

The Secretary
An Comisiún Pleanála
64 Marlborough Street
Dublin 1

[by email only]

27 November 2025

**Re: Prospective Strategic Infrastructure Development – Pre-application Consultation Request
Proposed Increase in Capacity and Upgrade of Plant to Commercially Robust Advanced
Thermal Technology to Facilitate a Change in Technology from Pyrolysis to Thermal
Treatment, and Ancillary Development
Derryclure Energy Centre, Derryclure, Tullamore, County Offaly (as Permitted Under An
Bord Pleanála Ref. PL19.238420)**

Dear Sir/Madam

Further to our pre-application consultation meeting on 10 October and in advance of the proposed meeting on 3 December next, this correspondence sets out the information required to facilitate the Commission in making a determination in respect of whether the proposed development constitutes SID, and whether it constitutes a renewable energy project for the purposes of the RED III Directive and the transposing Regulations.

It also provides details in respect of the matters identified on the Commission's agenda to inform the consultation. In this regard, the following document is submitted herewith providing further detail in respect of the proposed technology:

Appendix A: Energos Technical Presentation

1. Development Context

The Derryclure plant is located c. 4.5 km south of Tullamore, accessed from the N80 National Primary Road. It adjoins a licensed landfill facility and a recycling bring centre to the west.

Permission was granted by the Board in July 2011 (ABP Ref. PL19.238420) for the established waste to energy facility, described in the statutory notices as:

Directors:
Declan Brassil &
Sharon Gorman

Reg No.:
329512

'Provision of an industrial facility to accommodate an advanced pyrolysis system for the recovery of energy from biomass and waste. The approximate output will be six megawatts of renewable electricity for export to the national grid in line with Ireland's climate change strategy and five megawatts of heat. The facility will consist of an enclosed fuel recovery area, a reception and pretreatment area, pyrolysis area, engine areas, office and staff facilities, ancillary accommodation and maintenance areas all enclosed in one building. The building will have 19 metres and 30 metres high vent stacks. Externally the site will accommodate vehicle movement areas, staff and visitor carparking, oil and water storage tanks and flare stack. The site will be provided with an effluent treatment system and percolation area and all additional landscaping and associated site works. The site will be accessed via a new entrance onto the Offaly County Council road to Derryclure Landfill. This road will be upgraded along with the access to the N80 including all associated site works. A new substation and switchroom structure will be located on this access road, all at Derryclure, Tullamore, County Offaly. An Environmental Impact Statement will be submitted to the planning authority with the application. Development comprises or is for the purposes of an activity requiring an integrated pollution prevention or control licence or a waste licence.'

The stated design capacity of the permitted plant is 65,000 and Condition 4 of the Board's Order permitted a maximum intake of 75,000 tonnes per annum.

The permission was extended under OCC Ref. EX/16010 and further extended under OCC Reg. Ref. FX/21001 for a further period of two years to expire on 29 October 2023.

1.2 EPA Licensing

The Environmental Protection Agency granted an Industrial Emissions licence subject to conditions, on 16 December 2014 to Glanpower Limited, 19 High Street, Tullamore, County Offaly, Reg. No. W0282-01.

The primary category was Category 5.2: Disposal or recovery of waste in waste incineration plants or in waste co-incineration plants: (a) for non-hazardous waste with a capacity exceeding 3 tonnes per hour; Category 5.3(b): Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, and excluding activities covered by Directive 91/271/EEC: (ii) pre-treatment of waste for incineration or co-incineration;

The licence has remained active to date but is not commenced. The Licence was formally Amended by the EPA in August 2023.

The EPA satisfied itself on the basis of the information available that subject to compliance with the conditions of Licence Reg. No.WO282-01 granted on 16/12/2014 and amended on 05/03/ and any amendments noted herein, any emissions from the activity will comply with and not contravene any of the requirements of Section 83(5) j of the Environmental Protection Agency Act 1992 as amended. The Agency has applied the Commission Implementing Decision of 2019/2010 of 12 November 2019 establishing Best Available Techniques (BAT) Conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration as a reference when setting licence conditions.

