

December 2024

Prepared by CWPA Planning & Architecture

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Environment Impact Assessment Report

Re. Application for

*"Permission of works and activities (21,9000 tonnes per annum) at St Margaret's
Waste recycling and transfer centre,"*



Quality Assurance – Mandate Stature

This document has been prepared and reviewed in accordance with CWPA Planning & Architecture Quality Assurance team provisions.

Date of Preparation	Prepared By	Checked By	Approved By
December 2024	Roisin Corr Rachel Kenny	Rachel Kenny Joe Corr	Joe Corr

Application Information:

Applicant:	St Margaret's Recycling Centre
Planning Authority:	An Bord Pleanála
Local Authority:	Fingal County Council
RE:	Permission for certain works and activities, including 21,900 tonnes per annum, at existing waste transfer and recycling centre at St. Margaret's, Co. Dublin
Subject Site:	St. Margaret's Recycling Centre, Sandyhill, Co. Dublin
Prepared By:	CWPA Planning & Architecture

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1.0 Introduction

CWPA Planning & Architecture have been retained by the Client, Mr. Brian McDonnell of St. Margaret's Recycling Centre, to prepare this Report for the consideration of An Bord Pleanála in respect of the planning application under Substitute Consent Provisions,

'Retention of existing works and revised site size and retention and continuation of waste recycling and transfer activities from 2019 to 2023 for tonnages ranging from 26,000 tonnes to 42,500 tonnes, and from 2024 onwards for up to 21,900 tonnes per annum at waste transfer and metal recycling centre at St. Margaret's, Co. Dublin.'

And simultaneously permission for:

Ongoing use of the existing waste transfer and metal recycling centre and authorised treatment facility for end-of-life vehicles (subject of retention under substitute consent provisions) for up to 21,900 tonnes per annum at waste recycling and transfer centre at St. Margaret's, Co. Dublin;

and for additional works comprising –

- *Underground surface water attenuation tank comprising c.675 cubic metres, and an above ground overflow connected to same comprising 1500sqm.*
- *Enhancement of car parking provision, including installation of 2no. EV charging points.*
- *Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc.*

The application for retention works and use is accompanied by a remedial Environmental Impact Assessment Report (rEIAR) and a remedial Natura Impact Statement (rNIS), which considers and assess the historic development and use of the site, this EIAR comprises an assessment of the proposed development and future use on site and the statutory planning context pertaining to same. In addition, and separate to this report, a Planning Statement has also been prepared by CWPA and sets out the planning rationale and justification for the proposed development and demonstrates how it complies with the proper planning and sustainable development of the area, and current County Development Plan.

Please note that this EIAR and Planning Statement should be read alongside the remedial Environmental Impact Report (rEIAR) and associated reports relating to the retention application. It should also be read in conjunction with the planning application drawings prepared by CWPA and all other studies, plans and particulars submitted as part of the planning application.



1.1 Planning History

The planning history pertaining to the subject lands is of particular relevance in that the majority of the physical infrastructure was understood to be constructed and/or operated with the benefit of temporary planning permissions, and a permanent planning permission under F97A/0109 relating to the use of 0.6 hectares of the site, the industrial buildings and the site's use as a waste recycling facility for up to 10,000 tonnes per annum.

In reviewing planning and development histories, it is now apparent, given the levels of non-compliance on site, prior to 1997, and post the granting of permission in 1998, that the development has in effect always been non-conforming on the basis that there has been unauthorised development for a period in excess of the 'enforcement' proceedings timeframe.

The development was first established in c.1995, and subject of an application for retention in 1997 (under F97A/0109). Permission was granted under F97A/0109 for a facility comprising c.0.6ha, 'industrial' buildings of c. 1083 sqm and offices of c.58sq, weighbridge, proprietary waste treatment system, etc. and tonnage of up to 10,000 tonnes per annum. F97A/0109, did not restrict or preclude the processing of ELVs (which prior to ELV Regulations, 2003 were considered to be 'metals') and nor did it place any restriction on outdoor processing of waste, or the type of plant and machinery required or used on site to enable the processing of the waste types on site.

It would appear that from c.1998 onwards, notwithstanding that permission was granted for an annual tonnage of up to 10,000 tonnes, that this tonnage was immediately exceeded, and initially operated at c.22,000 tonnes per annum. In 2001 a waste licence for up to 60,000 tonnes per annum was granted by the EPA. The site was not operated by the applicant at this time, however, tonnages on site were recorded by the EPA, and are noted as follows –

Year	Tonnage
2002	59,259.23
2003	93,970
2004	83,510.4
2005	95,035.8
2006	49,006.61 (up to July)

After this period, it would appear that the Waste Licence was voluntarily relinquished, and the operators at that time (i.e. from 2007) operated under a Waste Permit granted by Fingal County Council. It is understood that the facility continued to operate at similarly high levels after this period, although the facility was operated by Barnmore Ltd. at this time.

In respect of development on site, there was a significant amount of plant and machinery on site, and the types of waste and materials processed includes end of life vehicles, and the processing of certain waste occurs outdoors. It may be noted that the nature of 'waste processing', and in particular C&D and metal, existed on site prior to F97A/0109 being permitted (in 1998) and the types of waste accepted on site has not materially changed in nature in the intervening years, albeit operations have adapted to updated regulations and commercial requirements in line with the waste licences and permits issued.



A number of retention applications were lodged in 2003 in respect of alterations to the site size, in respect of F03A/1561, the site at this time was also noted as being larger than that permitted in 1997, and exceeded that subject of permission at that time. No reference was made to tonnage.

The current applicant took over operations in 2010, and sought retention for the works and activities on site. Under F10A/0177, regularisation of the enlarged site size, was sought, however operations on the site had been taking place on this larger site prior to 2003. At this time, permission was granted for an annual tonnage of 25,000 tonnes per annum. Under F13A/0409 permission was granted for 21,900 tonnes per annum on a site of c.1.6ha.

From a review of the planning history on site it would appear that the site has developed and operated outside of the various planning permissions, being first established in c.1995. It operated at levels well in excess of 21,900 tonnes per annum since c.1998, and did so without the benefit of planning permission.

It is our contention that, notwithstanding the various temporary permissions since that period, the existing development is a 'non-conforming use' in respect of the c.1.6ha site, and c.22,000 tonnes per annum. Retention for the unauthorised activities was sought and granted on a temporary basis, with the last being under F13A/0409, permission being granted in August 2014. As the physical development on site at this time was assessed and permitted, as per the application of F13A/0409, and as the development generally operated in accordance with this permission (with the exception of c.1.2ha of hard standing), the substitute consent application in respect of 'use' has been limited to that element of the development not previously assessed, and not permitted following the expiration of the temporary permission of F13A/0409. In effect, the development became unauthorised at the date of the expiry of the temporary permission under F13A/0409 - 18th August 2019.

Notwithstanding the non-conforming nature of much of the physical development, being in existence since between 1995 and 2003, and that no enforcement action was taken within the statutory period, the applicant is seeking retention, on a without prejudice basis, for all works on site.

In respect of the 'use' and 'tonnage' from 19th August 2019 to 31 December 2023, the subject development no longer had the benefit of planning permission beyond that granted in 1998 for a smaller site and facility and lower tonnage. During this time, i.e. from 2019 to 2023, the facility operated at levels where a mandatory EIAR would have been required based on annual tonnage in excess of 25,000 tonnes. It is therefore considered that permission for the 'retention' of certain works and activities on site facilitating these operations must be sought under 'substitute consent' provisions, specifically during the above period. While the development no longer operates at this tonnage and the applicant does not propose to revert to the higher tonnage, it is considered appropriate to apply for retention for all past annual tonnage and use of the site in the same application, and therefore a 'remedial EIAR' is submitted for the period 2019 to date (relating to existing development on site).



Operations/use on site are currently regulated by way of a waste permit issued by Fingal County Council Environment Section for 21,900 tonnes per annum (ref. WFP-FG-13-0002-03). Up to 18th August 2019, permission for the current works on site and use on site for 21,900 tonnes per annum was permitted under F13A/0409. The development has also been informed by permissions Reg. Ref. F11A/0443, Reg. Ref. F10A/0177 and Reg. Ref. F03A/1561, which culminated in the most recent temporary permission Reg. Ref. F13A/0409 for which permanent permission is now being sought.

Permission under F13A/0409 was a temporary permission and expired on 18th August 2019, at which time those elements the subject of that temporary permission became unauthorised. When permitted under F13A/0409 and noting the waste permit licence and associated management and monitoring, the development was not considered to result in an adverse environmental impact. When the operator continued to operate the day after the lapse of permission under F13A/0409, no greater an impact arose, and as such in carrying out the unauthorised development, the developer (i.e. operator of the waste recycling centre) had not intended to circumvent any EU directives or legislation, and following the carrying out of an EIA, we are satisfied that no adverse impact arose. The development no longer operates at a level that requires a mandatory EIA.

The applicant had endeavoured to regularise matters on site, lodging an application for retention and continuation of the use up to 24,900 tonnes per annum under FW20A/0029. However, permission granted by Fingal County Council under F20A/0029 was refused on appeal by An Bord Pleanála. This decision was the subject of Judicial Review proceedings, and a judgement issued in February 2024, upholding the Board's decision. In preparing this Report, consideration is also given to the judgement as applicable.

The principle of the use of the site and a notable quantum of the physical works were originally permitted under the parent permission in 1997, and thereafter extended under temporary permissions from 2003 to 2014 (under F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109). To this end, the majority of works on site were originally designed and permitted having regard to the relevant Development Plans, and national and local policies applicable at that time, as well as environmental constraints. The development, the subject of retention, in terms of its physical form was permitted in 2014, and deemed to be in accordance with the proper planning and sustainable development of the area, and was not considered to result in any adverse impact such as would warrant its refusal. The current tonnage 21,900 tonnes per annum, was also permitted, and deemed not to result in an unacceptable adverse environmental impact. These are relevant factors in considering the proposed development, and are relevant in terms of mitigating and exceptional circumstances and rationale justifying and supporting the granting of permission for retention as sought in the Retention Application.

This will be outlined in full in Section 4 of this EIAR. It is, however, acknowledged, following on from advice at our pre-app consultation meeting with An Bord Pleanála (ABP) in February 2024, that these works and activities, in so far as they no longer had the benefit of planning permission from 19th August 2019, were required to be assessed under substitute consent provisions, and as the subject development is dependent on and relating to this 'retention' stage of the application, should be submitted as a separate but simultaneous application, under the same provisions.



To this end, the development subject of retention, and the proposed continued use of the site (at previously permitted levels, i.e. 21,900 tonnes per annum), alongside proposed mitigation works, has been assessed having regard to all relevant policy objectives contained in the National Planning Framework: Project Ireland 2040 (NPF), the Regional Spatial Economic Strategy for the Eastern and Midlands Region (RSES), the Fingal Development Plan (FDP) 2017 – 2023 (FDP), the FDP 2023 – 2029, the Dublin Airport Local Area Plan, 2020 and all applicable Section 28 Ministerial Guidelines.

1.2 Objectives of this EIAR

This Environmental Impact Assessment Report (EIAR) has been prepared in parallel with the preparation and formulation of a Planning Application for the proposed continued use of St. Margaret's waste processing and transfer facility, and authorised treatment facility for End of Life Vehicles for a throughput of 21,900 tonnes per annum, and for associated mitigation works, in particular updated and augmented surface water drainage infrastructure, located at Sandyhill, St. Margaret's, Co. Dublin. The facility which has been in existence on the lands for c. 25 years; first permitted in 1998, under F97A/0109, and subject of retention of existing development and activities under simultaneous application, as addressed in the separate rEIAR.

The majority of this EIAR was prepared by CWPA Planning, and where applicable, has regard to the work done by the previous consultants in 2013 under F13A/0409 and in 2019, as part of FW20A/0029, in order to provide relevant baseline data from which the subject developments potential impact can be assessed against.

ESC Environmental Ltd, Irwin Carr (Noise Consultants), Waterman Moylan Engineering Consultants and RMDA Landscape Architects have provided significant additional inputs, and in addition to CWPA are the principal contributors to this EIAR to date. Full details of the study team and expertise is provided in Section 1.4 of the report.

In terms of the application, St. Margaret's Recycling & Transfer Centre Ltd. will apply to An Bord Pleanála for substitute consent under the Planning and Development Act 2000 (as amended), the Planning & Development Regulations 2001-2023 and the Protection of Environment Act 2003 for planning permission, under substitute consent provisions for –

Retention of Current & Historic Development and Use of the Site – as follows

1. Existing buildings, plant and machinery and their use associated with the daily operations of the waste recycling and transfer facility. Existing development comprises the weighbridge, offices, recycling and transfer/industrial buildings, hard standing, car parking, plant and machinery, detailed below:
 - a. Prefabricated cabins (2no.) 177 sqm. - comprising ancillary offices, staff facilities, control room;



- b. Prefabricated w/c & Steel Container (store) 29 sqm;
 - c. recycling and transfer/Industrial buildings, 1917 sqm;
 - d. Weighbridge; and
 - e. Machinery comprising hammermill, shredders, bailers, tilters, forklifts, grabbers, et al.
- 2. Existing Infrastructure, ancillary and enabling works, comprising amendments to site access and boundary arrangements including dust mitigation measures, enhanced access and gateway, above and below ground surface water drainage, proprietary wastewater treatment plant, fire water storage and retention, attenuation and storage tanks, truck and vehicle parking. Works/Infrastructure the subject of retention includes those constructed under Reg. Ref's. F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109.
- 3. The enlargement of the site for waste transfer and recycling purposes, including an Authorised Treatment Facility for End-of-Life Vehicles, increasing the site size from 0.6ha (permitted under F97A/0109) to 1.75ha; comprising the area of an enhanced site access and that of the proprietary wastewater treatment system and percolation areas and the 1.6ha associated with the current waste permit and includes the installation of an impermeable reinforced concrete slab surface throughout, and underground surface water drainage system throughout.
- 4. The historic use (c.2009 to 2023) of lands comprising 1.2 ha to the east of the licenced 'waste transfer and recycling centre', surfaced with compacted hardcore and used for the temporary storage of vehicles, plant and machinery associated with the waste recycling activity.
- 5. Historic use of the 1.6 ha of the site, as a waste transfer and recycling centre and an Authorised Treatment Facility for End-of-Life Vehicles, in particular during the period 2019 to 2023, where waste throughput at the facility rose from 26,000 to 42,500 tonnes per annum, and which was carried out without the benefit of planning permission.
- 6. Retention of the on-going use of the existing metal processing and transfer facility with waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction and demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles from January 2024 to date of application decision.
- 7. Existing mitigation measures introduced up to 2023, and subject of retention, include –
 - a. Change in operating regime from 1997 permission, to introduce a permanent restriction on acceptance of raw material to licensed waste collectors and trade/construction companies, with associated ban on acceptance of material from members of the public, ban on sale of material to members of the public.



- b. Enhancement of surface water drainage systems, fire prevention and firewater retention measures, dust suppression, etc.
 - c. Enhancement of access arrangements and maintenance of sightlines at gateway onto the R122 St Margarets Road in compliance with the appropriate design standards.
 - d. Upgrade of septic tank to proprietary wastewater treatment system
 - e. Erection of/replacement of dust netting as required at site boundaries, where applicable.
8. Proposed Mitigation measures include –
- The restoration of 1.1 ha of compacted hardcore surfaced lands to grassland or wildflower meadow, and to include agricultural haul roads/tracks to serve adjacent agricultural lands, generally in compliance with conditions 3 and 6 of F13A/0409.

The above is accompanied by a remedial EIAR and remedial NIS, and a separate but interlinked application, and is understood to be considered by the Board in advance of their consideration of the proposed on-going and future use of the site.

The remedial Environmental Impact Assessment Report (rEIAR) has been prepared to comply with the requirements of the 2014 Directive 2014/52/EU, is to assist and inform An Bord Pleanála, as the Competent Authority, in undertaking an environmental assessment of this development (from 19 August 2019 to date, noting that between 2019-2023, the development would have been subject to a mandatory EIAR).

It is understood, under the substitute consent provisions, a separate planning application for **the future use of the site** is also required, and to this end, and a proposal for the future use of the site. This simultaneous application is for the future use and development of the Recycling Centre at St Margaret's is therefore submitted in tandem with that of the retention application under the Substitute Consent provisions.

Future Use of Site –

Proposed development

1. ***Permission for the on-going use of the existing metal processing and transfer facility with an increase in waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles, and***
2. ***Underground surface water attenuation tank comprising c.675 cubic metres, and an above ground overflow connected to same comprising 1500 sqm, on an area of c.2,6161sqm contiguous to the existing site.***
3. ***Enhancement of car parking provision, including installation of 2no. EV charging points, and***



4. ***Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc,***

This application and associated EIAR and NIS and relevant drawings, site layouts, etc. is submitted in tandem with the application for Retention.

1.3 Format

This EIAR follows what is referred to as a grouped format structure. Using this structure, the EIAR examines each specialist environmental topic in a separate chapter. It should be noted that an EIAR examines the likely impact of a proposed development, although as the development (existing/current works and use) is subject to a remedial EIAR, before the Board at this time, this EIAR will avail of information contained in the rEIAR, and the 'known' environmental impacts associated with the previous and existing development. The EIAR also examine current and on-going possible or predicted impacts.

Notwithstanding that the development is now in substantial compliance with the 2013 permission, and as such operating at a level where impacts were not considered to be unacceptable, with the passage of time, it is acknowledged that additional mitigation measures may also benefit the scheme, bringing it in line with current standards and best practice and these will be considered as part of the EIAR. It may be noted that the development, in terms of the majority of physical works and a throughput of up to 21,900 tonnes per annum, were to a large extent previously permitted by Fingal County Council, and many mitigation measures were already conditioned and are in place, potential impacts were already considered and mitigated, and therefore did not materialise as an impact following the lapse of permission in 2019, and in the context of this EIAR would not be considered 'mitigation' as they are already an integral and established part of the existing development.

Some mitigation measures (e.g. Restoration of 'agricultural lands') were not implemented and this will be the subject of assessment and while retention is sought for the historic use of these lands for ad hoc storage of plant, machinery and vehicles associated with the recycling centre, the proposed development provides for the reversion of these lands (c.1.ha) to grasslands.

Under applications submitted in 2019 and 2020, a number of infrastructural improvements were proposed. These relatively minor infrastructural improvements relating to drainage, boundary and parking arrangements (numbered 2 to 4 above), while not necessary (as per the rEIAR) are considered to further mitigate potential impacts associated with the long term continuation of the site as a waste recycling facility and Authorised Treatment Facility (ATF) for End of Life Vehicles (ELVs) - i.e. the proposed developments would bring the facility in line with current standards.

The application is also the subject of an NIS, and while this is a separate process, as applicable, the conclusions of same will be considered where relevant in this document.



The EIAR chapters generally follow the following format:

- Study Team (overview - Table 1.1)
- Typical Structure and Authors of specialist chapters (Table 1.2)
- Impact predictions generally follow the language and definitions outlined in Table 1.3
- Consideration of Alternatives (as they relate to the chapter)
- Project Description
- Description of Receiving Environment (as it relates to the chapter)
- Identification and Assessment of Impacts (as they relate to the chapter)
- Mitigation and Monitoring Proposals

1.4 Study Team

Table 1.1: Study team for EIAR

Role	Personnel	Company
Study Manager	Rachel Kenny	On behalf of CWPA
Study Co- Ordinator	Joe Corr	CWPA
Environment & Waste Permit Manager	Peter McCormick	ESC Environmental Ltd
Environment & Waste Permit Manager	Martijn Leenheer	ESC Environmental Ltd
Engineering Aspects Study Manager	Ian Worrell	Waterman Moylans



Table 1.2: Specialist Topics –

Chapter 2 Screening & Scoping sets out the basis for the selection of these topics.

Chapter/Parts	Personnel	Company
Population & Human Health	Rachel Kenny	On behalf of CWPA
Biodiversity	Serena Alexander	On behalf of CWPA
AA/NIS	Serena Alexander/ Rachel Kenny/ Peter McCormick	ESC Environmental Ltd
Land, Soils, Geology, Hydrogeology,	Martijn Leenheer/Peter McCormick	ESC Environmental Ltd
Water & Hydrology	Peter McCormick/Martijn Leenheer. Ian Worrell/Graham Byrne	ESC Environmental Ltd Waterman Moylans
Air Quality & Climate	Main Authors – Martijn Leenheer/Peter McCormick	ESC Environmental Ltd
Noise and Vibration	Shane Carr	Irwin Carr Consulting
Landscape & Visual Impact	Ronan MacDiarmada	RMDA landscape Architects
Traffic & Transportation	Ian Worrell/Graham Byrne	Waterman Moylans
Archaeology & Cultural Heritage	Rachel Kenny/ Fran Whelan	On behalf of CWPA
Material Assets	Rachel Kenny	On behalf of CWPA
Waste Management	Martijn Leenheer	ESC Environmental Ltd
Accident & Disaster Risks	Martijn Leenheer	ESC Environmental Ltd
Interactions & Cumulative Effects	Rachel Kenny/ Joe Corr	On behalf of CWPA



1.5 Impact predictions

Rating of potential environmental impacts in the specialist chapters generally follows the Glossary of Impacts contained in the EPA Guidelines as shown in Table 1.3 below. This takes account of the quality, significance, duration and type of impact characteristic identified.

Table 1.3 Impact predictions

Impact Characteristic	Term	Description
Quality	Positive	A change which improves the quality of the environment
	Neutral	A change which does not affect the quality of the environment
	Negative	A change which reduces the quality of the environment
Significance	Imperceptible	An impact capable of measurement but without noticeable consequences
	Slight	An impact which causes noticeable changes in the character of the environment without affecting its sensitivities
	Moderate	An impact that alters the character of the environment in a manner consistent with existing and emerging trends
	Significant	An impact, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Profound	An impact which obliterates sensitive characteristics
Duration	Short-term	Impact lasting one to seven years
	Medium-term	Impact lasting seven to fifteen years
	Long-term	Impact lasting fifteen to sixty years
	Permanent	Impact lasting over sixty years
	Temporary	Impact lasting for one year or less
	Cumulative	The addition of many small impacts to create one larger, more significant impact
	'Do Nothing'	The environment as it would be in the future should no development of any kind be carried out
	Indeterminable	When the full consequences of a change in the environment cannot be described



Type	Irreversible	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost
	Residual	Degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic	Where the resultant impact is of greater significance than the sum of its constituents
	'Worst Case'	The impacts arising from a development in the case where the mitigation measures may substantially fail

1.6 Difficulties encountered

The EIA Regulations require that difficulties such as technical deficiencies, lack of information or knowledge encountered in compiling any specified information for the EIAR be described. In general, there were no significant difficulties encountered in the production of this EIAR. Any issues encountered during assessment of individual factors are noted within the specialist chapters.

1.7 Level of detail in project description

The project description details provided in Chapter 4 and in the specialist Chapters 5 to 16 are generally the outermost ('not to exceed') characteristics of the proposed development, that is maximum dimensions and emissions that could arise from the range of technologies and processes that could be employed. These are the characteristics that have potential to cause the greatest environmental effects. This facilitates an evaluation of 'worst case' environmental effects which is in keeping with the Guidelines and with best practice. Actual effects will not exceed the predicted effects.

1.8 Quotations

By their nature, EIARs contain statements about the proposed development, some of which are positive, and some less than positive. Selective quotation or quotations out of context can give a misleading impression of the findings of the study. Therefore, the study team urges that quotations should, where reasonably possible, be taken from the conclusions of specialists' chapters.



1.9 EIA Report Quality Control

CWPA is committed to consistently monitoring the quality of EIA Report documents prepared both in draft form and before they are finalised, published and submitted to the appropriate competent authority taking into account latest best-practice procedure, legislation and policy.

While every effort has been made to ensure that the content of this EIA Report document is error free and consistent there may be instances in this document where typographical errors and/or minor inconsistencies do occur. These typographical errors and/or minor inconsistencies are unlikely to have any material impact on the overall findings and assessment contained in this EIA Report.

1.10 References

- Guidelines on the information to be contained in Environmental Impact Statements, EPA, 2022 ([Guidelines on the information to be contained in Environmental Impact Assessment Reports \(EIAR\) \(epa.ie\)](#))
- European Communities (Environmental Impact Assessment) Regulations, 1989, as amended
- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (SI 296/18)



2.0 Screening & Scoping.

2.1 Legislation and Guidance

EIAs are carried out in response to the requirements of the European Directive on the assessment of the effects of certain public and private projects on the environment, particularly as codified in Directive 2011/92/EU and amended by Directive 2014/52/EU.

The enabling statutory instruments (S.I.s) which transpose the Directive into law in Ireland are the European Communities (Environmental Impact Assessment) Regulations, 1989, as updated by the Planning and Development Acts 2000 to 2006 (the EIA Regulations), with the key legislation being the Planning and Development Regulations 2001 (S.I. 600/2001), as amended. These regulations prescribe the classes of projects subject to Environmental Impact Assessment (EIA). Amendments introduced by Directive 2014/52/EU were transposed into Irish planning law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (SI 296/18). These set out the statutory format and content for an EIAR.

2.2 Screening

Under the Planning and Development Regulations, 2001 (SI 600 of 2001), Environmental Impact Assessment Report (EIAR) is to accompany a planning application where a proposed development meets the criteria outlined under Schedule 5, Development for the purposes of Part 10; Part 2, (11), Other Projects, (b) Installations for the disposal of waste with and annual intake greater than 25,000 tonnes not included in Part 1 of this Schedule.

In respect of the current proposal, i.e. the future use of the lands/site for a waste transfer and recycling centre and ATF for ELVs with a throughput of up to 21,900 tonnes per annum, the development while is of a class for which an EIA may be required, it is below the threshold relating to this class of development.

However, noting the Board's previous consideration of development of the site and subject development, albeit for a figure of c.24,500 tonnes (under ABP 310169), and that the proposed development is linked to a rEIAR submitted as part of this substitute consent application, we consider a subthreshold Environmental Impact Assessment Report (EIAR) would be required to support the development, i.e. works on the site.

Substitute Consent Provisions

Any person who has carried out development (or the owner, occupier of the land) may apply to the Board for substitute consent in respect of development carried out where an EIA or AA or both are required and where the applicant considers exceptional circumstances exist. Section 177A provides for applications for substitute consent. Section 177B provides that where a



planning authority becomes aware that a development would have required an EIA, determination as to whether an EIA was required or an AA and/or a court within the State of the ECJ had invalidated a grant of permission in relation to that development the planning authority must inform the developer that an application for substitute consent should be made to the Board.

Section 177C provides that in the absence of a notice under 177B, the owner or occupier of land, (where development has been carried out where that development would have required an EIA, or a determination as to whether an EIA was required, or an AA), may apply to the Board for substitute consent if:

- There is a material defect in a permission as determined by a court within the State, or the ECJ because of the absence or inadequacy of an EIA or AA, or any error of fact or law or,
- where the applicant is of the opinion that exceptional circumstances exist, which would make it appropriate to permit the regularisation of the development by way of an application for substitute consent.

In respect of the subject matter, the applicant is satisfied that a remedial EIAR is required (noting previous operating levels exceeding 25,000 tonnes per annum), and that even at the sub-threshold limit permitted by the Planning Authority, the Board's Inspector under ABP-310169, and thereafter the Board in accepting the Inspector's assessment of the case, considered a sub-threshold EIA to be required.

There is also provision for pre-application consultations with the Board regarding proposed substitute consent applications (as per the Planning & Development, Maritime and Valuation (Amendment) Act, 2022 and specifically s.27 of this Act, amending s.177E of the Principal Act.), and to this end, the applicant has availed of pre-application consultation, and this report and application have been informed by the advice given by the Board's inspectors (although it is acknowledged that this advice is given without prejudice to the Board's consideration of the application).

This EIAR has been prepared in accordance with the above and has had due regard to other relevant regulations and guidance including Guidelines on information to be contained in Environmental Impact Statements, EPA, 2022, Advice Notes on Current Practice in preparation of Environmental Impact Statements, EPA, 2003 and relevant European Commission guidance documents, as relevant. It should be considered and read in the context of the Retention Application.



2.3 Scoping

2.3.1 Basis of scoping for this EIAR

Scoping is the process of identifying potential concerns that need to be examined in an EIAR. The determination of potential concerns to be addressed in this case was based on:

- the requirements of the EIA Regulations;
- the requirements of the EIA Directive;
- the Environmental Protection Agency's Guidelines on the information to be contained in Environmental Impact Statements (EPA, 2022) and Advice Notes on Current Practice (in the preparation of EISs) (EPA, 2003);
- the EIA team's experience of preparing and submitting previous EIARs.

2.3.2 Related Projects

The proposed project subject of this EIAR consists of an existing facility subject of the substitute consent application, which has been in place for over 25 years, albeit with some infrastructural additions in place since 2003 onwards.

As this is an existing development and is not linked to other projects, related projects are not relevant.

2.3.3 Relationship between the EIAR and Assessments under other EU Directives.

This EIAR takes account of available results from other relevant assessments while avoiding duplication of those assessments, particularly the following:

2.3.3.1 *The Habitats and Birds Directives (92/43/EEC and 79/409/EEC)*

The proposal's potential to affect the integrity of the Natura 2000 network, as required under these Directives, has been assessed and an Appropriate Assessment (AA) screening has been formulated and has resulted in the preparation of a Natura Impact Site (NIS).

The Appropriate Assessment Screening and NIS is included as a separately bound document within the planning application document set. It is referred to in the biodiversity chapter of this EIAR as relevant.

2.3.3.2 *The Waste Framework Directive (2009/98/EC)*



Chapter 14, Waste Management, considers aspects which fall under this Directive, as appropriate.

2.4 References.

- European Communities (Environmental Impact Assessment) Regulations, 1989
- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (SI 296/18)
- Advice Notes on Current Practice in preparation of Environmental Impact Statements, EPA, 2003
- OPR Practice Note PN02 Environmental Impact Assessment Screening



3.0 Alternatives

3.1 Introduction

This section of the EIAR focuses on alternatives that were considered during the preparation of this EIAR and planning application.

Before looking at the impacts of any development on the environment, the 2018 regulations require an EIAR to include:

A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment.

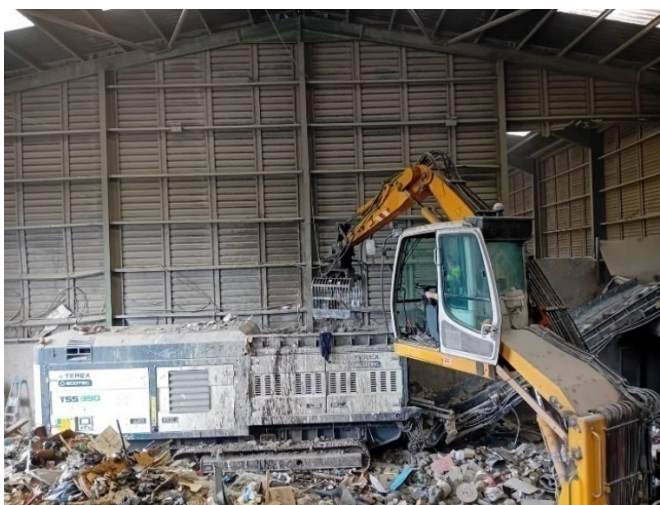
As the application, and proposed development is one of which relates to the continued use of an existing development, the subject of retention under substitute consent procedures, consideration of alternatives is somewhat limited and restricted to a large extent to ‘use’ or ‘not’ of the site, rather than the physical works on site.

Certain additional mitigation measures are proposed in this application, including a 675 cubic metre underground tank and above ground surface water attenuation area associated with 30 and 100 year flood events. The alternatives in respect of the specific approaches here will be dealt with in the specific chapter dealing with the potential impact of this element of the development. However, as it is proposed as a mitigation measure, and brings the development subject of retention, in line with current standards, the ‘do nothing’ scenario which is the principle alternative makes little sense.

A waste recycling facility was permitted on site in 1997, for 10,000 tonnes per annum, although it may be noted that an EPA waste licence was in effect during this period for 60,000 tonnes per annum. During this time, and as would have been in place when permission was granted under F97A/0109, the site comprised metal, C&D, timber and domestic general waste recycling activities serving individual as well as commercial waste/metal disposal. Much of the waste recycling activity in terms of processing of waste occurred within the existing industrial buildings, including car dismantling and crushing, with the associated machinery, including the hammermill, shredders and compactors housed within these buildings. (Photos 3.1 to 3.3 provide evidence of activities within these buildings). The history of the site, as permitted both on a temporary and permanent basis is relevant to the consideration of alternatives, and to a large degree limits the extent to which alternatives are possible or practicable.



Photos 3.1 to 3.3 – depicting historic development/operations within the permitted 'industrial buildings' comprising waste recycling activities.





3.2 Planning Description

Permission is sought by St. Margaret's Recycling & Transfer Centre Ltd. at St. Margaret's Metal Recycling, Sandyhill, St. Margaret's, Co. Dublin, under substitute consent provisions, for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

An Environmental Impact Assessment Report and a Natura Impact Statement are submitted in respect of the above and accompany the application relating to these elements for which permission is sought.

A simultaneous application is included as part of the Substitute consent process, which seeks retention of the existing development and waste transfer and recycling facility at the site, and the proposed development is contingent on the retention application being permitted – ie.

Retention of:

1. Existing buildings, plant and machinery and their use associated with the daily operations of the waste recycling and transfer facility. Existing development includes that previously permitted under Reg. Ref's. F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109, and specifically comprises;
 - a. Prefabricated cabins (2no.) 177 sqm. - comprising ancillary offices, staff facilities, control room;
 - b. Prefabricated w/c & Steel Container (store) 29 sqm;
 - c. recycling and transfer/Industrial buildings 1917 sqm
 - d. Weighbridge; and
 - e. Machinery comprising hammermill, shredders, bailers, tilters, forklifts, grabbers, et al.
2. Existing Infrastructure, ancillary and enabling works, comprising amendments to site access and boundary arrangements including dust mitigation measures, enhanced access and gateway, above and below ground surface water drainage, proprietary waste water treatment plant, fire water storage and retention, attenuation and storage tanks, truck and vehicle parking.



Works/Infrastructure the subject of retention includes those constructed under Reg. Ref's. F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109.

