



Planning Section
County Hall
Main Street
Swords
Co. Dublin
K67 X8Y2

18th December 2023

Re: Application FW32A/0111

Subject Site: Lands at Huntstown and Coldwinters Townland, Co. Dublin

Dear Sir/ Madam,

We refer to application FW32A/0111 and attach herewith our response to matters raised in the Further Information request dated 14th June 2023.

This statement addresses both revisions to the proposal and also Further Information Matters.

Further Information Matters

Point 1: The applicant is requested to clarify the quantum of waste types that the facility will cater for.

Response: The overall annual materials intake will be 95,000 tonnes. As detailed in section 3.2 of the EIAR the proposed development is Phase 1 of the Huntstown Circular Economy Hub. It comprises a Materials Recovery Facility (MRF), a Food Container Cleaning Plant (FCCP) and ancillaries.

The MRF is the first step in the recovery and recycling chain and its purpose is to sort a wide range of wastes into recoverable and recyclable streams, with the objective of achieving a 98% recovery rate. Wastes which will arise in the Greater Dublin Area will include:

- Source segregated household and commercial wastes comprising residual municipal solid waste (MSW);
- Source segregated household, commercial and industrial wastes comprising mixed and single stream dry recyclables (e.g. paper, cardboard, plastic, glass, metal);
- Source segregated household and commercial food waste ('brown bin')
- Source segregated and mixed construction and demolition (C&D) wastes

The recoverable materials will be sent off-site to authorised recovery facilities, for example waste to energy plants, cement kilns and soil recovery sites.

Initially the majority of the potential recyclables (metals, paper, plastic, cardboard, timber) will also be sent off site for further treatment at authorised waste management facilities to produce recyclables that can be reintroduced into the economy.

On these basis and as particulars set out in the accompanying EIAR FI point 1 is addressed.

Point 2: The applicant is requested to revisit the proposed material finish of the buildings proposed to provide for some visual interest and demonstrate compliance with Table 14.15 of the Fingal Development Plan 2023-2029.

Response: In the first instance we refer to the accompanying drawings prepared by Hyphen Architects along with the Design Statement. As per updated design proposals the material finish for buildings incorporates a combination of external cladding and panel finishes.



Figure 1 Extract from proposed elevations

The accompanying CGI's (appended to the Design Statement) demonstrate how the proposal will create an attractive business park.



Figure 2 Extract from CGIs



Figure 3 Extract from CGI's

Also in response to the Development Plan we detail below how the requirements of table 14.15.1 of the FCDP and objective DMS103 are complied with.

| Objectives & Urban Design Objectives of | Response |
|---|--|
| Access & Circulation | The lands are well serviced by existing road infrastructure, with access gained from the southern site boundary. Connections to the wider area are provided by the National Road N2 and the Regional Road R135 which connect the site to the wider Blanchardstown area. The entrance arrangements are designed to meet required standards. The car and cycling parking are sited to be in close proximity to the main building entrances to ensure ease of access for visitors and employees. Pedestrian, cyclist and vehicular routes provide connectivity and overall the design will provide for permeability and access for both now and in future developments on adjacent lands. |
| Pedestrian/Cycle Connections | The proposal has been designed to accommodate pedestrian and cycle circulation in a safe and efficient manner. We refer to the TTA and Mobility Management Plan prepared by Trafficwise for further details. |
| Permeability | The building layouts, internal road layouts, setbacks, car parking and landscaping have been integrated to achieve good permeability for the proposed scheme, both meeting current operational requirements and to facilitate future masterplan requirements with a through-road achievable as part of the site layout. |
| Lighting | Public lighting has been designed with regard to Table 14.15.1 and we refer to the public lighting report and drawings for further details. |
| Loading/Service Areas | The loading areas are located to the sides of the proposed units, with proposed loading bays effectively integrated into the proposed facade design and service yard layout. |

| Objectives & Urban Design Objectives of | Response |
|--|--|
| Waste/Recycling | Waste management and recycling have been considered as part of the design of the development with bin storage and recycling points located at points where they are screened from adjoining estate roads. Also all processes are to be carried out internally. |
| Storage (Plant, Materials, Machinery) | The ESB substation, weighbridge building, ancillary storage buildings and bicycle shelter have been carefully located within the subject site, to maximise accessibility whilst also being at less conspicuous locations within the overall layout. |
| Set Backs | The setback from site boundaries, adjacent roads and landscape buffers along these streets is consistent with best practice and has regard to the 10m and 7m guidance set out in FCDP to the greatest practical extent. In addition, the building layout and elevation design provides for a level of activation onto the site. Landscaped buffer areas are also provided to the site perimeter. |
| Signage | The proposed recycling facility includes signage zone on the building elevations as detailed on the architectural drawings. The scale of the proposed signage is considered to be compatible with the scale of the proposed units, the surrounding context. The proposed signage by way of size does not detract from the visual amenity of the area. |
| Sustainability | The proposal has been designed with regard to sustainability. |
| Building Orientation and Road Frontage | The siting and orientation of the proposed units ensures active frontages within the site, whilst also balancing the operational requirements |
| Massing and Form | The scale and massing of the development is appropriate given the size of the site and the surrounding context. Careful consideration has been given during the design stage, to ensuring that the proposed development will be designed to achieve a suitable standard of architecture, designed to assimilate into and complement the receiving landscape and built environment. |
| Building Appearance and Materials and Colour Palette | The design team and applicant have carefully considered the materiality and treatment of the building facades and propose an effective facade treatment which aims to break down the building mass and enhance the visual interest of the proposed unit. In keeping with a facility of this nature the proposed material palette consists of architectural wall panels with variation in panel type and colour to effectively modulate the elevations. |

| Objectives & Urban Design Objectives of | Response |
|---|---|
| Appearance | The design and layout of the proposed development provides for a high-quality design, visual continuity and pedestrian/cycle friendly environment whilst at the same time ensuring the functioning of business park. |
| Facades | The proposed facade finishes are in keeping with what is expected for a Business Park with contemporary finishes to ensure durability. The main facade material will consist primarily of architectural wall panels in horizontal format. The entrance is differentiated from the main mass of the building adding to the overall design aesthetic and utilising extensive fenestration and glazing to enhance activity onto the main entrance and arrivals area of the site. |
| Roofscape | Roof elements should be simple in form and continuous. The facade design maintains a simple, unified parapet line for the proposed buildings. |
| Telecommunications and Antenna Equipment | No plant is proposed at roof level which would be visible against the skyline. We refer to the architectural drawings. |
| Solar, Utility, Electrical and Mechanical Equipment | The proposal includes zones for potential future PV panels at roof level. The design and layout of the PV panels have been informed by the Glint and Glare Assessment and also addressed in the accompanying Aviation report by O'Dwyer & Associates. |
| Building Entrances | All buildings and the main entrance are enhanced with feature cladding surround and elements of curtain wall glazing. Glazing is also provided to first floor office and staff welfare areas. |
| Parking | Refer to the attached TTA and section 4.4 of this statement for the parking rationale. Given the low staff volumes required a reduced parking provision is proposed which is good practice. |
| Landscaping and Boundary Treatment | The proposed landscaping enhances the visual character of the area by promoting the planting of trees and other shrubbery within the site. Existing trees and hedgerows are retained wherever possible along site boundaries and the site extent provides for a generous buffer zone to the perimeter. |

Table 1 Summary responses to Table 14.15.1 of the CDP

Overall the design of the business park has taken into account best practice design standards from other industrial parks within the area so that a high-quality layout and design of buildings has been integrated into the scheme design.

The business park aims to promote several of the common principles of good development such as accessibility, green infrastructure and sustainable design together with best practice in architectural design and conservation.

In summary the design and layout of the proposed development provides for a high quality design, visual continuity, pedestrian/cycle friendly environments whilst meeting the functional requirements of the business park.

On these basis FI point 2 is addressed.

Point 3: The applicant is requested to provide drawings and details of the proposed staff facilities at the entrance to the development which are referenced within the statutory notices associated with the subject application.

Response: In the first instance we refer to drawing no. P008 'Road Cross Sections and General Details' submitted as part of the original application which includes particulars on the proposed staff facilities at the entrance.

Particulars of the proposed staff building at the entrance are now also detailed on drawing P008 'Road Cross Sections and General Details' submitted with the further information response.

Point 4: A Tree Survey is provided at Appendix 8.1 of the EIAR. The tree survey was carried out in March 2021 and as such is outdated. The applicant is requested to submit a complete tree survey including an Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement in accordance with BS 5837: 2012, Trees in relation to Design, Demolition and Construction - Recommendations as required. The tree survey and documents must be prepared by a suitably qualified arborist/ landscape professional.

Response: We refer to the up-to-date tree survey carried out in August 2023 by Andrew Boe (included as Appendix B to the LVIA Addendum).

As per the Tree survey the 'amenity value of the trees could be considered low.'

It identified 43 no. trees, groups of trees or hedgerows across the site which equated to 265 no. trees. Protection measures for hedgerows or trees will be undertaken (in accordance with BS5837:2012) across the application site during the operational period including keeping appropriate "buffer" distances across root zones of mature trees of approximately 5m.

Going forward there will be a five year guarantee after construction that all the proposed planting works still exist and have established in line with landscape design expectations. This will ensure that no planting has been removed or damaged due to the subsequent construction or plant failure.

Procedures will be implemented whereby any failed or stressed vegetation or grass planted will be replaced as soon as they are identified. Monitoring will also ensure that there is no ponding of water due to differential settlement or any other severe differential settlement of surface layers.

On these basis FI point 4 is addressed.

Point 5: The applicant is requested to submit a revised Landscape Plan to include for the requirements of Objective DMS0134 - Site Summary of Specimen Removal, Retention and Planting, of the Fingal Development Plan 2023-2029.

Response: We refer to the revised Landscape Plan by Parkhood Landscape Architects; specifically drawing 7670-L-2101 along with the Landscape, Maintenance and Management Plan. Also relevant is the Development Impact Plan 7670-L-2700 which sets out how the proposal relates to existing hedges and trees.

On these basis FI point 5 is addressed.

Point 6: The applicant is requested to submit an integrated Green Infrastructure Plan which complies with the requirements of Objective DMS0124 of the Fingal Development Plan 2023-2029. Subject to the findings and details of the updates and revised Tree Survey, Landscape Plan and Green Infrastructure Plan, the applicant may be required to reconfigure the layout of the proposed development to ensure adequate hedgerow retention, protection and augmentation.

Response: We refer to the accompanying Green Infrastructure Plan by Parkhood Landscape Architects.

The landscape designs associated with the proposed development of the site are based on the concept of gapping up and augmentation of boundary hedgerows, enhancing the general landscape treatments within the site and ensuring adequate screen boundaries are created around and through the site.

Plants selected are indigenous and species selection follows from those identified within the All-Ireland Pollinator Plan (and appropriate reference to the Draft Fingal Biodiversity Action Plan 2022-2030) to ensure successful plant establishment that will merge visually and ecologically into this area. Internally, the site will include grass, hedgerows and gravel areas though these areas are visually obscured from any publicly accessible areas.

The integration of green infrastructure on the site boundaries (mainly existing hedgerows) and new landscape areas will allow for improved wooded corridors across the wider site through the planting of over 118 trees, 1129 linear meters of hedgerows and 8082m² of woodland across the site (extending to 8.2% of the site).

In summary policy GINHP3 of the CDP (Greening of Developments) has been fully addressed in landscape proposals. In broad terms the application site extends to 98292m² of which the proposed Materials Recovery Facility, associated yards and access (i.e. paved areas) extend to 19128m² in phase 1 and 40022m² site wide. The remnant area of the site is to be landscaped or includes existing hedgerows / vegetation which is to be retained and augmented. In total the proposed planting includes the following:

Phase 1

- 45 no. Standard Trees;
- 1129 linear meters of new hedgerows;
- 278 linear meters of retained and augmented hedgerows;
- 4945 m² of native woodland planting;
- 2083 m² of meadow seeding;
- 160 m² of shrub planting;
- 6595 m² of grass seeding.