The amendment was for the purpose of updating the licence to ensure compliance with the Commission Implementing Decision for waste incineration (201 9/201 O/EU). This amendment updated the licence conditions and maintains or tightens the emission limit values to ensure the operation of the installation is in line with the latest developments in best available techniques (BAT) and to achieve a high level of

protection of the environment. The proposed changes did not substantially change the nature or extent of the operations at the installation.

Glanpower Ltd have commenced the process of obtaining the required technical amendments to the existing licence to facilitate the proposed increased tonnages and technical changes to the proposed process. This process will run in parallel with the planning application process.

Derryclure Energy Limited - W0282

Industrial Emissions

[Licence Dashboard](#) [Licence Versions](#) [Compliance Records](#)

Licence Details	
Organisation	Derryclure Energy Limited
Licence Name	Derryclure Energy Limited - W0282
Licence Number	W0282
County	Offaly

Active Licence Details	
Version	W0282-01
Issued	16/12/2014
Type	Industrial Emissions
Status	Licensed
Sub-status	Not Commenced
Sector	Waste
Major Activity	11.3 (a). Disposal or recovery of waste in waste incineration plants or in waste co-incineration pla
IED Activity	5.2 (a). Disposal or recovery of waste in waste incineration plants or in waste co-incineration plan

Site Details	
Address 1	Derryclure Energy Centre
Address 2	Derryclure
Address 3	Tullamore
Town/City	Co Offaly
County	Offaly
Eircode	
NACE Code	3821
NUTS Code	IE063



1.3 The Proposed Development

The proposed development comprises the following principal elements:

- To enhance the permitted pyrolysis plant to a Commercially Robust Advanced Thermal Technology (ACT) to facilitate the processing of MSW by thermal treatment to generate electricity for export to the national grid and to facilitate a more efficient waste-to-energy solution capable of long-term commercial operation and compliance with regulatory standards.
- To increase the permitted intake of residual Municipal Solid Waste (MSW) from 75,000 to 200,000 tonnes per annum.

The following works will facilitate the proposed increase in capacity and change in process:

- New internal equipment layout and upgrade in process
- Additional external plant located externally to the south of the building to include an air cooled condensing unit, treatment tanks and residual process material collection area.
- The revision and relocation of the flue stack to include emission monitoring platform and access arrangements
- Relocation of the transformer unit and backup generator unit.
- Increase in size of the previously approved ESB substation
- Alterations to external landscaping and boundary treatments to the site layout, external yard areas, roads, hardstanding's and all associated siteworks and services

Details of the proposed works are identified on the drawings submitted with the pre-application consultation request submitted on 15 July 2025.

2. Seventh Schedule Development

The proposed development is considered to be an infrastructure development for the purposes of Sections 37A and 37B of the Planning and Development Act 2000, as amended, by reason of coming within the definition of a Class 3 project, being:

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

2.1 Detailed Description of the Proposed Process

A detailed description of the process is provided in the presentation attached at Appendix A, prepared by the technology provider.

In summary, the proposed process comprises an installation for the disposal, treatment or recovery of waste by reference to the following:

Treatment of waste: Directive 2010/75/EU – The Industrial Emission Directive (IED):

- Gasification: Thermal treatment of waste in the gasifier (ref. permit classification 5.2 (a) as per IED Annex I)
- Chapter IV / Article 42 on waste incineration with gasification belonging to processes other than oxidation.
- See also Article 3 def. (40) defining a “waste incineration plant”.

Recovery of waste: Directive 75/442/EEC Annex IIB / Directive 2008/98/EC Annex II:

- Energy recovered by combustion of the syngas in the oxidizer.
- Recovery operation R1: Use principally as a fuel or other means to generate energy; footnote (*)
 - Footnote(*): Recovery Operation R1 includes incineration facilities dedicated to the processing of municipal solid waste only.
 - R1 energy efficiency must be greater than 0.65 for installations permitted after 31 December 2008.
- Recovery Operations R4:
 - R4 / recycling of metals

Disposal of waste: Directive 75/442/EEC Annex IIA / Directive 2008/98/EC Annex I:

- Disposal operation category D10: Incineration on land

The proposed annual intake is 200,000 tonnes per annum. The proposed development proposes for an increase in intake of 125,000 tonnes per annum and therefore exceeds the threshold of 100,000 tonnes per annum specified in Class 3.