3. The enlargement of the site for waste transfer and recycling purposes, including an Authorised Treatment Facility for End-of-Life Vehicles, increasing the site size from 0.6ha (permitted under F97A/0109) to 1.75ha; comprising the area of an enhanced site access and that of the proprietary wastewater treatment system and percolation areas and the 1.6ha associated with the current waste permit and includes the installation of an impermeable reinforced concrete slab surface throughout, and underground surface water drainage system throughout.
4. The historic use (c.2009 to 2023) of lands comprising 1.2 ha to the east of the licenced 'waste transfer and recycling centre', surfaced with compacted hardcore and used for the temporary storage of vehicles, plant and machinery associated with the waste recycling activity.
5. Historic use of the 1.6 ha of the site, as a waste transfer and recycling centre and an Authorised Treatment Facility for End-of-Life Vehicles, in particular during the period 2019 to 2023, where waste throughput at the facility rose from 26,000 to 42,500 tonnes per annum, and which was carried out without the benefit of planning permission.
6. Retention of the on-going use of the existing metal processing and transfer facility with waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles from January 2024 to date of application decision.
7. The restoration of 1.1 ha of the above noted compacted hardcore surfaced lands to grassland or wildflower meadow, and to include agricultural haul roads/tracks to serve adjacent agricultural lands, generally in compliance with conditions 3 and 6 of F13A/0409, is a proposed mitigation measure.
8. Existing mitigation measures introduced up to 2023, and subject of retention, include:
 - Change in operating regime from 1997 permission, to introduce a permanent restriction on acceptance of raw material to licensed waste collectors and trade/construction companies, with associated ban on acceptance of material from members of the public, ban on sale of material to members of the public.
 - Enhancement of surface water drainage systems, fire prevention and fire water retention measures, dust suppression, etc.
 - Enhancement of access arrangements and maintenance of sightlines at gateway onto the R122 St Margarets Road in compliance with the appropriate design standards.
 - Upgrade of septic tank to proprietary wastewater treatment system
 - Erection of/replacement of dust netting as required at site boundaries, where applicable.

A remedial Environmental Impact Assessment Report and a remedial Natura Impact Statement are submitted in respect of the above.



3.3 Guidelines

The EPA Guidelines give considerable coverage to alternatives, partly because the consultation about the effectiveness of EIA practice found that “the acceptability and credibility of EIA findings can be significantly affected by the extent to which this issue is addressed.”

The consideration of alternative routes, sites, alignments, layouts, processes, designs or strategies, is the single most effective means of avoiding environmental impacts. The acceptability and credibility of EIA findings can be significantly affected by the extent to which this issue is addressed.

However, it is important, from the outset, to acknowledge the existence of difficulties and limitations when considering alternatives. These include:

- Non-Environmental Factors
- Site Specific Issues

Non-environmental Issues

EIA is confined to the environmental effects which influence the consideration of alternatives. It is important to acknowledge that other non-environmental factors may have equal or overriding importance to the developer, e.g., project economics, land availability, engineering feasibility, planning considerations.

Site Specific Issues

The consideration of alternatives also needs to be set within the parameters of the availability of land (it may be the only suitable land available to the developer) or the need for the project to accommodate demands or opportunities which are site specific. Such considerations should be on the basis of alternatives within a site e.g., design, layout.

For the purposes of the Regulations, alternatives may be described at three levels:

1. Alternative Locations
2. Alternative Designs
3. Alternative Processes

3.4 The Design Hypothesis

The subject site has been in operation as a waste recycling centre, for over 25 years and for the majority of this time at a scale of c.22,000 tonnes per annum. It is acknowledged that it has evolved over this time to reflect changing requirements relating to ‘waste management’, including greater efforts on the part of the Government to reduce waste to landfill or incineration, and to minimise and repurpose waste material (as part of the evolving circular economy). Development on site has had the benefit of a permanent planning permission for up to 10,000 tonnes per annum on a c.1 hectare site; and thereafter over the subsequent 2 decades temporary permissions allowing the site increase in tonnage to 21,900 tonnes and



almost 3 hectares, with the principle waste recycling activity taking place on the c.1.6 hectare permit site (as per Waste Licence permit).

3.5 Alternatives

3.5.1 'Do nothing scenario'

One alternative typically considered is to 'do nothing'. In this instance, we understood this to be 'to allow the current temporary permission to expire and the existing recycling centre to be discontinued.'

This would result in the closure of an essential element of waste infrastructure for Fingal, a reduction in waste recycled within the Fingal Area and will result in job losses for the local community. The Government and indeed Fingal County Council's commitment to increasing waste recycling and to reduce landfill waste is clear and evident at National, Regional and Local Planning Policy level. There are clear guidelines for the provision of high-quality recycling facilities across Fingal that meets the recycling needs of the area but also to ensure that the legally binding targets for reducing carbon emissions through re-use and recycling is met. The Centre also has a five year contract with An Garda Síochána re ELVs which account for approx. 90% of ELVs coming to site, and again recognising the obligations and requirements for such a facility to meet the county's needs, refusing to take in this waste, was considered to result in an adverse impact for the community and state services. The need for the services and facilities provided for recycling at St. Margaret's is demonstrated in the fact that the recycling facility has been providing essential services to the waste management sector for over 25 years and continues to operate successfully in an environmentally safe way in accordance with a waste facility permit (again operating within the 21,900 limit as of 2024).

There is significant demand for waste recycling facilities such as St. Margaret's and this is also evident noting that permission has been sought over the years to increase the tonnage accepted on site to meet this increasing demand.

Should permanent permission not be put in place, it is likely that there will be an increase in waste reaching landfill and a reduction in waste being recycled (noting that this centre operates at c.95% recycled for reuse). The closure of this facility and resulting transfer of waste outside of the county and country, i.e. removing the 'recycling' and 'circular economy' element to waste collection, is contrary to the proper planning and sustainable development of the area. In the absence of St. Margaret's Recycling Centre and having to return the site to its previous agricultural use, demand would have to be met elsewhere, either by extending other facilities in the area, or through the intensification and/or expansion of such facilities or indeed providing for a new recycling centre. A lack of recycling facilities could lead to longer term issues in ensuring that materials are recycled and reused in an appropriate and environmentally safe manner.



With the implementation of the Circular Economy and Miscellaneous Provisions Act 2022 it is expected that a higher rate of recovery is required. As one of five companies with the infrastructure to achieve a high recovery rate, St. Margaret's Recycling is an essential part of the recovery of metals for other waste companies within the area. Should the temporary permission expire, there will only be four such facilities in the Republic which will reduce re-use and recovery significantly. Furthermore, St. Margaret's Recycling is only one of three Authorised Treatment Facilities for end-of-life vehicles within the entire Fingal area (in comparison with South County Dublin which has c. 8 facilities). Should permission not be granted, there will only be two such facilities in Fingal which will reduce re-use and recovery significantly. Both the Development Plan and the Eastern Midlands Region Waste Management Plan 2015-2021 recognised that the European Union (End of Life Vehicles) Regulations 2014 help facilitate the achievement of a rate of reuse and recovery of a minimum of 95% by an average weight per vehicle and year and the reuse and recycling of a minimum of 85% by an average weight per vehicle and year from January 2015. Therefore, the do-nothing scenario which would result in permission expiring on the lands would be contrary to Policy IUP22 of the Fingal Development Plan 2023-2029 which seeks to transition from a waste economy towards a green circular economy and make Fingal self-sufficient in terms of resource and waste management. The reality is that a substantial proportion of (waste) companies are and will continue to be reliant on St. Margaret's Recycling to dispose of vehicles and metal recovery in a way that is not harmful to the environment. This means that the demand for waste recycling facilities will continue in the long term and a larger capacity will be required. This will continue to be the case even with the provision of additional services for the Fingal Area as it is of national importance to ensure every effort is made by local authorities and consumers to ensure that as much material is recovered and recycled in a manner that is not harmful to the environment.

The return of the subject site to agricultural use would provide for the inefficient use of serviced lands. The lands are also subject to specific development constraints particularly the location of the lands within the Outer Public Safety Zone. The purpose of Public Safety Zones (PSZ's) is to protect the public on the ground from the small but real possibility that an aircraft might crash in a populated area. Essentially, a PSZ is used to prevent inappropriate use of land where the risks to the public are the greatest. The existing development on site, and that proposed are wholly appropriate in terms of intensity of use on site (with no individual members of the public arriving on site), thereby ensuring that concerns relating to the PSZs are respected and reflected in the design and use of the site.

3.6 Alternative Locations

3.6.1 Alternative Sites

At the time of its initial 'unauthorised use', i.e. the day after the temporary permission expired, closing the site and ceasing operations and relocating to an alternative site was not a viable alternative, in that there was no available permitted site vacant and ready to facilitate this activity, and closing the site would have resulted in the loss of 25 to 30 jobs, and a significant quantum of waste leaving the country and going to landfill without any effort to recycle and reuse.



Going forward, if the site is not permitted to operate as per the 2013 regime, i.e. at 21,900 tonnes, and taking waste from commercial sources only, the applicant could seek to implement the 1997 planning permission whereby intake of waste from the public as well as commercial sources is reintroduced. This would have the negative effect of increasing traffic movements, and potentially reducing recycling and recovery capabilities. In addition, demand is not reduced with the closure of this facility or return to a lower tonnage, and therefore to meet the demand a new facility will need to be opened to deal with the increased waste which will be produced by the increasing population in the area (discussed in Chapter 5 Population). Any such development would likely be developed on unused greenfield lands within the Fingal Area, with greater environmental impacts arising (noting that the existing facility has already been physically development, with associated environmental impacts assessed and experienced).

The Fingal County Development Plan 2017-2023, similarly to the 2023- 2029 Plan, only permits high impact recycling facilities on lands zoned Heavy Industry which are predominantly in the vicinity of the Huntstown Quarry in northeast Blanchardstown. Access to lands at this location are not available at this time, although the applicant is working with Fingal County Council Property Section to identify a long-term new site where a new Waste Recycling Centre could be located and operated to meet the full demands of the county in terms of waste recovery and recycling.

All of the infrastructure associated with St. Margaret's Recycling is in place on the subject site including hardstanding area, entrance road, existing building infrastructures, weighbridge etc. The existing facility has been previously assessed and approved by Fingal County Council and is in accordance with the proper planning and sustainable development of the area. The development of a new recycling centre and facility on a greenfield site would require new infrastructure including underground drainage etc., new roads and associated surface treatments, service buildings etc which would be contrary to the proper planning and sustainable development of the area noting that St. Margaret's Recycling is an existing serviced and operational facility.

In addition, the development of new recycling centre on an alternative greenfield site could have adverse environmental impacts on biodiversity, soils, water, air, human health, visual impacts, traffic, cultural heritage during both the operational and indeed construction stage of the development, all of which will require detailed assessment in due course (although the applicant will only be considering sites that are appropriately zoned, and have been through the SEA process to ensure that the principle and level of possible environmental impact is minimal and design solutions can mitigate).

In conclusion, the option of the continued use of the existing recycling centre and the increase in tonnage (as per waste licence and previous permission, i.e. 21,900 tonnes per annum) as presented in this application is the most suitable option available in the vicinity. The use of the lands at St. Margaret's is environmentally sound having regard to the impact that would be generated by the development of a recycling facility at an alternative location. It should be noted that the environmental impact of the proposed development had been previously assessed by the Competent Authority and (at 21,900 tonnes per annum) permitted planning permission and a waste licence.



3.7 Alternative Designs and Processes

The site at St Margaret's uses state of the art mill technology for the recycling of waste on site. The alternative technology would be a pre-shredder with a picking line but the residue of this technology could be recovered further in a mill as present at St Margaret's Recycling.

Bans on the acceptance of incoming material from members of the public and on the sale of material to members of the public have been implemented by the applicants at the Centre. Commencing in 2021, the applicant has restricted the acceptance of raw material to a small number of licensed waste collectors and trade / construction companies.

As a consequence of the changed dynamics the demand for the facility to take in higher tonnage has been increased. The increase in population and the general demand for a waste facility that can reach 95% recycling targets, adds to this pressure.

The existing infrastructure on site is more than capable of accommodating this increase and there is no requirement for additional facilities within the existing recycling centre to accommodate this increase and therefore does not constitute an intensification of activity on the site. There will be no change in plant, or staff, or operation procedures of the site.

As the facility itself is existing and well established, consideration of alternatives is limited to 'alternatives' in respect of the new works proposed, i.e. Alternatives to -

1. Upgrades to the underground surface water attenuation tank comprising c.675 cubic metres, and an above ground overflow connected to same comprising 1500 sqm
2. Enhancement of car parking provision, including installation of 2no. EV charging point and
3. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc,

The above works are proposed as part of mitigation and environmental improvement, therefore the alternative being not to provide them makes little sense. They are required, but they represent an environmental gain.

3.8 References

- European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (SI 296/18)
- Guidelines on the information to be contained in Environmental Impact Statements, EPA, 2022.



4.0 Project Description

4.1 Introduction

This Chapter provides a description of the nature and scale of the proposed development, i.e. development subject of retention and the proposed on-going operations associated with same. It also provides a context for the subject development in terms of its wider catchment area and its local environment.

Permission is sought by St. Margaret's Recycling & Transfer Centre Ltd. at St. Margaret's Metal Recycling, Sandyhill, St. Margaret's, Co. Dublin, under substitute consent provisions, for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

An Environmental Impact Assessment Report and a Natura Impact Statement are submitted in respect of the above and accompany the application relating to these elements for which permission is sought.

A simultaneous application is included as part of the Substitute consent process, which seeks retention of the existing development and waste transfer and recycling facility at the site, and the proposed development is contingent on the retention application being permitted – i.e.

Retention of:

1. Existing buildings, plant and machinery and their use associated with the daily operations of the waste recycling and transfer facility. Existing development includes that previously permitted under Reg. Ref's. F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109, and specifically comprises;
 - a) Prefabricated cabins (2no.) 177 sqm. - comprising ancillary offices, staff facilities, control room;



- b) Prefabricated w/c & Steel Container (store) 29 sqm:
 - c) recycling and transfer/Industrial buildings 1917 sqm
 - d) Weighbridge; and
 - e) Machinery comprising hammermill, shredders, bailers, tilters, forklifts, grabbers, et al.
2. Existing Infrastructure, ancillary and enabling works, comprising amendments to site access and boundary arrangements including dust mitigation measures, enhanced access and gateway, above and below ground surface water drainage, proprietary waste water treatment plant, fire water storage and retention, attenuation and storage tanks, truck and vehicle parking. Works/Infrastructure the subject of retention includes those constructed under Reg. Ref's. F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109.
3. The enlargement of the site for waste transfer and recycling purposes, including an Authorised Treatment Facility for End-of-Life Vehicles, increasing the site size from 0.6ha (permitted under F97A/0109) to 1.75ha; comprising the area of an enhanced site access and that of the proprietary wastewater treatment system and percolation areas and the 1.6ha associated with the current waste permit and includes the installation of an impermeable reinforced concrete slab surface throughout, and underground surface water drainage system throughout.
4. The historic use (c.2009 to 2023) of lands comprising 1.2 ha to the east of the licenced 'waste transfer and recycling centre', surfaced with compacted hardcore and used for the temporary storage of vehicles, plant and machinery associated with the waste recycling activity.
5. Historic use of the 1.6 ha of the site, as a waste transfer and recycling centre and an Authorised Treatment Facility for End-of-Life Vehicles, in particular during the period 2019 to 2023, where waste throughput at the facility rose from 26,000 to 42,500 tonnes per annum, and which was carried out without the benefit of planning permission.
6. Retention of the on-going use of the existing metal processing and transfer facility with waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles from January 2024 to date of application decision.
7. The restoration of 1.1 ha of the above noted compacted hardcore surfaced lands to grassland or wildflower meadow, and to include agricultural haul roads/tracks to serve adjacent agricultural lands, generally in compliance with conditions 3 and 6 of F13A/0409, is a proposed mitigation measure.
8. Existing mitigation measures introduced up to 2023, and subject of retention, include:
 - Change in operating regime from 1997 permission, to introduce a permanent restriction on acceptance of raw material to licensed waste collectors and trade/construction companies, with associated ban on



acceptance of material from members of the public, ban on sale of material to members of the public.

- Enhancement of surface water drainage systems, fire prevention and fire water retention measures, dust suppression, etc.
- Enhancement of access arrangements and maintenance of sightlines at gateway onto the R122 St Margarets Road in compliance with the appropriate design standards.
- Upgrade of septic tank to proprietary wastewater treatment system
- Erection of/replacement of dust netting as required at site boundaries, where applicable.

A remedial Environmental Impact Assessment Report and a remedial Natura Impact Statement are submitted in respect of the above.

4.2 Rationale for the proposed Development

Noting the planning history on site, the nature of the permissions which over time essentially would equate to the granting of a temporary permission for approx. 20 years for the existing St. Margaret's Recycling & Transfer Centre facility serving the Fingal area.

The reasons and justification for permanent permission are as follows:

- The St. Margaret's Recycling & Transfer facility provides the necessary and key waste processing and transfer facility to the Fingal and wider Dublin area. This would be in accordance with the Fingal Development Plan Policy 2023-2029 Objective IUO29.
- The granting of permanent planning permissions for this site are integral for fulfilling the policy objective Policy IUP22 of the Fingal Development Plan 2023-2029 which seeks to transition from a waste economy towards a green circular economy and makes Fingal self-sufficient in terms of resource and waste management.
- As the population of Fingal is increasing significantly, there is an increased demand for waste facilities to meet waste objectives and achieve binding targets to separate and process waste streams at municipal and national levels.
- Planning permission for the continuation of the waste processing and transfer facility has been granted planning permission by Fingal County Council on several occasions since 1997 and were compliant with the policies and objectives of the Fingal Development Plan at those times.



- The waste processing and transfer facility since 1997. In addition to this, the DAA had no objection to the principle of the extant planning permission granted under Reg. Ref. F13A/0409 provided mitigation measures are being met. It is submitted that the mitigation measures will continue to be implemented as part of the proposed application.
- The granting of permission does not preclude the lands from any future applications for alternative developments.
- The granting of permanent planning permission will put an end to the costly reoccurrence and administrative burden of repeat applications for temporary planning permissions.
- The granting of permanent planning permission will provide job security to 20-25 employees and the waste facilities owners. It will also provide security to ensure that an existing and waste transfer and recycling facility is available to the Fingal Area to safeguard its efficient operation and will have regard to the importance of increased recycling facilities as part of national and regional policy guidance.

Permanent planning permission is being sought and is considered appropriate having regard to the established nature of the facility which is fully constructed and in situ. As one of only three Authorised Treatment Facilities for End-of-Life Vehicles (ELV's), the granting of permission will be in accordance with waste management strategy for Fingal and particularly Objective WM01 which seeks to facilitate the sustainable expansion of existing Authorised Treatment Facilities for end-of-life vehicles complying with European Union (End of Life Vehicles) Regulations 2014, other relevant legislation and the Eastern Midlands Regional Waste Management Plan 2015-2021.

Permanent planning permission would allow for long term investments such as low carbon and sustainable energy generation. This would be in line with Policy IUP33 and Policy IUP30.

The applicant does not propose to extend operations on site and is in discussion with Fingal County Council to identify, acquire and develop an alternative site, and to facilitate this requires sufficient time, and certainty re. operations.

4.3 Fingal Development Plan 2023-2029

Relevant policies from the development Plan are listed below:

Objective IUO29 – Sustainable Waste Recovery and Disposal

Provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping with the EU waste hierarchy, national legislation and regional waste management policy to adequately cater for Fingal's growing population.



Policy IUP22 – *Transition From A Waste Economy Towards A Green Circular Economy*
Support the principles of transition from a waste economy towards a green circular economy and implement good waste management and best practices to enable Fingal to become self-sufficient in terms of resource and waste management and to enhance employment and increase the value recovery and recirculation of resources, in accordance with the Whole-of-Government Circular Economy Strategy 2022.

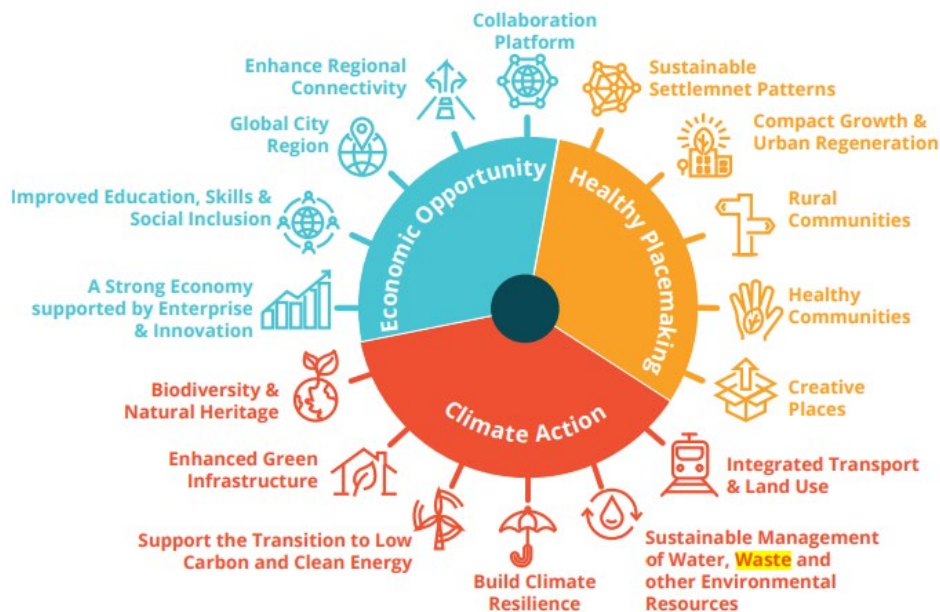
Policy CAP10 – *Climate Mitigation Actions in the Built Environment*

Promote low carbon development within the County which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation. New development should generally demonstrate/provide for: inter alia

f. Minimising the generation of site and construction waste and maximising reuse or recycling;



Figure 1.3: Regional Strategic Outcomes of the RSES



5.5.4.1 Circular Economy Chapter 11 Infrastructure and Utilities and Chapter 14 Development Management Standards of this Plan, seeks to integrate a more sustainable approach to waste based on circular economy principles. National climate action policy emphasises the need to take action to address climate action across all sectors of society and the economy. In the waste sector, policy on climate action is focused on a shift towards a ‘circular economy’, encompassing three core principles: designing out waste and pollution; keeping products and material in use; and regenerating natural systems

5.5.4.1 Circular Economy

Chapter 11 Infrastructure and Utilities and Chapter 14 Development Management Standards of this Plan, seeks to integrate a more sustainable approach to waste based on circular economy principles. National climate action policy emphasises the need to take action to address climate action across all sectors of society and the economy. In the waste sector, policy on climate action is focused on a shift towards a ‘circular economy’, encompassing three core principles: designing out waste and pollution; keeping products and material in use; and regenerating natural systems.



Chapter 11 – Infrastructure and Utilities

Supports the promotion and delivery of more sustainable forms of waste management in line with circular economy principles.

Supports minimising/preventing waste and maximising material recycling, reuse and re-purposing.

Fingal County Council in their Plan, further state:

“Successful waste management strategies and policies play an essential role in protecting public health, maintaining a high-quality environment and supporting sustainable development in Fingal and the wider eastern region. In managing our waste needs, we need to minimise waste going to landfill and maximise waste as a valuable resource, as we make the transition from a linear to a circular economy”

“Fingal County Council will continue to support the principle of the circular economy on re-usables and water and waste reduction. Promoting and delivering more sustainable forms of water and waste management in Fingal in line with circular economy principles will be central to the overall approach of the Plan.”

4.4 General Description of Site and Surroundings

The site is located in the town land of Sandyhills, approximately 100 m south of St. Margaret’s village and 6 km southwest of Swords, County Dublin. The R122 passes in a north-south direction close to the western edge of the site, adjoining the boundary only at the northwestern corner, where the site entrance is located. The R108 lies to the south which runs to the south of the site and Dublin Airport is located immediately to the west within the southern runway lying to the southeast.

The site is relatively isolated, bounded to its southern, western and eastern boundaries by agricultural lands, much of which is in family ownership. The village of St. Margaret's is located on the western side of the R122 and as such, the facility is somewhat disconnected and separate from the village.



4.5 Description of the Subject Development

4.5.1 General Description

The application site comprises approx. 2.93 hectares of which c1.6 hectares comprises the waste recycling and transfer facility (as per the Waste Permit). The site is located to the southeast of St. Margaret's village and is accessed off the R122 which runs to the west and northwest of the site. The R108 lies to the south which runs to the south of the site and Dublin Airport is located immediately to the west within the southern runway lying to the southeast.

The site is an existing brownfield site that is relatively isolated, bounded to its southern, western and eastern boundaries by agricultural lands, much of which is in family ownership. The site entrance, on to the R122, is formed by a high block concrete wall with metal panel gate. A concrete splayed area is situated between the entrance and roadside boundary. On entering the premises, a car parking area is provided to the left. The vast majority of the site is hard surfaced, c.1.75ha. A number of galvanised steel sheds are located to the western boundary of the site. These sheds access onto a concrete yard area. A weighbridge and several prefabricated cabins which function as office space, canteen and toilets is situated within the core waste recycling & transfer centre operational area of the site. An area of c.1.2 ha of compacted hardcore is located to the south of the Recycling Centre Operations. While once used for parking and storage associated with activities on site, it is currently not in use.

Figure 4 2 Site photo





The site is an established waste facility and has been in operation for the past 26 years (c. 1997) and operates as an authorised treatment for end-of-life vehicles (ELVs) from other under Waste Facility Permit from Fingal County Council (WFP-FG-13-0002-02).

All input material is weighed and recorded at the facility weighbridge. Input tonnages are monitored on a monthly and quarterly basis by the applicant. The waste types accepted on site comprise the following:

- Metals
- Construction and demolition waste
- Bulky/skip waste
- Wood waste
- Glass
- End-of-Life Vehicles (ELVs)
- Batteries

The above waste types, as well as timber, were recycled on site at the time of the 1997 permission. And at that time included waste from members of the public

4.6 Overall Process Description

The procedure for the acceptance of waste or indeed the waste types accepted at the facility will not be modified from that in existence as set out above in Section 2.2, i.e. all input material is weighed and recorded at the facility weighbridge. Should planning permission be forthcoming, the applicant will adhere with the Waste Facility Permit condition that will be applicable to the proposed application. The waste types accepted on site will remain in accordance with materials granted under temporary planning permission Reg. Ref. F13A/0409 where the following materials will be accepted at the facility:

- Metals
- Construction and demolition waste
- Bulky/skip waste
- Wood waste
- Glass,
- End-of-Life Vehicles (ELVs)
- Batteries

The St. Margaret's Recycling Facility does not and will not accept food waste (putrescible wastes) or green waste. Waste acceptance procedures are in place to ensure that food waste is not presented as part of the Construction & Demolition waste or other incoming waste streams.

It was noted within the previous application on the lands that there were concerns relating to birds. It must be noted that the only organic/biodegradable waste stream accepted on site is wood/timber waste associated with C&D, which is not a food source and therefore not deemed to be an attraction to scavenging birds. Design proposals considered previously provided for



the moving of wood chipping operations indoors. However, this element of the permission was not implemented, and this waste type is not handled on site.

All handling and processing of Construction & Demolition waste skips is carried out undercover and indoors. The facility has no record of complaints/non-compliance or history associated with bird nuisance.

Potential impacts relating to bird nuisance are therefore considered to be insignificant for this facility and operation. Continued implementation of the Waste Acceptance Procedure, in line with the requirements of the site's Waste Facility Permit, and the procedure of works as part of the development procedure will continue to be applied. The Dublin Airport Authority had no objection to the principle of the extant temporary planning permission granted under Reg. Ref. F13A/0409 provided mitigation measures were met. It is submitted that mitigation measures will continue to be implemented on site as there are no proposed amendments in relation to the recyclable waste and material accepted on site.

There are no changes proposed to the existing layout for the remainder of the site in terms of buildings etc. Permission is being sought for the continued use of the existing facilities including existing surface roads etc. Permission is sought for additional stormwater proposals. Please refer to the enclosed plans prepared by Waterman Moylan and CWPA which sets out the existing and proposed site layout and the existing and proposed engineering details.

4.7 Operating Hours

The site operates from 8 am to 5.30 pm on weekdays, 8am to 2pm on Saturday, and the site is closed on Sundays and bank/public holidays.

4.8 Construction

There is a small amount of construction to take place as part of proposed mitigation, relate to improvements to site boundaries, and provision of a new car and bicycle parking area.

A review of storm water attenuation relating to surface water drainage has taken place, and it is considered that the existing stormwater attenuation tank of 675m³ for the purposes of surface water drainage is sufficiently sized so as to meet the needs of the 1.75 ha site going forward. This will include 135m³ dedicated to auxiliary fire water storage for the purposes of firefighting. Irish water had been contacted to extend the current mains water lines for the purpose of installing a hydrant to increase the strategies available for firefighting on site, and this is technically feasible (with the site already being served by public mains), However, it has been determined by the fire consultant that this is not required.

4.9 Emissions

This is an existing site with an existing Waste Facility Permit (WFP-FG-13-0002-03) under which the emissions monitoring is required and reported.



5.0 Population & Human Health

5.1 Introduction

This section of the Environmental Impact Assessment Report assesses the impact of the proposed development on the human environment in the general area of the subject site at Sandyhill, St. Margaret's, Co. Dublin. The assessment was carried out by Rachel Kenny, BE, MRUP, FIPI on behalf of CWPA.

Rachel Kenny is a senior planning consultant with CWPA, Planning & Architecture consultancy, and has 30 years experience as a planner in public and private sector organisations, including Fingal, Meath and Louth County Council and An Bord Pleanála (as Director of Planning). She holds a degree in Civil Engineering (be (Civil) (Hons) and Masters in Regional and Urban Planning (MRUP), both from University College Dublin. She is a fellow and corporate member of the Irish Planning Institute. She has experience in both forward planning and development management, and specialises in, inter alia, Strategic Infrastructure Development, and large scale EIAR projects. Specific aspects that will be examined will include population levels, human health, fire risk and safety, impact on employment, commercial activity, community infrastructure and social facilities.

This section of the EIAR assesses the impact of the proposed development on population and human health in the vicinity of the site. Insofar as possible, this assessment has also considered impacts on the future workers and visitors to the subject lands.

5.2 Research Methodology

The following assessment of the predicted impacts on population and human health was undertaken based on local population information from the Central Statistics Office's Census of Population reports, the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, Fingal County Development Plan 2023-2029 and the Dublin Airport Local Area Plan 2020. A site visit was also undertaken to appraise the location whilst a desktop study was also undertaken to assist in characterising the environment in relation to human beings.

5.3 Receiving Environment

The subject lands are located at Sandyhill, St. Margaret's, on the east side of the R122 (Finglas – Balbriggan Regional Road), on a site located directly south of the main settlement known as St. Margaret's. To the south are lands that support the main southern runway to Dublin Airport with the M50 located further south of the subject site. The surrounding area is comprised primarily greenfield agricultural lands with clusters of housing and commercial developments located along the R122 road both to the north and south of the application site.



The subject lands comprise an existing recycling centre that has been in existence since 1997 (albeit in different ownership) on 1.6 ha of lands. The site functions primarily as an Authorised Treatment Facility (ATF) for end-of-life vehicles (ELVs). It also serves as a waste recovery and recycling facility including an Authorised Treatment Facility (ATF) for end-of-life vehicles (ELVs), which is permitted to accept waste metals, C & D waste material and batteries. The site comprises, concrete hardstanding entrance laneway and public parking area in the northwestern corner; hardstanding for the storage of cars awaiting depollution, covered waste processing shed, site offices, welfare facilities and a weighbridge at the entrance and secure perimeter fencing.

5.4 The Subject Development

The proposed development, subject of this EIAR is as follows –

Permission is sought for –

1. The on-going use of the existing metal processing and transfer facility with waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. Permission for upgrades to the underground surface water attenuation tank comprising c.675 cubic metres, and an above ground overflow connected to same comprising 1500 sqm
3. Enhancement of car parking provision, including installation of 2no. EV charging point and
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc.

5.5 Population

The population of the state experienced rapid growth in the period between 1996 and 2022. The latest Census results (i.e. 2022) show that Ireland's population stood at 5,149,139 in April 2022, an increase of 8% since April 2016.

In particular, the population growth of Fingal County Council has been strong with an 11.6% rise on 2016 levels, more than twice that of the state overall. The population of the County has



been attributed to the availability of zoned and serviced land, strong inward investment and its strategic position in the Greater Dublin Area.

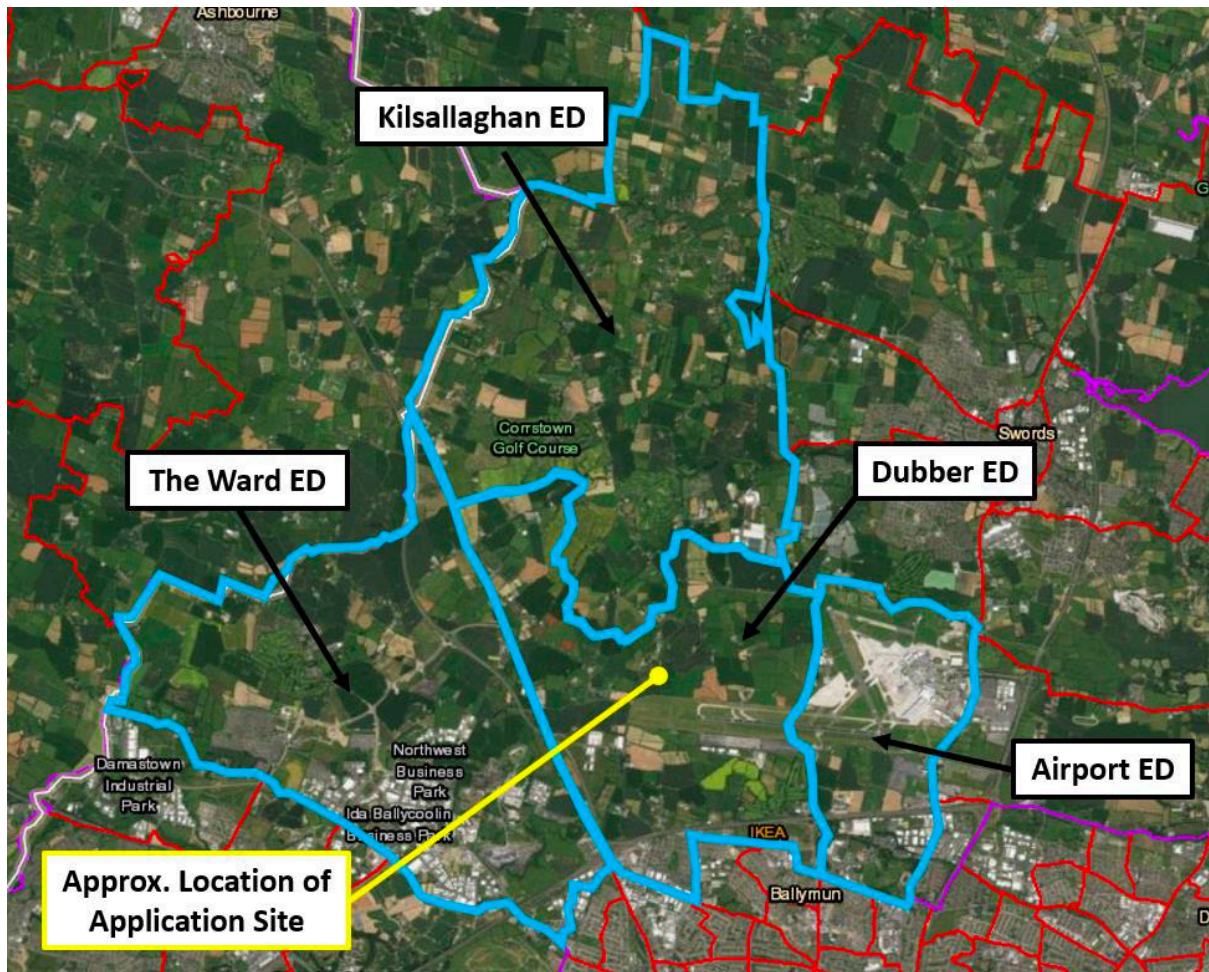


Figure 4.1: Electoral Division Map (subject site indicated in yellow)

**Table 5.1 Population Trends 2011-2022**

Location	Population			Percentage	Change	
	2011	2016	2022	2011-2016	2016-2022	2011-2022
Airport ED	4,032	5,018	6,139	+24.45	+22.34	+52.26
Dubber ED	6,359	7,372	8,812	+15.93	+19.53	+38.58
The Ward ED	8,241	9,602	13,242	+16.51	+37.91	+60.68
Kilsallaghan ED	2,205	2,263	2,427	+02.63	+07.25	+10.07
Total Catchment	20,837	24,255	30,620	+16.40	+26.24	+46.95
Fingal County	273,991	296,020	330,358	+08.04	+11.60	+20.57
Dublin City	527,612	554,554	592,818	+05.10	+06.90	+12.36
Dun Laoghaire - Rathdown	206,261	218,018	233,933	+05.70	+07.30	+13.41
South Dublin	265,205	278,767	301,068	+05.11	+08.00	+13.53
Dublin	1,273,069	1,347,359	1,458,177	+05.83	+08.22	+14.54
Kildare	210,312	222,504	247,869	+05.79	+11.40	+17.86
Wicklow	136,640	142,425	155,813	+04.23	+09.40	+14.03
Meath	184,135	195,044	206,552	+05.92	+13.20	+12.17
State	4,588,252	4,761,865	5,149,139	+03.78	+08.00	+12.22

On a regional level, aside from Fingal, the Dublin Local Authorities experienced a steady rate of growth when compared with the other counties in the Greater Dublin Area. This mirrors an identifiable and inevitable trend that emerged during the last two intercensal periods (2011-2016, 2016-2022) where the population in some of Dublin's traditional residential areas declined, whereas areas in the hinterland of Dublin including Fingal experienced exponential growth.

