

# EIAR FOR THE DEVELOPMENT OF A HEALTHCARE WASTE MANAGEMENT FACILITY AT BLARNEY BUSINESS PARK

**Volume 2- Main Body of the EIAR Chapter 6 – Scoping and Consultation** 

#### **Prepared for:**

**SRCL Ireland Ltd (T/A Stericycle)** 



We protect what matters.

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#### 6. SCOPING AND CONSULTATION

#### 6.1 Introduction

This chapter describes the consultation process and Environmental Impact Assessment Report (EIAR) scoping that was undertaken to identify potential impacts associated with the proposed development to be considered in the EIAR.

It presents the issues that arose through the consultation process and how these issues were addressed in the preparation of the EIAR.

#### 6.2 Statement of Authority

This chapter of the EIAR was prepared by Emma De Klerk and Richard Deeney.

Emma De Klerk is an Environmental Scientist with FT. Emma holds a BSc (Hons) in Environmental Sciences from University College Cork where she achieved First Class Honours. Emma has been involved in a variety of diverse and challenging projects covering key aspects of environmental assessment, amenity development, and monitoring. She has been responsible for the research, data collation, validation, and analysis for a multitude of projects, including desk-based studies, research, as well as the development of associated environmental assessment and monitoring reports.

Richard was the primary author of this chapter. Richard is Principal Environmental Scientist who works in the Circular Economy and Environment group at Fehily Timoney at FT. He has ca. 13 years of experience. He is vastly experienced in the coordination and completion of planning applications; EIA, including EIA Screening, EIA Scoping and the production of Environmental Impact Assessment Reports (EIARs); Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) of plans and programmes; IE/IPC/Waste Licensing and Compliance; and Sustainability and Climate Action consultancy. He leads an Environmental Science team that delivers projects in these areas. He is an expert project manager who has led and successfully delivered a wide range of strategic and complex projects. He has expertise in assessing the effects of plans and projects on a wide breadth of environmental topics. Richard has a substantial amount of experience completing EIA Scoping and coordinating stakeholder consultation, including public consultation events during the planning process.

#### 6.3 Scoping and Consultation

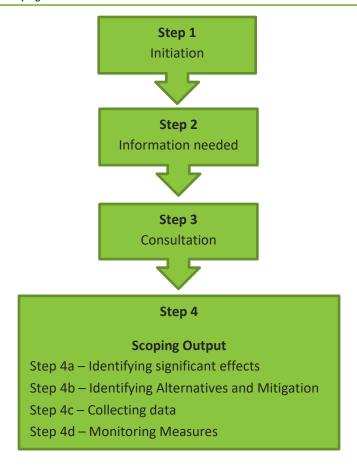
The purpose of the EIA scoping process is to identify the key points and issues which are likely to be important during the environmental impact assessment (EIA) and to eliminate those that are not. The scoping process identifies sources or causes of potential environmental effects, the pathways by which the effects can happen, and the sensitive receptors, which are likely to be affected. It defines the appropriate level of detail for the information to be provided in the EIAR. The primary focus of scoping is to define the most appropriate assessment of significant effects related to the proposed intensification.

#### 6.3.1 Consultation and Scoping Methodology

An informal or voluntary scoping exercise was carried out, which established the terms of reference for the EIA and identified the concerns and issues that warranted attention during the assessment phases. This process was carried out considering the four-stage process recommended in the European Commission guidance entitled 'Environmental Impact Assessment of Projects - Guidance on Scoping' (EC, 2017) as follows:

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The Guidelines on the Information to be Contained in Environmental Impacts Assessment Reports, Environmental Protection Agency (2022) advise that scoping should be an ongoing and iterative process, and assessors should 'maintain a flexible view of the scope throughout the work on the EIAR, particularly during the earlier stages.'