Accordingly, it is submitted that the proposed project constitutes SID as it is an installation for the disposal, treatment or recovery of waste and exceeds the threshold of a Class 3 project within the Seventh Schedule (3(a)) and would meet the tests in S.37A of the PDA, 2000, as amended.

3.2 Section 37A(2) Criteria

It is considered that the proposed development comes within the scope of paragraphs (a) and (b) of section 37A(2) of the Act for the reasons set out below.

3.2 Section 37A(2)(a)

Section 37A(2)(a) requires that:

'the development would be of strategic economic or social importance to the State or the region in which it would be situate'

EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. The waste hierarchy requires that waste is managed as a resource, that disposal is the last resort, and that Ireland becomes self-sufficient in waste management and avoids the need for landfill. This is supported and implemented by *inter alia* the recovery of energy from residual waste.

The National Waste Management Plan for a Circular Economy 2024-2030 (NWMP) that replaced the regional waste management plans, identifies a required capacity of an additional 200,000 -300,000 tonnes per annum of dedicated additional thermal recovery capacity. In this regard, Policy TP14.2 (Focus Area 14 'Recovery Infrastructure') supports *'the provision of 200,000 to 300,000 tonnes of additional dedicated thermal recovery capacity for the treatment of non-hazardous residual wastes nationally, to ensure there is adequate active thermal treatment capacity'*. The NWMP estimates the cost of this infrastructure at €200 million and that it will be delivered by the private sector.

Core Policy 12 of the NWMP (Volume II) 'Nationally and Regionally Important Infrastructure' states:

'The Plan recognises and supports the need for nationally and regionally important waste infrastructure, including infrastructure of the type, scale and proximity essential to maintain waste services and infrastructure that contributes to the ambition and policies of the Plan.'

It goes on to state that there is a waste treatment capacity deficit nationally leading to the export of 38% of MSW for thermal recovery and recycling in 2021 and that the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market. CP12 expressly identifies the need to support and protect existing and future 'nationally' and 'regionally' important waste infrastructure and move towards self-sufficiency. Such infrastructure is stated to be the type and scale deemed essential to maintain a functioning waste market within the State.

Table 4.1 under CP12 provides the criteria for what constitutes 'nationally and regionally important infrastructure', supported by Core Policy 12:

Table 3.1: NWMP Core Policy 12 – Excerpt from Table 4.1

Table 4-1: Criteria for Nationally and Regionally Important Infrastructure

Treatment	National Criteria and Threshold
Pre-Treatment Infrastructure	Pre-treatment infrastructure with a capacity greater than 100,000 tonnes per annum.
Recycling Infrastructure	Recycling infrastructure with a capacity greater than 100,000 tonnes per annum.
Recycling Infrastructure (Composting and Anaerobic Digestion)	Recycling infrastructure with a capacity greater than 50,000 tonnes per annum.
Thermal Treatment of MSW	Dedicated thermal treatment plants with a capacity greater than 100,000 tonnes per annum.
Non-hazardous Landfill	Landfills with a capacity greater than 100,000 tonnes per annum.
Soil Recovery Facilities	Soil recovery facilities with a capacity greater than 250,000 tonnes per annum.
Treatment	Regional Criteria and Threshold
Pre-Treatment Infrastructure	Pre-treatment infrastructure with a capacity greater than 50,000 tonnes per annum.
Recycling Infrastructure	Recycling infrastructure with a capacity greater than 50,000 tonnes per annum.

The proposed development will increase the design capacity of the plant from 65,000 tonnes per annum to 200,000 tonnes per annum, an increase of 135,000 tonnes per annum and a 200% increase in capacity.

Derryclure and the proposed development come within the scope of 'Pre-Treatment Infrastructure', 'Recycling Infrastructure', and 'Thermal Treatment of MSW', and exceeds the 100,000 tonnes per annum 'national' threshold. Accordingly, the proposed development is defined for the purpose of the NWMP as being of 'a national' significance.

