="list-style-type: none"> • Difficulties for traffic exiting from the L2506 to the N.24 • Potential effects of the proposed development on the local population and human health during construction operations and decommissioning.
--	---

I certify that this is a true extract of the Minutes of the April Meeting of Tipperary County Council which was held on Monday 8th April, 2024.

Signed:


 Ger Walsh, Meetings Administrator
 Tipperary County Council