

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1.

15th July 2025

Pre Application Consultation Request for proposed development to be considered as Strategic Infrastructure

Name of Applicant: Glanpower Ltd, Derryclure Energy Centre, Derryclure, Tullamore, Co. Offaly.

Local Authority: Offaly County Council

Description of development:

The development will consist of the alteration of the previously approved Derryclure Energy Centre (developed pursuant to a grant of permission from Offaly County Council (Ref. 10/307) and An Bord Pleanála (Ref. PL19.238420) to provide for the acceptance of up to 200,000 tonnes per annum (TPA) of non-hazardous waste material, including:

- **Increase in Permitted Tonnage**

The proposal seeks to increase the permitted waste intake to 200,000 tonnes per annum. This increase aligns with the strategic capacity targets set out in TP14.2 of the Regional Waste Management Plan, which supports the development of sustainable thermal treatment capacity for municipal solid waste. The increased tonnage is consistent with regional and national waste policy objectives, aiming to reduce landfill dependency and support recovery through energy generation.

- **Upgrade to a Commercially Robust Advanced Conversion Technology (ACT)**

The second aspect involves upgrading the plant's existing (or previously planned) process to a more commercially viable and operationally proven Advanced Conversion Technology. The proposed upgrade will allow the facility to accept municipal solid waste and process it to generate electricity for export to the national grid. The upgraded system is designed to meet the requirements for licensing under the EPA IE Licence. This change reflects a shift to a more modern and efficient waste-to-energy solution, capable of long-term commercial operation and compliance with regulatory standards.

The works will include the following

- New internal equipment layout and upgrade in process
- Additional external plant to yard at 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

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- Relocation of 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

Dear Sir/Madam

On behalf of our clients Glanpower Ltd, we wish to request a meeting with the Board for the purpose of receiving an opinion as to whether it is appropriate that an application for permission/approval be submitted for the proposed development on the basis that it is considered to be Strategic Infrastructure Development as outlined in Schedule 7 of the Planning and Development Act 2000.

These provisions are set out in section 37CC and 182F of the 2000 Act.

Qualifying developments are listed in the Seventh Schedule contained in section 37A of the Planning & Development Act 2000 as amended.

Subsection 3- Environmental Infrastructure states that
a waste disposal installation for

(a) the incineration, or

(b) the chemical treatment (within the meaning of Annex IIA to Council Directive 75/442/EEC under heading D9), of non-hazardous waste with a capacity for an annual intake greater than 100,000 tonnes.

The proposed development will have a capacity of 200,000 tonnes which is in excess of the threshold set out in the 7th Schedule.

Development Summary

The development is to be located at Derryclure, Tullamore Co. Offaly. The applicants received planning from An Bord Pleanála under planning reference PL19.238420) This development was for

Development at Derryclure, Co Offaly for Glanpower Ltd. The application relates to a development which comprises or is for the purposes of an activity requiring an integrated pollution prevention or control licence or a waste licence. The development will be an industrial facility to accommodate an advanced pyrolysis system for the recovery of energy from biomass and waste. The approximate output will be 6 megawatts of renewable electricity for export to the national grid in line with Ireland's climate change strategy and 5 megawatts of heat. The facility will consist of an enclosed fuel recovery area, a reception and pre-treatment area, pyrolysis area, engine areas, office and staff facilities, ancillary accommodation and maintenance areas all enclosed in one building. The building will have 19m and 30m 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 on to 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.

The development was constructed by October 2023. The applicant is now seeking approval for two separate changes:

- **Technology Upgrade** The first proposed change is to upgrade the previously approved waste treatment process to a more advanced and efficient technology. This change aims to improve overall performance, reduce emissions, and support more reliable long-term operation.
- **Increase in Waste Capacity** Separately, the applicant is seeking to increase the facility's annual waste intake from the currently approved 75,000 tonnes to 200,000 tonnes. This increase is intended to align with regional waste management targets and make more efficient use of the facility's infrastructure.