Furthermore, Derryclure is expressly referenced in the NWMP as a key element of waste management infrastructure for the achievement of national and regional targets and objectives relating to landfill and the recycling of MSW. Table 2.1 of the NWMP references the Derryclure plant as a facility that is expected to treat 65,000 tonnes per annum:

Table 3.2: NWMP– Excerpt from Table 2.1

Table 2.1: Expected rMSW treatment capacity changes

Facility	Capacity Change
Glanpower Ltd. (W0282-01)	A 65,000 tonnes rMSW capacity pyrolysis plant in Derryclure, Co. Offaly which has planning and licensing consent but is not fully constructed (assumed capacity may be available by the middle of 2025).
Indaver Ringaskiddy (no licence reference as no application lodged)	A circa 216,000 tonnes rMSW capacity at the waste to energy plant in Ringaskiddy, Co. Cork which has yet to lodge any application for planning or licensing (capacity unlikely to be delivered in the timeframe of this Plan by 2030).

Table 5.6 of the NWMP identifies Derryclure as a proposed thermal facility with capacity for 65,000 tonnes, which together with the planned Indaver expansion at Ringaskiddy, will bring on line an additional 261,000 tonnes capacity per annum.

Table 3.3: NWMP–Table 5.6

Table 5.6: Proposed Thermal Recovery Facilities in Ireland

Facility	Location	Proposed Additional Capacity per Annum (tonnes)	Waste Type	Status
Glanpower Ltd. (W0282-01)	Derryclure, Offaly	65,000	Mixed Municipal Waste	Consents in place. Pyrolysis Plant scheduled to commence construction in 2024-2025.
Indaver Ireland Ltd.	Ringaskiddy, Cork	216,000	Residual Waste	ABP now re-evaluating the permission granted for the facility in May 2018
Total		261,000		

¹³⁵ Capacity reverted from 235,000 tonnes to 220,000 tonnes at end of 2019.

¹³⁶ Estimated waste treated at all consented cement plants combined in 2022 (equating to 64% of consented capacity in 2022).

¹³⁷ Note that this is the total SRF capacity available for coprocessing under P0030-06. A further 75,000 tonnes coprocessing capacity is available for other non-municipal waste streams including solvents, tyres, wood, plastics, etc.

The proposed development will increase the design capacity of the plant from 65,000 tonnes per annum to 200,000 tonnes per annum, a 300% increase in capacity.

In summary, the proposed development:

- Makes a significant contribution to national self-sufficiency in waste treatment within the State and reduces reliance on exports of MSW, consistent with Core Policy 12 and Focus Area 11 of the NWMP;
- Makes a significant contribution to bridging the capacity gap of 200,000 to 300,000 tonnes per annum of additional dedicated thermal recovery capacity for MSW identified in the NWMP.
- Diverts residual MSW from landfill and recovers energy from waste consistent with national policy as set out in the National Planning Framework, the Waste Framework and Landfill Directives, and the Climate Action Plan 2025.
- Provides renewable energy generation, replacing finite fossil fuels, in a manner consistent with the waste hierarchy, the RED III Directive and national policy. (Refer to sections 3 and 4, below)

Accordingly, it is submitted that the proposed development meets the requirement of section 37A(2)(a) and is development 'of strategic economic or social importance to the State or the region in which it would be situate'.

3.2 Section 37A(2)(b)

Section 37A(2)(b) requires that:

'the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate'.

3.2.1 Relevant Objectives of the NPF

The Revised National Planning Framework (2025) (NPF) guides strategic development and infrastructure

investment at national level. The NPF seeks to address environmental challenges through the pursuit of overarching aims including 'Resource Efficiency and Transition to a Climate Neutral Economy' which includes for renewable energy and managing waste through adequate capacity and systems to manage waste in an environmentally safe and sustainable manner.

The proposed development will contribute substantially to the fulfilment of following objectives of the NPF:

The implementation of the NPF relies upon policies, actions and investment to deliver 10 National Strategic Outcomes including **National Strategic Outcome 9**: 'Sustainable Management of Environmental Resources of the Framework' states that conserving and enhancing the quality of the natural and environmental resources will become more important in a crowded and competitive world as well as the capacity to create beneficial uses from products previously considered as waste, creating circular economic benefits.

Relevant National Policy Objectives include:

- **National Policy Objective 66** The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.
- **National Policy Objective 70** Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.
- **National Policy Objective 71** Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development
- **National Policy Objective 73** Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.
- **National Policy Objective 76** Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.