Using the (EC) (2017) methodology, while maintaining a 'flexible view' of the scope of the EIAR, the following tasks were undertaken during the scoping exercise:

- 1. FT conducted a preliminary appraisal of planning and environmental considerations relevant to the proposed development. This involved the following:
  - A review of EIARs carried out for similar waste management development, or for development situated in the vicinity of the proposed development site.
  - An examination of publicly available baseline environmental data and information relating to the development site and its environs.
  - A walkover of a similar facility operated by the Applicant at Beech Road, Dublin.
  - A walkover survey of the development site and the wider area surrounding the site.
  - An evaluation of reasonable alternatives associated with the proposed development, having regard to environmental criteria and considerations.
  - An examination of historic planning application files pertaining to the development site and surrounding sites.
  - A review of historic environmental monitoring data for similar facilities operated by the Applicant.
  - A review of the Cork City Development Plan 2022 2028, planning policy for the area and the Strategic Environmental Assessment and Appropriate Assessment produced for this Plan.

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- 2. In April 2025, a stakeholder consultation document, which set out a description of the proposed development and the proposed scope of the EIAR, was issued to relevant consultees. This document requested scoping input from consultees. The scoping opinions from such bodies were taken into consideration when completing this EIAR.
- 3. In June 2025, a Virtual Public Consultation (VPC) was carried out to allow members of the public to develop an understanding of the proposed development and planning and environmental aspects associated with the development. The public were provided with an opportunity to submit their views on planning and environmental matters relating to the proposed development.
- 4. Between late 2024 to mid-2025 Pre-Application Consultations was undertaken with Cork City Council, An Coimisiún Pleanála and the EPA to scope the planning and environmental matters and topics to be addressed in the planning application and EIAR.

#### 6.3.2 Stakeholder Consultation

A consultation letter was sent out to 44 no. recipients on 25<sup>th</sup> April 2025. The recipients included relevant statutory consultees (as defined under planning legislation, non-governmental organisations (NGOs) and key stakeholders with an interest in planning and environmental matters.

A copy of the consultation letter is included in Appendix 6.1 - Stakeholder Consultation Letter, in Volume 3 of this EIAR. Stakeholders consulted are identified in Table 6-1.

Table 6-1: Stakeholders Consulted

Stake	holder
An Taisce	Irish Wildlife Trust
Bat Conservation Ireland	Landscape Alliance Ireland
Birdwatch Ireland	Local Authority Waters Programme
Climate Change Advisory Council	National Transport Authority (NTA)
Commission for Regulation of Utilities (CRU)	NPWS Development Applications Unit
Cork City Council Biodiversity Officer (Planning)	Office of Public Works
Cork City Council Biodiversity Officer (Parks)	Office of the Planning Regulator
Cork City Council Climate Action Officer	Southern Regional Assembly
Cork City Council Environment Archaeologist	Southern Waste Region
Cork City Council Environmental Department	Sustainable Energy Authority of Ireland (SEAI)
Cork City Council Heritage Officer	Teagasc
Cork City Council Planning	The Arts Council
Eirgrid	The Department of Agriculture, Food and the Marine (DAFM)
Environmental Protection Agency	The Department of Enterprise, Trade and Employment (DETE)
ESB Network Services Bureau	The Department of Housing, Local Government and Heritage

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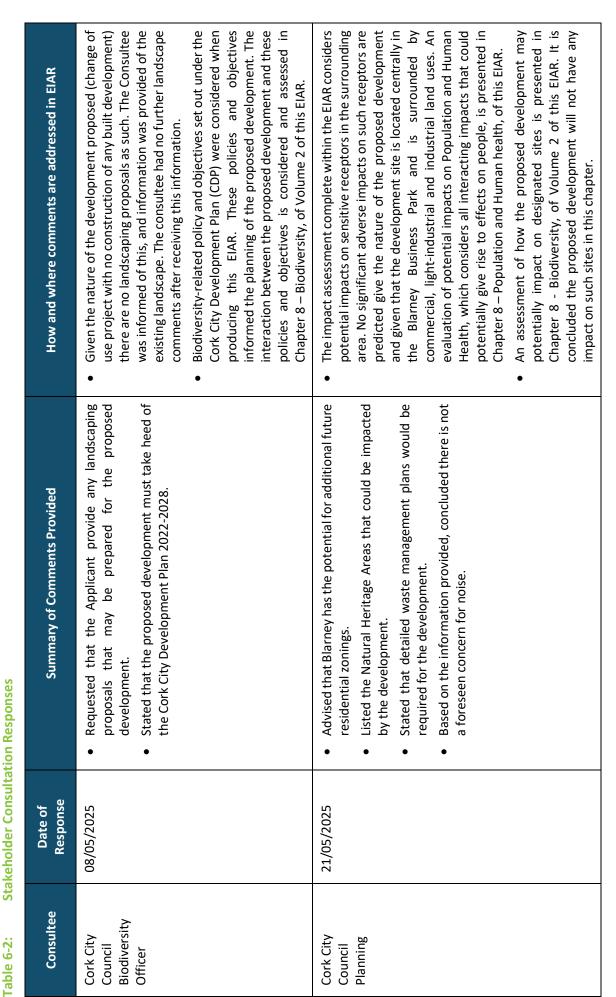


