

File With _____

Appeal NO: ABP 321 465

Defer Re O/H

TO: SEO

Having considered the contents of the submission dated/ received 21/2/25
from

J. Beado I recommend to/not to circulate at this stage for the following

reason(s): no m issues

E.O.: [Signature]

Date: 25/2/25

To EO: _____

TO BE CIRCULATED Y/N

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare SC _____ - enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4 weeks - SC _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 321665

M _____

Please treat correspondence received on 21/7/25 as follows:

1. Update database with new agent for Applicant/Appellant _____	
2. Acknowledge with SC <u>20</u>	1. RETURN TO SENDER with BP _____
3. Keep copy of Board's Letter <input type="checkbox"/>	2. Keep Envelope: <input type="checkbox"/>
	3. Keep Copy of Board's letter <input type="checkbox"/>

Amendments/Comments
<u>S131 Ref x2</u>
<u>L/D 28/7</u>
<u>* To be scanned</u>

4. Attach to file (a) R/S <input type="checkbox"/> (d) Screening <input type="checkbox"/> (b) GIS Processing <input type="checkbox"/> (e) Inspectorate <input checked="" type="checkbox"/> (c) Processing <input type="checkbox"/>	RETURN TO EO <input type="checkbox"/>
--	--

	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>[Signature]</u>	AA: <u>[Signature]</u>
Date: <u>25/7/25</u>	Date: <u>28/07/25</u>

AN COIMISIÚN PLEANÁLA
LDG- _____
ACP- _____
21 JUL 2025
Fee: € _____ Type: _____
Time: 16.35 By: J.A.N.O.

23 Richmond Ave,
Fairview,
Dublin 3
19th July 2025

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Re: St. Margaret's Recycling & Transfer Centre Ltd, Sandyhills Planning Reference SU06F.321465

Dear Sirs,

I am replying to your letter of enquiry dated 30th June 2025 in relation to submission made by the Department of Housing, Local Government and Heritage and my opportunity to comment on their observations.

The Department of Housing, Local government and Heritage highlights the fact that the facility borders the R122 Road and it's intends to discharge and direct any surface water runoff from the development site via a field drain and then into a culvert that runs beneath the R122 and re-emerges 180 meters to the West to eventually outfall into the Huntstown stream which is circuit 500 m downstream from the site,

The Department is highlighting the substantial risks that are put forward by the applicants and their team that may in the long-term show the cumulative pollution effects from the discharged water via Hunstown stream and Ward rivers that lead into the special area of conservation for the Malahide estuary.

The Department also pleads with the planning authority to satisfy itself that enough safeguards would be in place during a recycling operation that are proposed to be undertaken on site and to ensure that these activities do not create any polluting materials that might adversely affect downstream biota that enter run off as a result of leakages or other accidents on site.

I have previously noted numerous accidents incidents on site that have not been reported to the authorities and were not adequately dealt with in the AA or the EIAR for the Site and the environmental submissions by the applicants are totally inadequate and not fit for purpose as noted by the Department and they're worried submission of environmental concerns.

Also, the applicants have not profiled the full extent of the recycling and processing activities on the site to warrant an informed decision by the Commission for Planning to adequately deal with cumulative risks with the environment associated with processing, shredding, cutting of scrap and the planned importation of bailed end of life vehicles from un-substantiated suppliers posing additional importation of pollutant risks to an already overburdened facility. The environmental submissions by the applicants do not deal with the planned activities on site that are particularly focused on the operations in the open areas in the rear yard close to agricultural land and where the risk of pollutants can also be dissipated on these lands by windblown dust from the operations. The applicants propose additional netting around the site to restrict the dust where possible but obviously, and this is a case of closing the stable door when the horse has bolted. These pollutant risks are caused by open area processing which means cutting, shredding, processing individual pieces and potential contaminants into smaller pieces in order to stockpile for better market opportunities at substantial risk to the local environment and biota as described by the Department of Housing Local Government and Heritage. These additional windblown risks may enter the local rivers and streams through run-off from lands outside the control of the applicants and will never be documented as an additional risk created by such outdoor processing activities.

Also, the dust migration that has already exited the yard that can charge the local grassland area and also end up in the local ditches and drainage systems.