Section 9.2 of the NPF addresses Resource Efficiency and Transition to a Neutral Carbon Economy, and includes measures for managing waste stating that Ireland's imminent population increase is certain to *'increase pressure on waste management capacity, as consumption is still a key driver of waste generation. While the ultimate aim is to decouple, as much as possible, consumption from waste generation over time, **additional investment in waste management infrastructure, and in particular different types of waste treatment, will be required. In managing our waste needs, the NPF supports circular economy principles that minimise waste going to landfill and maximise waste as a resource. This means that prevention, preparation for reuse, recycling and recovery are prioritised in that order, over the disposal of waste***'.

3.2.2 Relevant Objectives of the RSES

The Midland and Eastern Region RSES supports the implementation of the NPF, the National Development Plan (NDP), and national economic and climate policies by providing a long-term strategic planning and economic framework for the Region. It identifies regional assets, opportunities and pressures and provides policy responses in the form of Regional Policy Objectives.

The proposed development is located within the Midlands Region that comprises the Strategic Planning Area (SPA) of Offaly, Westmeath, Longford and Laois.

The RSES requires local authorities to implement policies that achieve waste reduction, increase material re-use and recycling, and reduction in waste disposal. This can be achieved by complying with the strategic objectives, targets and goals set out in the National Waste Management Plan 2024 and the principles of a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. Waste minimisation and waste avoidance can be encouraged through the reuse of materials and using fewer resources in the production and distribution of products.

Section 10.3 addresses Energy Infrastructure and states that the diversification of energy production systems away from fossil fuels and towards green energy including wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets will require the progressive and strategic development of a different form of energy grid.

Chapter 7 Environment and Climate, includes 'Energy and Waste' a core element of the approach to reducing emissions by 40% by 2030 and support the transition to a low carbon region by 2050.

Section 10.3 of the RSES addresses the need for energy infrastructure and the need to provide a policy approach that will address an increased demand for indigenous resources and increased security of supply.

The proposed development will contribute substantially to the fulfilment of following objective of the RSES:

Regional Policy Objective RPO 10.25:

'Development plans shall identify how waste will be reduced, in line with the principles of the circular economy, facilitating the use of materials at their highest value for as long as possible and how remaining quantum of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food and shall take account of the requirements of the Eastern and Midlands Region Waste Management Plan.'

The Offaly Development Plan includes policies and objectives that implement RPO 10.25, as detailed in Section 5.3 below, and the proposed development is consistent with and contributes to the implementation of those objectives.

Accordingly, it is submitted that 'the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate', in accordance with Section 37A(2)(a) and (b) of the Act.

3. The RED III Directive

The RED III Directive was transposed into Irish legislation by way of European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. 274 of 2025) with the majority of the provisions coming into effect on 7 August 2025. Circular CEPP1/2025 issued by the Department of Housing, Local Government and Heritage (15 August 2025) states that the Directive is broad ranging and includes provisions that aim to speed up the permit granting process for renewable energy projects by providing mandatory permit granting timelines for various types of renewable energy projects, as well as provisions concerned with environmental protection Directives and how they are applied to certain renewable energy projects.

Glanpower Ltd has engaged with Mr Andy Fox of SEAI as the 'single point of contact' for all RED III applications. Mr Fox has undertaken to revert with a decision as to whether the proposed development comes within the scope of a candidate project under the Directive following discussions with the Department of Climate Energy and the Environment.

The relevant definitions under S.I. 274 of 2025 are:

'renewable energy' means energy from a renewable non-fossil source, namely wind energy, solar energy (including solar thermal and solar photovoltaic energy), geothermal energy, osmotic energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas or biogas;

'renewable energy development' means development the purpose of which is to generate renewable energy from one or more than one renewable non-fossil resource, and includes the building of renewable energy plants and any co-located energy storage, and any works necessary for the connection of such plants or storage to the grid, but does not include relevant solar energy development, small-scale solar energy equipment development and small-scale non-ground source heat pumps;

Renewable energy is effectively 'energy from a non-fossil source'. This definition aligns with all relevant European legislation and also with Relevant National and International Energy Generation legislation. Glanpower proposes to generate renewable energy from the advanced thermal treatment of MSW as collected Kerbside at the point of presentation for collection. This material contains considerably varying composition with the predominant variability emanating from geographical location as urban and rural collected MSW can vary considerably in organic content composition. Glanpower has assessed the target zone for collection and estimate that 50% of the content of the target feedstock for the facility is 'Non-Fossil' derived. Accordingly, it is extrapolated that 50% of the energy generated from the proposed facility is 'renewable energy'.