Stake	holder
Fáilte Ireland	The Department of Rural and Community Development (now referred to as Department of Rural and Community Development and the Gaeltacht)
Gas Networks Ireland	The Department of the Environment, Climate and Communications (DECC) (Now referred to as Department of Climate, Energy and the Environment).
Geological Survey of Ireland	The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (now referred to as Department of Culture, Communications and Sport).
Health Service Executive	The Department of Transport
Heritage Council	The Health and Safety Authority
Inland Fisheries Ireland	Transport Infrastructure Ireland (TII)
Irish Sports Council	Uisce Éireann

In total, 5 no. scoping responses were received (not including summary acknowledgements). Copies of all responses received are included in Appendix 6.2 - Stakeholder Consultation Responses in Volume 3 of this EIAR. A summary of the key issues raised and a note on how and where that issue is addressed in the EIAR is provided in Table 6-2. The responses received were fully considered and where appropriate, the topics raised were assessed within the EIAR.



EIAR for a Healthcare Waste Management Facility Chapter 6 - Scoping and Consultation Stakeholder Consultation Responses





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Consultee	Date of Response	Summary of Comments Provided	How and where comments are addressed in EIAR
			<ul> <li>A detailed Resource and Waste Management Plan (RWMP) has been developed for the construction phase of this development.</li> <li>A breakdown the proposed waste management activities that will be undertaken on-site during the operational phase is provided in Chapter 4 – Description of Existing and Proposed Development, of Volume 2 of the EIAR, including the type and quantity of waste to be accepted on-site, the type of processing plan to be installed on-site and associated waste handling, storage, processing and transfer activities.</li> </ul>
ESB Network Services Bureau	21/05/2025	Provided general guidance on the ESB connection process.	• An electricity supply system has been installed at the proposed development site. This system is connected – via underground connection - to the underground electricity mains serving the business park. An ESB substation and switch room building is situated adjacent to the 7 m access roadway to the south of building. This existing connection is suitably sized for the proposed development. No new connections will be developed on-site, and the existing connection will not be increased in size. There will therefore be no requirement to prepare any connection application to the ESB.