It is quite obvious that the applications creates risk to the local environment and the traffic that shall use the R122 road for the purpose of delivering material to the site and the run off of pollutants from the vehicles that use the road network to enter the site with End of life vehicles not already depolluted with water running into the local surface water system without even considering the risks associated with additional pollutants and

1

contaminants that shall be washed out in the surface water, including engine oil, hydraulic coil, fuel additives, coolant materials, battery acids, asbestos, lead, heavy metals and other after shredder residue.

This is no ordinary recycling centre proposed, this is a heavy industrial type facility and has been built on an ad hoc basis without proper planning, have ignored the planning rules and waste permit regulations, operated without due consideration to those regulations and believes they are entitled to clemency for their actions. This facility will ultimately cause long term environmental and public health issues. The management have admitted to been unregulated and plead with the commission to allow the continuation of the operations based on information provided, but this information does not deal with the concerns of the local authorities waste enforcement departments nor those additionally highlighted by the Department of Housing, Local Government and Heritage and everything seems to be a band aid fix to all environmental risks that have been exposed during this process, rather than been considered in a complete substantive environmental report with the application.

The lack of transparency in dealing with incidents on the site like the major fires that lead to fire water breaching the surface water system in the past, which ultimately ends up in the localised drainage system for the whole ecosystem of the area. The environmental submissions do not adequately deal with the reality on site and all the concerns for the local environment. All restriction/obligations previously imposed on the applicants by the local authorities have been blatantly ignored and nothing will remedy the attitudes of the applicants required by any new permit nor planning conditions. The reality is that the site is not fit for the purposes applied for by the applicants.

Accordingly, I request that the application be refused.

Your Faithfully



J Beades PC

AN COIMISIÚN PLEANÁLA
LDG- _____
ACP- _____
21 JUL 2025
Fee: € _____ Type: _____
Time: 16 55 By: HANU

23 Richmond Ave,
Fairview,
Dublin 3
19th July 2025

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Re: St. Margaret's Recycling & Transfer Centre Ltd, Sandyhills Planning Reference SU06F.321465

Dear Sirs,

I am replying to your letter of enquiry dated 30th June 2025 in relation to submission made by the DAA and my opportunity to comment on their observations.

The proposed treatment of surface water run-off from this facility has been proven to be totally inadequate not properly designed and creates a very high risk to the local environment and potentially to the Malahide estuary via the drainage system into the Ward River and all its tributaries.

The DAA have noted that the land surrounding the premises is virtually flat land itself creates a scenario whereby contaminants can leave the site in surface water as the flows and cross flows of concrete previously poured in the scrapyards did not encompass a proper and profound drainage grease and gully system to handle the volume of surface water migrating from the site. Meaning that there was no created directional flow adequate to deal with the challenges created by the types, tonnages of the materials accepted at the yard never mind their continuous exceedances of volume of material processed at the facility. All designs submitted are for low level tons i.e. the 22,000 tons proposed by the applicants.

It seems that all commentary submitted in the observations are based on a lower tonnage as opposed to the actual tonnage that were processed at this facility unabated not authorised uncontrolled by local authorities or their departments as conceded by the applicants. There was no consideration given to the increased surfaces areas of run off from processed materials stored and stockpiled and the risks from torrential rain downpours. Also the dust migration that has already exited the yard that can damage the local grassland area and also end up in the local ditches and drainage systems

It is quite obvious that the application of the SUDS system of controlling surface water run-off not only in an area close to a major international Airport is totally unfit for purpose without even considering the risks associated with additional pollutants and contaminants that shall be washed out in the surface water, including various oils types associated with cars as well as from various metals from shredder residue.

We must also take into consideration the pollutants that arise from fires that may occur on the site and evidence is there of the previous fires and incidents that occurred on site previously these fires created their own pollutants that were released into the environment and subsequently because of the extent of the issue the local fire brigade were in attendance with fire retardant chemicals that were released into the surface water system. (Please see my observation to you dated 16th Feb 2025 on this matter)

It is obvious that surface water treatment and those plans submitted are totally and utterly inadequate for such a facility that has been un-regulated nor authorised and continues to operate without any enforcement of the statutory regulations. The Board previously highlighted that surface water and fire water treatments were not



adequate, and the use of any type of percolation system will not be adequate to de-risk the environmental impacts created by the activities applied for by the applicants

I believe that the application is totally inadequate and that the DAA comments do not cover other pollution concerns.

Accordingly, I request that the application be refused.

Your Faithfully



J Beades PC