If the wider site is built out, this will include further planting works that would further contribute to the environmental quality, setting and character of the site and includes the following:

Wider Site (Phase 1,2 & 3)

- 118 no. Standard Trees;
- 1129 linear meters of new hedgerows;
- 436 linear meters of retained and augmented hedgerows;
- 8082 m² of native woodland planting;

- 3786 m² of meadow seeding;
- 1308 m² of shrub planting;
- 13893 m² of grass seeding.

The collective planting and landscape works will contribute to the wider green infrastructure in relation of landscape character benefit, ecological / environmental worth and visual amenity of the site.

The applicant's objective for these areas is to ensure the landscape has a neat, clean and easily maintained character going forward.

Point 7: The Stage 1 Road Safety Audit should be revisited as it is not clear if the overall road upgrade and junction has been included in the report. The applicant is advised to liaise with the Transportation Planning Section of Fingal County Council prior to submission of a response.

Response: We refer to the accompanying Technical Note by TrafficWise; key extracts are set out below:

'2.1 The Stage 1 Roads Safety Audit dated April 2023 was prepared by Traffico Ltd. Road Safety Engineering. Road Safety Audit Report, Table 1.3 sets out a list of drawings which were examined as part of the audit process which include Drawing P001 'Site Layout Plan'. The site layout drawing includes a red line boundary within which is shown the development proposals that include road improvements proposed at North Road and between North Road and the direct access serving the development access. For the avoidance of doubt, we include at Appendix A an email from the Audit Team Leader, Martin Deegan of Traffico Ltd. in which he confirms that the road improvement works were considered as part of Stage 1 Road Safety Audit.'

2.2 Prior to preparing this response I contacted Niamh O'Connor of the Transportation Planning Section of Fingal County Council who indicated that the email confirmation from the Audit Team Leader was a satisfactory response to Item No.7 of the Request for Further Information.'

We also refer to Appendix A of this Technical Note.

On these basis FI point 7 is addressed and to the satisfaction of Transportation Planning Section.

Point 8: The applicant is requested to revisit the overall site layout plan which provides for additional long stay cycle parking and lockers for staff and also provide for motor bike parking.

Response: We refer to the drawing HYP-A-001 which includes details on revised long stay cycle parking. Lockers and wash facilities for staff are also provided within the main building (drawing HYP-A-002) along with motorbike parking provision.

On these basis FI point 8 is addressed.

Point 9: The applicant is requested to submit ground percolation results to illustrate that the subject site has adequate percolation. In addition, the applicant shall submit more detail on how the proposed rainwater system will function.

Response: We refer to the accompanying Engineering report by Coyle Civil and Structural and the Ground Percolation results are included as Appendix H 'BRE 365 Test Results.'

As detailed in the Engineering report (section 6.2) and accompanying Technical Note we summarise:

The surface storm water design consists of the following components.

- SuD's infiltration soakaway with storage capacity.
- Permeable paving to carpark areas.
- Rainwater harvesting to building roofs.

Given the poor infiltration rate on-site via the BRE 365 Test the storm system has been provided with cellular storage to allow adequate on site storage in the event of a 1/1000 year rainfall event, this will allow the storage of rainwater on site and the gradual infiltration via the included soakaway.

It is proposed to harvest the rainwater from the building roofs allowing for attenuation of up to 10,000 litres per industrial unit for further use. As such 2no. separate surface water drainage systems have been proposed to separate rainwater from the roof and to collect it in the rainwater harvesting tank. A separate surface water system for trafficked hardstand areas and all ground surface rainwater runoff has been proposed and to be discharged through a by-pass petrol interceptor (Klargester). All rainwater from the site will be stored and infiltrated at site, there is therefore no outfall from the site and the as such the controlled flow rate is 0.0 litres per second per hectare (0l/s/ha).

In order to comply with Development Plan requirements it is necessary to include a SuDS based storm water management system in accordance with the Greater Dublin Strategic Drainage Strategy. The above listed SUDS design items are included through the following;

1. Permeable paving to all car parking areas to allow for self infiltration to the subsoil. Given the turning of heavy duty HGV's it is not possible to provide permeable paving to all hardstand areas.
2. Rainwater harvesting is provided to all roof water in the form of underground rain harvesting butts. The retained water will be used for general washing and vehicle washing.
3. The installation of an underground storage cell with subsoil infiltration (soakaway). The drainage from the hardstand yard areas will be directed to a petrol/oil interceptor and in turn to the storage cell to allow for infiltration to the subsoil.

The surface water drainage system has been designed to ensure adequate capacity is achieved with a minimum self-cleansing velocity in the pipes when flowing half full.

It is noted the previous planning application ref FW20A/0063 made reference to an open swale. Open swales or retention ponds are not a viable means of SUDS for this site as open swales and ponds attract bird life and the proximity of the site to Dublin Airport would increase the risk to aircraft from increased bird number.

This above is addressed further in the Aviation Consultants report accompanying the original application particulars.

On these basis FI point no. 9 is addressed.

Point 10: The applicant is requested to submit a commensurate flood risk assessment in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.

Response: We refer to the Flood Risk Assessment provided by Coyle Civil & Structural Ltd in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. In summary the lands are in flood zone C and the FRA demonstrates the site is not at risk of pluvial, fluvial or tidal flood risk.

Point 11: The applicant is requested to submit a taking in charge map.

Response: We refer to Fingal's publication 'Taking in Charge' policy document (2020) and in particular section 1.6 therein which states that Industrial Estates cannot be Taken in Charge.

1.6 Facilities that cannot be Taken in Charge (non-exhaustive list)

- Boundary walls*
- Roads or services connecting into private infrastructure such as private roads, sewers etc. (i.e. roads that are not connected to an existing public road).
- Areas identified as private areas in Taking in Charge planning drawings and Taking in Charge planning compliance drawings.
- Allocated parking areas.
- Gated Developments.
- Industrial estates.
- Commercial centres with no housing attached such as shopping centres.
- Developments that have been conditioned to be private in their planning permission as they have no public utility

On these basis the Industrial Estate is not proposed for Taking in Charge and will be maintained by a Estate Management Company, as is the case for such developments.

Point 11 is therefore addressed.

Point 12: Groundworks are proposed on the eastern portion of the site. However the extent of these, and proximity to the site boundary, isn't clear from the site section drawings submitted. The applicant is therefore requested to submit the following:

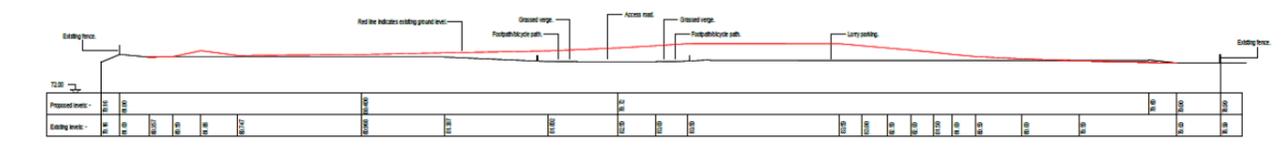
- (a) A section drawing which extends the section drawing A-A (as illustrated on site layout plan, P001) across the site. This shall show the eastern site boundary, existing ground level and proposed ground level and the proximity of works to the eastern site boundary.
- (b) A site section drawing which starts at the end point of the road carriageway on the southeast boundary. This shall show the site boundary, existing ground level and proposed ground level and the proximity of works to the south eastern site boundary.
- (c) Following preparation of this, the applicant shall review the separation distances from proposed works and the site boundary as stated in the Environmental Impact Assessment Report and Planning and Design Statement and make any revisions to the texts and assessment as necessary.

Response: We refer to accompanying drawings by Coyle Civil & Structural; specifically drawings P007 (Rev A). Section A-A has been updated to include for proposed levels from the existing public road in charge of Fingal CoCo and across the south-eastern site boundary and extends approximately 82 metres into the site.

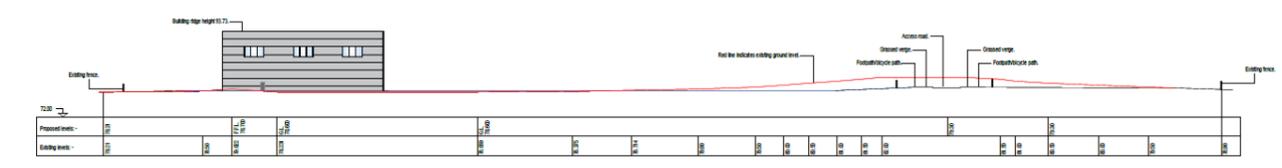


Site cross section A-A. Scale:- 1: 500.

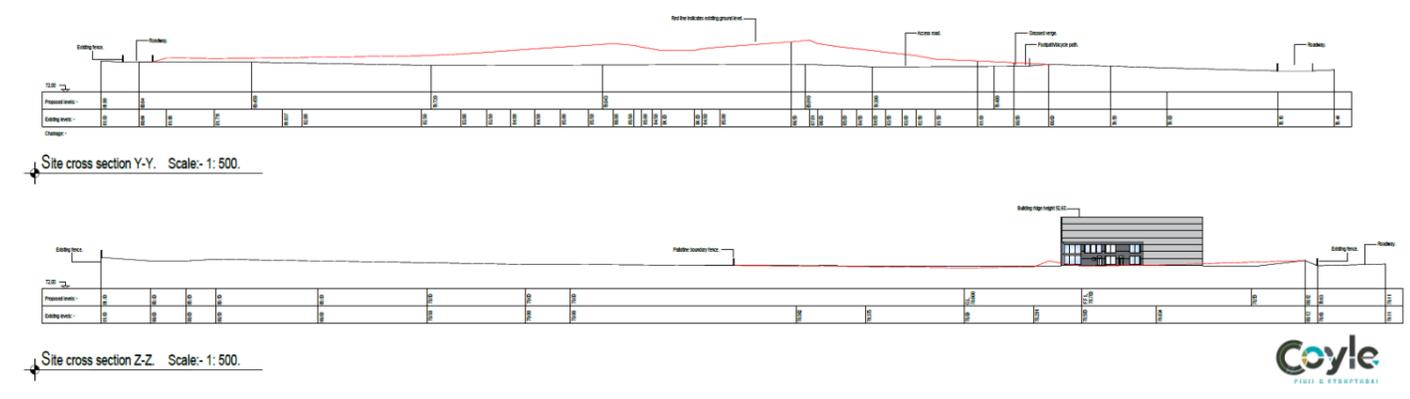
Site sections have also been included in drawing P007 that run from north-east to south-west (section X-X), east to west (section W-W) and north to south (sections Y-Y and Z-Z). These sections demonstrate the existing and proposed levels to the site.



Site cross section X-X. Scale:- 1: 500.



Site cross section W-W. Scale:- 1: 500.



Figures 4-8 Extract from site sections

In relation to sub-point (C) there has been no consequent amendments required to the site layout and therefore no matters arise in relation to separation distances.

On these basis FI point no. 12 is addressed.

Point 13: Having regard to case law of the Irish High Court and the CJEU (e.g. Case C-258/11, Sweetman and others) which established that determinations cannot have lacunae and must contain complete, precise and definitive findings capable of removing all reasonable scientific doubt as to the effects of a project on a European site, the planning authority is not satisfied that the proposal would not result in significant effects on European sites. Therefore, clarification is required in the form of an updated AA Screening report (and if necessary a Natura Impact Statement). A full appraisal of the surface and foul water management regime proposed, during construction and operation, is required, including a detailed analysis of the volumes and quality of water arising during operation, particularly its treatment and storage prior to discharge to the foul sewer or to the ground. This detailed clarification is required to enable an assessment to be made of whether the development, in view of best scientific knowledge, individually or in combination with another plan or project is likely to have a significant effect on a European site.

The response should have full regard to the additional information being requested, particularly in relation to flooding and foul and surface water management in general.

Response: We refer to the updated Appropriate Assessment Screening report by Dixon Brosnan which addresses matters raised above. A full appraisal of all aspects of the project have been considered to include for surface and foul water management (during construction and operation).