Consultee	Date of Response	Summary of Comments Provided	How and where comments are addressed in EIAR
Gas Networks Ireland	28/04/2025	<ul> <li>Stated that Gas Networks Ireland has Distribution Gas Network with the site area. Included an attachment of a current gas networks work map for the site area and communicated that a current map must be on site at all times while work is underway.</li> <li>Stated that supervision by Gas Networks Ireland on site is not required for digging but it was impressed that safe digging practices must be followed in compliance with the Health and Safety Authority 'Code of Practice for Avoiding Danger from Underground Services'.</li> <li>They stated that service pipes feeding individual properties are not generally shown on the map and their presence must be anticipated.</li> <li>The Gas Networks Ireland safety booklet 'Safety advice for working in the vicinity of natural gas pipelines' was attached to the response.</li> </ul>	<ul> <li>The proposed development has been designed to 'tie in' with the existing gas network at and surrounding the development site.</li> <li>The site already has a pre-existing gas connection (via underground connection) which will be used by the proposed development. This connection is suitably sized for the proposed development. No new connections will be developed on-site, and the existing connection will not be increased in size. There will therefore be no requirement to prepare any connection application to Gas Networks Ireland.</li> <li>The proposed development does not involve the carrying out of any ground works or excavation activities. There will be no risk of coming into contact with the underground gas network during the construction or operational phases of the proposed development.</li> </ul>
Inland Fisheries Ireland	30/04/2025	<ul> <li>Commented that the development proposes the disposal of septic/trade effluent to a public sewer. Requested that Irish water confirms there is sufficient capacity such that the disposal from the site will not result in an organic or hydraulic overload of existing waste treatment facilities or result in polluting matter entering waters.</li> <li>Stated that any works with the potential to interfere with watercourses or their surrounding banks should not be commenced without approval from IFI and must be cognisant of IFI 'Guidelines on protection of fisheries during construction works in and adjacent to waters'.</li> </ul>	<ul> <li>A characterisation of wastewater discharges from the proposed development is presented in Chapter 10 – Hydrology and Surface Water, of Volume 2 of the EIAR. Consent for the wastewater discharges from the facility will be obtained from Uisce Eireann through the EPA Industrial Emissions licence application process in accordance with Section 99E of the EPA Act (as amended). The Uisce Eireann Wastewater Treatment Capacity Register indicates that the Blarney Wastewater Treatment Plant (EPA Licence Reference: D0043) currently has spare capacity available.</li> <li>The proposed development does not involve any in-stream or near stream works.</li> </ul>

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#### 6.3.3 Virtual Public Consultation

The Applicant held a Virtual Public Consultation (VPC) event to provide the wider community with an understanding of what the proposed development will involve, and to provide members of the public with an opportunity to submit their views on the proposed development.

Advance notice of the event was published in the Evening Echo on the 12<sup>th</sup> of June 2025, and in the Southern Star on the 14<sup>th</sup> of June 2025. Copies of these notices are available in Appendix 6.3 VPC Newspaper Notices in Volume 3 of this EIAR. Both newspapers serve the local area in which the development site is located.

The VPC event was held online between the 12<sup>th</sup> of June and 10<sup>th</sup> of July 2025. A virtual exhibition display was presented in an online consultation room. The exhibition display included content on the following topics:

- 1. Welcome
- 2. About Stericycle
- 3. The Proposed development
- 4. Site Location Map
- 5. Benefits of the Proposed Development
- 6. Environmental Assessments
- 7. Photos of Comparable Site
- 8. Stakeholder Engagement and Contact.

The exhibition display included several virtual 'pull up banners' and 'easels.' Through these displays, those who entered the room were introduced to the proposed development; and were provided information on all elements of the proposed development, including the location of the proposed development, and the layout of the proposed development site. An overview of benefits associated with the proposed development was provided. An overview of the environmental assessment process that was being undertaken in support of the planning application, and detail on how environmental aspects of the proposed development would be managed, was then presented. Finally, members of the public were invited to submit their views on the proposed development and were provided detail on how to make submissions and the deadline for doing so. Still images of the event exhibition displays and content are provided in Appendix 6.4 VPC Exhibition Display in Volume 3 of this EIAR.

In total, 7 visitors entered the VPC even room over the course of the event. All attendees, but one, visited the room during the early stages of the event, with no new attendees visiting the site after the 1<sup>st</sup> of July 2025. Attendees spent 2 minutes on average viewing the event room. The 'Site Location Map', 'Environmental Assessment', and 'Welcome' banners were the most viewed part of the room.

These visitor numbers were considered by the provider hosting the event to be low relative to similar events held for development projects which constitute Strategic Infrastructure Development (SID). The applicant received no submissions on the proposed development during or after the hosting of the event.

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#### 6.4 Pre-application Consultation with Statutory Authorities

#### 6.4.1 <u>Pre-application Consultation with An Coimisiún Pleanála (formally An Bord Pleanála)</u>

A Strategic Infrastructure Development (SID) pre-application consultation meeting took place with An Coimisiún Pleanála (ACP) on 27<sup>th</sup> March 2025. Various aspects of the proposed development were discussed with ACP representatives at this meeting. A summary of their comments during this meeting and how these matters were addressed in this EIAR is provided in Table 6-3.