Table 5.1 (above) also shows the population growth within the District Electoral Divisions (DEDs) within the catchment area. The majority of DEDs within the area have experienced significant growth over the past decade. The subject lands are situated within the Dubber ED, an area that has seen major growth over the past decade with an increase of 19.53% recorded in the period between 2016 and 2022. Table 4.1 indicates that population within the vicinity of the Airport is relatively low due to safety restrictions or residential development and indeed the nature and extent of the airport area.

While the population within the catchment area may have increased since the 2016 Census due to significant residential developments at Finglas, Ballymun, Poppintree, Meakstown, Santry Demesne, Tyrrelstown, Hollywoodrath etc, the proposed development itself has no residential component and will not result in any increase in the permanent population of the area.



5.5.1 Potential Impact of the Subject Development (on Population)

Construction Phase

The construction phase of the subject development will not have any direct impact on the population of the area or the subject lands. The construction works are minor in nature, being the installation of SUDs underground tank and above ground overflow basin, a small section of post and panel wall within the site and provision of EV charging points. Therefore, given the nature of the works, the predicted impacts on population are imperceptible, neutral and short-term.

The construction of any project has the potential to give rise to impacts on the health and safety of human beings if activities are not managed properly. However, given the nature of the works, the predicted impacts are imperceptible, neutral and short-term. Measures to address Health and Safety considerations will be addressed in a construction and environmental management plan for the development in accordance with best practice.

Operational Phase

The operational phase of the subject development is not predicted to have any direct impact on the population of the area or the subject lands, in that it is a continuation of an activity that has been in place at this level or greater for c.25 years. Whilst the proposed development will continue to attract a small number of visitors to the site, this impact on population will only be of a transient nature, and is therefore considered to be imperceptible, neutral and short term.

In addition to the implementation of a CEMP, a fire prevention plan has produced to mitigate against risk of fire and airborne pollution as part of the Waste Permit requirements.

The implementation of this Plan will mitigate any predicted impact, therefore predicted residual impacts in respect of health and safety for the population, are deemed to be imperceptible, neutral and short-term, although this predicted impact is considered in full under Section 5.8.1 below.

5.5.2 Monitoring.

There is no requirement for population monitoring.



5.6 Employment.

5.6.1 Introduction

This section of the EIAR assesses the impact of the proposed development on employment in the vicinity of the subject site.

5.6.2 Research Methodology

The employment context of the receiving environment is set out drawing principally on the most recently available statistics for the total number of persons at work, unemployment levels and employment categorised according to social group. Therefore, information on the economic performance of the area and the wider Fingal region is derived primarily from the 2022 Census results and statistics obtained from the ESRI.

5.6.3 Receiving Environment

CSO 2022 statistics noted a State employment level of 2,300,000 compared with 2,006,641 in 2016 which resulted in an 16% increase in employment over the 6 year period. CSO figures released in Q2 2022 indicate 2,301,900 persons are in employment with an unemployment level of 176,276.

The unemployment rate as measured by the Census was 8%, down from 13% in April 2016. The CSO states that as of Q2 of 2023 the unemployment rate stood at 4.4% (121,200, Labour Force Survey Quarter 2 2023).

The long-term unemployment rate and the seasonally adjusted unemployment rates have also declined. This represents a considerable period where unemployment has declined indicating the continuing strong growth in the economy.

5.6.4 Characteristics of the Subject Development

The proposed development will take place on a site area of approximately c.3 hectares. The continuation of the existing waste processing and transfer facility on a permanent basis has ensured the existing employment on the lands was retained.

5.6.5 Potential Impact of the Subject Development

Construction Phase

The construction phase of the proposed development works will not have any direct impact on the receiving environment of the area or the subject lands.



Operational Phase

The operational phase of the proposed development will not have any direct impact on the population of the area or the subject lands. Securing retention and permanent planning permission will safeguard the existing employment at St. Margaret's Recycling who have over c.25 staff employed in the daily operation of the facility. This is considered to be a slight to moderate, positive and long-term impact arising from the development.

5.6.6 Remedial and Reductive Measures

No adverse impacts on employment are predicted to occur during the construction or operational phase of the development. No remedial or mitigation measures are considered necessary.

5.6.7 Predicted Impact of the Subject Development on Employment

The predicted impact of the proposed development will be the same as that set out for potential impacts.

5.6.8 Monitoring.

There is no requirement for employment monitoring.

5.7 Community Infrastructure and Social Facilities

5.7.1 Introduction

This section of the EIAR assesses the impact of the proposed development on the local community, social infrastructure and facilities in the vicinity of the subject site.

5.7.2 Research Methodology

This section was undertaken with regard to existing community facilities in proximity to the site, which may be affected by the proposed development.

5.7.3 Receiving Environment

The Fingal County Development Plan 2023-2029 defines the term 'community infrastructure' as including infrastructure and facilities such as education facilities, facilities associated with social service provision, public health facilities, childcare facilities including private nurseries, community facilities, libraries and arts centres, religious buildings, and cemeteries. The current situation in relation to these facilities in the subject area is set out in the following sections.



5.7.3.1 Community

The subject site is located on the periphery of the urban area of Dublin. The immediate vicinity of the site is very sparsely populated.

There is a full range of community facilities in Finglas and Ballymun where they are located within the urban area proper include a wide provision of schools, churches, library services and health services. These areas are well provided for in terms of active community recreation facilities, including playing fields, parks and sports facilities. These areas are also well provided for in terms of passive recreation facilities including public houses, restaurants, cinemas etc.

5.7.3.2 Education

The nearest primary school to the waste transfer and recycling facility is St. Margaret's National School which is situated within c. 150 meters north of the subject site. It is envisaged that the existing facility together with the increase in waste throughput at the facility will not impact upon educational facilities in the vicinity of the application site.

The nearest educational facilities excluding the St. Margaret's National School are located in Finglas to the south of the M50 and Kilbrook to the north of the waste and transfer facility. This is reflective of the location of the lands in close proximity to the airport and the safety restrictions associated with an International Airport.

5.7.3.3 Recreation

There are a number of recreational and sporting facilities located approximately 1.4 km north of the facility is St. Margaret's GAA club, with the St. Margaret's Golf & Country Club and grounds of Rivermeade Football Club located in Kilbrook further north of it. A number of recreational and sporting facilities located approximately 2.5 km south/southeast of the site beyond the airport runway that include grounds of the Royal College of Surgeons, and the GAA facilities of Ballymun Kickhams and Parnell's and Silloge Park Golf Club.

5.7.4 Characteristics of the Subject Development

The proposed development will take place on a site area of approximately 2.93 hectares. The continuation of the existing waste processing and transfer facility on a permanent basis will ensure the existing employment on the lands is retained.

5.7.5 Potential and/or Predicted Impact of the Subject Development

5.7.5.1 Construction Phase

Construction impacts are expected to be short term, but some potential adverse local impacts can be expected due to the actual construction of the development. This is likely to be



associated with construction traffic and any possible nuisance with such movements, for example an increase in daytime noise levels. The resident community in adjoining dwellings are most likely to have been affected by these short-term temporary impacts. Corresponding mitigation measures are set out in Chapter 16 which would have reduced these impacts to an insignificant level. It must also be noted that the construction phase comprises minor works and will be completed within a very short timeframe given the minor nature of the works.

5.7.5.2 Operational Phase

The continuation of use is unlikely to have any significant operational impacts on the community and social infrastructure in the vicinity of the application site.

5.7.6 Remedial and Reductive Measures

Construction Phase

The construction phase of the development is predicted to have none to imperceptible, short term and neutral impacts on the community and social facilities, which would not require reductive measures.

Operational Phase

The proposed development is not predicted to have any adverse impacts on community facilities in the area. No remedial or reductive measures are proposed with reference to community facilities.

5.7.7 Potential and Predicted Impact of the Proposed Development

The continuation of use is unlikely to have any significant or perceptible operational impacts. There is no predicted impact on community facilities as a result of the proposed development.

5.7.8 Monitoring

There is no requirement for community monitoring.

5.8 Human Health

The continued use of the existing St. Margaret's Waste Transfer and Recycling facility will not have an adverse impact on human health including mental health or wellbeing. Furthermore, there will be no adverse impacts on social, economic or environmental living conditions as a result of the continued use of the facility.



No mitigation measures are required in respect of Population and Human Health during the operational phase of the development.

5.8.1 Fire Risk & Safety

The operation of any project of this nature has potential to give rise to unplanned events or accidents, including fire, which impact on health and safety of human beings if such activities are not managed appropriately. Subject to adherence to best practice operation measures, such impacts are not considered to be likely or significant in this instance.

While possible, since 2018, the applicant has enhanced fire prevention measures on site, and the subject development proposes future measures regarding fire water management. It should be noted that during previous fire events there was no injury or loss of life.

5.8.2 Remedial and Reductive Measures

Construction Phase

The construction phase of the development is predicted to have none to imperceptible, short term and neutral impacts on fire safety, which would not require reductive measures.

Operational Phase

Mitigation measures outlined in the fire prevention plan (assessed and monitored in the context of the waste permit) should ensure that this would not result in any adverse impact or risk to life or property.

5.8.3 Potential and Predicted Impact of the Proposed Development

The continuation of use is unlikely to have any significant or perceptible operational impacts, subject to implementation of the fire prevention and management plan. Therefore, predicted impacts are determined to be imperceptible, neutral and short-term.

Furthermore, residual risks of fire and road traffic accidents will be managed by emergency services as per their standard procedures. (These procedures, including monitoring are part of the waste permit process and have been appropriately dealt with under the waste management legislation).

5.8.4 Monitoring

In addition to the implementation of a CEMP, a fire prevention plan has produced to mitigate against risk of fire and airborne pollution as part of the Waste Permit requirements.

The implementation of this Plan will mitigate any predicted impact, therefore predicted residual impacts in respect of health and safety for the population, are deemed to be imperceptible, neutral and short-term, although this is considered in Chapter



5.9 References.

- Census 2022
- CSO Quarterly Figures.
- Labour Force Surveys (various quarters)



6.0 Biodiversity

6.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) was carried out on behalf of ESC Environmental Ltd, by Serena Alexander, Ecologist; Peter McCormick, Environmental Scientist and Martijn Leenheer, Environmental Scientist.

Serena graduated from University College Dublin with a 1st Class Hons BSc degree, in Zoology in 2023, and works as a graduate ecologist with ESC Environmental Ltd. She has experience working in commercial and research-based labs, as well as familiarity with general genetics, phylogenetics and ecology. She specialises in data analysis, microbial/biological techniques, and has strong IT skills incl. R & Rstudio, Mega Software, and LinRegPCR.

Peter McCormick is a Senior Consultant with ESC Environmental Ltd., and has 7 years' experience in the Environmental Sector, working with both the public and private sector. He holds a degree in Level 8 BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo). He has experience in many aspects of environmental works including wastewater treatment system design, environmental permitting, water management, and specialises in ecological assessments (EcIAs), Appropriate Assessments and Natura Impact Statements.

Martijn Leenheer holds a 1st Class BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo) and has 11 years' experience in Ireland in soil remediation, invasive species commercial Wastewater Treatment, Discharge Licences, Waste Permits and Licences has been involved in Risk Assessments, NIS and EIAR reports for various commercial projects. Before moving to Ireland Martijn worked in the Netherlands as an Environmental Field Technician in soil research. He has been an Operations Director of Environmental Services Consultancy for 11 Years and a Founding Director of ESC Environmental LTD since 2021.

It assesses the biodiversity value of the proposed development area and the potential impacts of the development on the ecology of the surrounding area and within the potential zone of influence (Zol), and proposes measures for the mitigation of these impacts, where appropriate. Separately, an Appropriate Assessment has been carried out under separate legislative and EU Directive provisions, and this EIAR may be read in conjunction with this assessment.

Under the EIA Directive, as well as best practice methodology from the EPA, the analysis of impacts to biodiversity is an essential component of the EIA process, and so is a required chapter in any EIAR.

Under Article 6(3) of the Habitats Directive an "Appropriate Assessment" of projects must be carried out to determine if significant effects are likely to compromise the integrity of Natura 2000 sites. An Appropriate Assessment has been prepared as a separate stand-alone report.



6.2 Relevant Legislation

6.2.1 National Legislation

6.2.1.1 Wildlife Act 1976 and amendments

The Wildlife Act 1976 was enacted to provide protection to birds, animals, and plants in Ireland and to control activities which may have an adverse impact on the conservation of wildlife. With regard to the listed species, it is an offence to disturb, injure or damage their breeding or resting place wherever these occur without an appropriate licence from the National Parks and Wildlife Service (NPWS). This list includes all birds along with their nests and eggs. Intentional destruction of an active nest from the building stage up until the chicks have fledged is an offence. This includes the cutting of hedgerows from the 1st of March to the 31st of August. The act also provides a mechanism to give statutory protection to Natural Heritage Areas (NHAs). The Wildlife Amendment Act 2000 widened the scope of the Act to include most species, including the majority of fish and aquatic invertebrate species which were excluded from the 1976 Act. The current list of plant species protected by Section 21 of the Wildlife Act, 1976 (and amendments) is set out in the Flora (Protection) Order, 2022 (S.I. No. 235/2022). The Flora (Protection) Order affords protection to several species of plant in Ireland. This Act makes it illegal for anyone to uproot, cut or damage any of the listed plant species and it also forbids anyone from altering, interfering, or damaging their habitats. This protection is not confined to within designated conservation sites and applies wherever the plants are found.

6.2.1.2 EC (Birds and Natural Habitats) Regulations 2011

The EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive 1992) provides protection to particular species and habitats throughout Europe. The Habitats Directive has been transported into Irish law through the EC (Birds and Natural Habitats) Regulations 2011.

Annex IV of the EU Habitats Directive provides protection to a number of listed species, wherever they occur. Under Regulation 23 of the Habitats Directive, any person who, in regards to the listed species, *“Deliberately captures or kills any specimen of these species in the wild, deliberately disturbs these species particularly during the period of breeding, rearing, hibernation and migration, deliberately takes or destroys eggs from the wild or damages or destroys a breeding site or resting place of such an animal shall be guilty of an offence.”*

6.2.1.3 Invasive Species Legislation

Certain plant species and their hybrids are listed as Invasive Alien Plant Species in Part 1 of the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011, as amended). In addition, soils and other material containing such invasive plant material, are classified in Part 3 of the Third Schedule as vector materials and are subject to the same strict legal controls.



Failure to comply with the legal requirements set down in this legislation can result in either civil or criminal prosecution, or both, with very severe penalties accruing. Convicted parties under the Act can be fined up to €500,000.00, jailed for up to 3 years, or both. Extracts from the relevant sections of the regulations are reproduced below. *“49(2) Save in accordance with a licence granted [by the Department of Arts, Heritage and the Gaeltacht], any person who plants, disperses, allows or causes to disperse, spreads or otherwise causes to grow in anyplace [a restricted non-native plant], shall be guilty of an offence.*

49(3) ... it shall be a defence to a charge of committing an offence under paragraph (1) or (2) to prove that the accused took all reasonable steps and exercised all due diligence to avoid committing the offence. 50(1) Save in accordance with a licence, a person shall be guilty of an offence if he or she [...] offers or exposes for sale, transportation, distribution, introduction, or release —(a) an animal or plant listed in Part 1 or Part 2 of the Third Schedule, (b) anything from which an animal or plant referred to in subparagraph (a) can be reproduced or propagated, or (c) a vector material listed in the Third Schedule, in any place in the State specified in the third column of the Third Schedule in relation to such an animal, plant or vector material.”

6.2.2 International Legislation

6.2.2.1 EU Birds Directive

The Birds Directive constitutes a level of general protection for all wild birds throughout the European Union. Annex I of the Birds Directive includes a total of 194 bird species that are considered rare, vulnerable to habitat changes or in danger of extinction within the European Union. Article 4 establishes that there should be a sustainable management of hunting of listed species, and that any large scale non-selective killing of birds must be outlawed. The Directive requires the designation of Special Protection Areas (SPAs) for: listed and rare species, regularly occurring migratory species and for wetlands which attract large numbers of birds. There are 25 Annex I species that regularly occur in Ireland.

6.2.2.2 EU Habitats Directive

The Habitats Directive aims to protect some 220 habitats and approximately 1000 species throughout Europe. The habitats and species are listed in the Directives annexes, where Annex I covers habitats and Annex II, IV and V cover species. There are 59 Annex I habitats in Ireland and 33 Annex IV species which require strict protection wherever they occur. The Directive requires the designation of Special Areas of Conservation for areas of habitat deemed to be of European interest. The SACs together with the SPAs from the Birds Directive form a network of protected sites called Natura 2000.

6.2.2.3 Water Framework Directive

The EU Water Framework Directive (WFD) 2000/60/EC is an important piece of environmental legislation which aims to protect and improve water quality. It applies to rivers, lakes,



groundwater, estuaries, and coastal waters. The Water Framework Directive was agreed by all individual EU member states in 2000, and its first cycle ran from 2009 – 2015. The Directive runs in 6-year cycles; the second cycle ran from 2016 – 2021, and the current (third) cycle runs from 2022-2027. The aim of the WFD is to prevent any deterioration in the existing status of water quality, including the protection of good and high-water quality status where it exists. The WFD requires member states to manage their water resources on an integrated basis to achieve at least ‘good’ ecological status, through River Basin Management Plans (RBMP), by 2027.

6.2.2.4 Bern and Bonn Convention

The Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1982) was enacted to conserve all species and their habitats. The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, enacted 1983) was introduced to give protection to migratory species across borders in Europe.

6.2.2.5 Ramsar Convention

The Ramsar Convention on Wetlands is an intergovernmental treaty signed in Ramsar, Iran, in 1971. The treaty is a commitment for national action and international cooperation for the conservation of wetlands and their resources. In Ireland there are currently 45 Ramsar sites which cover a total area of 66,994 Ha.

6.3 Methodology

This section details the steps and methodology employed to undertake an Ecological Impact Assessment of the proposed development, and follows best practise methodology, as noted in 6.3.2.

A comprehensive desk-based assessment has been undertaken, and site visits have been carried out by Serena Alexander, Peter McCormick and Martijn Leenheer at the site during March and August 2024 as detailed in the following sections.

6.3.1 Zone of Influence

The “zone of influence” (Zol) for a project is the area over which ecological features may be affected by changes as a result of the proposed development and associated activities. This is likely to extend beyond the development site when there exists ecological or hydrological links beyond the site boundaries (CIEEM, 2018). The Zol varies with different ecological features depending on their sensitivity to environmental change.

Given the location of the site of the subject development (its placement adjacent to Dublin Airport-zoned lands) and distance from Natura 2000 sites (minimum distance >10km away), the Zol is regarded to be relatively limited, with the exception of potential hydrologically linked habitats to the site. As noted in the Appropriate Assessment, on the basis of precautionary



principles, indirect hydrological links cannot be excluded. There are no direct pathways to any other Natura 2000 site.

6.3.2 Desk Study

This EIAR chapter has been prepared in accordance with the following publications:

- Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland (the Institute of Ecology and Environmental Management (IEEM), 2016)
- Guidelines on the Information to be contained in Environmental Impact Assessment Reports (the Environmental Protection Agency (EPA), 2017)

A desktop study was carried out to collate and review available information, datasets and documentation sources pertaining to the site's natural environment. The desktop study relied on the following sources:

- Information on species records [cite] and distributions, obtained from the National Biodiversity Data Centre (NBDC) at www.maps.biodiversityireland.ie ;
- Information on waterbodies, catchment areas and hydrological connections obtained from the Environmental Protection Agency (EPA) at www.gis.epa.ie ;
- Information on bedrock, groundwater, aquifers and their statuses, obtained from Geological Survey Ireland (GSI) at www.gsi.ie ;
- Information on the network of designated conservation sites, boundaries, qualifying interests and conservation objectives, obtained from the National Parks and Wildlife Service (NPWS) at www.npws.ie ;
- Satellite imagery and mapping obtained from various sources and dates including Google, Digital Globe, Ordnance Survey Ireland ;
- Information on the existence of permitted developments, or developments awaiting decision, in the vicinity of the proposed development from the National Planning Application Database available at: <https://housinggov.ie/maps.arcgis.com>

There are a number of designations for nature conservation in Ireland, including but not limited to Special Protection Areas (SPA; Birds Directive), Special Areas of Conservation (SAC; Habitats Directive) - both of which fall under the umbrella of Natura 200 sites - RAMSAR sites, and Natural Heritage Areas. The mechanism for these designations is through national or international legislation. Proposed NHAs (pNHA) are areas that have yet to gain full legislative protection and are generally protected through the relevant County Development Plan. Surface hydrological pathways lead from the development site to the Malahide Estuary, which is designated as an SPA, SAC and a pNHA. Malahide Estuary is also internationally recognised as a Ramsar wetland site.

6.3.3 Assessment of Significance

An ecological assessment of the site was completed on behalf of ESC Environmental. The value of the ecological resources – the habitats and species present or potentially present was



determined using the ecological evaluation guidance given in the National Roads Authority's Ecological Assessment Guidelines (NRA, 2009). This evaluation scheme, which scales from locally important to internationally important, seeks to provide value ratings for habitats and species present that are considered ecological receptors of impacts that may ensue from a proposal. The NRA (2009) defines key ecological receptors as those ecological features which are evaluated as Locally Important (higher value) or higher, that are likely to be impacted significantly by the Proposed Development. Internationally important receptors would include Special Areas of Conservation (SAC) or Special Protected Areas (SPA) while those of national importance would include Natural Heritage Areas (NHA).

This evaluation scheme has been adapted here to assess the value of habitats and fauna within the Site of the Proposed Development. The value of habitats is assessed based on the condition, size, rarity, conservation and legal status. The value of fauna is assessed on its biodiversity value, legal status and conservation status. Biodiversity value is based on its national distribution, abundance or rarity, and associated trends.

Using the evaluation criteria as described above, the habitats and species identified as being present or potentially present within the ZOI were assessed. As per the NRA guidelines, assessment is only undertaken of key ecological receptors (KERs).

6.3.4 Assessment of Impact

Once the value of the identified Key Ecological Receptors (KERs) was determined, the next step was to assess the potential effect or impact of the Proposed Development on these KERs. This was carried out with regard to the criteria outlined in various impact assessment guidelines (NRA, 2009; CIEEM, 2018) that set down a number of parameters such as quality, magnitude, extent and duration that should be considered when determining which elements of the proposal could constitute impact or sources of impacts. Once impacts are defined, their significance was categorised using EPA Guidelines (EPA, 2022).

Identification of a risk does not constitute a prediction that it will occur, or that it will create or cause significant impact. However, identification of the risk does mean that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the risk and the characteristics of the ecological receptor.

Table 6.3.1 Criteria for assessing ecological importance

Importance	Criteria
International Importance	<ul style="list-style-type: none"> - European Site' including Special Area of Conservation (SAC), Site of Community Importance (SCI), Special Protection Area (SPA) or proposed Special Area of Conservation. - Proposed Special Protection Area (pSPA). - Site that fulfils the criteria for designation as a 'European Site' (see Annex III of the Habitats Directive, as amended).



	<ul style="list-style-type: none"> - Features essential to maintaining the coherence of the Natura 2000 Network - Site containing 'best examples' of the habitat types listed in Annex I of the Habitats Directive. - Resident or regularly occurring populations (assessed to be important at the national level) of the following: <ul style="list-style-type: none"> • Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; and/or • Species of animal and plants listed in Annex II and/or IV of the Habitats Directive - Ramsar Site (Convention on Wetlands of International Importance Especially Waterfowl Habitat 1971). - World Heritage Site (Convention for the Protection of World Cultural & Natural Heritage, 1972). - Biosphere Reserve (UNESCO Man & The Biosphere Programme) - Site hosting significant species populations under the Bonn Convention (Convention on the Conservation of Migratory Species of Wild Animals, 1979). - Site hosting significant populations under the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats, 1979). - Biogenetic Reserve under the Council of Europe. - European Diploma Site under the Council of Europe. - Salmonid water designated pursuant to the European Communities (Quality of Salmonid Waters) Regulations, 1988, (S.I. No. 293 of 1988).
National Importance	<ul style="list-style-type: none"> - Site designated or proposed as a Natural Heritage Area (NHA). - Statutory Nature Reserve. - Refuge for Fauna and Flora protected under the Wildlife Acts. - National Park. - Undesignated site fulfilling the criteria for designation as a Natural Heritage Area (NHA); Statutory Nature Reserve; Refuge for Fauna and Flora protected under the Wildlife Act; and/or a National Park. - Resident or regularly occurring populations (assessed to be important at the national level) of the following: <ul style="list-style-type: none"> • Species protected under the Wildlife Acts; and/or • Species listed on the relevant Red Data list. • Site containing 'viable areas' of the habitat types listed in Annex I of the Habitats Directive
County Importance	<ul style="list-style-type: none"> - Area of Special Amenity. - Area subject to a Tree Preservation Order. - Area of High Amenity, or equivalent, designated under the County Development Plan. - Resident or regularly occurring populations (assessed to be important at the County level) of the following:



	<ul style="list-style-type: none"> • Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; • Species of animal and plants listed in Annex II and/or IV of the Habitats Directive; • Species protected under the Wildlife Acts; and/or • Species listed on the relevant Red Data list. • Site containing area or areas of the habitat types listed in Annex I of the Habitats Directive that do not fulfil the criteria for valuation as of International or National importance. <p>- County important populations of species; or viable areas of semi-natural habitats; or natural heritage features identified in the National or Local BAP; if this has been prepared.</p> <p>- Sites containing semi-natural habitat types with high biodiversity in a county context and a high degree of naturalness, or populations of species that are uncommon within the county.</p> <p>- Sites containing habitats and species that are rare or are undergoing a decline in quality or extent at a national level.</p>
Local Importance (higher value)	<p>- Locally important populations of priority species or habitats or natural heritage features identified in the Local BAP, if this has been prepared;</p> <p>- Resident or regularly occurring populations (assessed to be important at the Local level) of the following:</p> <ul style="list-style-type: none"> • Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; • Species of animal and plants listed in Annex II and/or IV of the Habitats Directive; • Species protected under the Wildlife Acts; and/or o • Species listed on the relevant Red Data list. • Sites containing semi-natural habitat types with high biodiversity in a local context and a high degree of naturalness, or populations of species that are uncommon in the locality; <p>- Sites or features containing common or lower value habitats, including naturalised species that are nevertheless essential in maintaining links and ecological corridors between features of higher ecological value.</p>
Local importance (lower value)	<p>- Sites containing small areas of semi-natural habitat that are of some local importance for wildlife;</p> <p>- Sites or features containing non-native species that are of some importance in maintaining habitat links.</p>

6.3.5 Impact Assessment Criteria

In line with the EPA Guidelines (EPA, 2022), the following terms are defined when quantifying the quality of effects. See Table 6.3.2 below.



Table 6.3.2: Definition of quality of effects.

Quality	Definition
Positive Effects	A change which improves the quality of the environment (for example, by increasing species diversity; or the improving reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).
Neutral effects	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error
Negative/adverse effects	A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).

In line with the EPA Guidelines (EPA, 2022), the following terms are defined when quantifying the significance of impacts. See Table 6.3.3 below.

Table 6.3.3 Criteria for Assessing Impact Magnitude.

Impact magnitude	Definition
No change	No discernible change in the ecology of the affected feature
Imperceptible impact	A change in the ecology of the affected site, the consequences of which are strictly limited to within the development boundaries
Slight impact	A change in the ecology of the affected site which has noticeable ecological consequences outside the development boundary, but these consequences are not considered to significantly affect the distribution and/or abundance of species or habitats of conservation importance(1)
Moderate impact	A change in the ecology of the affected site, which has noticeable ecological consequences outside the development boundary. These consequences are considered to significantly affect the distribution and/or abundance of species or habitats of conservation importance.
Substantial impact	A change in the ecology of the affected site, which has noticeable ecological consequences outside the development boundary. These consequences are considered to significantly affect species or habitats of high conservation importance and to potentially affect the overall viability of those species or habitats in the wider area(2)
Profound impact	A change in the ecology of the affected site, which has noticeable ecological consequences outside the development boundary. These



	consequences are considered to be such that the overall viability of species or habitats of high conservation importance in the wider area ⁴ is under a very high degree of threat (negative impact) or are likely to increase markedly (positive impact).
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Table 6.3.4 Criteria for Assessing Impact Duration.

Impact type	Duration
Temporary impact	Impact lasting for one year or less
Short term impact	Impact lasting one to seven years
Medium term impact	Impact lasting seven to fifteen years
Long term impact	Impact lasting fifteen to sixty years
Permanent impact	Impact lasting over sixty years

It is not possible to define specific numerical thresholds, as different species/habitat have varying degrees of resilience to ecological perturbation 2 i.e., the area relevant to the assessed importance of the feature

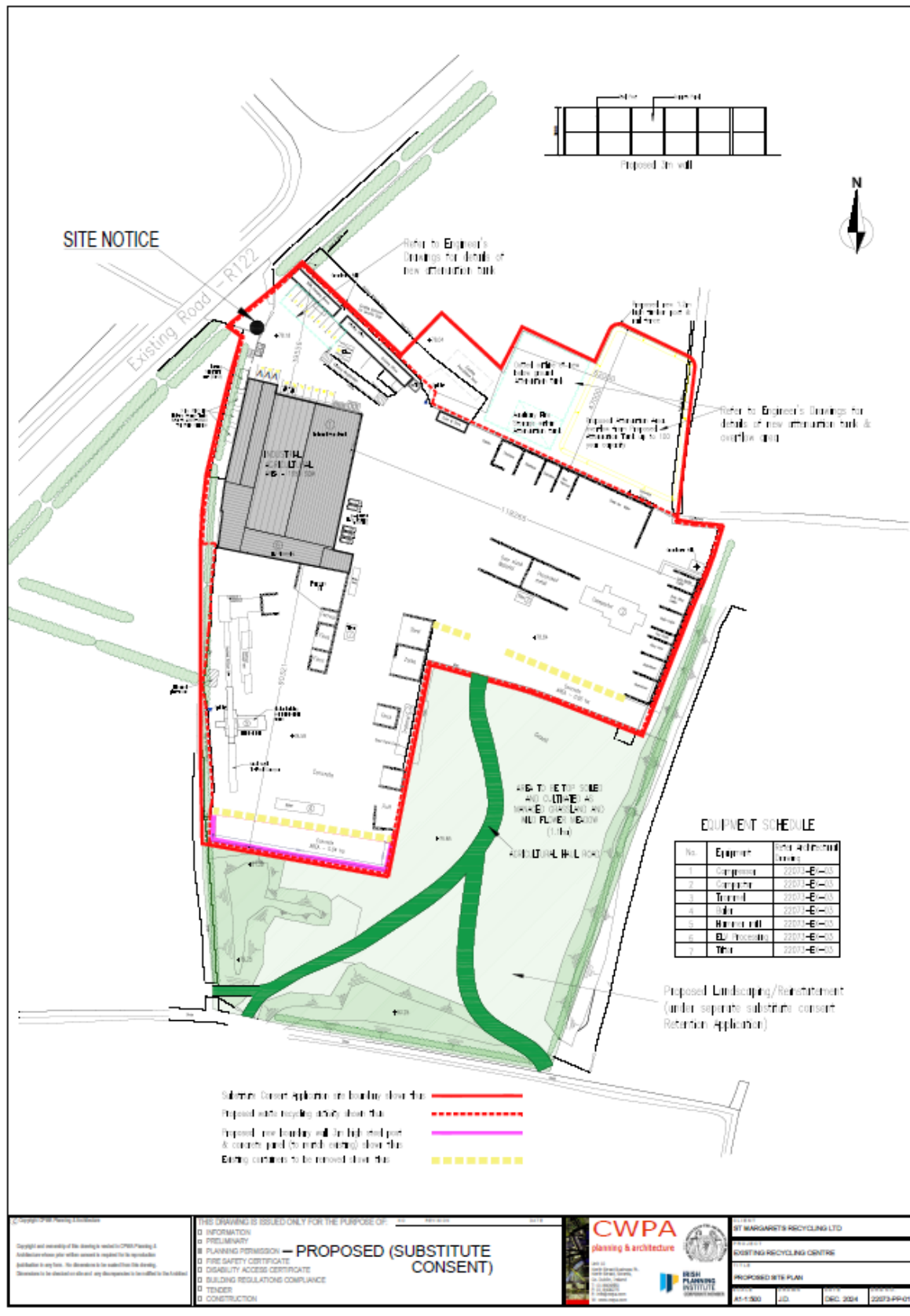
6.4 Project Description

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).