The screening exercise was completed in compliance with the relevant European Commission guidance, national guidance, and case law. The potential impacts of the proposed development have been considered in the context of the European sites potentially affected, their qualifying interests or special conservation interests, and their conservation objectives.

Through an assessment of the source-pathway-receptor model, which considered the Zol of effects from the proposed development and the potential in-combination effects with other plans or projects, the following findings were reported:

'The proposed development at Huntstown and Coldwinters, Dublin, either alone or in-combination with other plans and/or projects, does not have the potential to significantly affect any European Site, in light of their conservation objectives.

Therefore a Stage 2 Appropriate Assessment is deemed not to be required'.

On these basis FI point no. 13 is addressed.

Point 14: In accordance with Section 172(1D) of the Planning and Development Act 2000, as amended, the Planning Authority has examined the EIAR submitted and considered whether it identifies and describes adequately the direct and indirect significant impacts on the environment of the proposed development. The Planning Authority is of the opinion that the document is inadequate in terms of the statutory requirement for:

- the description of the proposed development;
- the description of the likely significant effects of the project on the environment;
- consideration of cumulative impacts;
- a description of the reasonable alternatives taking account of the likely significant effects on the environment; and

Therefore, in accordance with Sections 172(1D) and 172(1E) the applicant is requested to submit a revised EIAR including non-technical summary addressing the following issues which should be submitted to the Planning Authority by 14th December 2023. In accordance with Section 172(1F), if this information is not received by the aforementioned date, or any further period as may be specified, the application for consent for the proposed development shall be deemed to be withdrawn.

Response: The original EIAR has been revised to incorporate the findings of the assessments, surveys and reports completed in response to the individual Further Information requests. The Revised EIAR presents an evaluation of the likely significant environmental impacts and applicable mitigation and monitoring measures associated with the construction and operation of the proposed development.

The Revised EIAR addresses all of the aspects listed in Schedule 6 of the Planning and Development Regulations 2001 (SI No. 600 of 2001) (as amended), having regard to the requirements of Article 5(1) and Annex IV of Directive 2011/92/EU as amended by Directive 2014/52/EU (the EIA Directive).

The information contained in the Revised EIAR complies with the requirements of Article 5 (1) (a) to (e), Article 3(1) (a) to (e) and Annex IV of Directive 2014/52/EU on the effects of certain public and private projects on the environment. The overall approach took into consideration the guidance and recommendations in the following:

- EPA Advice Notes for Preparing Environmental Impact Statements (2003).
- European Commission's Environmental Impact Assessment of Projects - Guidance on Screening (2017).
- European Commission's Environmental Impact Assessment of Projects - Guidance on Scoping Report (2017).
- European Commission's Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report (2017).
- Government of Ireland Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).
- EPA Guidelines on the Information to be contained in Environmental Impact Assessment Reports (May 2022).

For clarity the relevant section of the Revised EIAR is referenced in each response point below.

The applicant is requested to submit a revised EIAR, non technical summary and revised Construction Environmental Management Plan (CEMP) updated where appropriate, to address the following points:

A. The locations of the proposed construction compound(s), proposed materials storage areas, soil stockpiles etc., should be indicated on a site plan, which is also included in the CEMP, and the environmental impacts of these features should be assessed in the EIAR.

Response: Section 3.21.14 of the Revised EIAR states that 'A Preliminary Construction Environmental Management Plan (CEMP) has been prepared that describes the prevention and mitigation measures that will be implemented in the Construction Stage to minimise the risk of adverse environmental impacts, nuisance and impairment of amenity value. A copy of the Preliminary CEMP is in Appendix 3.3.' A site plan showing the location of the Construction Compound is in the revised preliminary CEMP.

As the soil conditions across the entire site are similar, there are no on-site surface water features and uniform set back distances from treelines/hedgerows will be implemented the positioning of the compound at this location has no associated significant environmental effects.

The scope of the Construction Stage assessed in the EIA is detailed in Sections 3.21.3 to 3.21.16 of the original EIAR. Section 3.21.9 specifically addresses Oil & Chemical Storage. Section 3.21.13 states that 'A Preliminary Resource Waste Management Plan (RWMP) has been prepared that describes the measures that will be implemented in the Design Stage and the Construction Stage to design out waste, minimise the volumes of waste generated, ensure that the wastes that do arise are managed appropriately and maximise the recycling/recovery of those materials. A copy of the RWMP is in Appendix 3.2 of the Revised EIAR and this addresses the management of wastes arising in the construction stage'.

B. The description of the proposed development should be revised to outline the following aspects and where required the assessment updated to take account of same:

i. Where the various streams are likely to be sourced.

Response: Section 2.2 of the revised EIAR states that the wastes that will be processed in the Materials Recovery Facility (MRF) and the food containers that will be treated in the Food Container Cleaning Plan will arise in the Greater Dublin Area.

ii. Risk of fire arising from waste materials delivered to site, and associated management of same.

Response: Section 3.8.1 of the original EIAR describes the waste acceptance procedures that will be implemented to prevent the acceptance of 'unsuitable materials'. Section 3.8.1 states:

'The incoming materials will be subject to a documented waste acceptance procedure that will require recording details of the source, type and quantity and the delivery vehicle registration number.

The wastes will be delivered by waste collectors that have up to date Waste Collection Permits and wastes will not accepted from members of the public. All deliveries will be in fully enclosed vehicles and all vehicles will be weighed in at the weighbridge, where accompanying documentation will be checked. The driver will then be directed to the appropriate off-loading area inside the MRF.

Any delivery, which upon inspection at the weighbridge is deemed not to be suitable, will not be accepted. In such event facility personnel will record the name of the haulier, the registration number

of the vehicle and the nature and origin of the waste and the vehicle driver will be instructed to return the materials to the producer. Records of all such incidents will be maintained.

Any materials identified as not being suitable following off-loading will, where practical, be loaded back onto the delivery vehicle for immediate removal from the MRF. If this is not possible, the material will be removed to a designated quarantine area inside the MRF, where it will be stored in suitable containers (e.g. skips) pending its removal. Records will be kept of the waste type, quantity, and ultimate disposal/treatment facility'.

Unsuitable materials include potential ignition sources and hazardous wastes; however for clarity Section 3.8.2 has been revised to refer to fire risk. The fire safety management measures that will be implemented in the operational stage are described in Section 3.13 of the original EIA and are reiterated in Section 13.3 of the revised EIAR.

iii. Potential for hazardous materials to be included in waste, and associated management of same.

Response: Section 3.8.1 of the original EIAR describes the waste acceptance procedures that will be implemented to prevent the acceptance of 'unsuitable materials'. Unsuitable materials include hazardous wastes; however for clarity Section 3.8.2 has been revised to refer to the potential for hazardous waste being present in the incoming materials. All hazardous waste, will be removed from the incoming materials, stored in a designated quarantine area and then sent to an authorised hazardous waste treatment facility.

iv. Where the end products are likely to be utilised.

Response: As referred to in Section 3.2 of the original EIAR 'the recoverable materials will be sent off-site to authorised recovery facilities, for example waste to energy plants, cement kilns and soil recovery sites. Initially the majority of the potential recyclables (metals, paper, plastic, cardboard, timber) will also be sent off site for further treatment to produce recyclates that can be reintroduced into the economy.

The EPA recently published a protocol for the production of recycled aggregates from C&D waste that will meet End of Waste Status, meaning they can be used as an alternative to quarry won materials. It is the intention to manufacture these aggregates in Phase 1. Subsequent Phases of the Hub will include recycling facilities that will process other recyclables, for example plastics and timber into products that can be reintroduced into the economic cycle and replace virgin materials.

For clarity, it is the intention that, as far as is practical, the end-products will be used in Ireland in accordance with End of Waste Protocols developed by the EPA and as adopted under European Union Regulations. The recycled aggregate are suitable for used at construction sites as general fill and in the manufacture of non-structural concrete.

As referred to in Section 3.8.2.3 of the original EIAR the recovered plastic polymers will be sent to a plastics recycling plant in Portlaoise. Those materials recovered from the incoming waste (e.g. metals) and for which there is no indigenous recycling capacity (e.g. smelters) will be exported.

v. Where the sludge from the facility, including likely quantity and frequency, will be sent for treatment.

Response: As stated in Section 3.9.2.1 of the original EIAR sludge accumulating in the DAF unit will be pumped to a fully enclosed sludge holding tank, where it will be stored before being sent off-site for treatment. The type of treatment and therefore the location of the treatment facility will depend on the characteristics of the sludge. It is estimated that in the region of 2-3m³ of sludge will be generated and sent of site weekly.

Section 3.9.2.1: The pre wash, hot wash and rinse water will be directed to a wastewater treatment plant located inside the building. This will comprise physico-chemical treatment and will not involve biological stages e.g. activated sludge. The water will flow by gravity to an underground chamber from where it will be pumped through a high level automatic fine screen to remove gross solids. It will then pass into an above ground balance tank fitted with a submersible agitator to keep the contents mixed.

From the balance tank the water will be pumped to a diffused air floatation (DAF) unit (80m³/hour capacity). Flocculants and coagulants will be added to enhance the removal of solids. The treated effluent will discharge to an above ground buffer tank from where it will be pumped back to the washing plant. Sludge accumulating in the DAF unit will be pumped to a fully enclosed sludge holding tank, where it will be stored before being sent off-site for treatment.

To maximise the efficiency of the DAF unit it is necessary to continually bleed a small volume (ca 1m³/hour) of the treated wastewater to the foul sewer and replace this with water from the mains supply.

vi. Details of surface water infiltration.

Response: The report on the infiltration testing carried out in accordance with BRE 365 during the site investigation completed in September 2022 is in Appendix H of the revised Watermain & Drainage Report (Coyle Civil and Structural Ltd), a copy of which is in Appendix 3.1 of the Revised EIAR. These infiltration results formed the basis for the design of the proposed surface water management system. Further information is provided in the response to FI 9 prepared by Coyle Civil and Structural.

vii. Risk of waste contamination of surface water run-off / discharge to ground.

Response: As described in section 3.8.1 of the original EIAR, all wastes will be off loaded, inspected, processed and stored inside the MRF, which will minimise the risk of waste contaminating surface water. As described in section 3.10.3 of the original EIAR, if there is a need for the external contingency storage of baled SRF/RDF, as a precautionary measure rainwater run-off from the storage areas will temporarily be diverted to the foul sewer by activating valves located in two inspection chambers. The prevention and mitigation measures that will be implemented to protect ground and groundwater were described in Sections 6.8.3 and 7.8.3 of the original EIAR and are reiterated in sections 6.8.3 and 7.8.3 of the revised EIAR.

Section 6.8.3 states *'The impermeable paved yards and the building floors will be subject to regular inspection and repair as required. The above ground oil storage bund in the MRF and the underground drains will be subject to regular inspection, with integrity testing completed every three years. Staff will be trained in accident response actions and appropriate spill clean-up equipment will be maintained on site'*.

The fire safety and emergency response measures that will be implemented in the operational stage to mitigate the risk of fire outbreak and, if one does occur, to ensure the appropriate response actions are taken to ensure the fire is extinguished as quickly as possible so as to minimise the adverse environmental impacts are detailed in Section 10.8.3.1.

The surface water drainage system will maximise the groundwater recharge within the site. The provision and maintenance of the Class 1 oil interceptor on the inflow to the soakaway will ensure that any minor oil leaks that occur from vehicles do not adversely affect the groundwater. In the areas where the permeable paving is provided the biodegradation of hydrocarbons will occur within the subbase.

Section 7.8.3: The impermeable paved yards and the building floors will be subject to regular inspection and repair as required. The above ground oil storage bund in the MRF and the underground drains will be subject to regular inspection, with integrity testing completed every three years. Staff will be trained in accident response actions and appropriate spill clean-up equipment will be maintained on site.