It is considered that the proposed development can be defined as a 'Renewable Energy Development' as the energy derived from the process comes from a 50% renewable non-fossil fuel source.

Accordingly, it is considered that the proposed development can be determined to be a RED III candidate project. SEAI confirmation remains pending.

4. Policy Context

This section sets out a high level overview of the principal provisions of national, regional and county level policy in addition to those set out in the preceding sections.

4.2 National Policy

The **Climate Action Plan 2025 (CAP 25)** is Ireland's national-level implementation plan for the National Energy Climate Plan (NECP), updated annually to track progress toward the NECP 2030 targets. These include a strategy to achieve 80% renewable electricity by 2030, achieved through the expansion of wind, solar, and other renewable energy sources. The CAP 25 emphasises the importance of integrating circular economy principles that includes renewable energy generation utilising MSW to assist in achieving renewable energy targets, supporting decarbonisation and diverting waste from landfill to continue to meet incremental targets under the Landfill Directive.

The proposed development diverts MSW from landfill to a higher tier of the waste hierarchy and maximises recovery of resources through the waste-to-energy process and confirms the continuation of the Whole of Government Circular Economy Strategy and the EPA's Circular Economy Programme 2021-2027. The proposed development supports CAP 25 by providing infrastructure to treat non-recyclable MSW, reducing landfill dependency, recycling materials, recovering energy, and supporting progress to a low-carbon circular economy.

The **National Development Plan 2021-2030** (NDP) sets out the Government's investment strategy for the 2021-2030 for public investment across all sectors and regions. The Plan identifies private investment as a key strategic investment priority in the transition to a circular economy and the sustainable management of environmental resources. It states:

'Investment in waste management infrastructure is critical to our environmental and economic wellbeing for a growing population and to achieving circular economy and climate objectives. Capacity will continue to be built in waste facilities, including anaerobic digestion, hazardous waste treatment, plastics processing, recycling, waste to energy, and landfill and landfill remediation, to meet future waste objectives.'

The NDP also notes that significant increase in waste infrastructure capacity will be required to process various waste streams to achieve EU legally-binding targets. The Plan prioritises a significant increase in capacity and the environmental sustainability of waste infrastructure. The proposed development supports these objectives of the Plan.

The **Circular Economy Act 2022** is supported by a wider circular policy base which establishes the framework for the national transition to a circular economy. This Plan has been prepared to support and supplement the wider policy base and includes specific targets, policies and actions to enable the waste and resource sector to meet the circularity challenge and accelerate the transition to a circular economy. The proposed development supports the objectives of the Act.

4.2 Offaly County Development Plan 2021-2027

Chapter 3 of the Plan sets out the following Strategic Aim:

'To achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable

settlement patterns and modes of transport, and by reducing the use of non-renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this.'

The Plan supports the potential economic benefit of a transition from a 'fossil fuel-based energy production through to investment in renewable energy, the promotion of the green enterprise sector and the creation of green collar jobs; all components of a local 'smart green economy'.

The proposed development supports the implementation of, and is consistent with, the following policies and objectives of the Plan:

Section 5.7.6 states:

'The Council recognises that the energy sector, both renewables and non-renewables, is currently a significant employer in the county and has potential for considerable growth over the lifetime of this plan. The Council will encourage and facilitate the development of renewable energy projects in rural areas. Please refer to the Chapter 3 Climate Action and Energy for more details.'

Section 11.5.2 states:

'The Council will support circular economy principles, prioritising prevention, reuse, recycling and recovery over the disposal of waste.' The relevant Policies are outlined below

CAEP-25 It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.

CAEP-26 It is Council policy to encourage developers of proposed large scale renewable energy projects to carry out community consultation in accordance with best practice and to commence the consultation at the commencement of project planning.