Fig 02. Proposed Site Layout (Indicative purposes)





6.5 Receiving Environment

Field Study

A number of site visits were carried out between March & August 2024 by Serena Alexander, Martijn Leenheer and Peter McCormick.

Serena graduated from University College Dublin with a 1st Class Hons BSc degree, in Zoology in 2023, and works as a graduate ecologist with ESC Environmental Ltd. She has experience working in commercial and research-based labs, as well as familiarity with general genetics, phylogenetics and ecology. She specialises in data analysis, microbial/biological techniques, and has strong IT skills incl. R & Rstudio, Mega Software, and LinRegPCR.

Martijn Leenheer holds a 1st Class BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo) and has 11 years' experience in Ireland in soil remediation, invasive species commercial Wastewater Treatment, Discharge Licences, Waste Permits and Licences has been involved in Risk Assessments, NIS and EIAR reports for various commercial projects. Before moving to Ireland Martijn worked in the Netherlands as an Environmental Field Technician in soil research. He has been an Operations Director of Environmental Services Consultancy for 11 Years and a Founding Director of ESC Environmental LTD since 2021.

Peter McCormick is a Senior Consultant with ESC Environmental Ltd., and has 7 years' experience in the Environmental Sector, working with both the public and private sector. He holds a degree in Level 8 BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo). He has experience in many aspects of environmental works including wastewater treatment system design, environmental permitting, water management, and specialises in ecological assessments (EclAs), Appropriate Assessments and Natura Impact Statements.

The site was surveyed in accordance with the Heritage Council's Best Practice Guidance for Habitat Survey and Mapping (Smith et al., 2010). Habitats were identified in accordance with Fossitt's Guide to Habitats in Ireland (Fossitt, 2000). Species abundance was determined using the DAFOR scale, which is a subjective form of habitat description commonly used in conjunction with habitat classifications.

6.5.1 Habitat and Flora Survey

Following Fossitt's Guide to Habitats in Ireland (Fossitt, 2000), the site can be described as the following:

The site, comprising the waste recycling facility and adjacent fields (See Figure 6.5.2 for habitat map) is nearly entirely composed of buildings and artificial surfaces (BL3). The external boundary to the south and west is composed of a native hedgerow – WL1 with Hawthorn *Crataegus monogyna*, Elder *Sambucus nigra*, Ash *Fraxinus excelsior*, Brambles *Rubus fruticosus* agg. and Ivy *Hedera helix*. A drainage ditch – FW4 along the western boundary had no



flowing water but was partly wet. Using methodology from the Heritage Council these hedgerows can be assessed as of ‘higher significance’ due to their age, structure and species diversity (Foulkes at el., 2013).



Fig 6.5.1: Habitat map

Elsewhere semi-natural boundaries, where they exist, are composed of earth banks – BL2 which are grassy with Docks *Rumex* sp., Vetches *Vicia* sp., Thistles *Cirsium* sp. and Ragwort *Senecio jacobaea*.



Fig 6.5.1.: hedgerow (WL1) along drainage ditch (FW4) in grassland area.



Fig. 6.5.2 : Earth banks present at the site along the eastern border



There are no alien invasive species (as listed on SI No 477 of 2011) or plants which are rare or protected. Overall, hedgerows on the site are of local biodiversity value but are not associated with habitats listed on Annex I of the Habitats Directive or for which SACs/SPAs are typically designated.

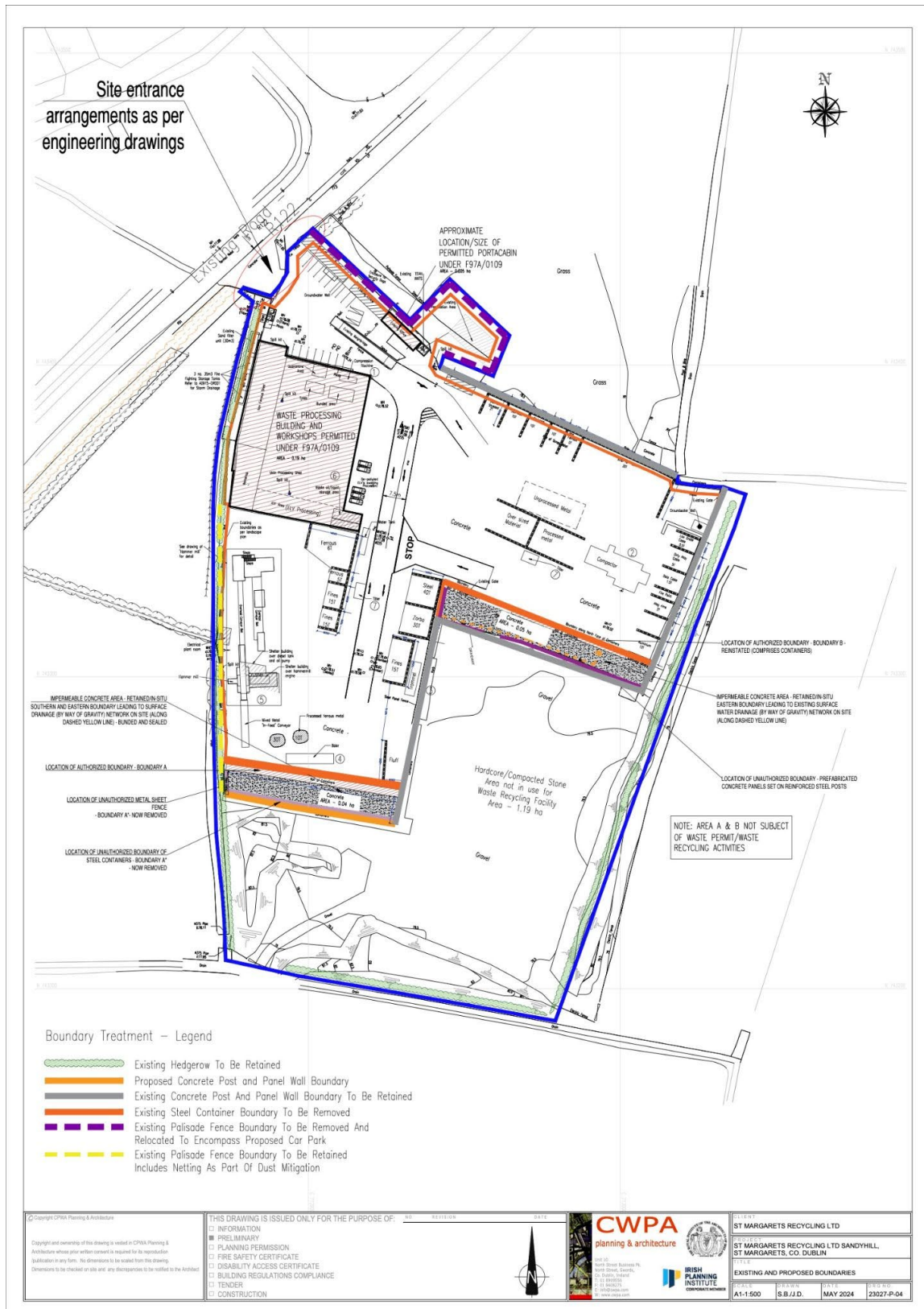
Other habitats are of low or negligible biodiversity value; see hatched lands in Fig 6.5.3 below, denoting areas marked “A”, “B” and “C”, conditioned to be restored to agricultural lands (under F13A/0109) - this area comprises compacted stone over existing ground.

Fig 6.5.3. Planning History Drawing – Hatched area to north and northeast of site denoting compacted stone over existing ground. (Indicative purposes only)





Fig 6.5.4: existing and proposed boundaries of the proposed development site at St. Margaret's Recycling & Transfer Centre Ltd.





6.5.2 Fauna Survey

Faunal surveys were carried out by Serena Alexander during the course of ecological walkover surveys. Walkover surveys were carried out within the site boundary; surveys involved a walkover of the site to identify any species present; or incidental sightings or proxy signs (prints, scats etc.) of activity.

6.5.2.1 Mammal Surveys

Footprints of Irish Hare were noted from the main portion of the site. No other direct evidence of mammals was recorded.

While limited data are available on the distribution of Hedgehog, Pygmy Shrew and Irish Stoat, they are considered ubiquitous in the Irish countryside and suitable habitat is available for them at and around the proposed development site (Hayden & Harrington, 2001).

No evidence of badger activity was found in any area of the site. The habitats on the site are considered suboptimal for sett construction, particularly as drainage ditches accompany the hedgerow (Byrne et al., 2012). There are no records from this locality of badgers from the National Biodiversity Data Centre.

There are no habitats on the site suitable for otters.

6.5.2.2 Bat Surveys

Features on the site are considered to be of low value to roosting bats (Hundt, 2012), with no suitable buildings or veteran trees with holes, cracks, etc. Thus, a detector survey was not carried out. Hedgerow features do, however, provide foraging opportunities and it can be presumed that bats are present for this purpose.

6.5.2.3 Avian Surveys

Of the species listed by BirdWatch Ireland as being of high conservation concern (Colhoun & Cummins, 2013) Grey Partridge *Perdix perdix*, Corncrake *Crex crex*, Barn Owl *Tyto alba*, and Yellowhammer *Emberiza citrinella* were recorded as breeding in North Dublin during the 2007-11 Bird Atlas project (Balmer et al., 2013). There is no suitable breeding habitat for Barn Owl on the subject lands while records for Corncrake and Grey Partridge date from pre-1972. Yellowhammer is typically associated with arable farmland and is not likely to be present on this site.

It is worth noting that there is active bird control measures at the nearby Dublin Airport and that the on-going planning process near the airport ensure that no features are included in the wider area that attract birds.



6.5.2.4 Herpetofauna and Aquatic Fauna Surveys

Common Frog *Rana temporaria* and Common Lizard *Lacerta vivipara* are protected under the Wildlife Act 1976 and are likely to be present on this site. Suitable habitat for spawning Frogs is present within the drainage ditch however no spawn was noted in 2018. Smooth Newts *Lissotriton vulgaris* are to be found in Dublin but there are no permanent ponds on this site in which they are likely to be breeding.

Monitoring by Inland Fisheries Ireland, from 2011, indicated that the Broadmeadow river system holds populations of Brown Trout *Salmo trutta*, European Eel *Anguilla anguilla*, Minnow *Phoxinus phoxinus*, Nine-spined Stickleback *Pungitius pungitius*, and Three-spined Stickleback *Gasterosteus aculeatus* (this list is an agglomeration from all three sampling points along the Broadmeadow). These fish may also be present along the River Ward.

It should be noted that the Broadmeadow river system is circa 10km from the site; the potential hydrological connection is mainly limited to surface runoff, and to a lesser extent bedrock aquifer flow or vertical infiltrating water. Surface water run-off on site is mitigated by way of a permitted and monitored water drainage system. These measures were permitted, and are in operation and an integral component of the existing development, rather than new mitigation. The system is monitored and has been found to be effective. As such, the two (i.e. the site and the Broadmeadow) are considered to be minimally connected but are considered on the basis of precautionary principles.

6.5.2.5 Invertebrates

Most habitats, even highly altered ones, are likely to harbour a wide diversity of invertebrates. In Ireland only one insect is protected by law, the Marsh Fritillary butterfly *Euphydryas aurinia*, and this is not to be found on farmland. Other protected invertebrates are confined to freshwater and wetland habitats and so are not present on this site.

6.6 Survey constraints or limitations

Habitats

It is acknowledged that due to the seasonality of various floral species, not all species will be apparent at any one time in the year. However, this limitation is in this case not considered material insofar as the site's boundaries are, for the most part, not natural boundaries. Where natural boundaries exist, the development has not altered these boundaries and they have been retained.



Invasive species

Throughout the survey work, the opportunity was taken to record the presence of any invasive non-native species. However, it is acknowledged that the detectability of such species can vary throughout the year and depend on their life stage or recent management.

6.7 Interaction of rEIAR & Assessments under EU Habitats & Birds Directives

6.7.1 Designated sites

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (79/409/EEC) seeks to protect birds of special importance by the designation of Special Protection Areas (SPAs). It is the responsibility of each member state to designate SPAs and SACs, both of which will form part of Natura 2000, a network of protected sites throughout the European Community. SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the qualifying interests of the sites; from these the conservation objectives of the site are derived.

When assessing ecological impacts, the CIEEM Guideline recommend a 15km pathway consideration zone as an adequate assessor for potential effects. Due to the characteristics and scale of the proposed project, all other Natura 2000 sites and pNHA/NHA sites beyond threshold distances of 15km are considered to be of sufficient distance from the proposed site, that no significant effects could be caused either directly or indirectly or in combination with other plans or projects to their interest features. Any impacts caused by the proposed development have no valid impact pathway to transfer along to reach any of the receptor interest features. These sites are thus 'screened out' and not considered further.

A stand-alone Appropriate Assessment screening is submitted separately to this assessment and expands on the potentially affected designated sites and their conservation objectives in more detail. Figure 6.7.1 displays the Natura 2000 sites within a 15km pathway consideration zone of the proposed project; hydrological pathways were considered beyond 15km also.



Species	Level of Protection	Habitat	Red List Status
Whiskered bat <i>Myotis mystacinus</i>	Annex IV Habitats Directive; Wildlife (Amendment) Act, 2000	Gardens, parks and riparian habitats	Least Concern
Natterer's bat <i>Myotis nattereri</i>		Woodland	Least Concern
Leisler's bat <i>Nyctalus leisleri</i>		Open areas roosting in attics	Near Threatened
Brown long-eared bat <i>Plecotus auritus</i>		Woodland	Least Concern
Common pipistrelle <i>Pipistrellus pipistrellus</i>		Farmland, woodland and urban areas	Least Concern
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>		Rivers, lakes & riparian woodland	Least Concern
Daubenton's bat <i>Myotis daubentonii</i>	Annex V Habitats Directive; Wildlife (Amendment) Act, 2000	Woodlands and bridges associated with open water	Least Concern
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>		Parkland, mixed and pine forests, riparian habitats	Least Concern
Irish hare <i>Lepus timidus Hibernicus</i>		Wide range of habitats	Least Concern
Pine Marten <i>Martes martes</i>	Wildlife (Amendment) Act, 2000	Broad-leaved and coniferous forest	Least Concern
Hedgehog <i>Erinaceus europaeus</i>		Woodlands and hedgerows	Least Concern
Pygmy shrew <i>Sorex minutus</i>		Woodlands, heathland, and wetlands	Least Concern
Red squirrel <i>Sciurus vulgaris</i>		Woodlands	Near Threatened
Irish stoat <i>Mustela erminea hibernica</i>		Wide range of habitats	Least Concern
Badger <i>Meles meles</i>		Farmland, woodland and urban areas	Least Concern



Species	Level of Protection	Habitat	Red List Status
Red deer <i>Cervus elaphus</i>	Wildlife (Amendment) Act, 2000	Woodland and open moorland	Least Concern
Fallow deer <i>Dama dama</i>		Mixed woodland but feeding in open habitat	Least Concern
Sika deer <i>Cervus nippon</i>		Coniferous woodland and adjacent heaths	-

6.7.3 Protected Species in the Area

The site of the proposed development is located within the Ordnance Survey Ireland National Grid 2km square O14. Species records from the National Biodiversity Data Centre (NBDC) online database for this grid square was studied for the presence of rare or protected flora and fauna. In addition, data from various sources (e.g. Inland Fisheries Ireland) were used to determine the presence of species in the vicinity of the Development. Table 6.7.2 below outlines the results of this assessment. It must be noted that this list cannot be seen as exhaustive as suitable habitat may be available for other important and protected species.

Table 6.7.2

Species	Habitat	Date of last record
Red hemp-nettle <i>Galeopsis angustifolia</i>	Calcareous gravels	Record pre-1970
Meadow barley <i>Hordeum secalinum</i>	Upper parts of brackish marshes, chiefly near the sea	Record pre-1970
Hairy St. John's-wort <i>Hypericum hirsutum</i>	Woods and shady places	Current, record from Santry Court
Hairy violet <i>Viola hirta</i>	Sand dunes, grasslands, limestone rocks	Current, record from Santry Demesne

6.8 The Predicted and or potential Impact of the Subject Development

The potential impacts of the proposed project on biodiversity on site is considered to be insignificant, in that the development has been constructed with mitigation measures as detailed below (i.e. in accordance with the permission under F13A/0409 and Waste Licence).



6.8.1 Impact Prediction

6.8.2 Construction Phase

1. Loss of Habitat:
No semi-natural habitats are to be affected by this proposal. The stretch of hedgerow to the west is to be retained along with its drainage ditch.
2. Species Mortality:
The direct mortality of species during land clearance. No habitat suitable for nesting birds or other wildlife will be affected by this project.
3. Pollution of Water Courses:
Through the ingress of silt, oils and other toxic substances. No significant effects are likely to occur from this source due to the limited nature of works to be undertaken and the lack of direct pathways to surface water bodies.
4. Damage to Treelines:
Treelines that are to be conserved are at risk from the movement of machinery and storage of materials that can compact soil. This in turn can damage the root structure of trees and other vegetation, leading to long-term impacts such as vulnerability to disease.

6.8.3 Potential impacts during normal operation

5. Impacts to species through the disruption of ecological corridors:
No ecological corridors are to be fragmented or disrupted as a result of the development.
6. Pollution to the water from foul water arising from the development:
The subject development is not served by Ringsend wastewater treatment plant, and therefore this WWTP and its operation has no direct bearing on the subject development. The development is served by a proprietary wastewater treatment system which is operating in accordance with standards set out by the EPA and as such in operating in this manner and being monitored accordingly does not adversely impact on groundwater.
7. Pollution to the water from surface water run-off arising from the development:
As part of the proposed development is the addition of an underground surface water attenuation tank, there is unlikely to be any negative environmental impact from surface water run-off.



8. Fire Water

In assessing this development, we have also considered the possibility and worst case scenario of a fire on site and the use of water to put out such a fire. Fire water retention has been provided for onsite as outlined in the chapter dealing with hydrology.

Additional measures are proposed if the development were to be permitted to continue to operate. These are considered to be satisfactory mitigatory measures and are to a large extent in place with the additional precautionary over and above attenuation proposed.

Table 6.1– Nature of predicted impacts

impact		Direct/ indirect	Cumulative	Duration	Reversible	Positive/ negative
Construction Phase						
1	Habitat loss	Direct	Yes	Temporary	Yes	Neutral
2	Species mortality	Direct	No	Permanent	No	Neutral
3	Pollution of water courses	Indirect	Yes	Temporary	Yes	Neutral
Operation Phase						
4	Impacts to species	Direct	Yes	Permanent	No	Neutral
5	Pollution to the water from foul water	Indirect	Yes	Permanent	Yes	Neutral
6 & 7	Pollution to the water from surface water run-off, incl. firewater	Indirect	Yes	Permanent	Yes	Neutral

6.8.4 Interaction with plans or projects

The development of these lands in principle was assessed in the LAP and the CDP SEAs and not considered to be such that would preclude their zoning and development.



6.8.5 Do nothing

N/A - Environmental improvements are recommended, and are also proposed to be implemented as part of the Substitute Consent Application for retention, specifically the conversion of c.1.1 ha of hardstanding to managed grassland/wildflower meadow.

6.8.6 Remedial and Reductive Measures

Additional SuDs measures are proposed if the development were to be permitted to continue to operate, and will ensure water quality is protected. These are considered to be satisfactory mitigatory measures and compliment the already in place mitigation, providing additional precautionary over and above attenuation in the event of 1:30 and 1:100 flood events.

Predicted impacts assuming mitigation are imperceptible, positive and long-term.

6.9 Interactions and Cumulative Impacts

As the subject development is existing, and all impacts are already known or experienced, interactions and cumulative impacts are minimal.

Previously assessed and conditioned mitigation in respect of surface water run-off is already in place, and has been as such since permitted in 2014, by way of surface water drainage, with oil interceptors. Attenuation tanks to cater for storm water and fire water events are also in place and subject of retention. These are considered in full under hydrology. The inclusion of these features is long-term, significant and positive.

The only element of construction and proposed mitigation is that noted above which is considered in greater depth in soils and geology, and is considered to be a minor but positive impact.

6.10 Monitoring

Monitoring is carried out as part of the waste permit, and will continue to be carried out with sampling for dust and water run-off being carried out on an on-going basis. To date monitoring has been effective and demonstrates no material or significant adverse impact

6.11 References

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7.0 Land, Soils & Geology

7.1 Introduction / Methodology

The following EIAR chapter has been prepared by Peter McCormick of ESC Environmental Ltd. Peter McCormick is a Senior Consultant with ESC Environmental Ltd., and has 7 years' experience in the Environmental Sector, working with both the public and private sector. He holds a degree in Level 8 BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo). He has experience in many aspects of environmental works including wastewater treatment system design, environmental permitting, water management, and specialises in ecological assessments (EclAs), Appropriate Assessments and Natura Impact Statements. A chapter on Lands, soils and geology was originally prepared by Colin O'Reilly PhD (Hydrology) of Envirologic Ltd and Niamh Murray of Boylan Engineering, on behalf of St. Margaret's Recycling and Transfer Centre Limited (St. Margaret's Metal Recycling - SMMR) and submitted under F19A/0135. However, this application which was for a greater tonnage was withdrawn. It was, however, helpful in terms of providing baseline data for this assessment.

The site is an operational recycling and waste transfer facility and also an Authorised Treatment Facility (ATF) for end-of-life vehicles (ELVs). Temporary planning permission was granted under REF: F13A/0409 for the continued use of the waste and recycling facility on site. The site currently holds a waste facility permit as authorised by Fingal County Council (WFP-FG-0002-02), permitted to accept 21,900 tonnes of material per year

The aims of this EIAR section are to establish the following:

- Baseline conditions relevant to the land, soil and geological environment within the site boundary, and the local surrounding environs;
- Significant impacts, if any, on the land, soil and geological environment, which occurred as a result of the subject development;
- Cumulative impacts with respect to subject activities within the application site and other nearby activities of a similar nature;
- Suitable mitigation measures to address identified adverse impacts.

7.2 Criteria for Rating of Effects

This chapter evaluates the effects, if any, which the Proposed Development will have on Land, Soils, Geology and Hydrogeology as defined in the Environmental Protection Agency (EPA) 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (EPA, 2022). This has been added to the original chapter.



Due consideration is also given to the guidelines provided by the Institute of Geologists of Ireland (IGI) in the document entitled 'Guidelines for the Preparation of Soils, Geology and Hydrogeology Chapters of Environmental Impact Statements' (IGI, 2013).

The rating of potential environmental effects on the land, soil, geological and hydrogeological environment is based on the standard EIAR impact predictions table included in this chapter, takes account of the quality, significance, duration, and type of effect characteristic identified (in accordance with impact assessment criteria provided in the EPA Guidelines (2022) publication).

The duration of each effect is considered to be either momentary, brief, temporary, short-term, medium term, long-term, or permanent. Momentary effects are considered to be those that last from seconds to minutes. Brief effects are those that last less than a day. Temporary effects are considered to be those which are construction related and last less than one year. Short term effects are seen as effects lasting one to seven years; medium-term effects lasting seven to fifteen years; long-term effects lasting fifteen to sixty years; and permanent effects lasting over sixty years.

The principal attributes (and effects) to be assessed include the following:

- Geological heritage sites in the vicinity of the perimeter of the development site;
- Landfills, industrial sites in the vicinity of the subject site and the potential risk of encountering contaminated ground;
- The quality, drainage characteristics and range of agricultural uses of soil around the site;
- Quarries or mines in the vicinity, the potential implications (if any) for existing activities and extractable reserves;
- The extent of topsoil and subsoil cover and the potential use of this material on site as well or requirement to remove it off-site as waste for disposal or recovery;
- High-yielding water supply springs/ wells in the vicinity of the subject site to within a 2km radius and the potential for increased risk presented by the Proposed Development;
- Classification (regionally important, locally important etc.) and the extent of aquifers underlying the site perimeter area and increased risks presented to them by the Proposed Development associated with aspects such as for example removal of subsoil cover, removal of aquifer (in whole or part), drawdown in water levels, alteration in established flow regimes, change in groundwater quality;
- Natural hydrogeological/karst features in the area and potential for increased risk presented by the activities at the site; and
- Groundwater-fed ecosystems and the increased risk presented by operations both spatially and temporally.

7.3 Sources of Information

The initial evaluation consisted of inspections of the site and adjacent lands through the examination of aerial photography and Ordnance Survey plans, followed by a site walkover



survey in June 2024. As part of a desktop study relevant data was collated and reviewed from sources at Geological Survey of Ireland (1:100,000 Sheet 13: Geology of Dublin), Fingal County Council, Environmental Protection Agency (EPA), National Parks & Wildlife Service (NPWS), Ordnance Survey of Ireland (OSI), Teagasc and Met Eireann. A review of previous site investigation data was also included, as noted above this included data collated by Colin O'Reilly PhD (Hydrology) of Envirollogic Ltd and Niamh Murray of Boylan Engineering.

The report has been compiled primarily taking cognisance of:

- Guidelines for the preparation of soils, geology and hydrogeology chapters of environmental impact statement. Institute of Geologists of Ireland (2013);
- Revised guidelines on the information to be contained in Environmental Impact
- Guidelines on the information to be contained in Environmental Impact Assessment Reports. Environmental Protection Agency (2022);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. Department by the Department of Housing, Planning and Local Government (August 2018 and last updated on 18 December 2019)

7.4 The Subject Development

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

7.4.1 The Receiving Environment

The receiving environment is discussed in terms of land geology, soils, hydrogeology and site history including potential for existing and historical contamination.



7.4.2 General Description of the Site

The site is located in the town land of Sandyhill, approximately 100 m south of St. Margarets village and 6 km southwest of Swords, County Dublin. The R122 passes in a north-south direction close to the western edge of the site, adjoining the boundary only at the northwestern corner, where the site entrance is located.

In terms of regional topography, lands are considered to be flat and low lying, decreasing in gradient from west to east towards the coastline. Undulations are within a narrow range between 70-85 m OD; the nearest feature outside this range being a hill 3 km to the west at Ward which reaches 91 m OD.

At a more local scale topography is very flat and shown on OSI 1: 50,000 Discovery maps to be at an elevation between 70-80 m OD.

With the exception of the site entrance the site is bounded on all sides by agricultural fields which support a mixture of medium to high intensity grassland and tillage production. The boundary of Dublin Airport lands comes to within 240 m of the southern site boundary. This part of the airport contains the western end of the east-west runway. The nearest buildings directly connected to airport activity are 2.3 km to the east.

The small village of St. Margaret's is located 100 m to the north and includes a national school, church, a small number of one-off houses and farmyards. A small manufacturing facility which appears to have ceased trading is located 100 m west of the site.

The application site comprises an area of approximately 3 ha of which 1.6 hectares is used as a waste transfer and recycling centre. The active site is irregular in shape with a width of 50 m at the rear (eastern) end which widens to 250 m at the front (west). Maximum length is 160 m in the northern portion, which narrows to 50 m at the southern boundary. The remainder of the site comprises compacted hardcore and surrounded by existing tress and hedgerow – and is located to the south of the permitted area.

The site previously functioned primarily as a metal and C&D waste transfer and recycling centre and an Authorised Treatment Facility (ATF) for end-of-life vehicles (ELVs). With the change from serving the public to more commercial sites, the facility serves as a waste recovery and recycling facility for further recovery of waste metals, C & D waste material and batteries. The site has been operational as a waste facility since 1997 and held an EPA Waste License (W0134-01) up to 2007 on which an annual throughput of 60,000 tonnes was granted.

During the operational phase of the subject site had an annual throughput of approx.26,000 to 42,500 tonnes (as noted below).

Year	Turnover (tonnes pa)
2019	33,524
2020	26,233
2021	42,263
2022	42,522



2023	33,695
2024	21,900

It may be worth noting, that the site has operated at an annual tonnage of circa 22,000 tonnes per annum since 1997, with permissible operating tonnage dictated by the various waste licenses and thereafter the waste permits (see below)

Year	Turnover (tonnes pa)
1997	21,000
2013	22,250
2014	21,900

During the Operational phase the main source of air quality impacts were the result of fugitive dust emissions from site activities.

Emission from site traffic and plant have the potential to impact climate.

The outputs of the facility are exported for reuse in production processes which reduces the need for raw materials to be mined and waste going to landfill

The scope of the application comprises an increase in the permanently permitted annual throughput at the facility from 10,000 tonnes to 21,900 tonnes per annum, however, it should be noted that this tonnage is as per that permitted in 2013, and had been in operation until 2019 with the benefit of planning permission.

In brief, the existing facility comprises:

- Concrete hardstanding entrance laneway and public parking area in the northwestern corner;
- Concrete hardstanding area for storage of cars awaiting depollution and storage of parts;
- Large covered waste processing shed including depolluting area in the western portion of the site;
- Site offices, welfare facilities and a weighbridge located in close proximity to the entrance;
- Concrete hardstanding area for storage of depolluted cars;
- Secure perimeter steel fencing.

And the adjacent lands (subject of restoration to managed grassland/wildflower meadow) comprise compacted hard core. No recycling activities have taken place on these lands, in accordance with permission F13A/0409 condition 6. Ad hoc temporary storage of unused or obsolete plant and machinery has occurred on these lands on occasion during the period 2014-2023. However, they are no longer used for any purpose associated with the recycling centre. The lands have yet to be restored to agricultural use, however, the applicant is proposing to introduce a managed grassland/wildflower meadow, and agricultural haul roads on these lands



on a temporary basis (pending their planned and permitted use in accordance with the DA zoning objective).

Topography on the site follows the general patterns in the area as described above, being mainly flat within the central works area (78.2 - 78.2 mOD). There is marginal slope from south (79.4 mOD) to north (77.7 mOD).



Figure 7.1: Site Location and Surroundings

7.4.3 Land Use

The site comprises of an existing waste recovery facility. With the exception of the site entrance, the site is bounded on all sides by agricultural fields which support a mixture of medium to high intensity grassland and tillage production. The boundary of Dublin Airport lands comes to within 240 m of the southern site boundary. This part of the airport contains the western end of the east-west runway. The nearest buildings directly connected to airport activity are 2.3 km to the east.

7.4.4 Soils

Reference was made to Teagasc soil maps which show that the agricultural soils that originally overlaid ground at the existing facility, consisted principally of deep mineral soils displaying good drainage Figure 7.2.

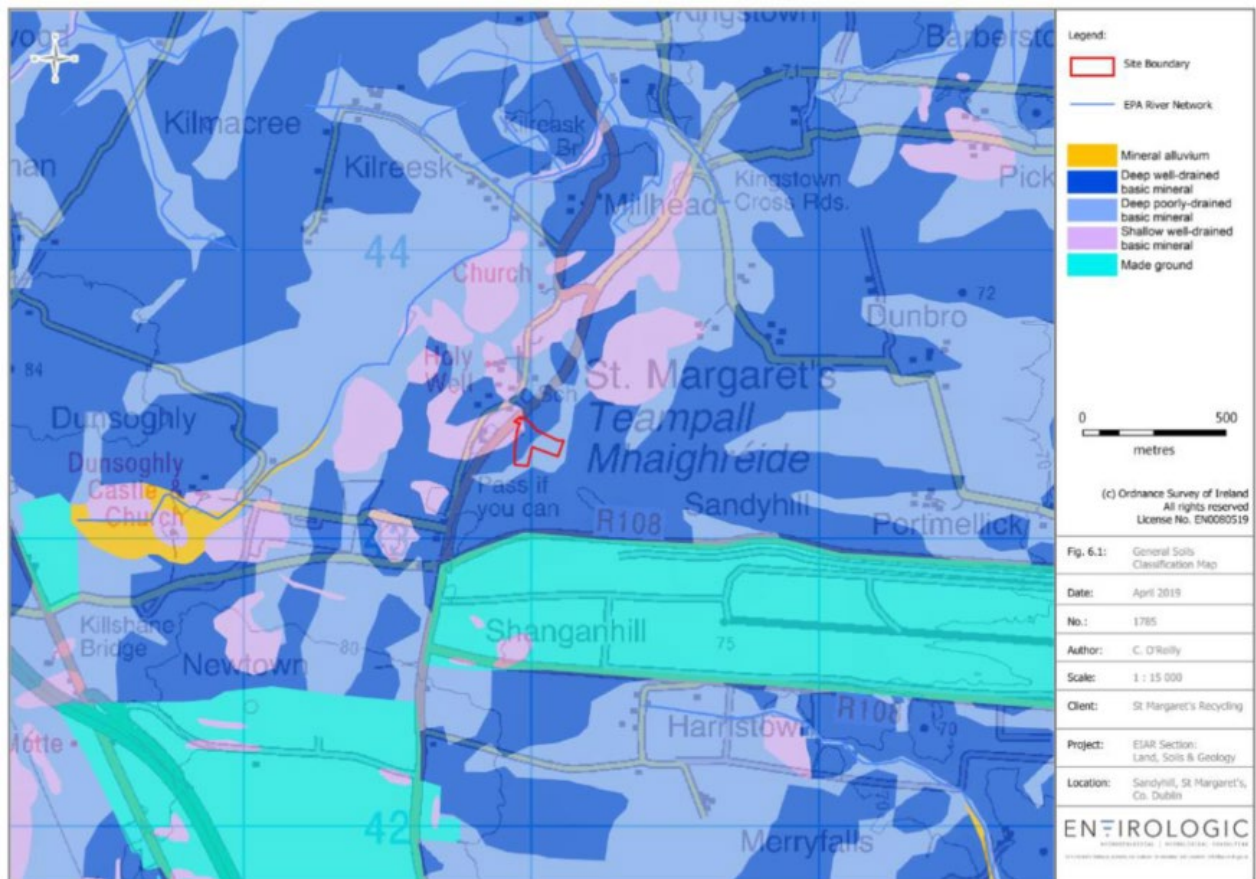


Figure 7 2 General Soils Classification Map

Gardiner and Radford (1980) report the soils as predominantly moderately well-drained grey brown podzolics of loam to clay loam texture. The profile is characterised by a slightly plastic consistency and weak structure which becomes massive in the lower part of the B horizon. The soil can become less well-drained in the very flat, lower-lying areas. Where gravels are present in the subsoil the surface texture can contain a higher sand content and exhibit rapid permeability. Combined with the low annual rainfall in the area this soil has a wide use range supporting a variety of high-quality agricultural production, including vegetables.

Soils in the region to the west tend to display poorer drainage characteristics with gleys becoming more prominent. The headwaters of the Huntstown River, including that segment passing adjacent to the site, are underlain and flanked by alluvial deposits which infers that it may not have been naturally formed along its full route. The Ward River, located approximately 3 km to the northeast of the site, is underlain by alluvium deposits in its entirety.