The fire safety and emergency response measures that will be implemented in the operational stage to minimise the risk of fire outbreak and, if one does occur, to ensure the appropriate response actions are taken to ensure the fire is extinguished as quickly as possible are detailed in Section 10.8.3.1.

viii. Effectiveness of odour control, including measures to reduce risk of odour emissions during receipt and dispatch of wastes

Response: Details of the proposed odour control measures that will be implemented in the part of the MRF where odorous materials will be accepted are in Section 3.18.3.3 of the original EIAR. Section 3.18.3.3 states:

'The only materials accepted at the facility that will be significant source of malodours are the residual MSW and the 'brown bin' wastes that will be processed in the MRF. An odour management system comprising the extraction of odorous air and its treatment in an odour control unit (OCU) consisting of a dust filter to remove dusts and a carbon filter to reduce odour levels will be installed in the MSW/Brown Bin Bay.

Prior to the installation of the system the walls and ceiling will be inspected and a thick foam spray will be applied to all cladding joints and other parts of the building fabric that could be susceptible to air leaks. The objective is to achieve an air leakage rate of < 2m³/m²/hour. Rapid action doors will be fitted to the vehicle access points.

Air will be drawn from the building using an extraction fan and a system of internal ceiling mounted ducts provided with grills. The fan will have the capacity to achieve 2 air changes per hour. The air will pass through the dust filter before entering the carbon filter. A damper will be fitted to the inlet of the unit to allow the air flow to be balanced. The treated air will vent to atmosphere via a single stack.

The detailed design of the odour management system will be submitted to the EPA for its prior approval before it is installed. The installation will be the subject of a Quality Assurance Plan to ensure it is installed and commissioned in accordance with the approved design parameters.

As described in section 3.8.1 of the original EIAR, all wastes will be off loaded, inspected, processed and stored inside the part of the MRF that will be maintained under negative air pressure, which in the case of odorous wastes, will allow the effective control of odours during delivery and dispatch'.

ix. Impact, including likely quantity and frequency, of diversion of surface water run-off on foul sewer / network.

Response: Section 3.8.4 of the revised EIAR provide details on the diversion of surface water run-off to the foul sewer. Section 3.8.4 states:

'As described in Section 3.8.2.1 bales of SRF/RDF bales of SRF/RDF will only be stored externally as a contingency in the event that the cement kilns/ waste to energy plants are off-line for longer than

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normal during the planned annual maintenance shut-down, or if there is a major outage. As these are contingency events it is not possible to predict the frequency of occurrence.

The quantity of run-off-diverted to the foul sewer that will connect to the Ringsend Wastewater Treatment Plant (WWTP) is a function of the duration of the external storage, the size of the storage area and the amount of rainfall during the temporary storage period.

Assuming, worst case that the bales are stored externally for two weeks, the storage area is 1,000m², and an average weekly rainfall of 75mm, the total volume of run-off diverted to the foul sewer would be 150m³, equivalent to a daily average of 10.7m³.

The wrapping on the bales is intended to prevent liquid seeps from the materials during storage and transport and it also prevents the infiltration of rainfall into the bales. Therefore the risk of surface water contamination is low.

As a worst case it has been assumed that in the run-off from the temporary storage area the Biochemical Oxygen Demand (BOD) will be 80 mg/l, the Chemical Oxygen Demand (COD) will be 200mg/l and the Total Suspended Solids (TSS) will be 100mg/l. These are all significantly below the average levels in the influent to the Ringsend WWTP, which are BOD 259mg/l, COD 533mg/l and TSS 240mg/l .

The total volume (150m³) represents 0.034% of the average annual hydraulic loading on the Ringsend WWTP. The Uisce Eireann 2022 Annual Environmental Report for the Ringsend WWTP confirms that maximum and average annual hydraulic loading on the WWTP is less than the peak treatment plant capacity. The total loadings during the two week storage event will be BOD 12kg, COD 30kg/day and TSS 15kg/day. These are orders of magnitude below the annual loadings on the WWTP, which are BOD 112,791kg, COD 232,115kg and TSS 104,517kg.

While the Ringsend WWTP has the capacity to accept and treat the run-off, as described in Section 3.19.1 of the EIAR, the operation of the MRF will be regulated by an Industrial Emissions Licence from the EPA. The EPA is obliged to engage with Uisce Eireann to determine the emission limits to the foul sewer that will protect the integrity of the sewer network and the effective operation of the Ringsend WWTP¹.

¹ <https://leap.epa.ie/docs/cddc6026-0808-405e-8740-cd941adf1f9f.pdf>

x. The locations, heights, types and likely impacts of proposed lighting.

Response: The proposed lighting system is described in Section 3.10.5 of the Revised EIAR and the details of the locations, heights, types of the lighting are shown on drawing no. E600 in Appendix 3.4 of the revised EIAR. The impacts were assessed in section 8.13.5 of the original EIAR. Section 3.10.5 states:

'The proposed lighting scheme is shown on Drawing No E600 in Appendix 3.4. The system is designed to minimise the impact external lighting upon faunal populations by retaining dark areas around the external boundaries. The scheme optimises the lighting configuration to achieve recommended illuminance levels, while minimising light spill through a combination of column location and height, luminaire wattage and optical setting.'

Also section 8.13.5 states:

'Lit areas of the site may be avoided by bats, although they are likely to continue to forage in dark areas. Construction and operational lighting design will ensure that dark areas are maintained at the site. However, increased lighting along retained hedgerow/treeline is likely to reduce the value of foraging habitat in some areas. The residual impact will be negative, moderate, likely and long-term at a local level.'

c. The measures for the control and management of surface water / surface water discharge either to field drains and / or ground during the construction phase should be detailed in the CEMP in Appendix 3.3 of the EIAR.

Response: As described in section 6.1 of the Watermain and Drawing Report (Coyle Civil & Structural Ltd) submitted with the application, Section 6.4 of the Preliminary CEMP and Sections 7.5.1 and 8.7.8 of the original EIAR, there are no drains or watercourses either inside, or adjacent to the site boundary and the closest water feature is Huntstown Stream, which is approximately 970m north of the site. Therefore there is no requirement to control and manage the flow of surface water run-off from the site into field drains in the construction phase. Currently incident rainfall infiltrates to ground and this will continue to be the case in the construction stage, meaning measures to control and manage the infiltration rate are not required.

If the query relates to the prevention of the discharge of contaminated surface water run-off to ground in the construction phase this is addressed in Section 6.4 of the Preliminary CEMP, which states that the prevention and mitigation measures referred to in Section 6.3 Land & Soil apply equally to groundwater. To avoid repetition these measures were not included in Section 6.4 of the Preliminary CEMP, but for clarity are set out below and have been incorporated into the Revised Preliminary CEMP.

- Excavation and the stripping of topsoil and subsoils will only be undertaken when absolutely necessary, as this can lead to sediment run off and leaching of nutrients from soils into the groundwater.
- Excavated soils not immediately reused will be stockpiled to minimise the effects of weathering.
- Good housekeeping (daily site clean-ups, use of disposal bins, etc.) and the proper use, storage and disposal of substances and their containers.
- Regular plant maintenance to minimise oil leaks.
- Diesel fuelled plant refuelling will only be undertaken by trained personnel in areas where appropriate spill control materials are to hand (spill mats, oil dry). Any spillages will be immediately contained, and the contaminated soil excavated and sent to an appropriately licensed waste management facility.
- Pouring of cementitious materials will be carried out where possible in dry periods based on weather forecasts. Plastic covers will be available in case of a sudden rainfall event.

- The concrete pumping will be monitored to ensure no accidental discharge.
- Excess concrete will be removed from the site and concrete washout, with the exception of chute cleaning, will not be permitted on the site
- There will be no hosing into surface water drains of spills of concrete, cement, grout or similar materials

d. The Alternatives section of the EIAR should be revised to appropriately consider potential alternative site layouts (e.g. Iteration 2), which has lesser impact on the western and southern site (townland) boundaries. The assessment of alternatives should be presented as a clear environmental assessment, with conclusive reasoning for choosing the selected alternative.

Response: As referred to in section 4.2 of the original EIAR the evaluation of alternative site layouts was determined by a combination of the site's physical constraints and relevant policy and guidance documents. The constraints were evaluated by the Design Team and the appropriate avoidance, prevention and mitigation measures were incorporated into the design.

The physical constraints are defined by:

- The site topography, ground conditions, biodiversity and access;
- Existing Uisce Eireann permanent and temporary wayleaves through the site for the Greater Dublin Orbital Sewer route;
- Eirgrid wayleaves through the site for underground lines, and

The design had regard to the following policy and guidance documents:

- Fingal County Development Plan 2023 -2029;
- Department of the Environment, Community and Local Government's Urban Design Manual (May 2009).

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• Iteration 1

This was a 'first pass' of Phase 1, including site access and the implications of the constraints that could be imposed by the rerouting of the overhead power lines. The proposed redline boundary was confined to Phase 1.

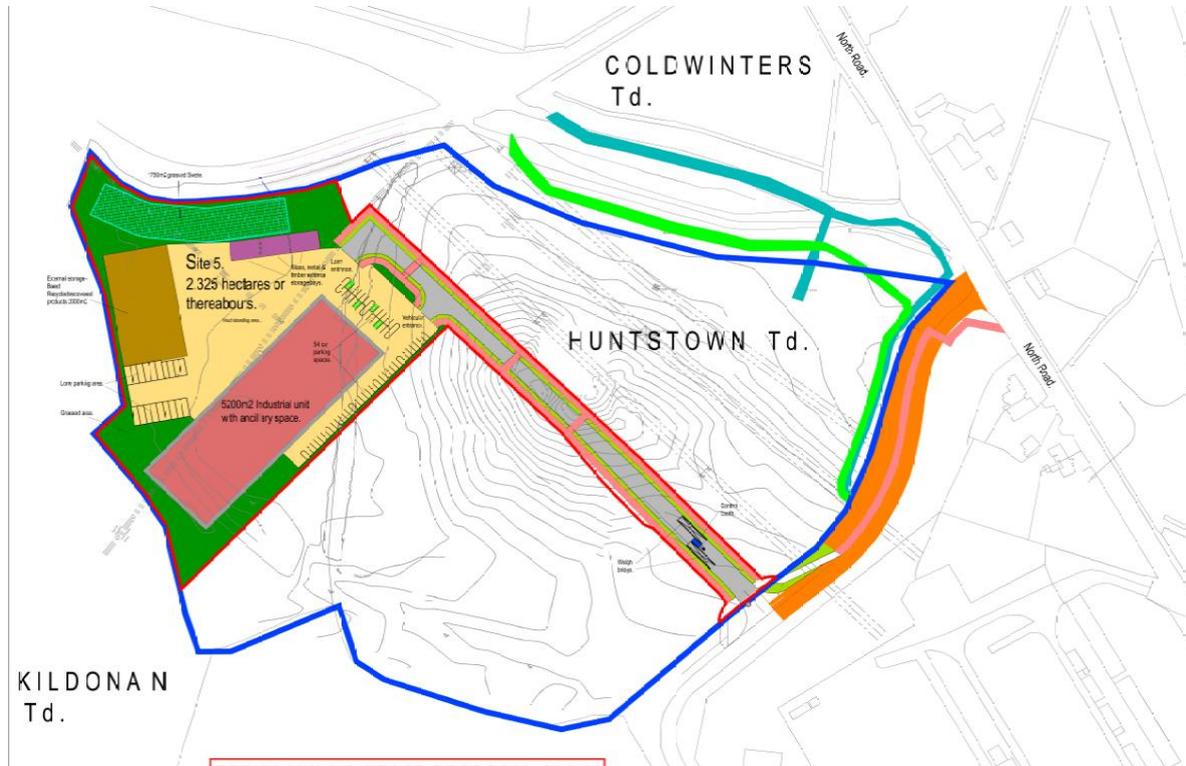


Figure 9 Iteration 1

• Iteration 2

Iteration No. 2 was an initial pass at possible future phases and encompassed the entire landholding and assessed car parking, cycle paths and internal access and the potential routes of the underground power lines.