CAEP-27 It is Council policy to ensure that whenever possible, community benefits are derived from all renewable energy development in the county such as near-neighbour benefit funds and general community benefit funds, which may take the form of contributions in kind to local projects, assets and facilities such as public amenities on the renewable energy site, measures to promote energy efficiency or a local energy discount scheme. **CAEP-28** It is Council policy to co-operate if required with the Eastern and Midland Regional Assembly in identifying Strategic Energy Zones as areas suitable for larger energy generating projects, community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered.

CAEP-29 It is Council policy to support the circular economy and within that the bio-economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development, resulting in optimal socioeconomic and environmental impacts such as resource efficiency and reduction of greenhouse gas emissions.

REDP-17 It is Council policy to support the development of renewable energy in rural areas, where it is considered appropriate i.e. where it is demonstrated that such development would not result in significant environmental effects. Such development will be assessed on a case-by-case basis.

ENVP-09 It is Council policy to facilitate the provision of adequate waste recovery and disposal facilities for the county.

ENVP-10 It is Council policy to promote circular economy principles, prioritising prevention, reuse, recycling and recovery, and to sustainably manage residual waste. New developments will be expected

to take account of the provisions of the Waste Management Plan for the Region and observe those elements of it that relate to waste prevention and minimisation, waste recycling facilities, and the capacity for source segregation.

ENVP-11 It is Council policy to ensure that all waste disposal shall be undertaken in compliance with the requirements of the Environmental Protection Agency and relevant Waste Management Legislation.

ENVP-12 It is Council policy to continue to fulfil its duties under the Waste Management (certification of historic unlicensed waste disposal and recovery activity) Regulations 2008, including those in relation to the identification and registration of closed landfills.

ENVP-13 It is Council policy to require the provision of recycling infrastructure where it is considered necessary and will assess requirements for recycling facilities on a case by case basis as part of the development management process.

ENVO-05 It is an objective of the Council to implement the Eastern-Midlands Regional Waste Management Plan 2015-2021; the Council's Litter Management Plan and Waste Bye-Laws.

5. Environmental Considerations

The proposed development is within the scope of mandatory Environmental Impact Assessment under Schedule 5, Part 1, Class 10 of the Planning and Development Regulations 2001 (S.I. No. 600 of 2001), as amended.

The relative significance of environmental topics has been established, affording full regard to the original Environmental Impact Assessment submitted with the parent permission and the Board's EIA, and professional judgement informed by precedent in the waste industry. The 'ranking' is based on the potential for likely significant effects, receptor sensitivity, reversibility, and cumulative context.

Tier 1 – Key Material Issues (High Significance)

Climate, Energy and Waste Policy Alignment

- Central to the project's justification under the EIA Directive.
- Demonstrate compliance with EU and Irish decarbonisation targets (European Green Deal, RED III, Climate Action Plan 2024).
- Quantify net GHG displacement relative to landfill baseline.
- Establish contribution to Ireland's renewable energy capacity and landfill diversion obligations (< 10 % biodegradable waste by 2035).
- Cross-references Chapter 3 (Policy) and Chapter 15 (Climate).

Air Quality and Human Health

- Stack emissions and ambient air quality are the principal receptor pathway concern.
- Detailed modelling (AERMOD / ADMS) to evaluate NO₂, SO₂, PM₁₀/PM_{2.5}, metals, dioxins/furans against Directive 2008/50/EC and IED 2010/75/EU limits.
- Health risk assessment (HHRAP) to confirm concentrations at sensitive receptors.
- Cross-reference Chapter 7: Air Quality and Odour and Chapter 4: Population and Human Health.
- Odour. The potential for odour emissions is acknowledged and is therefore treated as a priority issue within the Environmental Impact Assessment Report. The assessment identifies the relevant sources, evaluates the dispersion characteristics and considers the sensitivity of nearby receptors to ensure that the associated risks are fully characterised and appropriately mitigated.

- Odour control will be managed by keeping the fuel bunker and pretreatment areas under negative pressure. This will be achieved by extracting air through the Air Pre-heater fans and using that air as combustion air for the three process lines, after it is mechanically filtered and heated to 150°C. . Any surplus air not required for combustion must be discharged from the site. The proposal is to route this excess air through the main stack using an additional dedicated duct.
- The fuel bunker will be equipped with an interlocking door system for waste deliveries. When a waste lorry arrives, the first door opens, and the vehicle reverses into the entry chamber. The first door then closes before the second door opens to allow the truck to enter the building. This sequence maintains negative pressure within the bunker and pretreatment area and helps prevent odours from escaping during deliveries.