Figure 1- Photo of front facade as completed

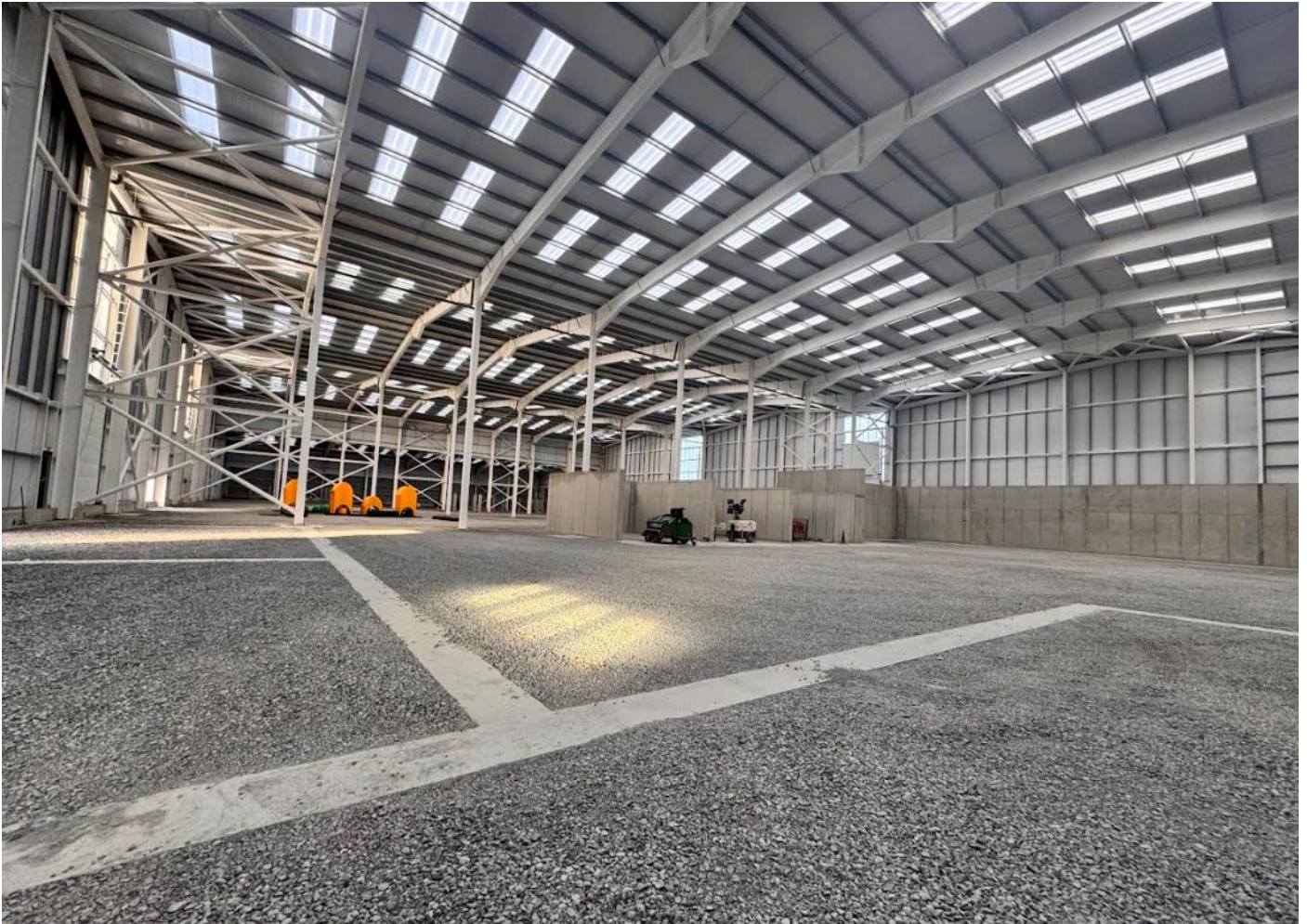


Figure 2 Internal Photo of facility

Additionally, the following supplementary works have been completed alongside the completion of the building:

- Installation of a 3.6km grid connection from the facility to the ESB substation at Clonminch, Tullamore, Co. Offaly
- Agreement with TII and Offaly County Council to complete the road alterations in line with the TII standards.



The new development will include the following alterations to the previously approved development.

- New internal equipment layout and upgrade in process
- Additional external plant to yard at 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
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Draft drawings of the proposed development have been attached to this letter for information purposes. These include the following drawings

- Site location Map
- Site Plan and Site layout
- Ground floor plan
- Main Building elevations
- Sections.

Planning & Policy Context

The planning and policy context for Waste-to-Energy (WtE) developments from thermal treatment is governed by a multi-tiered framework that integrates **European Union directives, national legislation, regional waste management plans, and local development plans**. This development will have to have regard to and be consistent with the planning hierarchy.

1. European Union Level (Supranational Policy Context)

Ireland's approach to waste and energy planning is strongly influenced by EU directives and policies, including:

- **EU Waste Framework Directive (2008/98/EC)**
Introduces the waste hierarchy:
Prevention → Preparation for reuse → Recycling → Other recovery (e.g., energy recovery) → Disposal.
WtE falls under "other recovery".
- **Landfill Directive (1999/31/EC)**
Encourages diversion of biodegradable waste from landfills, incentivising alternative treatments like thermal recovery.
- **Renewable Energy Directive (EU 2018/2001)**
Recognises energy from biodegradable waste as partially renewable, supporting WtE's role in renewable energy targets.

2. National Policy and Legislative Framework (Ireland)

- **Waste Management Act 1996 (as amended)**
Provides the legislative basis for waste policy and planning in Ireland.
- **National Waste Policy: "A Waste Action Plan for a Circular Economy" (2024-2030)**
 - Encourages a circular economy, emphasising waste prevention, recycling, and reuse.
 - Acknowledges a limited role for thermal treatment for residual waste after all other options are exhausted.
 - Supports energy recovery only for non-recyclable residual waste.
- **National Planning Framework (NPF) – Project Ireland 2040**
 - Sets spatial strategy for Ireland.
 - Promotes sustainable infrastructure, including waste management facilities aligned with climate goals.
- **Climate Action Plan (CAP) 2024**
 - Promotes decarbonisation of energy and waste sectors.
 - Encourages waste reduction, sustainable energy, and reduced reliance on landfill or incineration.