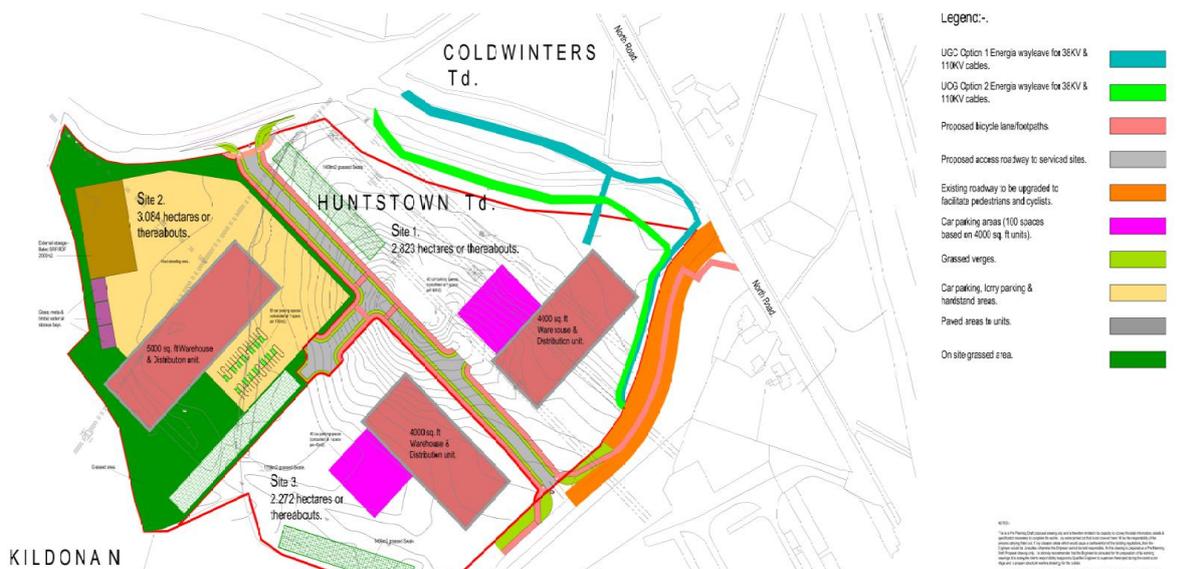


Figure 10 Iteration 2

Iteration 3 assessed the intensification of land use across the entire site.

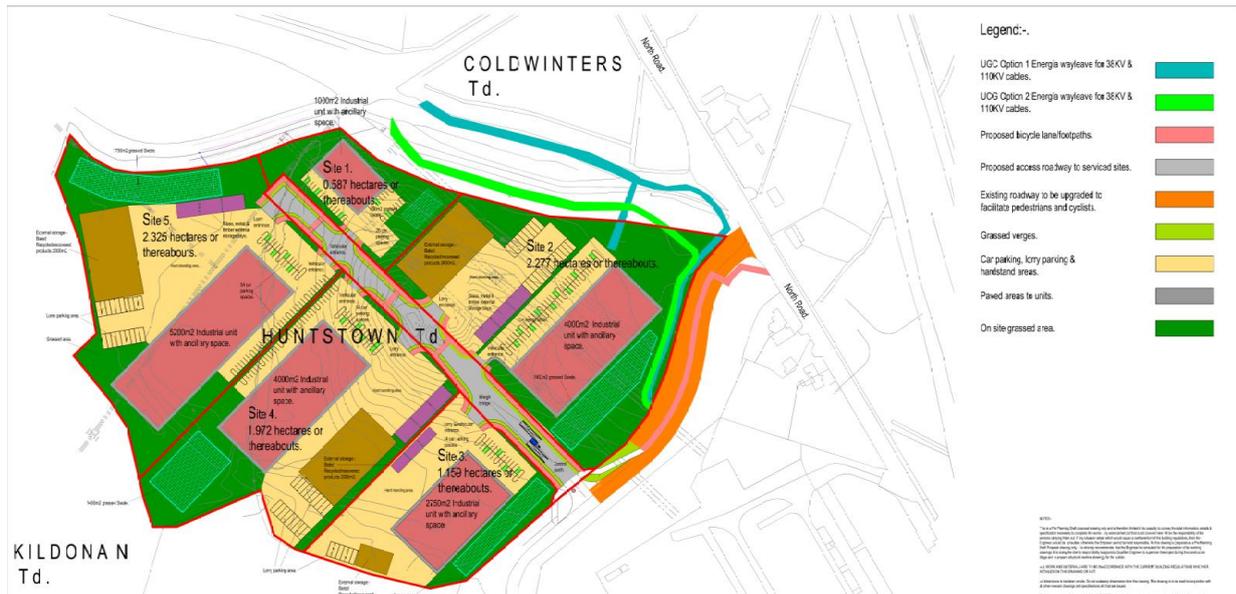


Figure 11 Iteration 3

• Iteration 4

Previous layouts were based on the storm water design objective of avoiding the use of underground attenuation systems in favour of above ground systems (swales); however the proximity to Dublin Airport and the flight path to Casement Aerodrome required consideration of aviation safety and the assessment of the bird strike hazard and the glint and glare potential in the landscaping and drainage provisions. On the advice of aviation consultants O'Dwyer Jones Partnership the drainage system design was changed to remove the swales and, as an alternative, use an underground attenuation system.



Figure 12 Iteration 4

The area of Phase 1 was increased to accommodate changes to the design of the Food Container Building to facilitate safe access to the buildings and incorporate landscaping measures.

Iteration 5 assessed how the revised Phase 1 fitted into the overall master plan.



Iteration 6 Final Layout

Iteration 6 is the Final Layout of Phase 1 and includes an extension of the redline boundary to include a section of the service road where alterations are required to facilitate the new vehicle entrance.



Figure 14 Iteration 6

It was a design objective to retain in full the hedgerows/treelines along the site boundaries. All of the iterations avoid any damage or intrusion to the existing hedgerows/treelines on southern and western boundaries. The only hedgerow to be removed as part of the development is an internal field boundary and is not part of the townland boundary. The mitigation measures to prevent any damage to the hedgerows/treelines along the townland boundaries include maintaining appropriate buffer zones (7 m). In this context it is considered that the proposed final layout is the 'best fit' for the site specific conditions.

e. Section 4.2 incorrectly states that the Development Plan does not define 'high impact' waste. This definition is included in Appendix 7 of the Fingal County Development Plan 2023-2029.

Response: The statement in section 4.2 that the Development Plan does not define 'high impact' waste activities is incorrect. The definition of 'high impact' waste activities in Appendix 7 of the Development Plan is:

'The use of land or buildings for facilities with high potential for odour, noise, dust and other nuisances including putrescible waste. Examples of high impact facilities are transfer stations and treatment plants for organic waste and residual waste which have a potential for odour, crushing and processing of construction and demolition waste, and facilities where waste is stored outside of buildings and which is visually intrusive or otherwise likely to be a nuisance, including scrapyards. Excludes landfills'.

This definition is in Section 4.2 of the Revised EIAR.

f. The documents submitted with the application, including the EIAR, acknowledges the significance of the trees and hedgerows on the western and southern boundary of the site. The documentation states that this boundary will be retained, protected and augmented. This boundary is also a townland boundary/feature. However, it is considered that the proposed development does not make adequate provision for the protection, retention and augmentation of this significant cultural, ecological and landscape feature either in terms of appropriate setback - stated as being 7 to 10m in the planning and design statement (Section 4.2, Genesis Planning) - or in terms of its full retention. In many places, aspects of the proposed development are significantly closer to the hedgerow and in-part it is proposed to remove a section of the feature entirely. The applicant is requested to revise the layout of the proposed development so as to maintain the stated setback of 7m minimum from any aspect of the proposed development, including fencing, to the edge of the vegetation in the townland boundary. The revised layout shall have regard to the findings, including root protection areas, and any recommendations for retention of trees / hedgerows of amenity value, in the updated arboricultural survey.

Response: This is addressed in the updated site layout plan and the closest point of buildings is 9.47 metres from the main western site boundary, The arborist's report and survey has also informed separation distances.

We also highlight as per the Arborist's report Trees along the western boundary all to be cleared given disease (Ash dieback on trees T01-T41), classified as Trees of Low Quality.

Additional site visits were undertaken to review the condition and value of the vegetation on this site boundaries for which – as noted above – the Tree Survey rated the general condition as being of low quality and the amenity value also as low. Irrespective, the hedgerows to the west and south of the site exist forming part of the landscape character and the landscape design objective is to retain and augment their presence.

The layouts have been amended to allow for the retention of the western hedgerow (total length c.307m) and its augmentation where weak with additional native hedgerow species to gap up these sections. Further, the hedgerows will be given appropriate management to remove ivy, remove dead material and cut back the hedge faces to return them to a more compact form in line with their original intent.

On the inside (or within the application site), native woodland belts will be planted that will further augment the boundary vegetation in this area as it matures. The minimum depth of any boundary vegetation will be 7m and, in sections, the existing hedge and proposed woodland belt will be of up to 16m wide. The area of proposed woodland plant equates to 1,300m² in total.

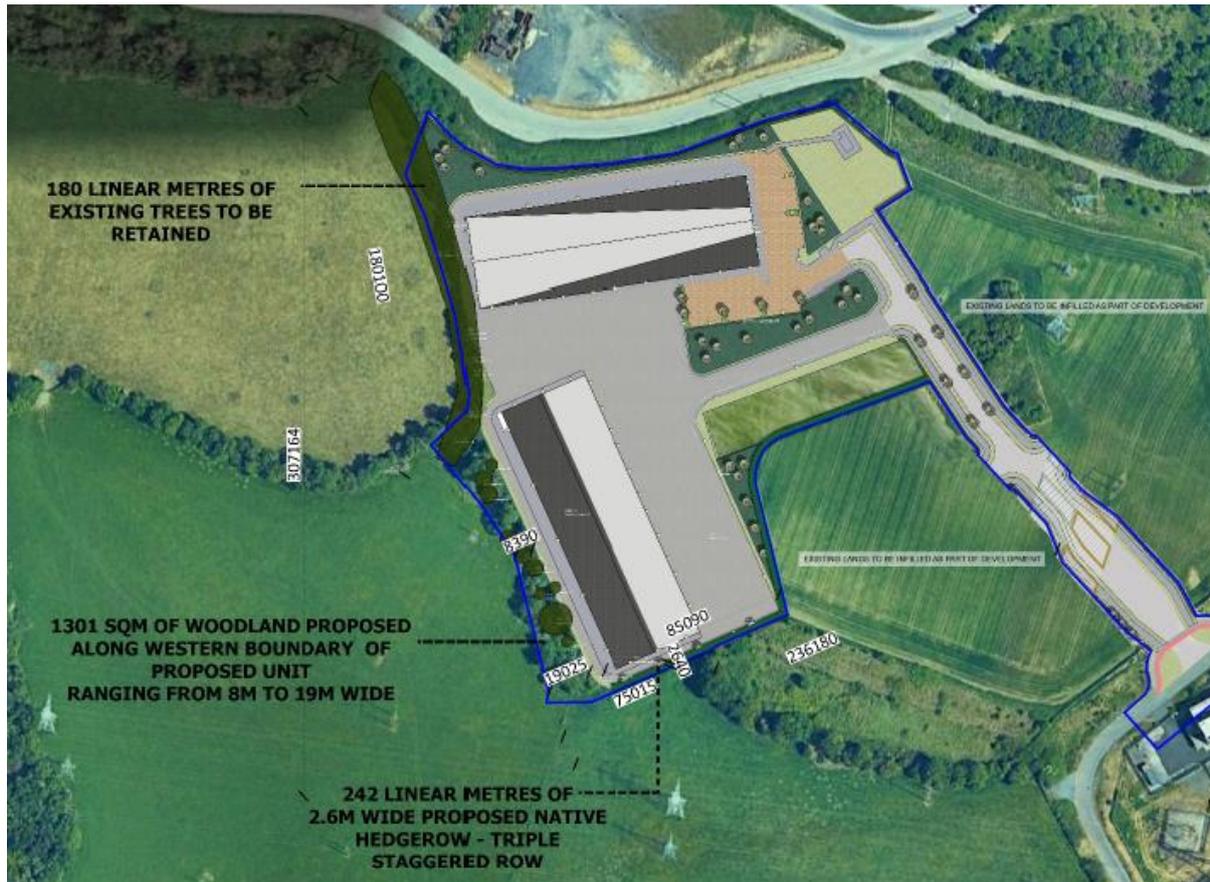


Figure 15 Extract from drawing no. 7670 L2101 annotated to identify specific hedgerow proposals

To the south of the subject site the hedgerow extends from the boundary with the Huntstown substation to the east though its trajectory is not straight and it carries over between the Phase One area and future areas proposed for development as part of the Circular Economy Hub. Again the quality is generally very poor but the objective is to, where possible, retain, augment and improve this boundary vegetation.