Population and Human Health

- Address cumulative exposure to air, odour, noise, water, and traffic;
- Include socioeconomic benefits.
- Demonstrate absence of measurable health risk from emissions, supported by WHO and EPA baseline data.
- Confirm net local benefit through employment and avoidance of waste export.

Noise and Vibration

- Potential impact during operation from continuous plant sources and intermittent vehicle activity.
- Assessment to follow BS 4142:2014 + A1:2019 and EPA NG4 (2016).
- Construction phase largely complete; residual works are temporary and minor.
- Not a particularly noise-sensitive area
- Controls required to prevent perceptible tonal or intermittent emissions.

Tier 2 – Important but Manageable Issues (Moderate Significance)

Water: Surface Water, Groundwater, and Wastewater

- Surface water management via SuDS and attenuation.
 - Note: No process discharge.
- Groundwater protection through impermeable hardstanding and bunded systems.
- On-site treatment for domestic foul effluent.
- Firewater retention volume and emergency isolation valves to be confirmed.
- Consistent with the Water Framework Directive (2000/60/EC) and Offaly CDP Objective WWO07.

Landscape and Visual

- Moderate visual exposure due to 35 m stack; mitigated by landfill landform and native planting.
- Much of the construction has been undertaken
- Actual building in place rather than relying on conceptual modelling
- Within the Cutaway Boglands LCA (medium sensitivity).
- Residual impact: Slight–Minor (not significant) per GLVIA3 assessment.

Traffic and Transport

- Operational traffic ≈ 116 HGV movements/day (< 3 % of N80 flows).

- Junction capacity (RFC < 0.6); road network adequate.
- Mitigation via Traffic Management Plan and HGV Routing Plan.

Tier 3 – Lower Significance / Residual Topics

Soils, Geology and Hydrogeology

- Previously assessed; groundworks completed; no further significant excavation proposed.
- Low risk of contamination or subsidence; mitigation through standard surface water management.

Biodiversity

- Site of low ecological value; adjacent habitats consist of improved grassland and scrub.
- No designated Natura 2000 sites within impact range; Appropriate Assessment Screening indicates no likely significant effects.
- Lighting and SuDS operation to incorporate biodiversity enhancement measures.

Archaeology, Architectural and Cultural Heritage

- No recorded monuments within site; one mound (OF025001) in Derrybeg townland > 300 m distant.
- Archaeological monitoring undertaken during construction works undertaken to date
- Monitoring during any residual excavations is proposed.

Material Assets and Waste

- Grid connection
- Reuse of existing infrastructure and industrial zoning minimises land take.
- Residues (Bottoms ash, metals, etc) to licensed recovery/disposal outlets.
- Consistent with Circular Economy objectives and EPA National Waste Plan 2020–2025.

6. Consideration of Connectivity to European Sites

A detailed appraisal of the potential for the proposed project to give rise to significant effects on any European Site has been completed through the preliminary Appropriate Assessment Screening indicates that there is no direct hydrological connectivity between the site and any Natura 2000 designation. Consequently, the assessment will focus on potential pathways associated with atmospheric emissions. Dispersion modelling has been undertaken and confirms that the predicted emission levels will not give rise to likely significant effects on any qualifying interests or conservation objectives of the relevant European Sites.

The following Natura 2000 sites have been identified within the Zone of Influence of the proposed development:

- Slieve Bloom Mountains SPA
- Slieve Bloom Mountains SAC
- Clonaslee Eskers and Derry Bog SAC
- Charleville Wood SAC
- Clara Bog SAC
- Raheenmore Bog SAC

- River Barrow And River Nore SAC
- Split Hills and Long Hill Esker SAC
- Screggan Bog NHA
- Daingean Bog
- Hawkswood Bog NHA

I trust that the information provided will facilitate a productive consultation meeting and if you have any queries in the interim in the meantime please don't hesitate to revert.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Declan Brassil', with a stylized flourish at the end.

Declan Brassil

Declan Brassil & Co.

Appendix A:

Energos Technical Presentation