3. Regional Level – Regional Waste Management Plans (Three Regions)

Ireland is divided into three regional waste management planning areas:

1. **Eastern-Midlands**
2. **Southern**
3. **Connacht-Ulster**



Figure 3 - National Waste Regions

The proposed development is located within the **Eastern-Midlands Regional Waste Management Plan**, setting the strategic waste policy at the regional level, including:

- Capacity assessments for waste infrastructure.
- Location criteria and siting guidance for new waste facilities.
- Emphasis on self-sufficiency and proximity principle, waste should be managed as close as possible to its source.
- Prioritisation of recycling over incineration, but acknowledgment of the need for thermal treatment for residual waste.

4. Local Level – Offaly County Development Plan 2021-2027

Local authorities regulate specific developments through:

- **Development Plans (reviewed every 6 years – currently under review)**
 - The proposed development is consistent with the zoning and land-use policies set out in the Offaly County Development plan.
 - The site has been Identified as a suitable location for waste infrastructure.
 - The proposed development is consistent with regional and national policy.
- **Planning Application Process under the Planning and Development Act 2000 (as amended)**
Depending on project scale:
 - Large-scale WtE projects may be considered Strategic Infrastructure Development (SID) handled directly by An Coimisiún Pleanála (ACP).
 - Requires Environmental Impact Assessment Report (EIAR) and Industrial Emissions Licence from the EPA.

Other Considerations

- **EPA Licensing:**
Any thermal treatment facility must be licensed by the Environmental Protection Agency (EPA) under the Industrial Emissions Directive. Glanpower secured a license for the original development and have been in regular consultation with the EPA. They will be engaging with the EPA as part of the SID consultation process.
- **Public Consultation:**
The proposed development will require a Mandatory EIAR to be prepared for the proposed development. Should An Coimisiún Pleanála agree that the proposed development is an SID the applicant will request a scoping process and will engage with prescribed bodies as well as the public.

Technology Description

The previously approved technology was referred to as PGE pyrolysis. It is proposed to replace this technology with the Energos Advanced Conversion Technology. The following is a summary of the differences between the two technologies.

PGE vs. Energos ACT

Despite differences in terminology and system layout, the PGE pyrolysis process and the Energos Advanced Conversion Technology (ACT) process are structurally and functionally very similar. Both convert municipal solid waste (MSW) into energy using thermal treatment, followed by gas cleaning, energy recovery, and emissions control.

The Energos ACT system is a more efficient system to convert the higher volume of material whilst producing a lower level of emission per tonne of material processed.

This is a key reason for the change in technology to ensure that whilst we increase capacity, we are managing emissions in the most sustainable way possible to reduce the level of emission per tonne.

The process still involves using a primary chamber with restricted oxygen where the material undergoes drying, pyrolysis, cracking and partial oxidation to form a syngas. This syngas is then combusted in a secondary chamber to generate steam. This steam drives a steam turbine to generate electricity.

The Air-cooled condensing unit that is proposed to be added to the rear of the building is used to condense the exhaust steam from the turbine and the heat is recovered to be reused within the building or can be used for district heating.

The proposed process meets Industrial Emissions Directive (IED) and BAT 2019; syngas oxidized at $>850^{\circ}\text{C}$ for >2 seconds.

The operation of the facility will be subject to EPA licence and is Continuous Emissions Monitoring System (CEMS) compliant with EU Directive 2010/75/EU.

Overview

- Two-stage thermal treatment: one to break down waste, the other to extract energy.
- Closed-loop energy recovery with steam, HRSGs, and condensers.
- Flue gas cleaning using lime-based scrubbing (with lime silos) vs ceramic filters, filtration, and emissions control.
- Odour control using negative pressure and sealed delivery systems.
- Automation and safety systems for stable, compliant operation.

The Energos ACT has a proven track record, with multiple plants successfully operating across Europe.

Conclusion

The proposed development is to upgrade the technology to be used at the Derryclure Energy Centre in Tullamore to reduce emissions per tonne and increase the capacity of the facility to take account of the region's growing demands.

The development proposal is consistent with the policies and objectives of the National planning Hierarchy and the National and Regional Waste Strategies.

We believe that the proposed development meets the threshold for Strategic Infrastructure Development as set out in Section 37C and the 7th Schedule of the Planning and Development Act 2000.

We request a pre-application meet with An Bord Pleanála to discuss the proposal and to get a determination from the Bord regarding SID Status.

We thank you for your consideration of the information supplied and we look forward to meeting you to discuss the proposal in more detail.

Yours sincerely,



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