Immediately to the south of the proposed Warehouse B is a section of hedgerow equating to approximately 75m. This includes 4 no. Ash (*Fraxinus excelsior*) trees surveyed as T007, T008, T009 and T010 for which the Tree Survey has recommended felling on the basis that they do "... not merit retention due to disease". In and around the trees is a collective of "single and multi-stemmed trees" that were assessed as part of a group, T030. Again the Tree Survey has recommended their felling due to disease. It is therefore proposed that this collective diseased vegetation is removed and that the area between the proposed hardstanding associated with proposed Warehouse B and the boundary is (re)planted with a replacement hedgerow. It is acknowledged that this area is thinner than the western boundary but, at 2.6m wide, there is sufficient room to provide an appropriate hedge made up of mixed native species. In total, based on a triple staggered row, this section would equate to 450 no. plants which, on maturing, would provide an improved buffer and screen over what is currently offered by the existing hedge.

g. The Landscape Masterplan for the site shall be updated to reflect the revised layout (to indicate the appropriate incorporation and augmentation of the townland feature on the western and southern boundaries.

Response: The landscape plans (Drawing No. 7670-L2100 Landscape Masterplan and Drawing No. 7670-L2101 and L2012 Landscape Proposals) have been updated to reflect the amendments to the site layout and including for additional planting on the western and southern boundaries including information on landscape treatments, species schedules, plant density and stock specification.



Figure 16 Extract from drawing 7670-L2100

h. The applicant is requested to expand the limited study area, with regard to the Archaeological Impact Assessment Report submitted as part of the EIAR, in order to considered the impact of the proposed development on the entire site area and include for geophysical survey and test trenching where features are identified.

Response: Archaeology Consultancy Services Unit were engaged to carry out an Archaeological Impact Assessment (AIA) of the areas of the site where archaeological test pits had not previously been completed. A geophysical survey identified potential archaeological features and these were then investigated by the excavation of test pits under a licence issued by the Department of Housing, Local Government and Heritage. The findings of the AIA have been incorporated into the updated EIAR.

i. Section 8.10.2.5 refers to lighting. The second paragraph states 'the following measures will be applied in relation to construction works lighting:'. However the measures have not been provided and should therefore be provided.

Response: The absence of the lighting control measures was a typographical error, but these were included in Section 6.6.1 of the Preliminary CEMP in Appendix 3.1 of the original EIAR and which are reproduced below:

- *Site lighting will be provided with the minimum luminosity necessary for safety and security purposes. Where possible, lighting will be restricted to the working area and using the cowl and angling noted above will minimise overspill and shadows on sensitive habitats outside the construction area and*
- *Site lighting will be positioned and directed so that it does not unnecessarily intrude on adjacent ecological receptors. The primary area of concern is the potential impact at the woodland and treelines. There will be no directional lighting focused towards these areas and cowling and focusing lights downwards will minimise light spillage.*

Section 8.10.2.5 of the Revised EIAR describes the construction works lighting measures.

j. Given the extent of earthworks proposed on the site, the applicant is requested to revise Section 9.8.1 to include for a dust monitoring regime. The outline Construction Environmental Management Plan shall be updated to include this.

Response: Section 9.8.1 of the original EIAR and Section 7.2 of the Preliminary CEMP states that '*If required by the planning authority dust deposition monitoring will be carried out in the construction stage at locations and frequencies specified by the planning authority*'.

Section 9.8.1 of the EIAR and the Preliminary CEMP have been revised to identify the number and locations of the dust monitoring points and the monitoring frequency. It is proposed that a minimum of three monitoring gauges will be located at the site boundary at points closest to the nearest sensitive receptors (residential and farm dwellings). It is proposed to conduct the monitoring at monthly intervals.

k. Section 10.5.1 refers to surrounding land use in the receiving environment and notes that 'a cluster of three dwellings 200m east of Phase 1 on North Road are the nearest receptors'. Given that impacts on population and human health are possible during the construction as well as operational stage, this distance, and other applicable distances, should be reviewed.

Response: In the first instance we submit the objective of this request is not clear, but for clarity section 10.5.1 of the original EIAR also refers to:

- *Individual dwellings further north, including the Ravenswood Estate Community Housing Project at 830 m.*
- *An isolated farmhouse 280 m southwest of the site (Kildonan House), which is accessed from the Substation service road.*

Section 10.5.1 further states that '*Other receptors are scattered in several directions, all of which are over 700 m from the site. A number of residential estates lie to the south and south-east, in addition to apartment complexes at Charlestown*'.

These receptors, shown on Figure 10.1 in the original EIAR, were assessed to determine the impacts of noise emissions in the construction and operational stages.

In terms of impacts on air quality, Section 9.4.3 of the original EIAR states that the sensitive human receptors that are of greatest interest are residential and commercial locations in close proximity to construction and operational activities at the site. Construction activities including earthworks, construction and track-out will occur in close proximity to residential and commercial areas. Ten sensitive receptors, whose locations are shown on Figure 9.6 in the original EIAR, were identified and included in the assessment of impacts.

I. While cumulative impacts are addressed in some detail in Chapter 8 of the EIAR, these impacts are not adequately or appropriately addressed in the majority of remaining chapters of the EIAR - for example section 6.10 Land and Soils and 7.10 Water, etc. The applicant is requested to submit a fully detailed assessment of the potential impact of the proposed development in cumulation with other planned and permitted developments in the surrounding area in accordance with Annex IV(5)(e) of Directive 2014/52/EU.

Response: Section 3.5.7 of the EPA Guidelines on EIA relates to the description of:

- Other related projects that occur as a direct result of the main project, such as a power line, a substation or a road junction upgrade which may result in significant effects;
- Off-site projects which include projects specifically required for the project which take place at a distance from the site, often on lands owned by others (such as public roads) and which are sometimes permitted and developed by others; and
- Secondary projects that may arise largely because of the existence of the principal project, though they are usually not carried out by the developer of the principal project.

The proposed development will not directly result in any other related project. The materials that will be accepted and processed at the MRF are currently generated at existing off-site residential, commercial and industrial activities. The food containers that will be cleaned in the FCCP arise at existing retail outlets. The only potentially significant cumulative effect linked to these off-site projects are traffic movements, including the delivery of wastes and food containers and the consignment of the processed waste and clean food containers, and these impacts are addressed in Chapter 14 of the original EIAR.

Any secondary projects that may arise due to the existence of the development will occur in the future, for example plastic recycling plants. All such projects will be the subject of separate planning applications and, depending on the scale, an EIA will also consider same under separate consents.

Section 3.7.3 of the EPA Guidelines relates to the '*addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects. While a single activity may itself result in a minor impact, it may, when combined with other impacts (minor or insignificant), result in a cumulative impact that is collectively significant. For example, effects on traffic due to an individual industrial project may be acceptable; however, it may be necessary to assess the cumulative effects taking account of traffic generated by other permitted or planned projects. It can also be prudent to have regard to the likely future environmental loadings arising from the development of zoned lands in the immediate environs of the proposed project.*'

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Directive Annex 5 e) requires *'information of the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected¹, or the use of natural resources'*.

In relation to Climate (Chapter 5) the assessment of cumulative effects took into consideration Ireland's legally binding obligations on greenhouse gas emission reduction, the impacts of the existing traffic and those associated with the proposed development.

In relation to Land & Soil (Chapter 6) the only potentially significant aspect of particular importance is land take. This is defined in Section 6.6.1 of the original EIAR as the *'transformation of natural and semi-natural land to urban and other artificialized land. It affects habitats and ecosystems, both directly by reducing their area, and indirectly through fragmentation and degradation'*.

Section 6.10 of the original EIAR states that the *'proposed development will contribute to the cumulative land take in the area zoned for Heavy Industry'*. This is in accordance with the 'prudent' approach recommended in Section 3.7.3 of the EIA Guidelines in relation to the development of zoned lands in the immediate environs of the proposed development. Section 8.10 of the original EIAR assesses in detail the cumulative impacts on Biodiversity, which includes habitats and ecosystems.

In relation to Water (Chapter 7), as there will be no discharge to surface water in either the construction, or operational stages an assessment of the cumulative effects of other existing and approved developments is not required.

As stated in Section 7.10 of the original EIAR, the harvesting of rainwater will reduce the groundwater recharge rate and will contribute to the cumulative impact on the quantitative status of the bedrock aquifer locally. The bedrock aquifer is classed as poor and moderately productive only in local zones. The nearest recorded abstraction well is ca 0.85 km to the north-east. This has a reported yields of 83.8 m³/day, but its use is unknown (Ref Section 7.5.2.2 of the original EIAR).

As the aquifer is not a significant groundwater resource, there will be no discharge to polluting substances to ground/groundwater in either the construction or operational stages and it is not proposed to abstract groundwater as part of the development it is considered that the an assessment of the cumulative effect of the proposed development along with individual existing and approved projects is not of particular environmental importance.

In relation to Air (Chapter 9) the assessment of cumulative effects includes the operation of the nearby Huntstown Quarry, the emissions to air from the Huntstown Energy Plant and the Huntstown Bioenergy Anaerobic Digestion Plant, existing traffic and the traffic associated with the proposed development. These cumulative effects on air quality were also assessed in Chapter 10 Population and Human Health.

The Landscape and Visual Impact Assessment (Chapter 11) concluded that the proposed development will have will have a not significant, negative, local and long term cumulative impact on the landscape.

The Material Assets Built Services Assessment (Chapter 13) concluded that in the operational stage the proposed development will contribute to the cumulative natural resource consumption in the Greater Dublin Area. The installation of the roof mounted solar panels on the processing buildings will reduce reliance on non-renewable energy sources. The development will also contribute to a cumulative increase in the waste recycling and recovery capacity in the Greater Dublin Area.

The Materials Assets: Traffic & Transport Assessment (Chapter 14) assessment of cumulative effects includes specific local developments other than the proposed development. The developments considered are those already in operation or granted planning permission, but yet to be implemented. Other future development that may give rise to the generation of new traffic on the receiving roads network was captured by the application of Transport (TII) published growth rates to all traffic on all routes within the study area.

¹ Our emphasis

m. of the proposed development showing the 'As Existing View', the 'As Proposed View' and the 'As Proposed Cumulative View' (where appropriate) should be submitted. The locations should include an open view, where available, from:

- i. the vicinity of residential properties located west of North Road (north of the Roadstone entrance and opposite entrance to Woodkraft).
- ii. the vicinity of residential properties located west of North Road (south of the Roadstone entrance - at entrance to commercial unit).
- iii. the existing entrance to Roadstone-Huntstown on North Road, and
- iv. the pedestrian bridge over the M50 to N2 slip lane

Response: Parkhood Chartered Landscape Architects have prepared photomontages of the proposed development for the locations identified by the Council. Chapter 11 of the EIAR has been revised to incorporate the photomontages and assess their significance.

n. **The following documents/items - the majority of which are referenced in the EIAR should be submitted:**

- i. **A Materials and Waste Storage Plan.**

Response: The preparation of a Materials and Waste Storage Plan is a requirement of the conditions of a licence issued by the EPA and, as referenced in Section 3.11 of the original EIAR, the scope of the Plan will be agreed with the EPA. The purpose of the Plan is to identify the types, maximum quantities and method of storage of wastes and materials to ensure that the requirements of the EPA Guidance Note: Fire Safety at Non-Hazardous Waste Transfer Stations, 2013 and the EPA Guidance on Fire Risk Assessment for Non-Hazardous Waste Facilities, 2016 are met.