7.4.4 Subsoils

The Quaternary is the geological period which began 2.6 million years ago and is characterised by ice-ages; cycles of colder, glacial conditions in mid-to high-latitudes interspersed with the warmer 'inter-glacial' periods in which we live today. In Ireland, our Quaternary history of



repeated glaciations has resulted in sculpted landforms and thick sedimentary deposits overlying bedrock across much of the country.

Figure 7-3 shows that subsoils underlying the site, and the majority of the surrounding area, consist predominantly of limestone-derived till which was carried in from the Irish Sea and intermixed with the local limestone and shale. Minor, isolated pockets of glaciofluvial limestone sands and gravels have been deposited in linear form close to the western boundary of the site. These extend north through St Margaret's to Millhead.

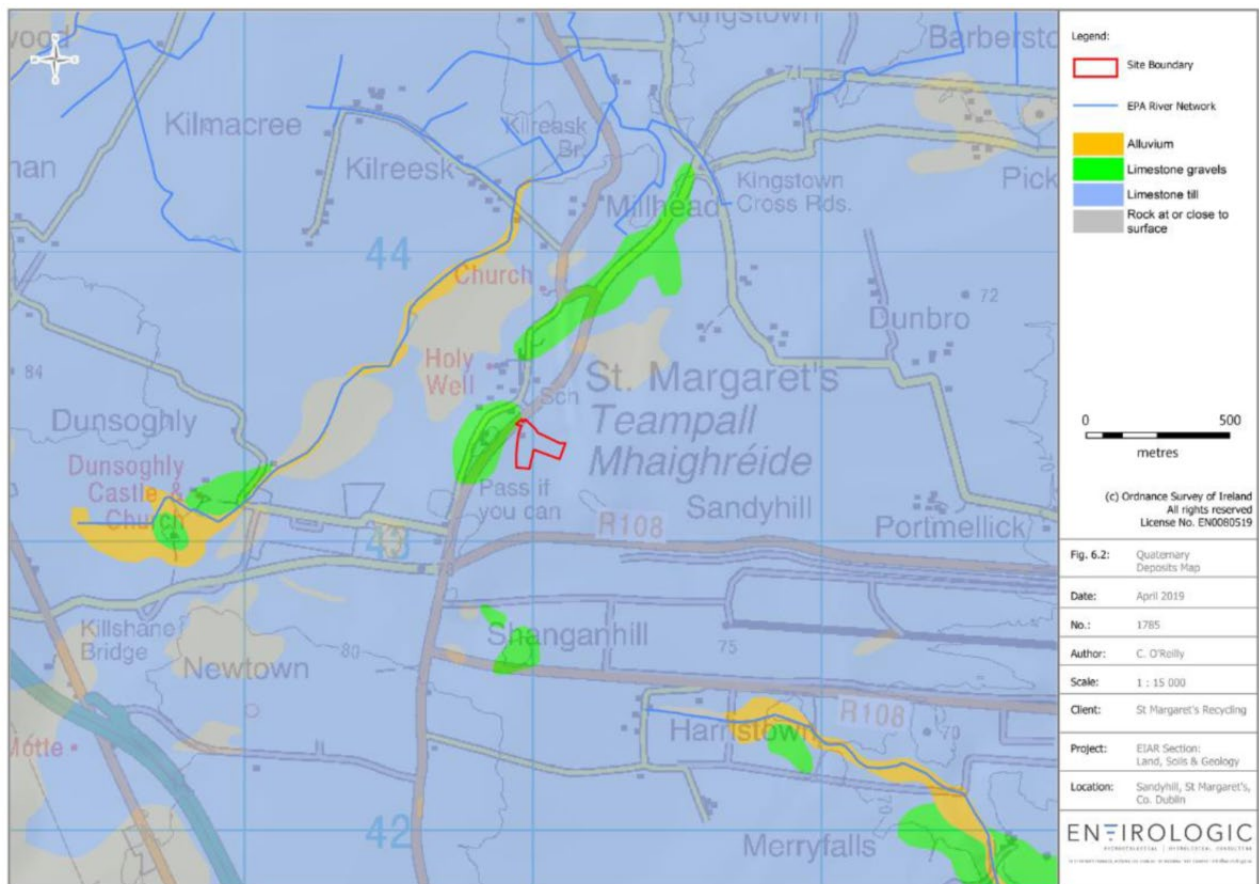


Figure 7.3 Subsoils Map (Source: GSI)

7.4.5 Bedrock Geology

The bedrock and structural geology in the vicinity of the site is illustrated in Figure 6.3. The 1:100,000 GSI bedrock geology map (McConnell et al., 2001) shows the subject site and surrounding area to be underlain by limestone and shale belonging to the Malahide Formation. This unit is classified as Lower Impure Limestones.

There is prominent structural deformation in the area, most notably along a northwest-southwest axis through the Carboniferous. Faulting has been mapped at surface in close proximity to the site. Two of these northwest-southeast trending structural faults are mapped as being evident in close proximity to the eastern and western boundary of the site.



The GSI groundwater well database shows that bedrock was recorded at 4 m below surface in an area west of the site. The GSI geotechnical database reports bedrock at 6.5 m below ground level 260 m west of the site in a 128 m deep borehole

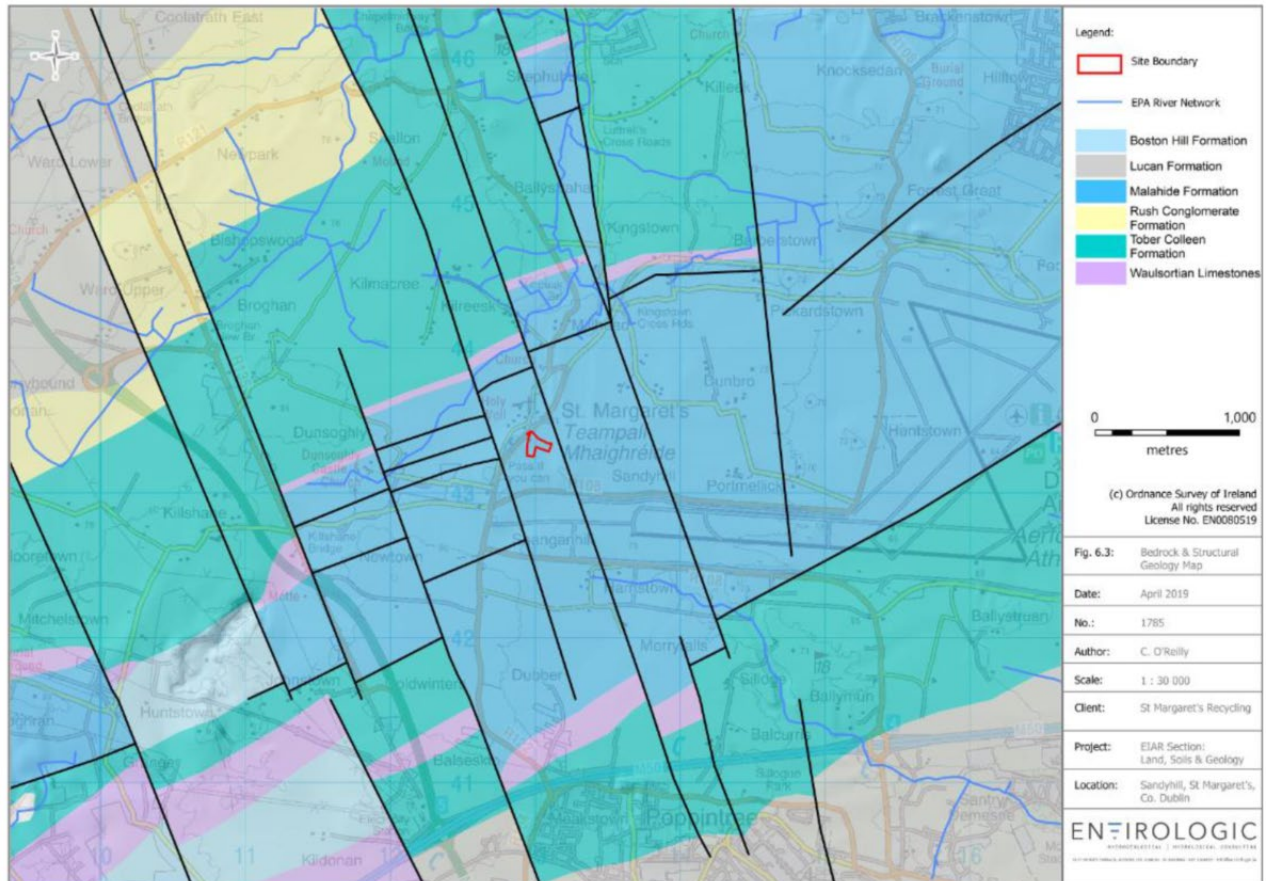


Figure 7.4 Bedrock Geology Map (Source: GSI)

7.4.6 Regional Hydrogeology

Locally Important Aquifers: Locally important aquifers are capable of supplying locally important abstractions (e.g. smaller public water supplies, group schemes), or good yields (100-400 m³/d). In the bedrock aquifers, groundwater predominantly flows through fractures, fissures, joints or conduits. Locally important sand/gravel aquifers are typically >1 km², and groundwater flows between the sand and gravel grains. This group is subdivided into the following types: Lm Locally Important Bedrock Aquifer, Generally Moderately Productive LI Locally Important Bedrock Aquifer, Moderately Productive only in Local Zones Lk Locally Important Karstified Bedrock Aquifer Lg Locally Important Sand/Gravel Aquifer.

The aquifer around the facility is classed as LI, Moderately Productive only in Local Zones. This is further discussed in chapter 8 Water and Hydrology.

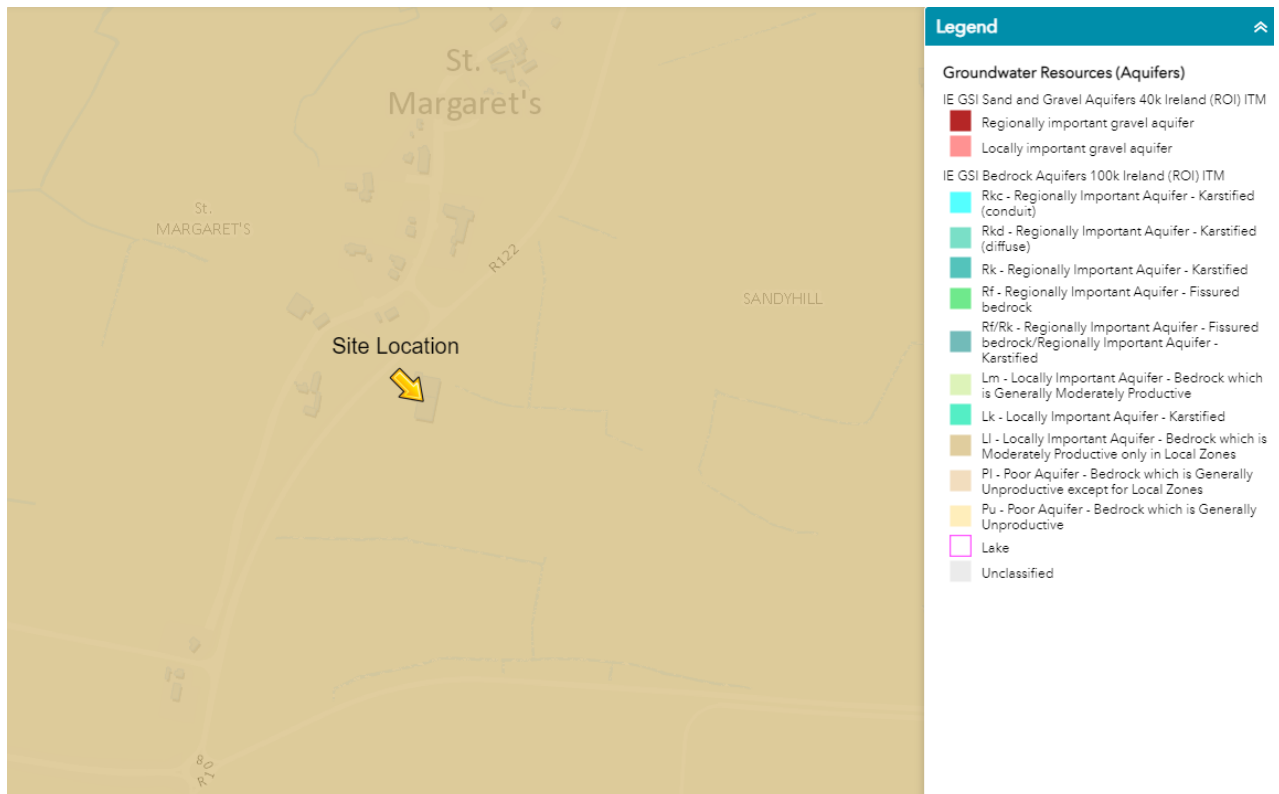


Figure 7.5 Aquifer Classification Map (Source: GSI, 2023)

7.4.7 Aquifer Vulnerability

The Aquifer vulnerability of the existing facility is divided between high and extreme classification on the GSI mapping tool. This is further discussed in chapter 8 Water and Hydrology.

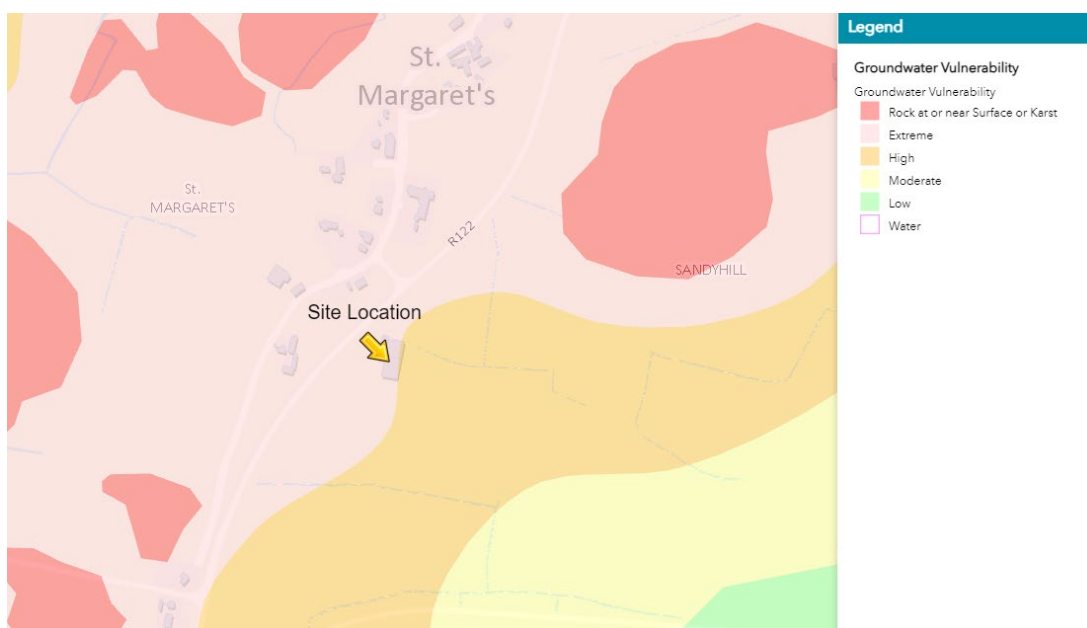




Figure 7 6 Aquifer Vulnerability Map (Source: GSI, 2023)

7.4.8 Groundwater Flow Direction

Groundwater elevations are mapped in Figure 7-7 Groundwater flow direction is shown to be from east to west, with the Huntstown Stream serving as the local baseflow sink. There is little or no hydraulic connectivity between surface waters in the open drain between the site and the Huntstown Stream.

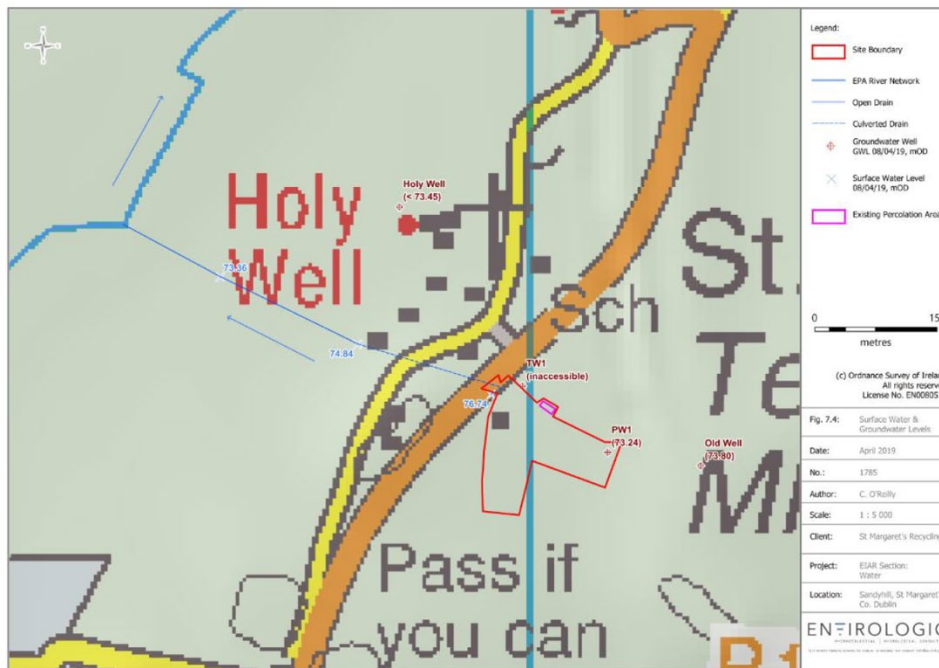


Figure 7- 7 Groundwater elevation

7.4.9 Soil Quality

Limited records from historical site investigation and well drilling works were made available and information contained within was deemed sufficient for the purposes of characterising site-specific lithology. Hence no additional intrusive site investigation works were carried out as part of this assessment.

An EIA Screening Report for the site (Patel Tonra, 2014) refers to a site investigation undertaken in 1997 to inform historical site development. Individual trial pit logs were not available for review.

Findings of the 1997 site investigation is summarized as:

- Maximum trial pit depth = 3.0 m;
- Subsoil consists of brown, sandy clay till underlain by stiff, black clay;
- Till permeability = 1×10^{-9} m/s, representative of moderate permeability subsoil;



- Groundwater encountered at 2.0 m below ground.

7.4.10 Groundwater Quality

The site is situated in the Swords Groundwater Body (IE_EA_G_011). This groundwater body is monitored by the EPA, and is considered “Not at Risk” in terms of the Water Framework Directive risk. The groundwater body has “Good quality” in the period of 2016-2021, the most recent available monitoring results from the EPA.

7.4.11 Economic Geology

The GSI (2024) mineral database was consulted to determine whether there were any mineral sites in the area of the subject site. As stated, the Huntstown Quarry is 2.7 km to the southwest to the subject site and is an active limestone quarry.

7.4.12 Geologic Heritage

There are no sites of geological heritage on the site or in the immediate surrounding area. The closest geological heritage site is Huntstown Quarry, 2.7 km to the southwest.

7.4.13 Geohazards

Much of the Earth’s surface is covered by unconsolidated sediments which can be especially prone to instability. Water often plays a key role in lubricating slope failure. Instability is often significantly increased by man’s activities in building houses, roads, drainage and agricultural changes. Landslides, mud flows, bog bursts (in Ireland) and debris flows are a result. In general, Ireland suffers few landslides. Landslides are more common in unconsolidated material than in bedrock, and where the sea constantly erodes the material at the base of a cliff and leads to recession of the cliffs. Landslides have also occurred in Ireland in recent years in upland peat areas due to disturbance of peat associated with construction activities. The GSI landslide database was consulted and the landslide in closest proximity to the proposed development was approximately 2 km to the southwest of the site, referred to as the M3 J4 Clonee 2014 which occurred on 3rd February 2014. There have been no recorded landslide events at the site. Due to the generally flat/level local topography and the underlying strata there is a negligible risk of a landslide event occurring at the site.

In Ireland, seismic activity is recorded by the Irish National Seismic Network. The Geophysics Section of the School of Cosmic Physics at the Dublin Institute for Advanced Studies (DIAS) has been recording seismic events in Ireland since 1978. The station configuration has varied over the years. Currently there are five permanent broadband seismic recording stations in Ireland and operated by DIAS. The seismic data from the stations comes into DIAS in real-time and are studied for local and regional events. Records since 1980 show that the nearest



seismic activity to the proposed location was in the Irish sea (1.0 – 2.0 Ml magnitude) and ~55 km to the south in the Wicklow Mountains.

There is a very low risk of seismic activity to the proposed development site. There are no active volcanoes in Ireland so there is no risk from volcanic activity.

7.5 Predicted Impacts

The procedure for determination of the potential impacts on the receiving soil and geological environment is to identify potential receptors within the site boundary and surrounding environment and use the information gathered during the desk study and field work to assess the degree to which these receptors will be impacted upon. Impacts are described in terms of quality, significance, duration and type in accordance with current EIAR guidelines (EPA, 2017; DHPLG, 2018). The impact definitions and criteria are further detailed in Appendix 6.2.

In accordance with the NRA Guidelines (2009) (as included in ‘Guidelines for the Preparation of Soils, Geology and Hydrogeology Chapters of Environmental Impact Statements’ (IGI, 2013)), the site is deemed to be an attribute of low importance as a function of it being of low quality and significance or value on a local scale, and its current use as a waste facility. There are no in-situ soils exposed on the site.

The potential impacts from the construction and operational phases of the proposed development are summarised below and in further detail in Table 7.1.

7.5.1 Construction Phase

The only construction which has occurred since 2019 have been the replacement of the hammermill, the extension of the concrete yard and the portacabins on site. The installation of the hammermill was an upgrade for the existing machinery on site. The hammermill was constructed on the footprint of the existing concreted yard and no soil was moved for the construction. The construction of the portacabins was similar, with the current portacabins being installed being installed on the footprint established by the previous portacabins. Due to the same location, there were no earthworks involved in the installation of these buildings.

The construction of the two additional concrete slabs were of a relatively small size which would have a very limited impact on the soil and/or geology considering the existing activities on site.

During enabling phase diesel will be consumed by plant and machinery, predominantly excavator and tractor-trailer.

7.5.2 Accidental Spills and Leaks

As with all construction projects there is potential for water (rainfall and/or groundwater) to become contaminated with pollutants associated with construction activity. Contaminated



water which arises from construction sites can pose a significant temporary risk to groundwater quality for the duration of the construction if contaminated water is allowed percolate to the aquifer.

During the construction of the development, there was a risk of accidental pollution incidences from hydrocarbons (ecotoxic) due to accidental spillages from construction plant or onsite storage.

Accidental spillages which are not mitigated may result in localised contamination of soils and groundwater underlying the site should contaminants migrate through the subsoils and impact the underlying groundwater. Groundwater vulnerability at the site is currently classified as extreme, high, and moderate in the south, central portion, and north of the site respectively. No soil stripping occurred which can also further reduce the thickness of subsoil and the natural protection they provide to the underlying aquifer.

The effect on the local and regional environment is likely to be **brief, imperceptible** and **neutral**. This is due to the potential for accidental spills having an impact on the local and regional soils is minimized by the construction occurring on a fully impermeable surface from which any accidental spills or leaks are directed through silt traps and oil interceptors before being introduced to the environment.

7.5.3 Operational Phase

The operational phase has one direct discharge to ground from the current operations on site. These are due to the wastewater treatment system and percolation area on site for staff use. The wastewater treatment system was installed and has been designed according to all relevant guidance. Due to this there is no potential for impact due to direct discharges to ground.

Chemical pollution (e.g. hydrocarbon spillages as a result of operational activities) has the potential to occur at the site. However, as the entire footprint of the site has been capped with hardstanding for the purposes of site operations and storing of de-polluted vehicles, there will be no resultant impacts to the underlying geological environment as a result of the continued operation.

The magnitude of the direct impacts to the land, soils and geological environment due to the operational phase is considered to be **long-term, neutral**, and **insignificant**.

7.6 Do Nothing Scenario

This item requires consideration of the effect on the environment as it would be in the future should the proposed works not be carried out. As the application is for retention permission, the do-nothing scenario is not relevant.



7.7 Alternatives

If the waste was not accepted into this facility it be redirected to different sites resulting in further land take and land being surfaced.

7.8 Mitigation Measures

There is no potential for an impact on land, soils and geology from either the operational phase or the construction phase, and therefore there are no mitigation measures necessary.

7.9 Residual Impacts

Residual impacts refer to the degree to environmental change that will occur after the proposed mitigation measures have taken effect.

As the site has assessed for impact prior to mitigation measures, the residual impacts are assessed to be **momentary, neutral** and **negligible** in both the construction phase and the operational phase.

7.10 Cumulative Assessment

The locality is still predominantly agricultural land. While there may be some smaller proposed developments in the surrounding area, the proposed development on site does not add to any predicted impact arising for these projects. In that that the proposed construction works do not result in a permanent loss of agricultural lands, it does not contribute cumulatively to the loss associated with other proposed developments in this area. Hence, the cumulative impact to the land, soils and geological resources in the area is considered to be **momentary, neutral** and **negligible**.

Construction Phase

The cumulative effects of the construction phase are negligible due to the scale of the construction occurring during the development. Therefore, the cumulative impact of the construction phase are considered **momentary, neutral** and **imperceptible**.

Operational Phase

The overall operation of the site is not changing other than an increase in annual throughput. This will have no impact on the land, soils, geology, and hydrogeology of the site and is therefore considered **long-term, neutral** and **imperceptible**.



7.11 Interactions

Due to the inter-relationship between land, soils, geology, and hydrogeology and hydrology, - there is a strong overlap between the assessed impacts and mitigation measures in both chapters.

7.12 References

- Directive 2014/52/EU of the European Parliament
- Environmental Protection Agency (EPA) Advice notes on current practice in the preparation of Environmental Impact Statement, Draft (EPA, 2015) and Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2022).
- Water Framework Directive (WFD) - Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy. This relates to the improvement of water quality across Ireland including rivers and groundwater bodies.
- River Basin Management Plan 2018-2021 (including regional plans by Local Authority Waters Programme (Waters and Communities 2020)). Draft River Basin Management Plan 2022-2027.
- Institute of Geologists Ireland (IGI) -Geology in Environmental Impact Statements, a guide (IGI, 2002) and Guidelines for the Preparation of Soils, Geology and Hydrogeology Chapters of Environmental Impact Statements (IGI, 2013).
- European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9 of 2010).
- European Communities Environmental Objectives (Groundwater) Amendment Regulations 2016 (S.I. No. 366 of 2016); European Communities Environmental Objectives (Groundwater) (Amendment) Regulations 2022 S.I. No. 287 of 2022.
- Part IV of the First Schedule of the Planning and Development Act 2000, as amended.
- European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003)
- Environmental Protection Agency 'Towards Setting Guideline Values for the Protection of Groundwater in Ireland Interim Report', (EPA 2003).
- European Union (Drinking Water) Regulations 2014 (S.I. No. 122/2014).
- European Union (Drinking Water) (Amendment) Regulations (S.I. No. 464 of 2017).
- Geological Survey of Ireland (GSI) - on-line mapping, Geo-hazard Database, Geological Heritage Sites & Sites of Special Scientific Interest, Bedrock Memoirs and 1: 100,000 mapping;
- Teagasc soil and subsoil database;
- Ordnance Survey Ireland - aerial photographs and historical mapping;
- Environmental Protection Agency (EPA) – website mapping and database information;
- National Parks and Wildlife Services (NPWS) – Protected Site Register.
- Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors” (CIRIA 532, 2001)
- Transport Infrastructure Ireland - Road Drainage and Water Environment (TII, 2015).



- Transport Infrastructure Ireland (previously National Road Authority) - Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes (TII, 2009)



8.0 Water & Hydrology

8.1 Introduction/Methodology

This chapter assesses and evaluates the potential impacts of the proposed development on the hydrological aspects of the site and surrounding area, in accordance with the requirements of Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (i.e. the EIA Directive) (European Union, 2014a).

The following EIAR section has been prepared by Peter McCormick of ESC Environmental Ltd and has availed of the analysis and data included in the previous EIAR from Reg. Ref FW19A/0135, prepared for St Margarets Metal Recycling by Colin O'Reilly PhD (Hydrology) of Envirologic Ltd and Niamh Murray of Boylan Engineering, on behalf of St. Margaret's Recycling and Transfer Centre Limited (St. Margaret's Metal Recycling - SMMR). Peter McCormick is a Senior Consultant with ESC Environmental Ltd., and has 7 years' experience in the Environmental Sector, working with both the public and private sector. He holds a degree in Level 8 BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo). He has experience in many aspects of environmental works including wastewater treatment system design, environmental permitting, water management, and specialises in ecological assessments (EclAs), Appropriate Assessments and Natura Impact Statements.

This Chapter also provides a characterisation of the receiving hydrological environment within the subject site and within a wider study area in the vicinity of the subject site. In assessing likely potential and predicted effects, account is taken of both the importance of the attributes and the predicted scale and duration of the likely effects.

The aims of this EIAR Section are to establish the following:

- baseline conditions relevant to the hydrological and hydrogeological environment within the site boundary and the local surrounding environs;
- significant impacts, if any, on the water environment, which can be reasonably expected to occur as a result of the Subject Site;
- cumulative impacts with respect to activities within the application site and other nearby activities of a similar nature;
- suitable mitigation measures to address identified adverse impacts.

8.2 Relevant Guidance

The hydrological baseline assessment has been carried out in accordance with the following guidance and established best practice:



- Environmental Protection Agency (EPA) Advice notes on current practice in the preparation of Environmental Impact Statement (EPA, 2015) and Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2022).
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. Department by the Department of Housing, Planning and Local Government (August 2018 and last updated on 18 December 2019)
- Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017).
- Transport Infrastructure Ireland - Road Drainage and Water Environment (TII, 2015).
- Transport Infrastructure Ireland (previously National Road Authority) - Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes (TII, 2009).
- Water Framework Directive (WFD) - Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy. This relates to the improvement of water quality across Ireland including rivers and groundwater bodies.
- The Planning System and Flood Risk Management, Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government (DoEHLG) and the Office of Public Works (OPW)).
- Guidelines on protection of fisheries during construction works in and adjacent to waters (Inland Fisheries Ireland, 2016).
- Guidelines for the Crossing of Watercourses during Construction of National Road Schemes, (TII, 2008)
- Water resource management in Ireland is dealt with in the following key pieces of legislation and guidelines:
- European Communities Environmental Objectives (Surface Waters); Regulations, 2009 (S.I. No. 272 of 2009 as amended by SI No. 77 of 2019).
- Part IV of the First Schedule of the Planning and Development Act 2000, as amended.
- European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003).
- Environmental Protection Agency 'Towards Setting Guideline Values for the Protection of Groundwater in Ireland Interim Report', (EPA 2003).
- European Union (Drinking Water) Regulations 2014 (S.I. No. 122/2014).
- European Union (Drinking Water) (Amendment) Regulations (S.I. No. 464 of 2017).

8.3 Criteria for Rating of Effects

This chapter evaluates the effects, if any, which the development has had or will have on Hydrology as defined in the Environmental Protection Agency (EPA) 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (EPA, 2022). The Draft EPA document entitled 'Advice Notes for Preparing Environmental Impact Statements' (EPA, 2015) is also followed in this hydrological assessment and classification of environmental effects. In addition, the document entitled 'Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes' by the National Roads Authority (NRA, 2009) is referenced where the methodology for assessment of impact is appropriate.



The rating of potential environmental effects on the hydrological environment is based on the standard EIAR impact predictions which take account of the quality, significance, duration, and type of effect characteristic identified (in accordance with impact assessment criteria provided in the EPA Guidelines (2022) publication).

The duration of each effect is considered to be either momentary, brief, temporary, short-term, medium term, long-term, or permanent. Momentary effects are considered to be those that last from seconds to minutes. Brief effects are those that last less than a day. Temporary effects are considered to be those which are construction related and last less than one year. Short term effects are seen as effects lasting one to seven years; medium-term effects lasting seven to fifteen years; long-term effects lasting fifteen to sixty years; and permanent effects lasting over sixty years.

The principal attributes (and effects) to be assessed include the following:

- River and stream water quality in the vicinity of the site (where available);
- Surface watercourses near the site and potential impact on surface water quality arising from Subject Site related works including any discharge of surface water run-off;
- Localised flooding (potential increase or reduction) and floodplains including benefitting lands and drainage districts (if any); and
- Surface water features within the area of the site.

8.4 Sources of Information

Desk-based hydrological information on the substrata (both Quaternary deposits and bedrock geology) underlying the extent of the subject site was obtained through accessing databases and other archives where available. Data was sourced from the following:

- Environmental Protection Agency (EPA) – website mapping and database information. Envirosearch water quality monitoring data for watercourses in the area;
- River Basin Management Plan for Ireland 2018-2021.
- The Planning System and Flood Risk Management, Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government (DoEHLG) and the Office of Public Works (OPW));
- Office of Public Works (OPW) flood mapping data (www.floodmaps.ie)
- Flood Risk Assessment and Management Plan for the Meath CDP 2021-2027.
- ‘Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors’ (CIRIA 532, 2001);
- National Parks and Wildlife Services (NPWS) – Protected Site Register.

Site specific data was derived from the following sources:

- Various design site plans and drawings
- Consultation with site engineers.



The initial evaluation consisted of inspections of the site and adjacent lands by examination of aerial photography and Ordnance Survey plans, followed by a site walkover survey in March 2019. Relevant hydrogeological data from the Geological Survey of Ireland (1:100,000 Sheet 16: Geology of Meath) was reviewed, together with additional data collated from data sources at Fingal County Council, Environmental Protection Agency (EPA), Ordnance Survey of Ireland (OSI), National Parks and Wildlife Service (NPWS), the Office of Public Works, (OPW) and Met Eireann.

A review of historical groundwater and surface water sampling data was undertaken with additional sampling of receiving surface waters, along with a groundwater and surface water level survey.

8.5 The Receiving Environment

Hydrology

Aquifer Classification

The site is underlain by a locally important bedrock aquifer (LI), consisting of bedrock which is generally moderately productive only in local zones Figure 8.1. This aquifer is made up of a limited and relatively poorly connected network of fractures, fissures and joints, giving low permeability, which decreases with depth. The aquifer has a low recharge acceptance. Most groundwater flows occur in an upper zone of about 15 m with a zone of interconnected fissures that extends approximately 10 m below this. Some recharge in the upper, more weathered zone (3-5 m) is likely to flow along the relatively short flow paths and rapidly discharge to streams, small springs and seeps. Baseflow to streams can significantly decrease in the drier summer months, resulting in low dry weather flows.

There are no karst features in the surrounding area. The site lies within the Swords Groundwater Body which states that permeability is likely to be moderate to low (1-10 m/d).

Dwellings in the area are all reportedly supplied potable water from the local mains water network. The GSI well database shows two warm springs west of the site. Typical spring temperatures range from 12.5 - 25 °C. It is thought that groundwater issuing from these springs comes from deep fractures. One other well is recorded in the area west of the site, this being 9.1 m deep and having a good yield of 164 m/d.