Table 6-3: ACP Comments

Summary of Comments Provided	How these comments are addressed in EIAR
ACP state that their preliminary view was that proposed development likely constitutes SID, but this decision will ultimately be made by the board.	This was noted. It was eventually determined that the proposed development is SID. This determination was references when considering the need for the proposed development in Chapter 2 – Need for the Proposed Development, of Volume 2 of the EIAR.
Inquired as to whether pre-application consultation with the EPA would be undertaken.	This was noted. Pre-application consultation with the EPA was undertaken. This consultation informed the production of the EIAR.
Inquired as to whether the proposed facility would be of a similar nature to the Applicant's waste facilities in Dublin.	This query was addressed during the meeting. It was noted that proposed facility would be broadly similar to the Applicant's existing waste facility situated at Beech Road Dublin (i.e. a treatment and transfer facility), but would be far more spacious and accommodating for traffic and waste storage/processing. In addition, the air emission abatement system proposed for the treatment process at this facility will be updated technology and will be contained internally in the building. A description of the proposed development is provided in Chapter 4 – Description of Existing and Proposed Development, of Volume 2 of the EIAR.
With regards to the principal use of the site, the application must comply with the zoning for the site and must consult with Cork City Council with respect of this matter.	Two pre- application consultation meetings were undertaken with Cork City Council (See Section 6.4.3) where the zoning relevant to this site was discussed.
	An assessment of compliance with the zoning objective (and planning policy generally) for the site is presented in Chapter 5 – Planning and Policy Context, of Volume 2 of this EIAR. In short, it is demonstrated in this chapter that the proposed facility complies with site zoning given 1) the design and contained nature of the facility, 2) that all waste activities will be carried out inside the building on-site, and 4) environmental assessment demonstrates that the proposed facility will not have any significant impact, or cause nuisance to, adjacent receptors in the business park.

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Summary of Comments Provided	How these comments are addressed in EIAR
As the Applicant does not intent to seek an EIA scoping review with the Board, it was advised that a full EIAR be submitted. This EIAR should be a full assessment, including topics such as air, transportation, noise, biodiversity, land, soil, surface water, landscaping visual, archaeology, cultural heritage etc.	A comprehensive EIAR has been produced for the proposed development. Certain EIA topics could have been 'scoped out' of the assessment given the development site location and given the proposed development does not involve any land-take, construction of new buildings etc. (e.g., Landscape and Visual Impact Assessment, Heritage etc.). These topics were considered and assessed within the EIA on the back of these comments however for completeness.
It was advised that any feedback received from interested stakeholders be considered in the EIAR.	All feedback received from consultees engaged during the EIA Scoping process was considered during the preparation of the EIAR.
ACP inquired as to the nature of emissions that may arise at the facility and whether these would be regularised under an EPA licence.	An assessment of emissions (actual/potential) from the proposed facility was undertaken in various EIAR chapters (e.g. noise, air, water emissions etc.). It has been concluded that the proposed facility will not give rise to emissions of significance, which may result in significant adverse effects or nuisance on environmental receptors, including receptors directly adjacent to the site.

#### 6.4.2 <u>Pre-application Consultation with the EPA</u>

The proposed facility will be required to operate under an Industrial Emissions (IE) licence from the Environmental Protection Agency (EPA). Considering this, a pre-application consultation regarding operation of the proposed facility was carried out with the EPA on the 08<sup>th</sup> May 2025.

FT gave a presentation during this meeting which described the objectives of the meeting, the project background, the proposed development, the development site location and context, and proposed environmental management measures that will be implemented at the proposed facility. A concept site layout plan was also presented during this presentation.

The EPA proceeded to provide detail to the Applicant on the following:

- The IE licence application process generally.
- IE Licence application guidance documents to assist with this process.
- The need for the proposed facility to be designed and operated in accordance with Best Available Techniques for waste facilities, as defined in the following documents:
  - o European Commission Best Available Techniques (BAT) Reference Document for Waste Treatment (BREF Document), 2018.
  - Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council, 2018.
- The need to ensure that all modelling that informs the EIAR is shared with the EPA when making the IE Licence Application process.