Each Plan is site specific and the scope is determined by the EPA licence conditions, internal building configuration and the types of waste accepted. This means that the Plan is a dynamic document and subject to regular revision. At this time, as the buildings have not been constructed and an EPA licence has not been granted it is not possible to prepare a site specific Plan; however a template Plan is enclosed.

- ii. **A detailed design of the Odour Management System.**

Response: The detailed design of odour management systems is completed subsequent to the grant of regulatory approval. As referred to in Section 3.18.3.3 of the original EIAR, the detailed design of the system will be submitted to the EPA for its prior approval before it is installed and commissioned. The design will be based on achieving the emission limit values set in the EPA licence, which will be derived from the odour impact assessment described in Section 9.3.3.1 of the original EIAR. The installation of the odour management system will be the subject of a Quality Assurance Plan to ensure it is installed and commissioned in accordance with the approved design parameters.

It is also to be noted that Section 257 of the Planning & Development Act 2000, as amended stipulates that *where a waste licence has been granted or is or will be required in relation to an activity, a planning authority or An Bord Pleanála shall not, where it decides to grant a permission under section 34 of that Act in respect of any development comprising the activity or for the purposes of the activity, subject the permission to conditions which are for the purposes of—*

(a) controlling emissions from the operation of the activity, including the prevention, limitation, elimination, abatement or reduction of those emissions, or

(b) controlling emissions related to or following the cessation of the operation of the activity.

On these basis we highlight a detailed design of the odour management system cannot be submitted at this stage for planning approval, as the EPA is responsible for approval of same via licencing procedures.

iii. A Decommissioning Management Plan.

Response: As referred to in Section 3.20 of the original EIAR, although the MRF does not have a defined lifetime the EPA licence will require the preparation of a Decommissioning Management Plan (DMP). The DMP is a site specific document and the precise scope is determined by the range of waste types and activities and the processes authorised by the EPA licence; however it will include the removal of all wastes and hazardous substances, clean out of all tanks and buildings, removal of plant and equipment, including processing lines and the disconnection of service.

The DMP will identify the actions that will be taken to ensure that the decommissioning works will not cause environmental pollution and, when complete, ensures the former MRF will not present any significant risk of environmental pollution.

Similar to the Materials and Waste Storage Plan, a DMP is a dynamic document that is subject to regular revision in response to changes to waste activities, processes and storage practices that may occur over the lifetime of the MRF. As the MRF has not been constructed and the EPA licence has not been issued, at this time it is not possible to prepare a site specific DMP; however a template Plan is enclosed.

iv. An Accident Prevention Policy and Emergency Response Procedure.

Response: Accident Prevention Policies (APP) and Emergency Response Procedures (ERP) are site specific and not generic documents and are integral to health and safety and environmental management systems that will be implemented in the operational stage. As they must comply with the scope defined in the EPA licence, it is not possible to prepare site specific documents at this time; however template APP and ERP are enclosed.

iv. An Integrated Green Infrastructure Plan should be prepared and submitted in accordance with objective DMSO124 of the Fingal Development Plan 2023-2029.

Response: An Integrated Green Infrastructure Plan has been prepared by Park Hood and has been incorporated into the revised EIAR.

o. The revised EIAR, non technical summary and CEMP should also be updated to reflect any changes arising from responses to other items of the request for further information.

Response: The revised EIAR, non-technical summary and the CEMP took into consideration the all of the responses to the request for further information.

Third Party Submissions

This practice in conjunction with the project team Enviroguide have reviewed all matters raised within the third party submissions. We set out below how each matter is addressed.

- **Geraldine Cooper Submission**

Point 1: No public consultation carried out

Response: There is no statutory requirement for public consultation to be carried out.

Point 2: Potential for adverse health effects on family members and the area

Response: Chapter 10 of the EIAR sets out in detail how impacts of the development have been assessed in relation to population and human health. It describes the impacts and the prevention, mitigation and monitoring measures to reduce their significance.

The EIAR also assesses a baseline scenario, discusses the cumulative effects and concludes on the residual impacts. For conciseness both the construction and operational stages of the development are considered in detail and the findings on a robust evidential basis clearly set out no significant adverse effects will arise on the recipient local population as operations are to be carried out internally.

Also an odour control system will be installed in the section of the materials recovery facility where the odorous wastes (MSW and 'brown bin') will be processed and stored. The system will involve the abstraction of the air and its treatment in a dust filter to remove dusts and carbon filter to reduce odour levels before it is emitted to the air via a stack. The system will be designed to meet the most stringent odour limit value specified by the EPA. The design, installation and operation of the system will require the EPA's prior approval.

Point 3: Traffic and Roads impacts

Response: Chapter 14 of the EIAR considered the construction traffic for the site. We summarise key extracts below.

- Section 14.3.2 Future Transport Objectives

'The Fingal County Development Plan 2023-2029 shows an indicative route of the proposed Metro West rail line adjacent to the M50 northern boundary. A proposed metro stop will be located at Kildonan, which is close to the development site. The light rail scheme will link the principal towns/suburbs along the western fringes of Dublin (beyond the M50 Motorway) including Tallaght, Lucan and Blanchardstown to the proposed Metro North scheme, which will serve Dublin Airport and Swords.

Fingal County Council plans to reopen the cul de sac at the section of North Road south of the entrance to Huntstown Quarry to facilitate access to industrially zoned lands north of the M50 and between North Road and Cappagh Road. The Council also has plans to provide a western link from the Broghan Roundabout on the R135 (old N2) to Dublin Airport. When in place the existing traffic flows at the signal controlled Kilshane Cross on the R132 (North Road) will significantly reduce.

It is an objective of the Fingal County Development Plan to move to more sustainable modes including walking, cycling and public transport during the life time of the Plan. The Greater Dublin Area Cycle Network Plan (2021) envisages the expansion of the city cycle network to provide new connections including a cycle lane along North Road to Ashbourne. The route will be along the hard shoulders of R135 (formerly N2).

14.4.1 Construction Stage

Access will be via the new entrance off the service road to the Substation. Traffic will comprise construction staff private vehicles and materials delivery vehicles, including articulated and rigid body trucks and ready mix concrete trucks. Construction staff will generally arrive before 08:00 and leave at 17.00 thereby avoiding the morning and evening peak hour traffic. Many of the staff will share vehicles. Given the scale of the development it is likely that approximately 60 construction workers will be on site at any time and there will be an average of 32 daily car trips

The initial works will involve the excavation and removal from the site of approximately 31,000m³ of soil. This will be done over a four week period and will generate 1,283 heavy goods vehicle trips, which equates to 25 daily trips over the four weeks. In the subsequent stage trips will be in the region of 25 or less per day. These trips will be evenly spread throughout the day and will not impact significantly during the peak periods.

14.4.2 Operational Stage

The likely impact of the heavy goods vehicle movement on the local road network will have a negligible impact on network capacity and operation. Direct impacts will be limited to the short section of North Road south of Huntstown Quarry Access Junction, which is currently a lightly trafficked cul-de-sac. It is the intention to reopen this cul de sac to allow access to zoned lands north of the M50 between North Road and Cappagh Road.

Based upon detailed assessments will not be a significant increase in traffic throughput or impact upon capacity at any junction either in the vicinity of the site or on the haul routes. The extent of the impact will be limited to the haul route principally along North Road. The impact will be medium-term (i.e. 25 years), occurring 5.5 days a week, between the hours of 07:00 and 19:00 (to 14:00 on Saturdays) and are expected to continue as long as the proposed development continues to operate.

Point 4: Separation distance

Response: The closest building proposed within the layout is located circa 200 metres from the respective objector's dwelling. Importantly we highlight this objector's dwelling is located on the opposite side of the public road with existing passing traffic and also within 50 metres of a National Road, with background noise levels already established.

In this context the proposed buildings are located further removed from the objector's dwelling than the existing National Road.

Also we refer to chapter 10 of the EIAR which sets out in details how receptors in the area have been assessed and we highlight noise monitoring has been carried out to inform assessment of the objector's respective dwelling.

For conciseness we summarise as per section 10.10.2 of the EIAR which states:

'The local soundscape is entirely dominated by road traffic noise. Although a number of commercial and industrial noise sources are located in the surrounding area, emissions from these do not contribute to the soundscape at receptors. The only exception is Kildonan House to the southwest of the site, where quarry operations are audible during the daytime.'

The predictive noise modelling indicates that noise emissions from the proposed development will be lower than baseline noise levels at receptors, and thus cumulative impacts will not arise. While cumulative impacts will arise in relation to an increase in North Road traffic, the increase will be negligible north of the Huntstown Quarry entrance. South of the entrance, the proposed development will generate an increase in traffic noise levels of 4 dB, resulting in a not significant to slight impact. Therefore, the proposed development will not give rise to any cumulative noise impacts of significance.'

In relation to traffic safety the submission states:

'The proposed entrance for heavy good vehicles is in close proximity to a sharp bend in the road. The site layout drawing indicates a sightline in the direction of this bend that is 90 metres. However the traffic report that is included with the planning application documentation states that a sightline of 120 metres is provided. Also the sight triangle crosses lands on the opposite side of the road that are zoned for General Employment and are in third party ownership. It cannot be assumed that therefore this sight visibility triangle will be kept free from obstacles in the future.'

Response: The speed limit on North Road is 50km/h and so too is the speed limit on the ESB substation, farm access and development access road. In accordance with Transport Infrastructure Ireland (TII) publication DN-GEO-03060 'Geometric Design of Junctions' Table 5.5, the standard sightline distance for a national road subject to 50km/h is 70m.

The site layout plans show a sight distance of 90m, which is one step above the standard, and the measured distance falls entirely within the bounds of the road as defined by the proposed development boundary and the existing boundary fence on the opposite side of the road.

The TII standard measurement of 70m applicable to National Roads falls entirely within the metalled surface of the road. The sight distance measurement is from the same point at the proposed access. Measuring from the submitted drawings is not complex and is easily understood without the need for a specific drawing.

The traffic report refers to the proposed development boundary being set back sufficiently to accommodate 120m sightlines along the future road alignment which is shown in the current development plan to connect to the Cappagh Road. This measurement is also shown on the submitted plans.

Notwithstanding the above, the site is located within a 50km/h zone and the Design Manual for Urban Roads and Streets (DMURS) applies. The DMURS standard sight distance applicable in a 50km/h zone is 45m or 49m where the receiving road is a bus route.

Given the satisfaction of the applicable DMURS standard of 45m and the satisfaction of the more prescriptive design standard for National Roads of 70m, both of which fall within the bounds of the hard surfacing of the road, the matter of obstruction of the visibility triangle does not arise.

In the interest of clarity, the layout of the proposed direct access to the development was designed in accordance with the geometric standards set out in the National Roads design publications of Transport Infrastructure Ireland and this was the standard carried through for the assessment of sight distances that are presented in the documentation submitted to the Planning Authority

Furthermore the verge on the opposite side of the road is public verge and encompassed within the sight distance serving the ESB Station. This sight distance is already in-situ and required to be kept free from obstructions under the ESB permissions.