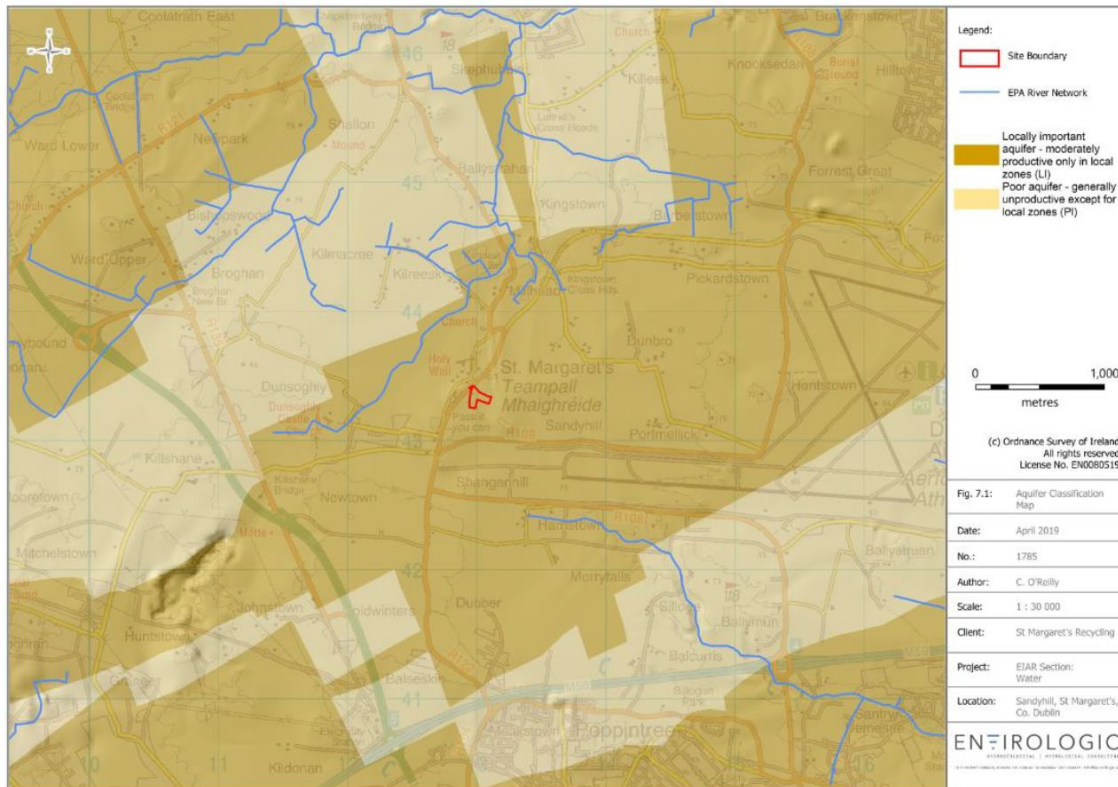


Figure 8.1 Aquifer Classification Map

Vulnerability

The vulnerability categories, and methods for determination, are presented in Groundwater Protection Schemes (1999). The guidelines state that 'as all groundwater is hydrologically connected to the land surface, it is the effectiveness of this connection that determines the relative vulnerability to contamination. Groundwater that readily and quickly receives water (and contaminants) from the land surface is considered to be more vulnerable than groundwater that receives water (and contaminants) more slowly and in lower quantities. The travel time, attenuation capacity and quantity of contaminants are a function of the following natural geological and hydrogeological attributes of any area:

- The subsoils that overlie the groundwater;
- The type of recharge - whether point or diffuse; and
- The thickness of the unsaturated zone through which the contaminant moves.

As shown in Figure 8.2, the GSI has assigned the existing site as having groundwater vulnerability classification of High (H) in the central and eastern part of the site, and Extreme (E) in the western portion, where sheds are currently sited.

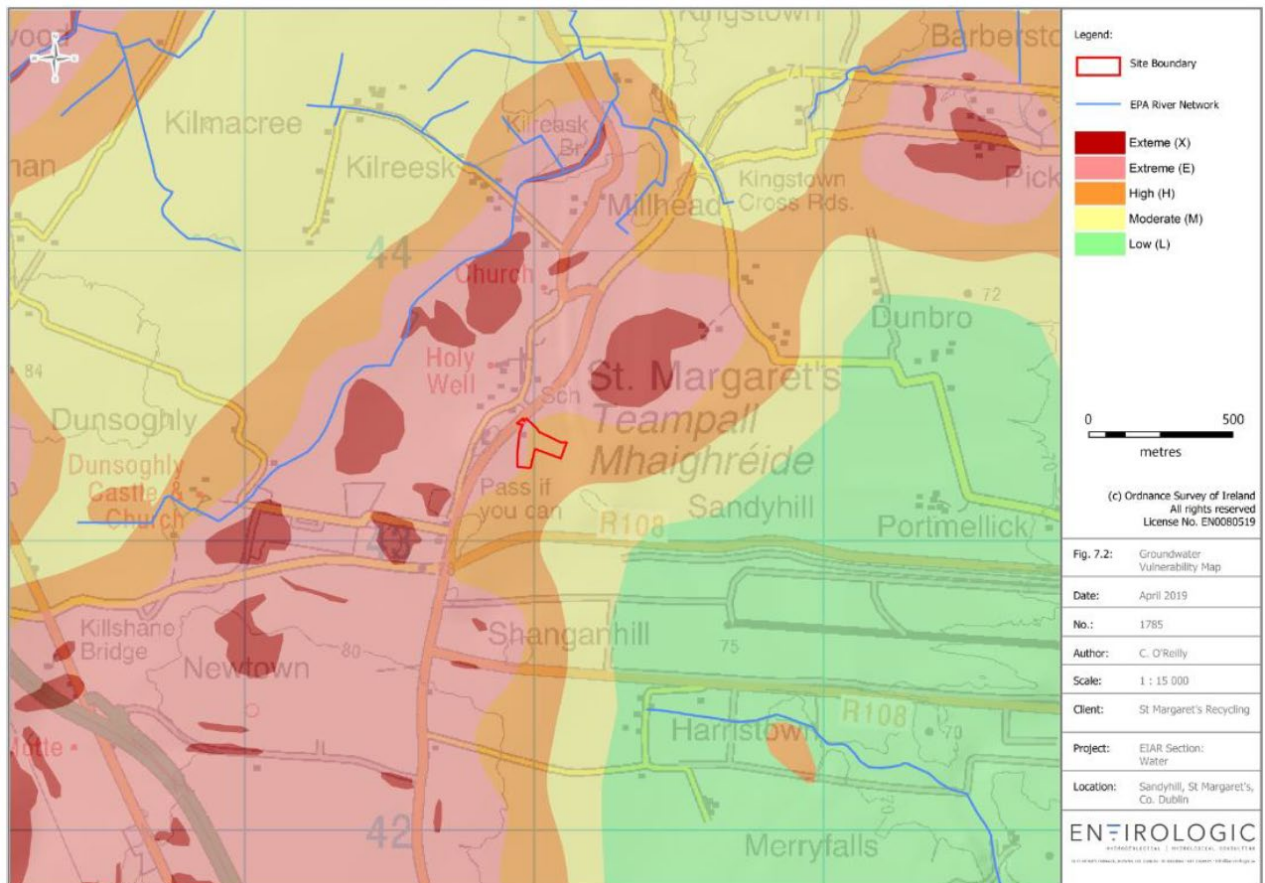


Figure 8 2 Groundwater Vulnerability Map

Surface Water

There is negligible natural surface water catchment upgradient of the site. The site is within the surface water catchment to the Huntstown Stream which flows in a southwest-northeast direction. Treated stormwater leaving the site is connected to the Huntstown Stream via a field drain. The field drain is culverted beneath the R122 and emerges as an open channel 180 m downstream of the site. The field drain outfalls to the Huntstown Stream 500 m downstream of the site. The surface water catchment to the Huntstown River at this point is 4.8 km² (Figure 8.3).

This Huntstown Stream outfalls to the Ward River approximately 3 km to the north at St Margaret's Golf Club. The Ward which subsequently joins the Broadmeadow River 7.5 km northeast, prior to entering the Malahide Estuary.

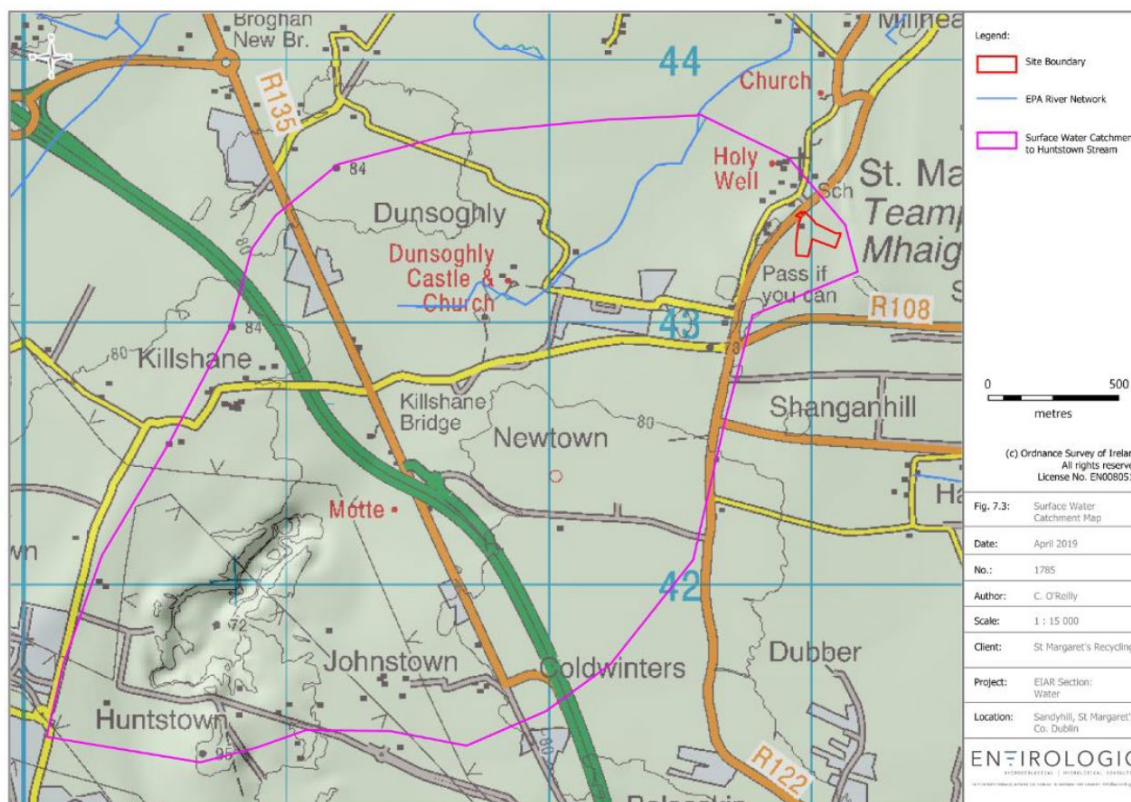


Figure 8 3 Surface Water Catchment

Surface Water Quality

Upgradient and downgradient monitoring points on the Huntstown are indicated at Dunsoughly Castle and Kilreask Bridge, respectively, but no EPA biological or hydrochemical sampling data is collected at these points or elsewhere on the Huntstown Stream.

WFD risk classification for the Huntstown Stream and upper Ward catchment are indicated as being 'under review'. WFD river waterbody status 2010-2015 is shown as 'good'.

Designated Areas

There are no designated areas on the site or in the surrounding area. The closest designated area is the Malahide Estuary SAC (000205) and SPA (004025) located approximately 7.5 km northeast of the site.

The Appropriate Assessment Screening Report submitted as part of the 2014 planning application (Patel Tonra, SM0105, May 2014) as a baseline, considered the potential surface water pollution pathway from the application site. Given the existing surface water treatment systems at the site, combined with the distance between the site and Malahide Estuary SAC, the risk to same is low and there will be no likely effects on Natura 2000 sites.



Flood Risk

A screening of online flood risk data sources is summarised as follows:

- No indicators on historical maps which suggest the site may be at risk of flooding.
- No historical flood events within the vicinity of the site.
- OPW pFRA maps show that the site is not at risk of fluvial or pluvial flooding.
- The site is not covered under the more detailed OPW CFRAM and Fingal FEM FRAM maps.
- The Huntstown Stream, where it passes adjacent to the site, is maintained as part of the Broadmeadow and Ward arterial drainage scheme.

Rating of Importance of Hydrological Attributes

Although there would be a hydrological connection or pathway between the site and the nearby Huntstown Stream, this is considered to be of **negligible/ imperceptible significance** due to the nature of discharge from the site and the mitigation measures already in place to avoid contamination.

8.6 The Subject Development

The proposed development, subject of this EIAR is as follows –

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).



Construction Phase

1. The proposed construction works include the following : upgrades to the surface water drainage system, including the installation of a surface water tank for 675 cu. metres, and above ground overflow area for c.1500 square metres.
2. Enhancement of car parking provision, including installation of 2no. EV charging points
3. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc.

Accidental Spills and Leaks

As with all construction projects there is potential for water (rainfall and/or groundwater) to become contaminated with pollutants associated with construction activity. Contaminated water which arises from construction sites can pose a significant temporary risk to groundwater quality for the duration of the construction if contaminated water is allowed percolate to the aquifer.

During the construction of the development, there is a risk of accidental pollution incidences from hydrocarbons (ecotoxic) due to accidental spillages from construction plant or onsite storage.

Accidental spillages which are not mitigated may result in localised contamination of soils and groundwater underlying the site should contaminants migrate through the subsoils and impact the underlying groundwater. Groundwater vulnerability at the site is currently classified as extreme, high, and moderate in the south, central portion, and north of the site respectively. No soil stripping occurred which can also further reduce the thickness of subsoil and the natural protection they provide to the underlying aquifer.

The effect on the local and regional environment is likely to be **brief, imperceptible and neutral**. This is due to the potential for accidental spills having an impact on the local and regional soils is minimized by the construction occurring on a fully impermeable surface from which any accidental spills or leaks are directed through silt traps and oil interceptors before being introduced to the environment.

Operational Phase

Surface Water Management

In the operational phase of the development, there will be some change by way of additional storage of surface water, from the current surface water management of the facility. All rainfall landing on open yard areas will continue to be captured, via a series of gulleys, in a subsurface piped network and diverted towards the stormwater treatment system. The drainage network



diverts stormwater in a northern direction in line with the site topography, before being diverted in a west/northwest direction towards the outfall points.

The current surface water treatment system serving the site comprises a series of silt traps, a buffer tank with oil decanting unit and two hydrocarbon interceptors, which manages and treats runoff from defined hardstanding areas. This infrastructure is described briefly as follows:

- Runoff from the southern portion of the site, which comprises a hammer mill plant and storage area for processed metals and depolluted vehicles. drains to a silt trap prior to passing through a 10 m³ oil decanting unit. Run-off from the central and northern areas of the site flows through a silt trap, located in the northern portion of the site, and a 206 m³ buffer tank before passing through Interceptor 1 (Klargester Full Retention Interceptor NSFA200), located in close proximity to the weighbridge. Following treatment. treated yard runoff outfalls to a field drain just south of the site entrance.
- Runoff from the 'Reception Yard" in the northwestern area of the site is diverted through Interceptor 2 (Klargester Interceptor NSBD10), also positioned close to the weighbridge. This treated stormwater water also outfalls to the open drain south of the site entrance.
- All roof runoff is currently collected in the existing gutters and downpipes and transferred to three 35 m³ rainwater harvesting tanks located along the western boundary of the site. This water is stored for emergency firefighting needs. Any excess water or overflow is diverted to the open drain that flows south to north along the western boundary.

Foul Water

Foul water on site is directed to an on-site wastewater treatment system as per the current operation of the site. The wastewater treatment system has been designed and installed according to the standards outlined in the Code of Practice 2009 for wastewater treatment. Due to this, there is no potential for impact on hydrology and hydrogeology due to foul water on site.

Water Supply

The water supply is provided via mains and this is to continue as per the current operation of the site.

8.7 Predicted Impacts

Construction Phase

The details of the construction phase are outlined above. The construction phase only occurs on the footprint of the existing structures, and this is all contained on impermeable surfaces.



Any surface water runoff which occurred due to construction needs to pass through oil interceptors and silt traps prior to discharge. Due to this, the potential impacts during the construction phase are considered to be **momentary, imperceptible** and **negative**.

Operational Phase

Direct or indirect Discharges

In the operational phase of the development, there is no material or significant change in the current surface water management of the facility, ie. the existing mitigation (including oil interceptors, attenuation, etc.) will remain in place within the core site. All rainfall landing on open yard areas is captured, via a series of gulleys, in a subsurface piped network and diverted towards the stormwater treatment system. The drainage network diverts stormwater in a northern direction in line with the site topography, before being diverted in a west/northwest direction towards the outfall points. The proposed works provide additional attenuation to the existing surface water management regime, rather than any additional filtration.

In the absence of mitigation, the effect on the hydrological environment is likely to be **short-term, imperceptible** and **neutral**. The effect is considered to be 'imperceptible' because there will not be intervention on the hydrological regime on a local or regional scale due to the aforementioned design measures included in the surface water and foul water drainage.

Accidental Spill and Leaks

The development includes the storage and use of fuel oil. Any accidental emissions of oil, petrol or diesel could cause contamination if the emissions enter the water environment unmitigated. However, any accidental discharge will be mitigated through petrol interceptors.

In the event of an accidental leakage of fuel or a spill, this will be intercepted by the drainage infrastructure; drainage from the site passes through petrol interceptor prior to connection to the onsite drainage networks.

In the absence of mitigation, the effect on the hydrological environment is likely to be **short-term, imperceptible** and **neutral**. The effect is considered to be 'imperceptible' because there will not be intervention on the hydrological regime on a local or regional scale due to the aforementioned design measures.

Do Nothing Scenario

This item requires consideration of the effect on the environment as it would be in the future should the proposed works not be carried out.

As the application relates to the continued use of an existing facility at its current level, ie as per the existing and established non-conforming use, the do-nothing scenario is not particularly relevant.



The only works proposed are environmental improvements, therefore were these measures not introduced the predicted impact would be imperceptible to slight (depending on the likelihood of a flood event), short term, and negative.

8.8 Mitigation and Monitoring Measures

While the likelihood of an impact on hydrology may be low, arising only in 1:30 and 1:100 year flood events, during these events, in the absence of mitigation, the impact on hydrogeology and hydrology from either the operational phase or the construction phase, is slight, short-term and negative; and therefore the mitigation measures proposed are considered necessary, ie. Additional storm water attenuation tank, and overground basin.

Residual Impacts

Residual impacts refer to the degree to environmental change that will occur after the mitigation measures have taken effect.

As the site has imperceptible to slight potential for impact prior to mitigation measures, the residual impacts are assessed to be **neutral and negligible** in both the construction phase and the operational phase.

8.9 Cumulative Impact Assessment

The following considers the cumulative impacts of the subject site and permitted and operating facilities in the surrounding area in relation to Hydrology. This considers the subject site and other surrounding proposed and relevant permitted developments noted in Chapter 4. For the most part the most relevant development is that relating to the subject site, in respect of retention of the existing waste recycling and transfer centre. The site's proximity to Dublin airport is noted, and where applicable in terms of cumulative impact has been noted.

As has been identified in the receiving environment section all cumulative developments that are already built and in operation contribute to our characterisation of the baseline environment. As such any further environmental impacts that the subject site may have in addition to these already constructed and operational cumulative developments have been assessed in the preceding sections of this chapter.

The existing facility must be included under an assessment of cumulative impacts, along with any other similar facilities in the area. In terms of protecting groundwater and surface water resources it is considered more appropriate to continue activities at the site by way of increasing the facility's capacity, as opposed to opening a new waste facility / ATF on a greenfield site, to meet the demands of the ELV disposal industry.



Reference was made to the vehicle disposal section of Fingal County Council's website (<http://www.fingalcoco.ie/environment/waste-and-recycling/vehicle-disposal/>), which outlined that there are only three ATF's in the Fingal Local Authority. The other two facilities are not located in close proximity to SMR, being approximately 12 km and 10 km to the north of the site, respectively.

Cumulative impacts to the surface water and groundwater environments may occur where activities of a similar nature are taking place within the upgradient and downgradient surface water catchment with respect to the site.

There are several industrial activities in the Huntstown Stream catchment. These include Huntstown Quarry, Bay Lane Quarry, Irish Asphalt, Dublin Aerospace Ltd. and P. Kelly Timber Ltd. Other potentially polluting activities in the catchment may be present but not operate under waste licenses, IPC or be subject to Section 4 discharge licenses. The contribution that the site may have in terms of cumulative impacts to the surface water environment can be monitored directly at the stormwater outfall. All stormwater leaving the site does so via a single outfall which is subject to ongoing monitoring. Additional monitoring can be undertaken upgradient and downgradient of the confluence of the site outfall with the Huntstown Stream if necessary. Measures are present to mitigate against impacts from the site. Infrastructure and monitoring regime at the subject site has been established to allow the effectiveness of these measures to be presented quantitatively to the local authority.

The site is entirely covered in hard standing and the only groundwater discharge is from the wastewater treatment system. As the wastewater treatment system is designed according to the relevant code of practice, it is considered that the site cannot contribute to any cumulative impacts to the aquifer in terms of quality that may be occurring from other facilities of a similar nature.

Therefore, the potential for a cumulative impact due to the construction or operational phase of the site is ***short-term, imperceptible and neutral***.

8.10 Interactions

Due to the inter-relationship between land, soils, geology, hydrogeology and hydrology, - there is a strong overlap between the assessed impacts and mitigation measures in both chapters. While the proposed mitigation measures introduced to mitigate potential impact on hydrology during flood events results in the short-term slight impact on soils to facilitate the construction of an under ground and overground attenuation tanks and basin, the net benefit to the environment is considered to be best served providing for the long term positive mitigation for hydrology.



8.11 References

- Directive 2014/52/Eu of The European Parliament
- Meath County Council Climate Action Strategy (2019-2024)
- Environmental Protection Agency (EPA) Advice notes on current practice in the preparation of Environmental Impact Statement (EPA, 2015) and Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2022).
- Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017).
- Transport Infrastructure Ireland - Road Drainage and Water Environment (TII, 2015).
- Transport Infrastructure Ireland (previously National Road Authority) - Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes (TII, 2009).
- Water Framework Directive (WFD) - Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy. This relates to the improvement of water quality across Ireland including rivers and groundwater bodies.
- The Planning System and Flood Risk Management, Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government (DoEHLG) and the Office of Public Works (OPW)).
- Guidelines on protection of fisheries during construction works in and adjacent to waters (Inland Fisheries Ireland, 2016).
- Guidelines for the Crossing of Watercourses during Construction of National Road Schemes, (TII, 2008)
- European Communities Environmental Objectives (Surface Waters); Regulations, 2009 (S.I. No. 272 of 2009 as amended by SI No. 77 of 2019).
- Part IV of the First Schedule of the Planning and Development Act 2000, as amended.
- European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003).
- Environmental Protection Agency 'Towards Setting Guideline Values for the Protection of Groundwater in Ireland Interim Report', (EPA 2003).
- European Union (Drinking Water) Regulations 2014 (S.I. No. 122/2014).
- European Union (Drinking Water) (Amendment) Regulations (S.I. No. 464 of 2017)
- Environmental Protection Agency (EPA) – website mapping and database information. Envision water quality monitoring data for watercourses in the area;
- The Planning System and Flood Risk Management, Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government (DoEHLG) and the Office of Public Works (OPW));
- Office of Public Works (OPW) flood mapping data (www.floodmaps.ie)
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- IGI. 2007. Recommended Collection, Presentation and Interpretation of Geological and Hydrogeological Information for Quarry Developments. Institute of Geologists of Ireland.
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- McConnell, B., Philcox, M.E., Geraghty, M. 2001. Sheet 13: Geology of Meath. A geological description to accompany the bedrock geology 1:100,000 bedrock series. Geological Survey of Ireland.
- Patel Tonra 2014, EIA Screening Report, St. Margaret's Recycling and Transfer Ltd.
- NRA. 2009. Environmental impact assessment of national road schemes - a practical guide. National Roads Authority.
- Walsh, S. 2012. A summary of climate averages 1981-2010 for Ireland. Climatological Note No. 14, Met Eireann, Dublin



9.0 Air Quality & Climate

9.1 Introduction/Methodology

9.1.1 Introduction

Chapter 9 of this Environmental Impact Assessment Report has been prepared by Martijn Leenheer BSc (Hons) of ESC Environmental LTD and assesses the Air Quality and Climate Impacts associated with the proposed continued use of the existing waste processing and transfer facility at St. Margaret's, Co. Dublin, together with proposed works described in further detail below. Martijn Leenheer holds a 1st Class BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo) and has 11 years' experience in Ireland in soil remediation, invasive species commercial Wastewater Treatment, Discharge Licences, Waste Permits and Licences has been involved in Risk Assessments, NIS and EIAR reports for various commercial projects. Before moving to Ireland Martijn worked in the Netherlands as an Environmental Field Technician in soil research. He has been an Operations Director of Environmental Services Consultancy for 11 Years and a Founding Director of ESC Environmental LTD since 2021. The development is located directly northwest of Dublin Airport and is currently accessed via the R122 regional road.

This study will identify, describe and assess the impact of the subject development in terms of air quality during the construction and operational phases of the scheme. Particular attention will be focused on sensitive receptors, such as residential areas adjacent to the site, and local amenities such as schools and shopping centres. Increased traffic volumes associated with the subject site is likely to be the main impact source.

This assessment was prepared in accordance with the EIA Directive 2014/52/EC and having regard for the following guidance:

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, May 2022)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. Department by the Department of Housing, Planning and Local Government (August 2018 and last updated on 18 December 2019)

This section should be read in conjunction with the site layout plans for the site and project description sections of this EIAR.

9.1.2 Research Methodology

Existing EPA air quality data has been examined in order to assess the background air quality in the area. It is used to identify the existing pollutant trends in the area and to establish spatial information in order to determine compliance with relevant ambient air legislation.



9.1.3 Criteria for Rating of impacts

In May 2008, the European Commission introduced a revised Directive on ambient air quality and cleaner air for Europe (2008/50/EC), which has been transposed into Irish Legislation through the revised Air Quality Standards Regulations (S.I. 180 of 2011).

The Directive and Regulations specify limit values in ambient air for sulphur dioxide (SO₂), lead, benzene, particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide (CO) and nitrogen dioxide (NO). These limits are mainly for the protection of human health and are largely based on review of epidemiological studies on the health impacts of these pollutants. In addition, there are limits that apply to the protection of the wider environment (ecosystems and vegetation). The site does not have emissions which impact these parameters in a significant manner. The main emissions on site are from fugitive dust, and emissions from the small amount of diesel engines used on site. These emissions are small in scale. The dust is monitored regularly, and monitoring has shown that the dust is not transported beyond the mitigation measures on site. The scale of the diesel engine usage on site is small, and therefore the impact on ambient air quality parameters is significantly outclassed by the impact from the volume of traffic which passes the site daily or from the aircraft passing overhead on a regular basis.

Dust Deposition Guidelines

The concern from a health perspective is focused on particles of dust which are less than 10 microns and the EU ambient air quality standards outlined in the previous section have set ambient air quality limit values for PM₁₀ and PM_{2.5}. With regard to larger dust particles that can give rise to nuisance dust, there are no statutory guidelines regarding the maximum dust deposition levels that may be generated during the construction and decommissioning phases of a development in Ireland.

With regard to dust deposition, the German TA-Luft standard for dust deposition (non-hazardous dust) sets a maximum permissible emission level for dust deposition of 350 mg/m²/day averaged over a one-year period at any receptors outside the site boundary. The TA-Luft standard has been applied for the purpose of this assessment based on recommendations from the EPA in Ireland in the document titled 'Environmental Management Guidelines - Environmental Management in the Extractive Industry (Non-Scheduled Minerals)'. The document recommends that the Bergerhoff limit of 350 mg/m²/day be applied to the site boundary of quarries. This limit value shall be implemented with regard to dust impacts from subject site.

Climate Agreements

Ireland is party to both the United Nations Framework Convention on Climate Change (UNFCCC) and the Kyoto Protocol. The Paris Agreement, which entered into force in 2016, is an important milestone in terms of international climate change agreements and includes an aim of limiting global temperature increases to no more than 2°C above pre-industrial levels with efforts to limit this rise to 1.5°C. The aim is to limit global GHG emissions to 40 gigatonnes



as soon as possible whilst acknowledging that peaking of GHG emissions will take longer for developing countries. Contributions to GHG emissions will be based on Intended Nationally Determined Contributions (INDCs) which will form the foundation for climate action post 2020. Significant progress was also made in the Paris Agreement on elevating adaption onto the same level as action to cut and curb emissions.

In order to meet the commitments under the Paris Agreement, the EU enacted Regulation (EU) 2018/842 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No. 525/2013 (the Regulation). The Regulation aims to deliver, collectively by the EU in the most cost-effective manner possible, reductions in GHG emissions from the Emission Trading Scheme (ETS) and non-ETS sectors amounting to 43% and 30%, respectively, by 2030 compared to 2005. Ireland's obligation under the Regulation is a 30% reduction in non-ETS greenhouse gas emissions by 2030 relative to its 2005 levels.

Following on from the recently published European Climate Law Regulation (EU) 2021/1119, and as part of the EU's "Fit for 55" legislative package where the EU has recently committed to a domestic reduction of net greenhouse gas emissions by at least 55% compared to 1990 levels by 2020, the Effort Sharing Regulation is proposed to be strengthened with increased ambition by the year 2030. The proposal for Ireland is to increase the GHG emission reduction target from 30% to 42% relative to 2005 levels whilst the ETS market will also have more stringent reductions from the currently proposed reduction of 43% by 2030 compared to 2005 to a 61% reduction by 2030 based on annual reductions of 4.2% compared to the previous annual reduction level of 2.2% per year (EU, 2021). In terms of the current operation of the ETS, the European Commission reported that the ETS Carbon Market reported a fall of 9% in emissions in 2019 relative to 2018 levels.

In 2015, the Climate Action and Low Carbon Development Act 2015 (No. 46 of 2015) was enacted (the 2015 Act). The purpose of the Act was to enable Ireland 'to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050' (3.(1) of No. 46 of 2015). This is referred to in the Act as the 'national transition objective'.

The Climate Action Plan (CAP), published in June 2019, outlines the current status across key sectors including Electricity, Transport, Built Environment, Industry and Agriculture and outlines the various broadscale measures required for each sector to achieve ambitious decarbonisation targets. The CAP also details the required governance arrangements for implementation including carbon- proofing of policies, establishment of carbon budgets, a strengthened Climate Change Advisory Council and greater accountability to the Oireachtas. The CAP has set a built environment sector reduction target of 40 - 45% relative to 2030 pre-NDP (National Development Plan) projections.

In June 2020, the Government published the Programme for Government – Our Shared Future. In relation to climate, there is a commitment to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (51% reduction over the decade) with an ultimate aim to achieve net zero emissions by 2050. Policy changes include the acceleration of the electrification of the transport system, including electric bikes, electric vehicles and electric



public transport, alongside a ban on new registrations of petrol and diesel cars from 2030. In addition, there is a policy to ensure an unprecedented model shift in all areas by a reorientation of investment to walking, cycling and public transport.

9.2 The Subject Development

9.2.1 The Subject Development

The subject development is described in full in Chapter 4.0 of this Environmental Impact Assessment Report but in summary consists of the following:

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

9.2.2 Construction Phase

Take out The proposed construction to take place is of minor nature, due to there being an attenuation system and electrical vehicle parking. There has not been large scale construction place since 2019 consists of the replacing of portacabins and the installation of the hammermill. The portacabins replacement was in the same location on an existing concreted area. The hammermill installation consisted of installation of prefabricated parts on existing concrete yard area.

Additionally, the applicant extended the permitted concrete area (as per F13A/0409) at two locations, and had proposed to replace the existing steel container boundary arrangement to concrete panel and steel post.



Figure 9. 1 - additional concrete areas shaded yellow (extract from DWG 'Proposed Permission')





9.2.3 Operational Phase

During the operational phase from the period 2019 to 2023, the subject site had an annual throughput of approx. 26,000 to 42,500 tonnes (as noted below).

Year	Turnover (tonnes pa)
2019	33,524
2020	26,233
2021	42,263
2022	42,522
2023	33,695
2024	21,900

It is proposed that the site will continue to operate at 2024 levels of tonnage and as such, there will be no increase in traffic over and above current rates.

It may be worth noting, that the site has operated at an annual tonnage of circa 22,000 tonnes per annum since 1997, with permissible operating tonnage dictated by the various waste licences and thereafter the waste permits (see below).

Year	Turnover (tonnes pa)
1997	21,000
2013	22,250
2014	21,900

During the operational phase the main source of air quality impacts were the result of fugitive dust emissions from site activities.

Emission from site traffic and plant have the potential to impact climate.

The outputs of the facility are exported for reuse in production processes which reduces the need for raw materials to be mined and waste going to landfill. Table 9.2: Proportions of Site traffic

Type	2019		2023	
	no	%	no	%
Car	67	39%	44	37%
LGV	47	27%	34	28%
OGV1	42	24%	18	15%
OGV2	18	10%	24	20%
Total	174	100%	120	100%

Source Traffic and Transport Assessment Waterman Moylan



9.3 The Receiving Environment

The St. Margaret's site is located to the west of Dublin Airport on the R 122 road. This development was previously permitted under temporary planning permission ABP Reg. Ref. F13A/0409. The site is bounded by agricultural lands to the north, south and east, the R122 to the west with Dublin Airport further to the southeast. The surrounding area is primarily used for aviation, industrial, storage/distribution and agricultural purposes.

Air quality data available from the Environmental Protection Agency (EPA) monitoring network was assessed. Four air quality zones have been defined for Ireland as follows:

- Zone A - Dublin Conurbation
- Zone B - Cork Conurbation
- Zone C - Other cities and large towns comprising Galway, Limerick, Waterford, Clonmel, Kilkenny, Sligo, Drogheda, Wexford, Athlone, Ennis, Bray, Naas, Carlow, Tralee, Dundalk, Navan, Letterkenny, Celbridge, Newbridge, Mullingar and Balbriggan.
- Zone D - Rural Ireland i.e. the remainder of the state excluding Zones A, B and C.

The subject site is located within air quality Zone A, the Dublin Conurbation. From the EPA report on ambient air quality in 2017 the most representative monitoring station in terms of the subject site is Swords, County Dublin. The Swords monitoring station does not record all ambient air quality parameters outlined in the Directive on ambient air quality and cleaner air for Europe (2008/50/EC) therefore air quality in the receiving environment is described using the average annual mean value concentrations from all measured monitoring stations in Zone A.