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• An overview of the integrated wastewater discharge consenting process with Uisce Éireann within the IE Licence Application under Section 99E of the EPA Act (as amended).

#### 6.4.3 <u>Pre-application Consultation with Cork City Council</u>

The Applicant carried out two pre-application consultations with the Cork City Council on the 21<sup>st</sup> of November and the 10<sup>th</sup> of December 2024. The main output to come out of both meetings is that given the high-end nature of the Blarney Business Park, it is vital that the EIAR demonstrates that the proposed development is in accordance with the light industry zoning objective for the area and relevant policies/objectives of the Cork City Development Plan 2022-2028, and will not detract from the quality of the Business Park or negatively impact on existing businesses. The Council stated they are supportive of the application in principle but advised that the following should be addressed in the EIAR:

**Table 6-4:** Cork City Council Comments

Summary of Comments Provided	How these comments are addressed in EIAR
A robust planning rationale for the proposed development must be provided.  Clear and robust compliance with planning policy must be demonstrated.	An assessment of the planning and policy context is provided in Chapter 5 – Planning and Policy Context, of Volume 2 of this EIAR. It is clearly demonstrated that the proposed development accords with, supports and promotes all relevant policy, including local, regional and national planning policy, waste and circular economyrelated policy and climate action policy.
Impact on future development must be considered.	The proposed development will not generate adverse effects on off-site environmental receptors or land use (existing or proposed), and will not have impact, alone, or cumulatively with other plans and projects, on the Blarney East/Ringwood or the Stoneview areas, which are being considered for future development. This has been demonstrated in the chapters of the EIAR (e.g. for Population and Human Health, Soils, Geology and Hydrogeology, Hydrology and Surface Water Quality, Air Quality, Noise and Vibration, Traffic and Transport, Landscape and Visual Impact, Material Assets etc.).  It should be noted that the proposed development will be operated in accordance with an Industrial Emissions Licence enforced by the EPA. This licence will prescribed conditions relating to emission prevention, control and monitoring.
The needs and justifications for the development must be demonstrated.	The need for the proposed development has been clearly demonstrated in Chapter 2 – Need for the Proposed Development, of Volume 2 of the EIAR.

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Summary of Comments Provided	How these comments are addressed in EIAR
The environmental assessment needs to clearly demonstrate that there will be no significant adverse effects on the surrounding environmental receptors and land uses.	All technical EIAR chapters (e.g., the Noise, Air Quality chapters etc.) demonstrate clearly the proposed facility will not result in any significant adverse effects on, or result in nuisance to, off-site environmental receptors, including receptors directly adjacent to the development site.
The fact that there is no general or heavy industry zoning in Cork City should be mentioned as this is pertinent information in the context of the proposed development.	This was noted in Section 1.5.3.1 of Chapter 5 – Planning and Policy Context, of Volume 2 of the EIAR, and supported the conclusion that the proposed development is suitable for an area zoned for light industry.
A non-technical breakdown of the waste inputs and outputs at the proposed facility should be provided.	This has been provided in Chapter 4 – Description of the Existing and Proposed Development, Volume 2 of the EIAR.

#### 6.5 Summary

Relevant stakeholders were consulted during the EIA Scoping process. The views of these stakeholders have been considered and addressed, as necessary, during the design and planning of the proposed development. Stakeholder views also informed the preparation of the EIAR.

A VPC event was undertaken to understand the level of public interest in the proposed development and the views of members of the public on the development. No submissions on the proposed development were received from members of the public as a result of the carrying out of this event.

Pre-application consultation with An Coimisiún Pleanála, Cork City Council and the EPA was undertaken. The views of each these bodies were considered and informed the preparation of the EIAR.

#### 6.6 References

- European Commission (2017). Environmental Impact Assessment of Projects Guidance on Scoping.
- Department of Housing, Planning and Local Government (2018). Guidelines for Planning Authorities and An Coimisiún Pleanála on carrying out Environmental Impact Assessment.
- Environmental Protection Agency (2022). Guidelines on The Information to Be Contained in Environmental Impact Assessment Reports.

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