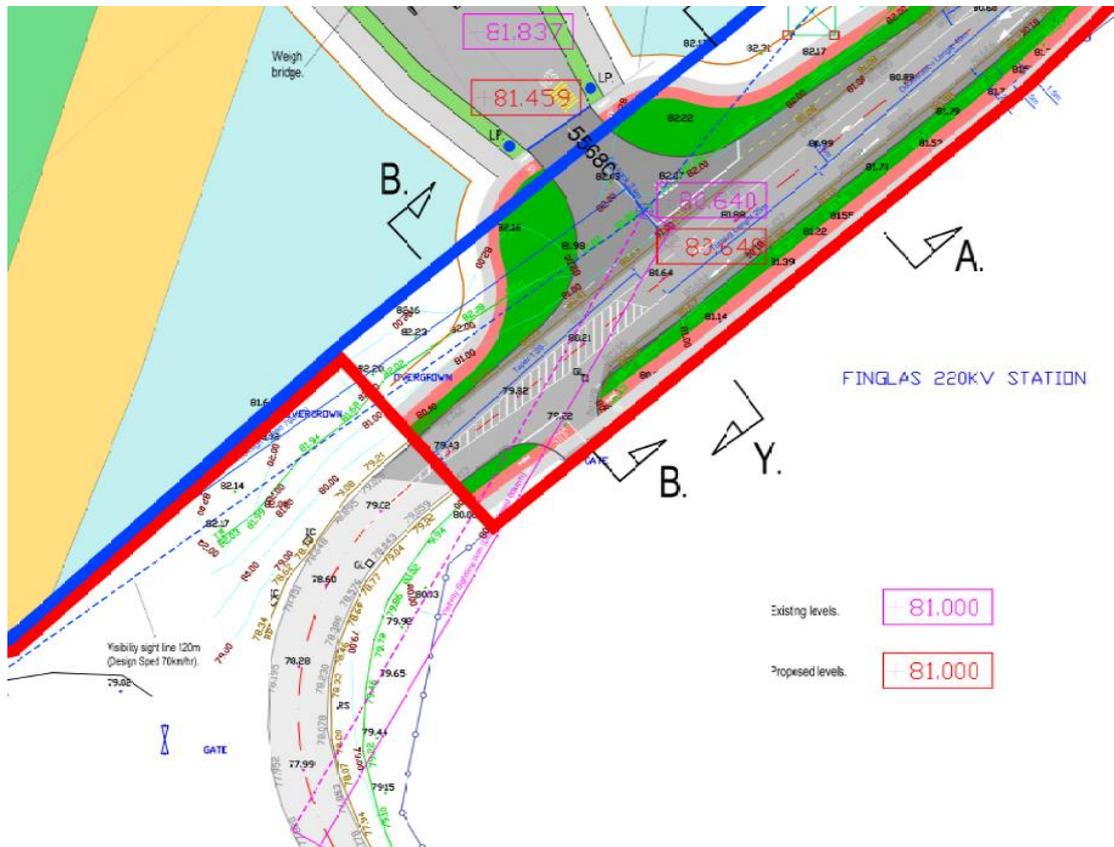


Figure 18 Extract from site layout plan with sight splay crossing over verge and ESB splay

Finally we highlight the verge on the opposite side of the road is within Fingal Co Council's control as per letter of consent included with the planning application; reproduced below for ease of reference.



Mr Ronan Woods,
Genesis Planning,
27 Patrick Street,
Newry,
Co Down/
BT35 8EB

20th June 2022

Our Ref LOC.011.2022

**Re: Letter of Consent for impending planning application for Rathdrinagh Land Company,
at Huntstown, Dublin 11.**

Dear Mr. Woods,

I confirm that the Property Services, Economic Enterprise, Tourism & Cultural Development Department of Fingal County Council consent only to the inclusion of that land in the ownership of Fingal County Council as identified hatched in orange on Drawing No. PLA-03B for the purpose of the planning application, and for no other purpose. It is the responsibility of the applicant for planning permission to ensure that the drawing supplied correctly reflect the boundaries of the land stated to be in ownership of the Council.

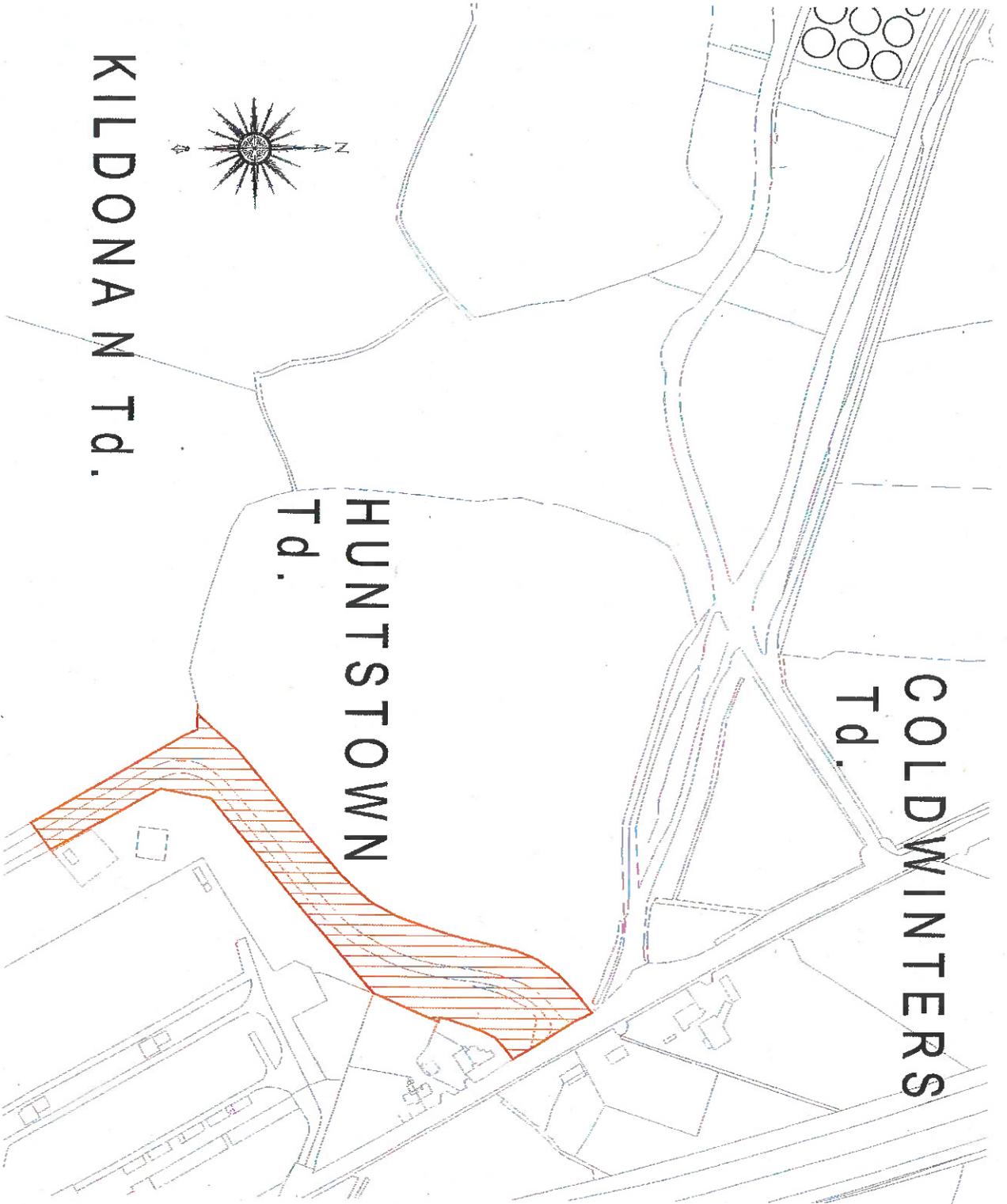
Furthermore, it should be noted the within consent does not confer any rights to Rathdrinagh Land Company in respect of the land identified and this letter shall not constitute a note or memorandum in writing for the purpose of Section 51 of the Land and Conveyancing Reform Act 2009.

In the event that planning permission is granted no works should commence without prior written agreement from the Property Services Section of Fingal County Council.

This letter is issuing on the basis of the undertaking given by the applicant of prior discussions with Council officials in relation to the land.

Yours sincerely,

John Quinlivan
Director of Services
Economic, Enterprise, Tourism
& Cultural Development Department



Site Location map. Not to scale.

O.S. Ref. Dublin 3062-D, 3063-C, 3130-B, 3131-01.

Area hatched orange measures 1.425 hectares or thereabouts.



No. 3 High Street, Monaghan Town,
Co. Monaghan. H18 X635

Tel: 047-721175

Website: www.coylecs.ie

E-mail: info@coylecs.ie

Project: Planning application to construct proposed new serviced Industrial Units and vehicular parking area, access roads and pedestrian footpaths, construct new entrance and all associated siteworks at Huntstown Td. Co. Fingal.

Client: Srelaw.

Sheet Title: Letter of consent map.

| | | | |
|---------------------------------|-----------------------------|-----------------------------|-----------------|
| Drawing Stage: Planning. | | Date: 24-05-22. | |
| Project No.: 22-039 S. | Drawing No.: PLA-03b | Scale: Not to scale. | Rev.: A. |
| Rev. A. | Date: 24-05-22. | Description: | |
| Checked: | | | |

The design particulars have been reviewed and amended in order to address the Further Information matters and to ensure compliance with relevant national policies, guidelines and local policies under the Fingal County Development Plan 2023-2029 where applicable.

The overarching project rationale will provide for environmental, business and public health needs and a waste management facility that will facilitate recycling by residential and commercial sources for the Greater Dublin Area.

The design objectives incorporated into the scheme are summarised as:

- Connect to existing road infrastructure.
- A purpose-designed recycling facility.
- Access and circulation provided within the site.
- Road connections designed to suit existing scenario and also future-proofed in terms of design for delivery of the wider Masterplan.
- Provision for current and future services.
- Compliant road design widths with connectivity to pedestrian and cyclist network.
- Active frontages and quality architectural design.
- A SUDS strategy that is appropriate for this location proximate to Dublin Airport.
- A landscape focused approach with retention and augmentation of existing hedges and creating a tree-lined avenue internally.
- A layout and use that will not adversely impact neighbouring lands.

We submit the proposed development will provide an appropriate form of high-quality business park for this zoned site.

The proposed recycling facility will create a vital and sustainable new element to the industrial profile of the area and which will be a significant economic asset to the local area in terms of economic activity and a Circular Hub.

Also in conjunction with the proposal the development has been carefully designed to integrate the new buildings to the existing industrial fabric of the surrounding area.

To conclude the development is appropriate, all matters raised under the Further Information are fully addressed and we trust the application will meet with favourable assessment by the Planning Authority.



Ronan Woods
Director

Enclosures

Planning

- Cover letter incorporating FI response
- Site notice and newspaper notice as per Article 35 of the Planning and Development Regulations
- 6 hard copies of drawings & 1no. digital copy as per Article 22(3) of the Planning and Development Regulations
- 10 hard copies of the EIAR & 1no. digital copy

Environmental

- Geophysical Survey report
- Archaeological Assessment
- Revised EIAR Non Technical Summary by O'Callaghan Moran
- Revised EIAR by O'Callaghan Moran with appendices that includes:
 - Updated Engineering Services Report (Appendix 3.1)
 - Updated RWMP (Appendix 3.2)
 - Updated CEMP (Appendix 3.3),
 - Updated Tree Survey (Appendix 11.1)
 - Green Infrastructure Plan (Appendix 11.2)
 - Landscape Management Plan (Appendix 11.3)
 - Archaeological Consultancy Services Report (Appendix 12.2)
- Revised Appropriate Assessment Screening by Dixon Brosnan

Landscape

- Landscape proposals by ParkHood (refer to Issue Sheet)

Architecture

- Architecture drawings by Hyphen Architects (refer to Issue Sheet)

Engineering

- Drainage and Watermain Engineering Report by CCS
- Drawing sheet 22-039 HCEH P013 Site Compound Plan
- Drawing sheet 22-039 HCEH Road Sections, Fencing & Weighbridge details P008 Rev A
- Drawing sheet 22-039 HCEH Site Layout Plan P001 Rev Q
- Drawing sheet 22-039 HCEH Site Sections P007 Rev A
- 2045-600 Huntstown External Lighting Layout Rev P
- Huntstown Lighting Assessment Report
- Coyle Civil & Structural Technical Note
- Flood Risk Assessment
- Traffic Wise- Technical Note