Table 9.2 shows the annual mean value concentrations measured for SO₂, PM₁₀, NO₂, CO and benzene in Zone A for 2017. The table compares the annual mean measured levels with the limit values defined in the National Air Quality Standards Regulations 2011 (S.I No. 180 of 2011).

Table 9-2 Extract of summary data from EPA Ambient Air Monitoring in 2017

Pollutant	Unit	Annual Mean Concentration in 2017	Annual Limit for Protection of Human Health
Sulphur Dioxide (SO ₂)	µg/m ³	1.7	20
Particulate Matter (PM ₁₀)	µg/m ³	12.4	40
Nitrogen Dioxide (NO ₂)	µg/m ³	20.8	40
Carbon Monoxide (CO)	mg/m ³	0.3	10
Benzene	µg/m ³	0.92	5



In summary, existing baseline levels of SO₂, PM₁₀, NO₂, CO and benzene based on data from the EPA monitoring network are currently below ambient air quality limit values in Zone A and by extension the levels in the vicinity of the subject site are also considered to be below the limit values.

Ireland met all of its EU Cleaner Air for Europe Directive (CAFE Directive) legal requirements in 2021 and 2022. Ireland was also compliant with EU limits in 2020; however, this was largely due to the reduction in traffic due to Covid-19 restrictions. For this reason, they have not been included in the baseline section.

9.3.1 Climate Baseline

The weather in Ireland is influenced by the Atlantic Ocean, resulting in mild, moist weather dominated by maritime air masses. The prevailing wind direction is from a quadrant centered west-southwest. These are relatively warm winds from the Atlantic and frequently bring rain. Easterly winds are weaker and less frequent and tend to bring cooler weather from the northeast in spring and warmer weather from the southeast in summer. The site of the proposed development close to the east coast would experience a higher frequency of easterly winds than more inland locations or those on the west coast.

The nearest meteorological station to the subject site is the Met Eireann Station in Dublin Airport which lies approximately 1km south of the subject site. The 30-year averages from the station at Dublin Airport are presented in Table 9.3.

Table 9.3: 30-year Average Meteorological Data from Dublin Airport (Annual Values from 1991-2020, source: www.met.ie)

Parameter	30-year Average
Mean Temperature (°C)	9.7
Mean Relative Humidity at 0900UTC (%)	83.5
Mean Daily Sunshine Duration (hours)	4
Mean Annual Total Rainfall (mm)	772.5
Mean Wind Speed (knots)	10.5

The prevailing wind direction for the area is between west and southwest as presented in the windrose for Dublin Airport Met Station for 1942 to 2014 in Figure 9.1. Northerly winds tend to be very infrequent (less than 5%) with easterly winds marginally more frequent (5-10%). Wind characteristics are typically moderate with relatively infrequent gales (average only 8.2 days with gales per annum). The 30 year period of 1991-2020 (figure 9:2) shows the same trends. Northerly winds tend to be very infrequent (less than 6%) with easterly winds marginally more frequent (6-12%). Wind characteristics are typically moderate with relatively infrequent gales (average only 7.8 days with gales per annum)



Windrose Dublin Apt 1-Jan-1942 to 31-Dec-2014

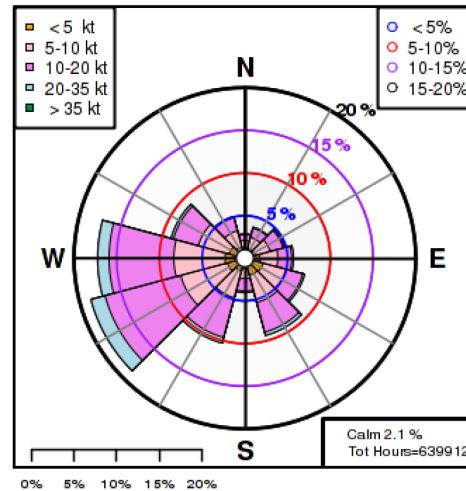


Figure 9.1: Windrose for the Dublin Airport Met Station 1942 to 2014
(source: www.met.ie)

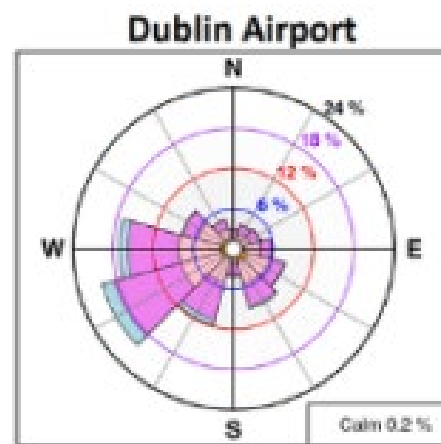


Figure 9.2: Windrose for the Dublin Airport Met Station 1991 to 2020
(source: www.met.ie)

The National Policy Position on climate action and low carbon development was published on the 23rd April 2014. The policy sets a fundamental national objective to achieve transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050. The policy states that greenhouse gas (GHG) mitigation and adaptation to the impacts of climate change are to be addressed in parallel national strategies - respectively through a series of National Mitigation Plans and a series of National Climate Change Adaptation Frameworks.

The National Policy Position envisages that development of National Mitigation Plans will be guided by a long-term vision of low carbon transition based on the following:

- An aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and
- In parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.



With reference to this project, the aggregate reduction emissions of at least 80% from the residential and transport sectors by 2050 are the relevant policy targets.

Further to the National Policy Position, the Climate Action and Low Carbon Development Act 2015 (No. 46 of 2015) was enacted on the 10th of December 2015. The Climate Act sets out the proposed national objective to transition to a low carbon, climate resilient and environmentally sustainable economy by the end of 2050.

Ireland reported an emission level of 61.55 million tonnes carbon dioxide equivalent (Mt CO₂eq). This is 3.6% higher (2.12 Mt CO₂eq) than emissions in 2015 and returns greenhouse gas emissions to 2009 levels. When compared to the 1990 baseline, Ireland has increased greenhouse emissions by 9.8% which is well below the 20% reduction target set for Ireland under the EU 2020 strategy.

Transport is currently the second largest contributor of GHG emissions (after agriculture) at 20.5% (which predominately consists of road transport). Between 1990 and 2016, the transport sector showed the greatest overall sectoral increase of 138.6% and increases are linked to economic prosperity with year on year increases observed up to 2007 followed by five years of year on year decrease during the economic downturn. The latest EPA projections indicate that under the "With Existing Measures" scenario, transport emissions are projected to increase by 12% over the period 2015 - 2020 to 13.2 Mt CO₂eq. Under the "With Additional Measures" scenario emissions are projected to increase by 10% in this period. The latter scenario assumes the target of 8% renewable fuel use in transport is reached, 10,000 electric vehicles are deployed, and further rollout of the Biofuels Obligation Scheme are all in place by 2020

9.4 Predicted and or Potential Impacts of The Proposed Development

9.4.1 Do Nothing Scenario

The do-nothing scenario is not relevant for a retention application. The do-nothing scenario is not relevant to the current application. The predicted impacts are expected to be short term and imperceptible and neutral.

9.4.2 Construction Phase

As the development in question is already constructed, and the construction that took place since 2019 was the replacement of portacabins and the installation of the hammermill on the existing concreted yard area, the construction phase of the scheme had no potential to generate emissions to atmosphere.



9.4.3 Operational Phase

Air Quality

The potential impact to air quality during the operational phase of the subject site would not have changed from the situation in 2019 except for the installation of the hammermill, outside of the industrial shed, which could have had the potential of dust generation.

Dust is the main emission which could have had a direct impact on the air quality, however monitoring results show that no dust is transmitted past the boundary of the site after the existing mitigation measures and there was no trend to indicate the hammermill had an adverse impact on the dust before mitigation measures. There was no clear correlation between annual throughput and wind-blown dust generation before mitigation.

Climate

Climate change has the potential to alter weather patterns and increase the frequency of rainfall in future years. As a result of this there is the potential for surface water flooding related impacts on site in future years. However, adequate attenuation and drainage are included in the proposal to account for increased rainfall in future years as part of the design.

From a climate perspective the increased tonnage accepted on the site is a positive impact due to the proximity principle. Although the operation of the site relied on diesel engines, the site's waste activity decreases waste being transported to Belfast. The emissions saved by the transportation of the accepted waste outweighs the emissions of the diesel engines used by the plant on site.

Human Health

Traffic related air emissions have the potential to impact human health. Due to change in the permit conditions to limit the waste accepted from the general public the actual volume of traffic to the site reduced while the accepted volume remained the same or increased. Furthermore, the waste accepted at this site was not diverted to alternative sites with a greater distance, reducing traffic emissions further.

While the plant runs on diesel engines, these are relatively small. The emissions from the waste being transported to Belfast would be much more than the emissions from running the plant. Tonnage does not have a direct correlation with the engine emissions from the plant on site as the plant is designed to recover larger amounts of tonnage than accepted on site.

Dust emissions could have adverse effects on human health, but the most reliable recent monitoring results confirm that no windblown dust is been transported outside of the site's boundary indicating that the existing mitigation measures are sufficient.



9.5 Mitigation and Monitoring Measures

9.5.1 Construction Phase

No mitigation measures were necessary for the construction of the 2 concrete slabs, the installation of the hammermill or the replacement of the portacabins as there was no potential for impact on climate or air quality during this phase.

9.5.2 Operational Phase

The main potential emission from the site is dust. The most recent reliable monitoring results show that there are no exceedances after the existing mitigation measures. Beside the mitigation measures introduced with the installation of the hammermill which consist of misting (at the intake of the hammermill and on the site during dry periods) and dust netting,, there were existing mitigation measures such as housekeeping, closed fencing, tree lines and earth banks.

9.5.3 Residual Impacts

Due to the mitigation measures outlined in Section 9.5, the residual impacts on air quality or climate from the construction will be **momentary, neutral, and imperceptible**. The residual impacts on air quality for the operational phases of the proposed development will be **brief, neutral and imperceptible**, while the impacts on climate will be **short-term, positive and imperceptible**.

9.6 Cumulative Impacts

9.6.1 Construction Phase

There were no historic cumulative impacts due to the small scale of the construction phase.

The 2013 permission conditioned the restoration of some 1.1ha of land to 'agricultural use'. To date a restoration plan has not been agreed. The lands, however, have not been used for waste transfer and recycling activities, as per condition 6 of F13A/0409. As part of the proposed landscape and soil/geology mitigation measures, it is proposed to create a wildflower/managed grassland field at this location, but not to use same as an active farm/agricultural purposes. The creation of the proposed managed grassland/wildflower meadow involves the importation of topsoil and as such this level of restoration and cultivation does not have the potential for cumulative impact.



9.6.2 Operational Phase

No facilities have been identified with the potential for cumulative impact within the subject site. As the subject site is an existing site which has been operational at current levels for over 25 years, and in excess of current levels for approx. 4 of those years, and monitoring results show that existing dust mitigation measures are sufficient there is little potential for cumulative impacts.

In accordance with the EPA Guidelines the cumulative impacts to air quality are predicted to be **short-term, neutral** and **imperceptible**.

9.7 Interactions

Air quality does not have a significant number of interactions with other topics. The most significant interactions are between population and human health and air quality. An adverse impact due to air quality in either the construction or operational phase has the potential to cause health and dust nuisance issues.

The mitigation measures that are and have been in place at the subject site ensure that the historic and current impact complies with all ambient air quality legislative limits and therefore the predicted impact is **short-term, neutral** and **imperceptible** with respect to the construction phase and **momentary, neutral** and **imperceptible** with respect to the operational phase in terms of human health impacts.

Interactions between air quality and traffic can be significant. The impacts of the proposed development on air quality are assessed by reviewing the change in annual average daily traffic on roads close to the site. Due to the fact that this is an existing operational site and there was no material change in the activity from the pre 2019 use, notwithstanding the increase in tonnage accepted on site, the impact of the interactions between traffic and air quality are considered to be **short-term, neutral**, and **imperceptible**.

Dust emissions have the potential to settle on plants causing impacts to local ecology. The mitigation measures on the site ensure that dust generation is minimised and the effect on Air and Climate will be **short-term, imperceptible** and **neutral**.

9.8 References

- UK Environment Agency (2003) IPPC H1 - IPPC Environmental Assessment and Appraisal of BAT
- Technical Instructions on Air Quality Control – TA Luft Dated 24th July 2002
- UK Environment Agency / DEFRA <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- and Deposition Modelling, Region 6 Centre for Combustion Science and Engineering



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- EPA (2022) Air Quality in Ireland 2021
- EU Council Directive 2008/50/EC
- Air Quality Standards Regulations 2011 S.I. No. 180 of 2011
- *Guidance on the Assessment of Dust from Demolition and Construction*, UK Institute of Air Quality Management (IAQM) (2014)
- A guide to the assessment of air quality on designated conservation sites, UK Institute of Air Quality Management (IAQM) (2020)
- EPA 2021 GHG Emissions Projections Report for 2020 – 2040
- EU’s Effort Sharing Decision (Decision No. 406/2009/EC) 2020
- EPA, Met Eireann and Marine Institute (2021) The Status of Ireland’s Climate, 2020



10.0 Noise & Vibration

10.1 Introduction/Methodology

Introduction

This chapter of this Environmental Impact Assessment Report (EIAR) has been prepared by Irwin Carr Consulting. Irwin Carr Consulting Ltd is an environmental consultancy based in Ireland. The company has a proven track record in noise impact assessments throughout the UK and Ireland, with extensive knowledge of the issues in relation to noise from wind energy developments.

The assessment was carried out by Shane Carr is a Director in Irwin Carr Consulting, primarily responsible for environmental noise and noise modelling. He has over 25 years' experience working in both the public and private sectors having previously obtained a BSc (Hons) Degree in Environmental Health and a Post-Graduate Diploma in Acoustics. Shane has been responsible for undertaking and reviewing noise impact assessments on numerous recycling facilities throughout the UK and Ireland. Shane carried out the baseline study.

The Noise and Vibration Impacts associated with the historic and continuing use of the waste processing and transfer facility at St. Margaret's, Co. Dublin, for tonnages ranging from 25,000 tonnes per annum to 42,500 tonnes for the period 2019 to 2023, and 21,900 tonnes per annum in 2024 onwards.

The development is located directly northwest of Dublin Airport and is currently accessed via the R122 regional road. The main noise source in the vicinity of the site is the operation of Dublin Airport, with consistent aeroplane movements throughout the day.

This study will identify, describe and assess the impact of the subject site in terms of the noise and vibration environment during the construction and operational phases of the proposed development. Particular attention will be focused on sensitive receptors, such as residential areas adjacent to the site, and local amenities such as schools, during both phases of the development.

This assessment was prepared in accordance with the EIA Directive 2014/52/EC and having regard for the following guidance:

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, Draft, August 2017);
- Advice Notes for Preparing Environmental Impact Statements (EPA, Draft September 2015);



- Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (TII, 2014); and
- EPA Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4, January 2016)

This section should be read in conjunction with the site layout plans for the site and project description sections of this EIAR.

10.2 Research Methodology

The following information sources have been consulted in relation to the assessment of noise and vibration:

- BS 5228-1 :2009+A1:2014 Noise and Vibration Control on Construction and Open Sites: Part 1 Noise;
- BS 5228-1 :2009+A1:2014 Noise and Vibration Control on Construction and Open Sites: Part 2 Vibration;
- BS6472-1 :2008 Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting;
- BS6472-2:2008 Guide to evaluation of human exposure to vibration in buildings. Blast-induced vibration;
- BS7385-2 1993: Evaluation and measurement for vibration in buildings. Guide to damage levels from ground borne vibration;
- ISO1996-1_2016 Acoustics - Description, measurement and assessment of environmental noise -- Part 1: Basic quantities and assessment procedure;
- Dublin Agglomeration Noise Action Plan 2019-2023'
- British Standard BS 7385: 1993: Evaluation and measurement for vibration in buildings Part 2: Guide to damage levels from ground borne vibration, and;
- British Standard BS 5228: 2009 +A1 2014: Code of practice for noise and vibration control on construction and open sites -- Part 2: Vibration (BS5228-2).

This section describes assessment criteria and methodologies used to assess the Noise and Vibration Impacts for the subject development, including conducting a baseline noise survey in the area and identifying potential noise sensitive receptors (NSRs). Assessment was carried out by Shane Carr of Irwin Carr. Shane Carr is a Director in Irwin Carr Consulting, primarily responsible for environmental noise and noise modelling. He has over 25 years' experience



working in both the public and private sectors having previously obtained a BSc (Hons) Degree in Environmental Health and a Post-Graduate Diploma in Acoustics. Shane has been responsible for undertaking and reviewing noise impact assessments on numerous recycling facilities throughout the UK and Ireland. Shane carried out the baseline study.

10.3 Operational Phase – Vibration Guidance

The Transport Infrastructure Ireland (TII) Guidelines recommend that in order to ensure that there is no potential for vibration damage during construction, vibration from construction activities should not exceed the values as set out in the TII guidance and detailed in Table 10.1.

Table 10: 1 Maximum allowable vibration levels during construction phase

Allowable vibration velocity (peak particle velocity) at the closest part of any sensitive property to the source of vibration, at a frequency of;		
Less than 10Hz	10-50Hz	50 to 100Hz (and above)
8mm/s	12.5mm/s	20mm/s

BS5228:2009 Part 2 Vibration gives recommendations for controlling vibration on construction and open sites. It is considered that the main source of vibration during construction works relates to piling operations, and earth movement which is anticipated for the proposed development.

It is generally accepted that for the majority of people, vibration levels in excess of 0.15 and 0.30mms-1 peak particle velocity are just perceptible. The table below details the distances at which certain activities give rise to a just perceptible level of vibration, these figures are based on historical field measurements.

Table 10: 2 Good Practice Mitigation – Design Measures

Activity	Distance from activity when vibration may just become perceptible (m) metres
Piling	25 - 30
Excavation	10 - 15
Heavy Vehicles (e.g., dump trucks)	5 - 10
Hydraulic Breakers	15 - 20

Traffic and operational machinery, such as power tools, forklifts etc., are possible sources of vibration during the operational phase of the development. In the case of nominally continuous sources of vibration such as these, vibration is perceptible at around 0.5 mm/s PPV and may become disturbing or annoying at higher magnitudes. Currently no major sources of vibration exist on the subject site. It would therefore be appropriate to assume that negligible vibration impacts will occur during the operation of the subject site and no further assessment is deemed to be required.



10.3.1 Operational Phase – Noise Guidance

Currently, no universal statutory noise standards apply in Ireland. Although certain limits relating to noise levels may be prescribed for licensed facilities under the Environmental Protection Agency Act, operations at the subject site are not covered under any of schedules of the act and therefore do not require a licence.

In the absence of statutory limits, it is therefore necessary to reference appropriate best practice guidance and standards in order to determine the impact of the subject site on the noise climate in the surrounding area during the operational phase.

The potential impacts of the operational phase are to be evaluated by comparing the predicted noise levels against the guideline values given below: Noise levels that are acceptable are based on the TII and WHO guidelines.

The main method of assessment compares the predicted noise levels to noise limit levels in documents such as NG4¹ or the World Health Organisation Guidelines (WHO).

In addition, BS 4142:2014 is an assessment methodology which provides guidance in relation to the measurement methodology for establishing the existing background noise levels and identification of the specific noise level.

World Health Organisation (WHO)

The World Health Organisation propose guideline values for the prevention of moderate and serious annoyance in outdoor areas as 50dB LAeq 6 hour and 55dB LAeq(16 hour) respectively although a more appropriate criteria for assessing disturbance or annoyance from noise arising from the site would be related to the significance of changes in noise levels as perceptible to human beings.

Institute of Environmental Management and Assessment

The information in Table 10.3 is taken from the 'Guidelines for Noise Impact Assessment' produced by the Institute of Environmental Management and Assessment (IEMA). This document replaces the draft guidelines published by the Institute of Acoustics (IOA) and IEMA in April 2002 and shows an appropriate impact rating procedure for noise levels attributable to certain operations based on perception of loudness.

It should be noted that the subjective description outlined in Table 10.3 applies to relatively continuous noise only. Irwin Carr would therefore deem the outlined changes as suitable

¹ Guidance Note for Noise: Licence Application, Survey and Assessments in Relation to Scheduled Activities (NG4) Environmental Protection Agency Office of Environmental Enforcement (OEE)



criteria for assessing noise arising from the subject site, from both onsite and road traffic related noise impacts.

Table 10: 3 IEMA Levels

Noise Level	Subjective Reaction	Impact Guidelines for Noise Impact Assessment	Impact Guidelines on the Information to be contained in EIARs (EPA)
0 dB	No change	None	Imperceptible
0.1 to 2.9 dB	Barely perceptible	Minor	Slight
3.0 to 4.9 dB	Noticeable	Moderate	Moderate
5.0 to 9.9 dB	Up to a double or halving of loudness	Substantial	Significant
10 dB +	More than a doubling or halving of loudness	Major	Profound

Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)

The Environmental Protection Agency (EPA) has produced a relevant guidance document relating to noise - NG4 - and while the proposed development is not a category which requires a licence from the EPA, the guidance is followed.

Where the EPA or a Local Authority sets conditions relating to noise emissions, these typically entail specified numerical noise limits which are not to be exceeded at Noise Sensitive Locations (NSL). These limits may apply to individual sources of noise on the site itself, at the boundary of the site or at the nearest Noise Sensitive Location (NSL). NG4 defines a NSL as

“any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or other area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.”

The noise attributable solely to on-site activities, expressed as a free field value at any NSL, should not generally exceed the values given below.

- Daytime (07:00 to 19:00hrs) – 55dB LAr,T
- Evening (19:00 to 23:00hrs) – 50dB LAr,T
- Night-time (23:00 to 07:00hrs) – 45dB LAeq,T

The following tasks were carried out in order to assess the noise impacts of the subject site on identified NSRs, during the operational phase of the scheme;

- A baseline survey has been conducted to establish baseline noise levels at the nearest noise sensitive receptor surrounding the site. The survey was carried out in



accordance with /ISO 1996: Acoustics: 'Description and measurement of environmental noise'.

- A detailed assessment of the cumulative predicted noise levels and potential impact upon noise sensitive receptors was carried out with reference to Irish and International best practice guidelines in the assessment of environmental noise.

10.4 The Subject Development

The proposed development, subject of this EIAR is as follows –

Permission is being sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

10.5 The Receiving Environment

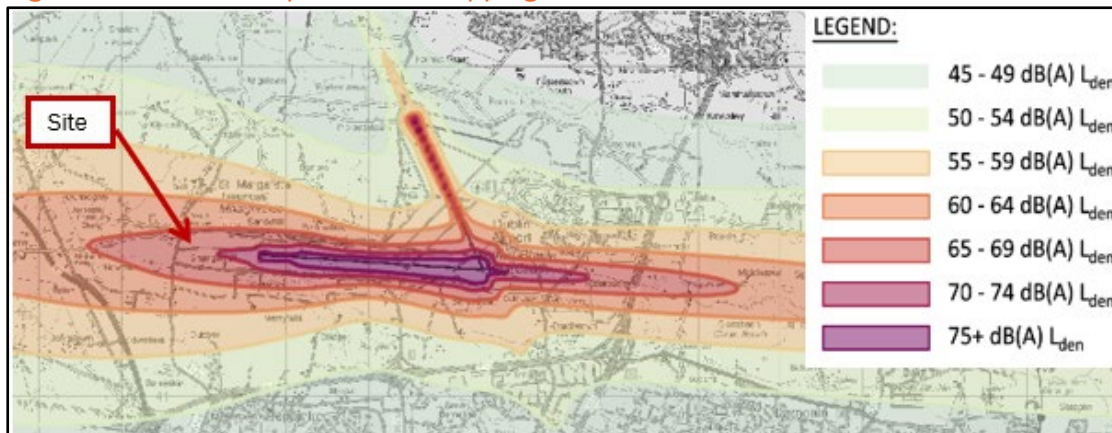
The St. Margaret's site is located to the west of Dublin Airport on the R122 road. This development was for the most part previously permitted under temporary planning permission ABP Reg. Ref. F13A/0409, with the exception of the increase in tonnage. It is acknowledged that this permission withered on 18th August 2019. Retention had been sought under FW20A/0029 but this was unsuccessful, and was refused on appeal. Therefore the only relevant extant permission is that of F9A7/0109, for 10,000 tonnes per annum and on a smaller c.0.6ha site.



The subject site, comprising 2.93ha (of which the recycling facility comprises approx. 1.8 ha) is bounded by agricultural lands to the north, south and east, the R122 to the west with Dublin Airport further to the southeast. The surrounding area is primarily used for aviation, industrial, storage/distribution and agricultural purposes. The subject site is also served by public transport with regular buses running along the R122 (bus service 40B, 83, 83A).

Figure 10.1 shows the noise mapping for the surrounding area as presented in the Dublin Airport Environmental Noise Action Plan 2021. The St. Margaret's site is located within the 65-69dB Lden contour from the aircraft noise from Dublin Airport and within the zone of 60-65dB Lden contours from road traffic from the M50, N2 and R122 roads. As a consequence the existing noise climate in the area is dominated by these road traffic and air traffic sources.

Figure 10: 1 Dublin Airport Noise Mapping 2016



10.6 Dates and Times of Noise Surveys

10.6.1 Baseline Noise Survey

In order to assess the surrounding environmental noise levels, a daytime noise survey was carried a noise survey was conducted between the 22 and 29 July 2024. During the survey, the day evening and night-time LAeq and LA90 were monitored.

The survey was set up using the following equipment:

- 821 Larson Davis Sound Level Meter
- Acoustic Calibrator

Table 10: 4 Noise Monitoring Location (NML)

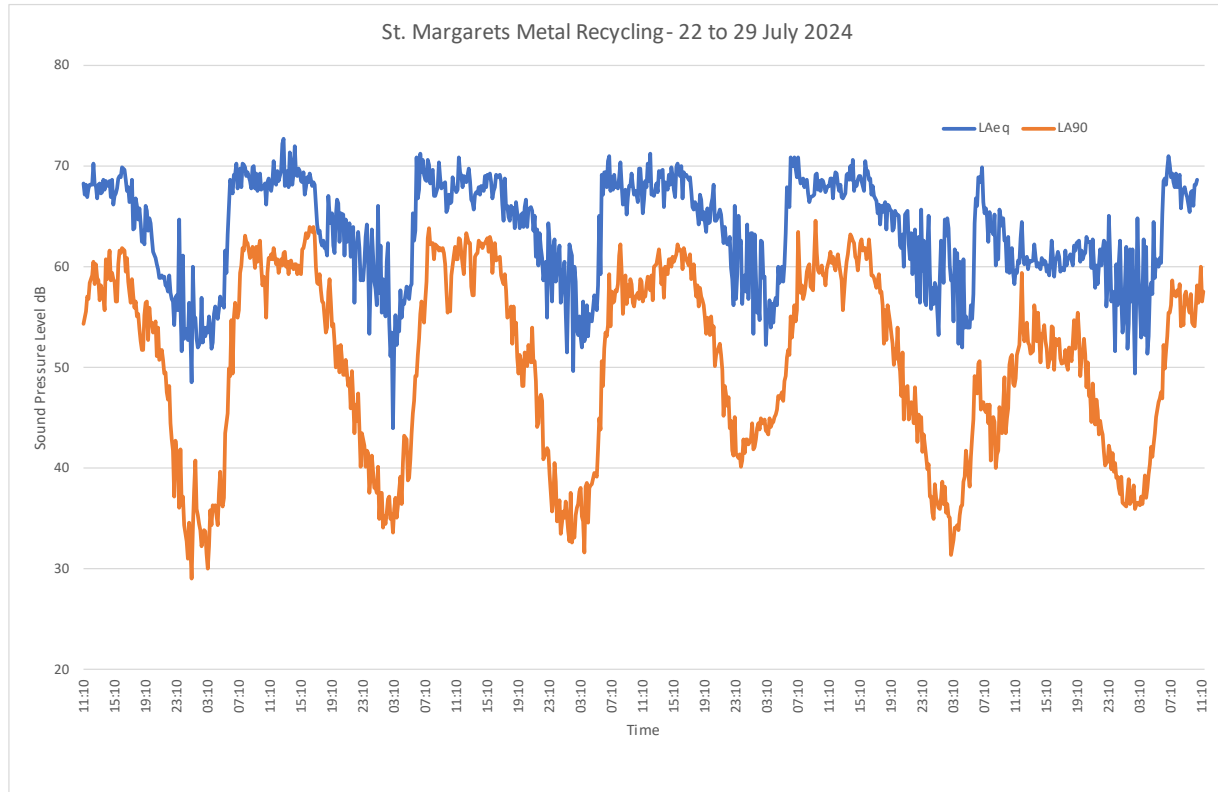
Description	Location (ITM)
Noise Monitoring Location 1 (NML 1)	712905, 743436



The acoustic parameters measured included LAeq and LA90. Instrumentation was checked and calibrated before and after the survey period, as per the requirements of NG4 and ISO19961F2

Figures 10.2 below show the results of the noise measurements at NML 1, over the 7-day survey period between 22 and 29 July 2024.

Figure 10: 2 Acoustic survey time history NML 1



Ambient Sound Levels

For the purposes of the NG4 assessment, the measured daytime and night-time ambient sound levels are presented in Table 8.6 with the background levels in Table 8.7.

Table 10: 5 Measured day, evening and night-time ambient sound levels (LAeq)

Date	NML 1 Noise Level, dB LAeq		
	Daytime Noise Criterion, dB LAr,T (07:00 to 19:00hrs)	Evening Noise Criterion, dB LAr,T (19:00 to 23:00hrs)	Night-time Noise Criterion, dB LAeq,T (23:00 to 07:00hrs)
Monday 19 July	67.6	61.3	61.6
Tuesday 20 July	67.8	63.5	63.0
Wednesday 21 July	68.0	63.8	62.9
Thursday 22 July	67.5	64.3	63.6

² International Standard ISO 1996-2: Acoustics – Description, Measurement and Assessment of Environmental Noise, Third Edition 2017



Friday 23 July	68.1	63.4	62.6
Saturday 24 July	61.8	61.4	62.4
Sunday 25 July	68.0	-	-

**Denotes less than full measurement period due to the time of installation and collection of the equipment, but is included for completeness*

Table 10: 6 Measured day, evening and night-time background sound levels (LA90)

Date	NML 1 Noise Level, dB LA90		
	Daytime Noise Criterion, dB LAr,T (07:00 to 19:00hrs)	Evening Noise Criterion, dB LAr,T (19:00 to 23:00hrs)	Night-time Noise Criterion, dB LAeq,T (23:00 to 07:00hrs)
Monday 19 July	58.5	52.4	46.0
Tuesday 20 July	59.5	50.5	46.3
Wednesday 21 July	60.7	49.2	46.5
Thursday 22 July	58.2	51.8	48.0
Friday 23 July	60.2	49.6	42.4
Saturday 24 July	51.2	49.5	45.0
Sunday 25 July	56.6	-	-

**Denotes less than full measurement period due to the time of installation and collection of the equipment, but is included for completeness.*

The highest measured levels at NML 1 were:

- Daytime: 68.1dB LAeq and 60.7dB LA90
- Evening: 64.3dB LAeq and 52.4dB LA90
- Night-time: 63.6dB LAeq and 48.0dB LA90

The environmental noise parameters were measured which are defined below.

LAeq is the A-weighted equivalent continuous steady sound level during the measurement period and effectively represents an average ambient noise value.

LA90 is the A-weighted sound level that is exceeded for 90% of the sample period; this parameter is typically used to quantify background noise.

A-weighting is the process by which noise levels are corrected to account for the non-linear frequency response of the human ear. All noise levels are quoted in dB(A) relative to a sound pressure of 20mPa.

Typical ranges of noise levels are presented in Table 10.7 to compare against the baseline noise levels measured



Table 10: 7: Typical noise Levels in the Environment

Sound Levels in decibels dB (A)	Description of Activity
0	Absolute silence
25	Very quiet room
35	Rural night time setting with no wind
55	Day time, busy roadway 0.5km away
70	Busy Restaurant
85	Very busy pub. Voice has to be raised to be heard
100	Disco or rock concert
120	Uncomfortably loud, conversation impossible
140	Noise causes pain in ears

Source: Guidance Note for Noise in relation to Scheduled activities, 2nd Edition, EPA 2006.

10.6.2 Baseline Vibration Survey

It has not been considered necessary to undertake baseline vibration monitoring as there is no evidence to suggest that existing receptors are currently affected by appreciable environmental vibration.

10.7 Predicted Impacts

10.7.1 Construction Noise

The site is built and operational, and this application generally relates to the continued use of existing infrastructure and buildings. The only construction proposed on the site relates to the installation of the attenuation tanks (above and below ground), which this section discusses. Using the method outlined in BS5228, a worst case LAeq value at potential NSRs at distances of 30m, 150m, 180m and 220m have been calculated for a range of fixed plant and machinery. The following plant has been presented to give an example of the potential construction noise levels:

- 1 No. road haulage trucks (22t capacity).
- 1 No. tracked excavators (20t operating weight):
- 1 concrete mixers

The methodology as outlined in BS 5228-1:2009+A1: 2014 was followed for predicting the noise levels in the proposed development. This methodology relates to the method for mobile plant in a defined area. The prediction of the LAeq from mobile plant operating over a small area or on site can be used for other activities when items of mobile plant are operating in close proximity to the point of interest, taking into account the adjustment of the predicted LAeq for standing and idling time of the plant. It is assumed that over a 1-hour period, all mobile plant will be operational for 80% of the time.



The results of these calculations are presented in Table 10.8. For reference, the guidelines on construction noise levels outlined in BS 5228-1:2009+A1: 2014 have been presented.

Table 10.7: BS5228 Indicative Noise Level Predictions: Stationary Plant

Noise Source Sound Power LWA dB

- 1 x No. Road haulage trucks 102dB
- 1 x No. Tracked Excavators 99dB
- 1 x concrete mixers 108dB

Table 10: 8: Predicted noise levels at Potential Noise Sensitive Receptors

Distance of potential NSR from construction site	Predicted Noise levels at NSR LAeq dB BS5288-1 (2009)	Monday – Friday (07:00 – 19:00)	Saturday (07:00 – 19:00)
65m	63	70	65
100m	59		
150m	56		
180m	54		

The nearest NSR to the site is the Sandyhill House residential property approximately 65m northwest of the site. At such a distance, the results of the indicative construction calculations shows that the resultant LAeq (1 hour) values of using such plant and machinery would be in the region of 63db LAeq and therefore not above the daytime ambient level of 68 dB LAeq.

BS5228-1 (2009) +A1: 2014 specifies that a daytime limit of 70dB LAeq shall apply on weekdays and a daytime limit of 65dB LAeq shall apply on Saturday. The ambient noise levels at the nearest NSR are below the BS5228-1 limits and will be short-term in duration. As the construction phase is deemed to not have a noticeable change on the noise climate at this location. Noise levels at other identified NSRs are all also below the limits set out in BS5228-1 for construction noise.

10.7.2 Construction Vibration

Increases in ambient levels of ground borne vibration may occur as a result of the construction phase of the development. Due to the limited nature and extent of the construction phase, primarily relating to removal /relocation of soil to provide for installation of attenuation tanks, the quantity construction vibration will be low. The exact impact of these vibration impacts cannot be quantified, as it relates to vibration typical of agricultural activities which will be imperceptible over and above existing noise on site and in the area. This is particularly true due to the site's location adjacent to Dublin Airport and associated runway, the level of background noise, and the distance to nearby noise sensitive locations, in tandem with the nature and scale of development, and existing and established boundary arrangements which also act as a noise buffer in respect of site operations, no specific or additional mitigation measures were necessary for the construction and/or operation phase.



10.7.3 Operational Phase

10.7.4 Operational Noise

This assessment has considered noise impacts associated with the proposed continued use of the existing waste processing and transfer facility. Owing to the presence of an established use onsite, it is not anticipated that there will be any significant changes in the noise levels attributable to the development site, as existing and proposed levels of activities regarding tonnage arriving to site are consistent or lower.

As continued use is sought at 21,900 tonnes per annum and the permanent permission allowed 10,000 tonnes per annum, the impact over and above 10,000 tonnes per annum will be assessed. However, as the non-conforming use relates to 21,900 tonnes, this is a worst case scenario or comparison.

The existing site has been used for the recycling of metal and processing of scrap metals.

The main noise sources relate to the operation of the site, with the assigned noise levels being based on similar measurements on the site:

- The operation of a grabs removing the material from the delivery vehicles and depositing in the appropriate locations. 94dB SWL was assigned
- Shredder operational on the site 100dB SWL
- Lefort 1,300 Baler operating at 100dB SWL
- HGV delivering material to the site was set as a line source with each vehicle travelling at 10km/hr and the source noise level being 104dB

The site has been modelled to assess worst case operation of the site with all units working simultaneously, this is not expected to happen in practice as it would be normal to allow for a build-up of material prior to processing.

Noise sources include HGV movements from the roadside entrance travelling through the weighbridge and to the turning area as shown in the proposed site layout drawing before exiting the site. The HGV movements have been included with an assumed sound power level of 98 dB(A) (4 movements per hour per entrance at 10km/h). Forklift Truck (FLT) movements have been included with an assumed sound power level of 104 dB(A) (BS5228:2014) travelling from the western façade entrance to each storage area within the yard. The FLT has been included travelling at a speed of 10km/h with a conservative 100% on-time.

The route of the HGV's has been amended for the proposed layout as has the locations of the grabs and crusher.

At night-time, no operations will take place.

Digital mapping was used to present the site layout and the nearby receptor properties, as shown in Figure 10.2 and 10.3



Receptors

Three receptors were identified representing the nearest dwellings in the vicinity of the proposed waste recycling facility. The location of these receptors are presented in Table 10.9 and Figure 10.2.

Table 10: 9: Noise Sensitive Receptors

Location	Co-ordinates
NSL1	712862, 743470
NSL2	712763, 743383
NSL3	712921, 743557

Predicted Noise Levels

Table 10: 10: Noise Sensitive Receptors

Location	Predicted Noise Levels (dB LAeq)
NSL1	43.7
NSL2	41.8
NSL3	41.6

As detailed in above, there are a number of steps involved in confirming the assessment under the NG4 guidance, as follows:

- Step 1: Quiet Area Screening of the Development Location

The Proposed Development is within approx. 2km of Dublin Airport.

The Proposed Development is not therefore considered a quiet area.

- Step 2: Baseline Environmental Noise Survey

Noise measurements were carried as detailed in Section 8.3 above.

- Step 3: Screen Areas of Low Background Noise

It can be seen that the daytime, evening and night-time noise levels presented in Table 10.5 and 10.6 are greater than limit levels for the day, evening and night-time periods, therefore vicinity of the Proposed Development is not considered to be a low background noise area.

- Step 4: Determine Appropriate Noise Criteria



Based on the information in Step 1-3 above the Proposed Development is not a quiet area or area of low background noise level.

The recommended noise for the Proposed Development is defined within the “All other Areas” criteria i.e., 55dB daytime, 50dB evening and 45dB night-time, as shown in Table 10.11 below.

Table 10: 11: Recommended Operational Noise Limit Criteria

Scenario	Daytime Noise Criterion, dB LAr,T (07:00 to 19:00hrs)	Evening Noise Criterion, dB LAr,T (19:00 to 23:00hrs)	Night-time Noise Criterion, dB LAeq,T (23:00 to 07:00hrs)
All other Areas	55dB	50dB	45dB

The maximum predicted daytime noise levels at the nearest receptor locations in the vicinity of the Proposed Development are 44dB, therefore the predicted worst case daytime noise levels from the operation of the Proposed Development will comply with the criteria as set out in NG4 for the day, evening and night-time periods (but it should be noted that the site will only operate during the daytime period).

Furthermore, the maximum predicted noise level at the closest receptor is 11dB lower than the WHO recommended lower external daytime noise level of 55dB LAeq.

10.7.5 Operational Vibration

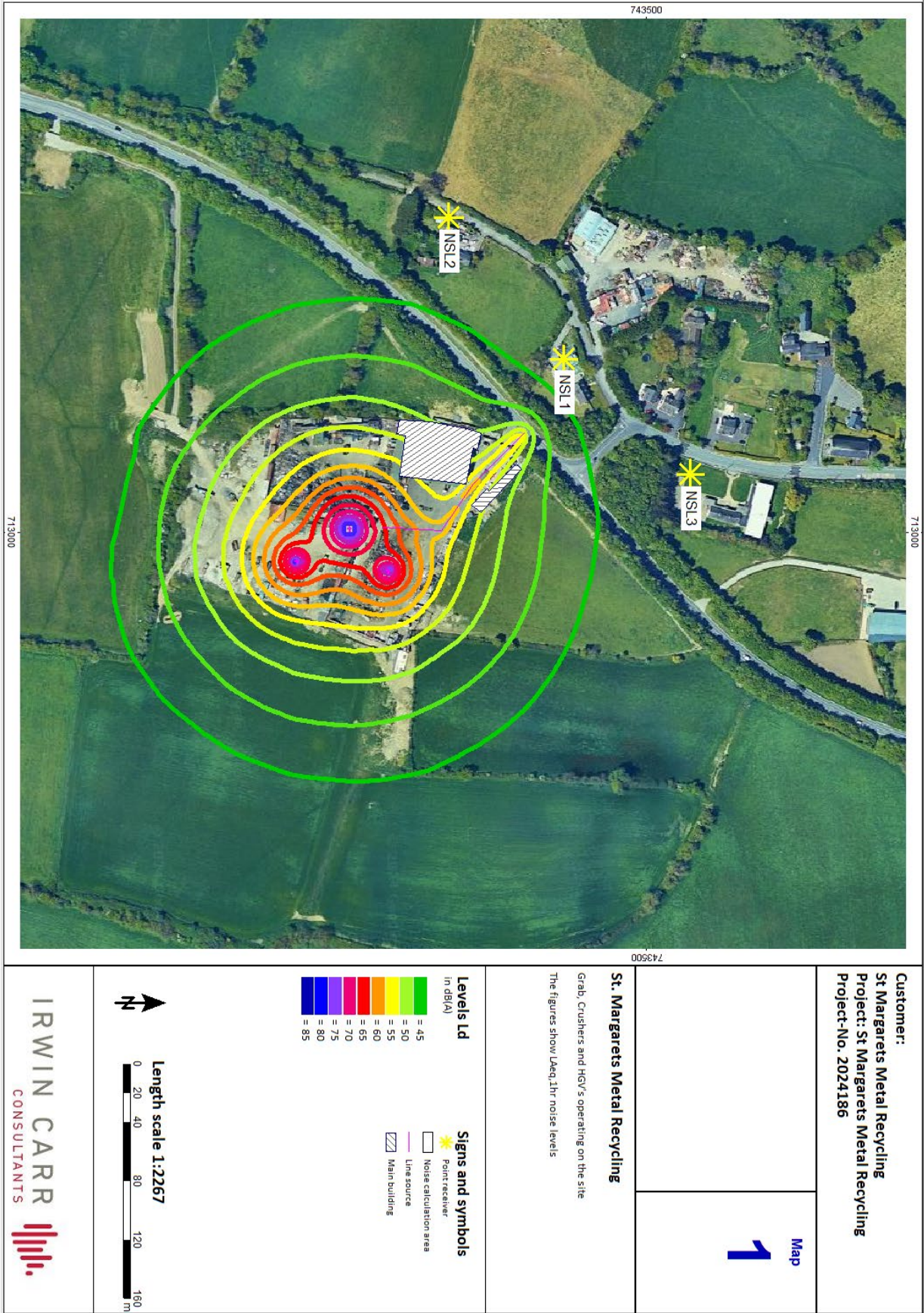
There will be imperceptible neutral long-term impacts on sensitive receptors as a result of the operational phase of the proposed development.



Figure 10.2 Site Location



Figure 10.3 Noise Map





10.8 Mitigation Measures

10.8.1 Construction Phase

N/a - imperceptible neutral short-term.

10.8.2 Operational Phase

The assessment of noise levels arising from operations at the subject site has shown that no mitigation is required for either noise or vibration at the site during the operational phase of the development.

10.9 Residual Impacts

10.9.1 Construction Phase

There is none.

10.9.2 Operational Phase

There will be no change to the noise and vibration from the operational phase of the facility, and no mitigation is proposed. Due to this, the residual impacts are deemed to be long-term, imperceptible and neutral.

10.10 Cumulative Impacts

10.10.1 Construction Phase

As the proposed development will not result in any perceptible impact during the construction phase, there will be no cumulative impact arising.

10.10.2 Operational Phase

Due to the site's location adjacent to Dublin Airport and associated runway, the level of background noise, is such that the operation of the site is considered to result in an imperceptible impact that would not be experienced as nearby noise sensitive locations. There is no cumulative impact arising.



10.10.3 Conclusion -

In accordance with the EPA Guidelines the cumulative impacts to noise and vibration are predicted to be long-term, neutral and imperceptible.

10.11 Statement of Significance

The significance of the potential noise impact of the development during operation and construction has been assessed using the methodology outlined in the Environmental Protection Agency Office of Environmental Enforcement (OEE) Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4) and in BS 4142:2014 + A1:2019 'Method of Rating and Assessing Industrial and Commercial Noise'

Noise levels due to the operation of the Proposed Development have been predicted using the industry best practice, i.e. SoundPLAN noise prediction modelling, and the predicted noise levels have been compared with the relevant noise limits and the significance of the potential impacts of the Development have been assessed by taking into account the noise limits at receptors and the degree to which compliance has been met in accordance with the Guidelines for Noise Impact Assessment (October 2014) produced by the Institute of Environmental Management and Assessment (IEMA).

Noise emissions during operation will be managed accordingly to comply with best practice, legislation and guidelines so that no significant effects occur

10.12 Interactions

Chapter 12, Material Assets, Traffic and Transport was reviewed in the preparation of this chapter.

10.13 References

- EPA Guidelines on Information to be contained in Environmental Impact Statements (2002).
- Draft 'Guidelines for Noise Impact Assessment' produced by the Institute of Acoustics/Institute of Environmental Management and Assessment Working Party.
- British Standard BS 5228 – 1: 2009+A1:2014: Code of practice for noise and vibration control on construction and open sites – Noise.
- Transport Infrastructure Ireland (TII) publication Good Practice Guidelines for the Treatment of Noise and Vibration in National Road Schemes.
- British Standard BS 7385: 1993: Evaluation and measurement for vibration in buildings Part 2: Guide to damage levels from ground borne vibration.
- British Standard BS 5228-2: 2009+A1:2014: Code of practice for noise and vibration control on construction and open sites – Vibration.



- BS 4142:2014: Methods for rating and assessing industrial and commercial sound.
- Environmental Protection Agencies Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4) (January 2016).
- ISO 1996-2:2017 Acoustics - Description, measurement and assessment of environmental noise - Part 2: Determination of environmental noise levels.
- ISO 9613 (1996): Acoustics – Attenuation of sound outdoors – Part 2: General method of calculation.



11.0 Landscape and Visual Impact

11.1 Introduction

Introduction

This Landscape and Visual Impact Assessment (LVIA) prepared by Ronan MacDiarmada & Associates Ltd (RMDA) was informed by a desktop study and a survey of the site and receiving environment in July 2024. The assessment will align with the methodology prescribed in the Guidelines for Landscape and Visual Impact Assessment, 3rd edition, 2013 (GLVIA) published by the UK Landscape Institute and the Institute for Environmental Management and Assessment.

The report will identify and discuss the impact of the future development of a Recycling Centre at R122, Sandyhill, St. Margaret's, Co. Dublin will have on the existing landscape or the environment.

The Recycling Centre has a history of planning submissions, and this LVIA shall deal with the Recycling Centre and the proposed changes and their impact on the landscape.

The proposed development relates to:

1. The on-going use of the existing metal processing and transfer facility with waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. The restoration of the 1.1 ha of compacted hardcore surfaced lands to grassland or wildflower meadow, and to include agricultural haul roads/tracks to serve adjacent agricultural lands, in compliance with conditions 3 and 6 of F13A/0409. These lands were included in an enlarged site area, comprising 2.93 ha under F13A/0409 and F20A/0409.
3. Permission for upgrades to the underground surface water attenuation tank comprising c.675 cubic metres, and an above ground overflow connected to same comprising 1500 sqm
4. Enhancement of car parking provision, including installation of 2no. EV charging point and



5. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc.

This assessment should be read in conjunction with the images that have been taken for this report; submitted accompanying the assessment, for visual receptors and images. RMDA have provided an assessment of the viewpoints – LVIA Viewpoints that should also be read alongside this report.

Figure 1: Site Location Map

Source: Googlemaps.ie



Fig 01 Site Outline (existing)

11.2 Statement of Authority

RMDA provides specialist landscape and visual services for projects from inception, through site/route selection, environmental impact assessment (EIA) and the planning process, to detailed design and construction. The company specialises in landscape character assessment (LCA) and landscape and visual impact assessment (LVIA) – for a wide variety of projects.

Ronan MacDiarmada is the chapter's main author, with Mark Morris providing oversight. Ronan holds a Bachelor of Agricultural Science in Landscape Horticulture and is the director of Ronan MacDiarmada & Associates Ltd (RMDA Ltd). A graduate of University College Dublin, he is a qualified Landscape Architect and a Corporate Member of the Irish Landscape Institute. Ronan specializes in Landscape and Visual Assessment (LVIA) and has over twenty years of experience in various projects, including master planning and landscape planning, particularly for Large Scale Residential Developments in Ireland. Additionally, he brings experience working with multi-disciplinary teams on a diverse range of projects from residential & public realm



projects as well as commercial developments in sectors such as healthcare, hospitality, and education.

Mark Morris, B.Sc. (Landscape Architect) is a graduate Landscape Architect with Ronan MacDiarmada & Associates Ltd and is a graduate of University College Dublin. His role in RMDA is to review and comment on the production of LVIA. Mark is responsible for a range of types of developments, commercial and detailed design to LVIA and landscape planning, including Large Residential Developments (LRD) throughout Ireland.

11.3 Methodology Used

Landscape and Visual Assessment Methodology: -

This assessment is based on the following guidelines:

- “Advice Notes on Current Practice in the preparation of Environmental Impact Statements,” Environmental Protection Agency (2015)
- “Guidelines on the Information to be Contained in Environmental Impact Statements,” Environmental Protection Agency (2002).
- “Draft 2017 EPA Guidelines on Environmental Impact Assessment”, Environmental Protection Agency.
- “Advice Notes for Preparing Environmental Impact Statements” Draft (September 2015)
- “Guidelines for Landscape and Visual Assessment,” 3rd Ed., Landscape Institute and Institute of Environmental Management and Assessment, 2013.

The following Methodology was used in this assessment:

- A desk top study of the proposed site and its environs, including reviewing aerial photography and ordinance survey documents.
- A site survey was undertaken to determine the character of the landscape and the surrounding area, including site visits during the month of July & August 2024.
- An assessment of the proposed development was conducted by examining the layout plans, elevations, and sections to determine the impacts of the development.
- An evaluation of these impacts was carried out in accordance with the criteria set out in the EPA guidelines.
- A review of statutory planning and other documentation to ascertain the local and wider significance; and visiting the site and surrounding area during July & August 2024 and preparing a photographic record of views and landscape features.

11.4 Definition of Landscape

Ireland is a signatory to the European Landscape Convention (ELC). The ELC defines landscape as



‘An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.’

This definition is important, as it defines that the landscape is not only a physical and visual amenity but provides for a range of functions: As a cultural resource, the interaction of man and landscape has formed the basis of much of our cultural heritage and values. The rhythms of the land as it was settled has informed what St. Margaret’s, is today, the undulating landform has created hills and coastal area which are a feature of the hinterland. The landscape/townscape provides opportunities for passive and active recreation. It contributes to the sense of place, as over time and place various histories and interactions have formed a sense of place for the local populations. The landscape provides a historic record, it also is a resource for food production, sources of energy and in the natural cycle, oxygen, water as the source for materials for living. In particular the landscape has the ability to renew itself.

The existing site and its environs are overwhelmingly that of a village setting and townscape and this is defined in GLVIA-2013 in the following manner (Section 2.7):

“Townscape’ refers to areas where the built environment is dominant. Villages, towns, and cities often make important contributions as elements in wider-open landscapes, but townscape means the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces, and the relationship between buildings and open spaces. There are important relationships with historic dimensions of landscape and townscape, since evidence of the way the villages, towns and cities change and develop over time contributes to their current form and character.”

11.5 Forces for Landscape Change

The remedial EIAR, as recognised that the landscape in St. Margaret’s, is changing and has granted a permission for a recycling centre. It has changed with the settlement pattern over the last several hundred years. It has progressed as a village. The patterns of settlement have been driven primarily by economic need and the requirement to provide shelter and food resources. It must be acknowledged that change will occur, necessitating a balance between economic, social, and environmental forces and values.

In this context, the recycling centre will take advantage of the existing landscape associated with this location. The landscape will focus on managing existing field boundaries through the preservation of native hedges and trees within the urban realm ensuring that residents, and visitors to St. Margaret’s will have a sense of value and place within the locality. This will promote and retain the rural character in St. Margaret’s. Although the recycling centre is present, it will provide a positive contribution to the current landscape.

11.6 Nature of Impacts

Impacts on the landscape arising from the development will comprise two distinct but closely related aspects. The first aspect will be the impact in the form of change of character to the landscape that arises from integrating the development into the existing context. The second



aspect will involve the visual impact, which will depend on the degree and nature of change in the visual environment. It is recognised that the combined impact on character and views will elicit responses, the significance of which will be partly informed by an individual's subjective perception of how much the changes matter. However, neither aspect will apply to the development as there will be no further impact from what exists on the current site.

The assessment of landscape/townscape and visual impacts include:

- Direct impacts upon specific landscape elements and buildings within and adjacent to the site.
- Effects on the overall pattern of the landscape elements that give rise to the character of the site and its surroundings.
- Impacts upon any special features or interests in or around the site.
- Direct impacts of the scheme upon views in the landscape / townscape.
- Overall impact on landscape character and visual amenity

In determining the Visual Impacts, the following definitions were used to assess the significance of the impacts:

11.7 Significance Criteria –

Table 1

No Impact:	There are no changes to views in the visual landscape.
Imperceptible Impact:	An impact capable of measurement but without noticeable consequences
Slight Impact:	An impact which causes noticeable changes in the character of the environment without affecting its sensitivities.
Moderate Impact:	An impact that alters the character of the environment in a manner that is consistent with existing and emerging trends.
Significant Impact:	An impact which, by its character, magnitude, duration, or intensity alters a sensitive aspect of the environment.
Profound Impact:	An impact which obliterates sensitive characteristics.

Additional terms used to describe quality of visual impact: -

- Neutral Impact: A change which does not affect the quality of the landscape.
- Positive Impact: A change which improves the quality of the environment or landscape.
- Negative Impact: A change which reduces the quality of the environment or landscape.



11.7.1 Terms used to describe the Duration of visual impact: -

Table 2

Momentary	Effects	Seconds to Minutes
Brief	Effects	Less than a day
Temporary	Effects	Less than a year
Short-term	Effects	Lasting 1 to 7 years
Medium-term	Effects	Lasting 7 to 15 years.
Long-term	Effects	Lasting 15 to 60 years.
Permanent	Effects	Lasting over 60 years.
Reversible	Effects	Effects that can be undone
Frequency of	Effects	Describe how often the effect will occur.

11.8 The Receiving Environment

11.8.1 Description of the Receiving Environment

The site of the proposed development is located in St. Margaret's, Sandyhall on the R122. West of Dublin Airport, North of the M50 motorway and adjacent to the village of St. Margaret's.

Currently the Recycling Centre is in use and has a minimal impact upon the surrounding area as the site is concealed from the road.

11.8.2 Policy Context of Receiving Environment

Landscape Character: The site is located within the Rolling Hills Character Type area. The Rolling Hills Character Type is categorised as having a modest landscape value.

St Margaret's is a rural village and hence the following policies apply to the development, the policies from Fingal County Council Development Plan 2023-2029 are as follows:

Policy SPQHP51 – Protection of Rural Villages
Support and protect Fingal's Rural Villages by ensuring their appropriate sustainable development to preserve the character and viability of villages and support local services.
Objective SPQHO64 – Enterprise in Rural Villages
Promote the provision of suitable, appropriately sized enterprises within rural villages to minimise the need for commuting.



11.8.3 Protected Views

There are no protected views to or from the location of St Margaret's Recycling Centre. The existing site is already part of the local landscape and there is no protected site which the recycling centre obstructs the viewing of.

11.8.4 Built Heritage

The proposed development of a Recycling Centre is located on farmland and there is no structure with any historical significance present on the site. We have referenced Dunsoghly Castle approximately 1km away. It has been referenced in the visual analysis.

11.8.5 Implications of Development Plan Policy

The Plan policy identifies several documents and policies which should be considered as part of this Assessment. In reviewing the impact of the Recycling Centre, these documents were consulted. including:

- An Bord Pleanála, Pre-Planning meeting for Substitute Consent, reg. ref. ABP-310169/21, guidance information provided by authority.
- Fingal County Council Submissions & Response through communications between client and local authority.
- Fingal County Council Development Plan 2023-2029

11.8.6 Landscape Character

Rolling Hills Character Type is categorised as having a modest landscape value. It is generally made up of agricultural land, such as the site in St Margaret's. The protected views (R108 (St Margaret's to Naul road) and R125 (Swords to Ashbourne Road), tree belts and undulating lands also add value to the area.

11.9 Summary of Landscape Characteristics and Values

The site around St Margaret's is generally agricultural in nature, while Dublin airport is a short distance from the site. There are no pre-existing historical sites that the site obstructs in any way, although there is a church and graveyard in the vicinity which is thought to date back to the 12th century. However, with the airport directly adjacent (to the East) and a major route, the M50 (to the South), the rural ambience is misleading as these have a major impact on the surrounding land use, as reflected in the logistic park to the West.



11.9.1 Landscape/Townscape Values

The GLVIA Guidelines sets out the methodology for assigning landscape sensitivity. This is based on combining judgements on landscape value, and landscape susceptibility.

Landscape values are derived from both indications of value as seen in national and local policy, as well as other indications that a landscape or landscape element, is valued. The site is zoned Industrial Enterprise Employment.

In addition to formal designations at international, national, and local level, the GLVIA refers to criteria which can help to describe landscape values in landscapes that are not covered by designations. These include the following:

- **Landscape Quality/Condition:** The location of the development is in the townland of Sandyhill village of St. Margaret's. St Margaret's is a small village that is still rural in outlook, however the city of Dublin, Finglas to the south and the Airport to the east provide quite an urban edge to the locality.
- **Cultural Heritage/Conservation value:** The proposed development is located in St. Margaret's Village which has been noted
- **Aesthetic/Scenic Quality:** The site is rural in the immediate area, however as noted the influence of the Airport has created commercial interests
- **Perceptual aspects:** A landscape may be valued for its perceptual qualities, such as wildness or tranquillity. Although the proposal is beside a road, it is located in St. Margaret's, but within a rural landscape, although Dublin Airport, and neighbouring Foodpark and logistics activities are relevant from wider view point.
- **Public Accessibility and Recreation Value:** The site is in private ownership and not publicly accessible. However, it may be easily viewed from the road. The recreation value of the site is high as the scenic views and proximity to the coastal walkways provide valuable amenity for the residents.

11.9.2 Conservation Values

The conservation values indicate aspects of the receiving environment that are sensitive and could be negatively impacted by the proposed development. These values form the potential landscape/townscape and visual constraints for the proposed development.

The buildings on the proposed site are not on the Record of Protected Structures.

The site will not impact or affect any conservation areas or any other protected structures or buildings in the proximity.



St. Margaret's will retain the inherent landscape and environmental qualities of the surrounding landscape, with the hedgerows and grasslands/field system around the site remaining intact.

The proposed Recycling Centre shall not affect the conservation values of the site, with the closest conservation sites being St Margaret's Cemetery (460.19m away), Millhead Windmill (731.16m away) and Dunsoghly Castle (1.1km away). These will not be visible from the recycling centre.

11.9.3 Enhancement Values

The enhancement values will reflect the change occurring in the landscape and its inherent robustness. These will include:

- a) The retention of existing hedgerows and trees.
- b) The return of hardstanding to grassland, in keeping with the surrounding Agricultural landscape.
- c) Biodiversity gain in the form of an overground detention basin with new wetland and marginal plant species with the associated fauna that will inhabit this space.
- d) Removal of steel containers and replacement with an ordered and appropriate concrete panel and metal fence.
- e) Reorganisation of the existing offices and car parking arrangements.

11.10 Characteristics of the Proposed Development

The site layout will remain unchanged from its current state, meaning there will be no detrimental influence on the local landscape. The attenuation tanks won't be visible above ground. The site, as it exists, does not visually impact the surrounding landscape, with only the entrance to the site visible from the road.

Permission sought for:

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,



4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

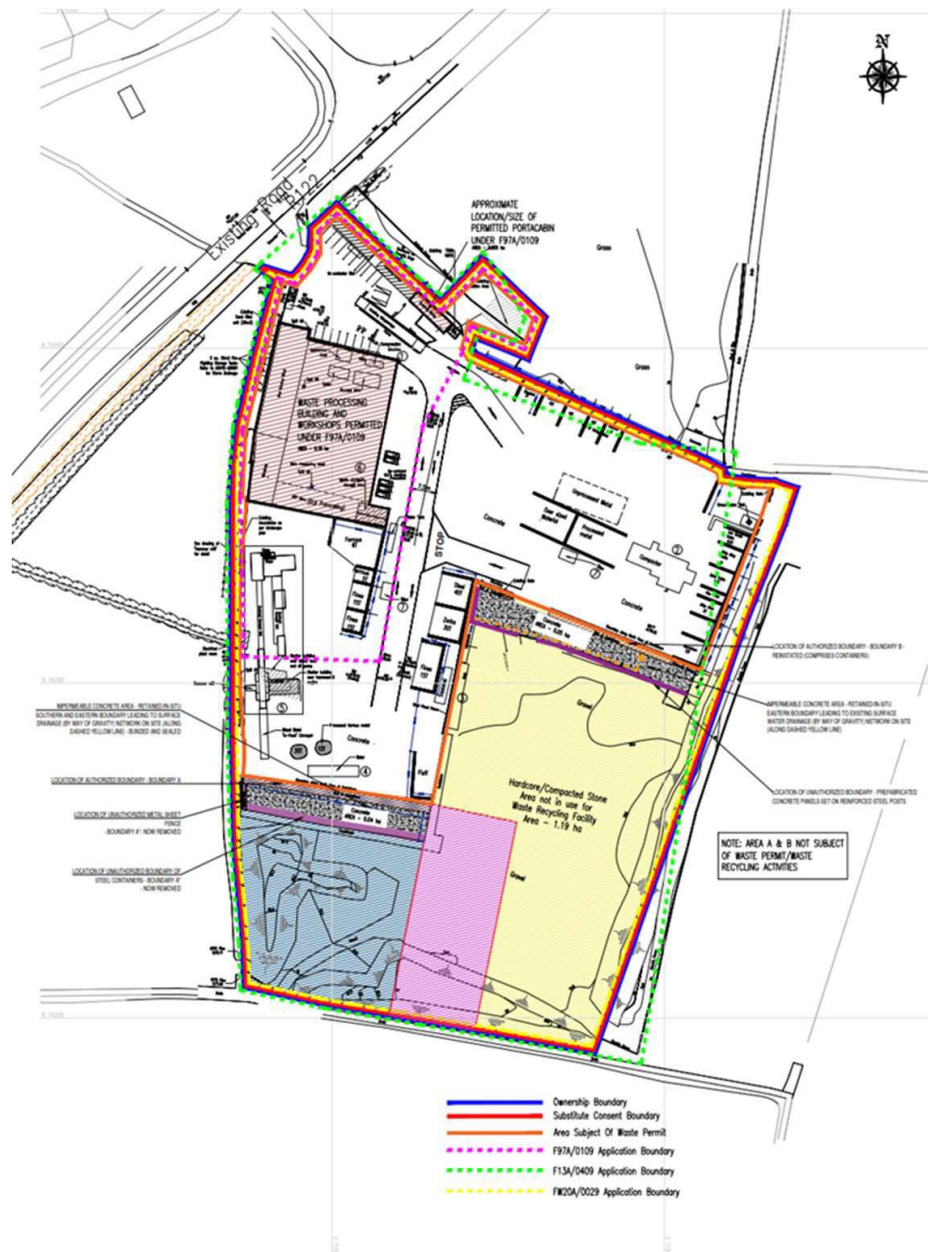


Fig 02. Proposed Retention Submission – CWPA



11.11 Analysis of Impacts and Mitigation Measures

11.11.1 Likely Significant Impacts and Associated Mitigation Measures

The proposed continued use of the site relies on the retention and use of the existing development on site, there are no works proposed above ground level that would increase visibility on site. This proposal will retain the existing hedgerows and trees as mitigation associated with this submission. The sheds and offices are low and will not impact upon any other buildings in close proximity whereby there is concern of overlooking or overbearance.

11.11.2 Potential Visual Impact

The existing development is a Recycling Centre, which has sheds and outbuildings located onsite.

The scale of the sheds is in keeping with the surrounding landscape and have been granted permission.

The landscape proposals will primarily focus on retaining existing hedgerows and trees which will remain intact, and a management scheme will ensure they are kept in good health.

The sheds and offices are not be visible from many surrounding areas and may only be visible on the R122 and from the entrance. The ongoing use of the Recycling Centre will not overbear on the neighbouring St Margaret's village and the overall impact of the Recycling Centre to the existing area, shall be slight in the short term and imperceptible to no impact in the long term.

There will be construction of a 758 m³ underground water attenuation tank and a 1,500 m² above-ground basin for overflow located to the north of the site. The tank will not be visible, and the above-ground basin will ultimately be covered with grass, potentially creating a new habitat that increases biodiversity. Therefore, the impact will be minor/negligible and short-term, as the area designated for the attenuation tank is typically planted with mixed vegetables (such as potatoes). As the crop rotation occurs, the impact will be similar, transitioning from bare soil to green crops/grassland.

The potential gain in biodiversity is significant and will contribute to the preservation of existing hedgerows and ditches, supporting a range of flora and potential fauna.

11.11.3 Visual Impacts due to introduction of new structures & Buildings

The ongoing use of the proposed Recycling Centre shall not impact negatively upon the surrounding area.



There will be no new structures or buildings above ground, with the exception of a 3m high wall replacing existing stacked containers at the southern site boundary to existing agricultural field in family ownership.

Attenuation tanks and basin will not be visible above ground level.

11.11.4 Visual Impacts due to access road

There will be no new visual impact due to the site entrance remaining unchanged.

11.11.5 Visual impacts due to telecommunications/power lines

There are no changes proposed to telecommunication/power lines, therefore no new visual impact due to these elements remaining unchanged.

11.11.6 Visual Impact of lighting

The lighting of the existing development shall be limited to that currently in place for the Waste Recycling Centre.

11.11.7 Visual Impact of Landscaping Proposals

The landscaping proposals will consist of retention and as applicable augmentation of entire field system boundaries, hedgerows and trees, and will reflect the mitigation measure proposed with the substitute consent application regarding the planting/seeding of c.1.1ha of existing hardcore to wildflower/managed grassland to the south of the Facility.

The retention of agricultural field boundaries will enhance the biodiversity of a range of pollinator plants and trees. The flowering of these plants will help support bee populations while also adding texture and colour to the landscape. Furthermore, the area of hardstanding of 1.1ha which will be converted back to grassland with pollinator species, will be beneficial for both human users and local flora and fauna. This will create a positive and long-term visual and landscape impact.

11.12 Avoidance Remedial and Mitigation Measures

11.12.1 Construction Phase

There shall be a minor construction phase, however much of this will involve existing features and enhancements. The construction phase will deal mainly with making good and enhancing



features, fences, wastewater etc. The development will have little or no impact – remaining visually unobtrusive. The office units to the front, already in existence will be retained as they will be required for the efficient operation of the centre. They will also be located at the entrance alongside existing sheds.

There shall be a reordering and organisation of the existing car park spaces. This shall be fit for purpose and provide and organised and localised parking arrangements for staff and visitors. The existing metal containers shall be replaced by concrete panel and metal post that shall provide internal screening. The fence shall not be visible in the wider landscape.

11.12.2 Operational Phase - mitigation.

The mitigation measures will include measures that were taken during the design stage, which have evolved throughout the design process, including the retention and management of existing hedgerows and trees as well as converting hardstanding back to grassland. Allowing for the above ground detention basin to become a wetland area, with an additional range of plants and new biodiversity.

11.12.3 Waste handling areas

The bin storage and associated waste areas will be accommodated within organised storage areas in the designated locations, as they are currently, and screened from view and comply with the original grant of permission.

11.12.4 Do Nothing Impact

The existing development is a non-conforming use, and is to be retained. The do nothing scenario does not alter the visual appearance of the site. The substitute consent application comprises the restoration of hardstanding back to grassland which will be welcome and necessary as part of the overall development and retention of elements.

The above ground detention basin would provide increased biodiversity gain, creating further habitat in conjunction with the retained hedgerows, therefore, in 'doing nothing' there would be a missed opportunity in respect of this element of the proposal.

11.13 Landscape / townscape Impact Assessment Criteria

The following criteria are considered, when assessing the potential impacts on the townscape resulting from a proposed development,

- Landscape/townscape character, value, and sensitivity.
- Magnitude of likely impacts.
- Significance of landscape effects.



The sensitivity of the townscape to change is the degree to which a particular setting can accommodate changes or new elements without unacceptable detrimental effects to its essential characteristics. Landscape/townscape Value and Sensitivity is classified using the following criteria set out in Table 3 below.

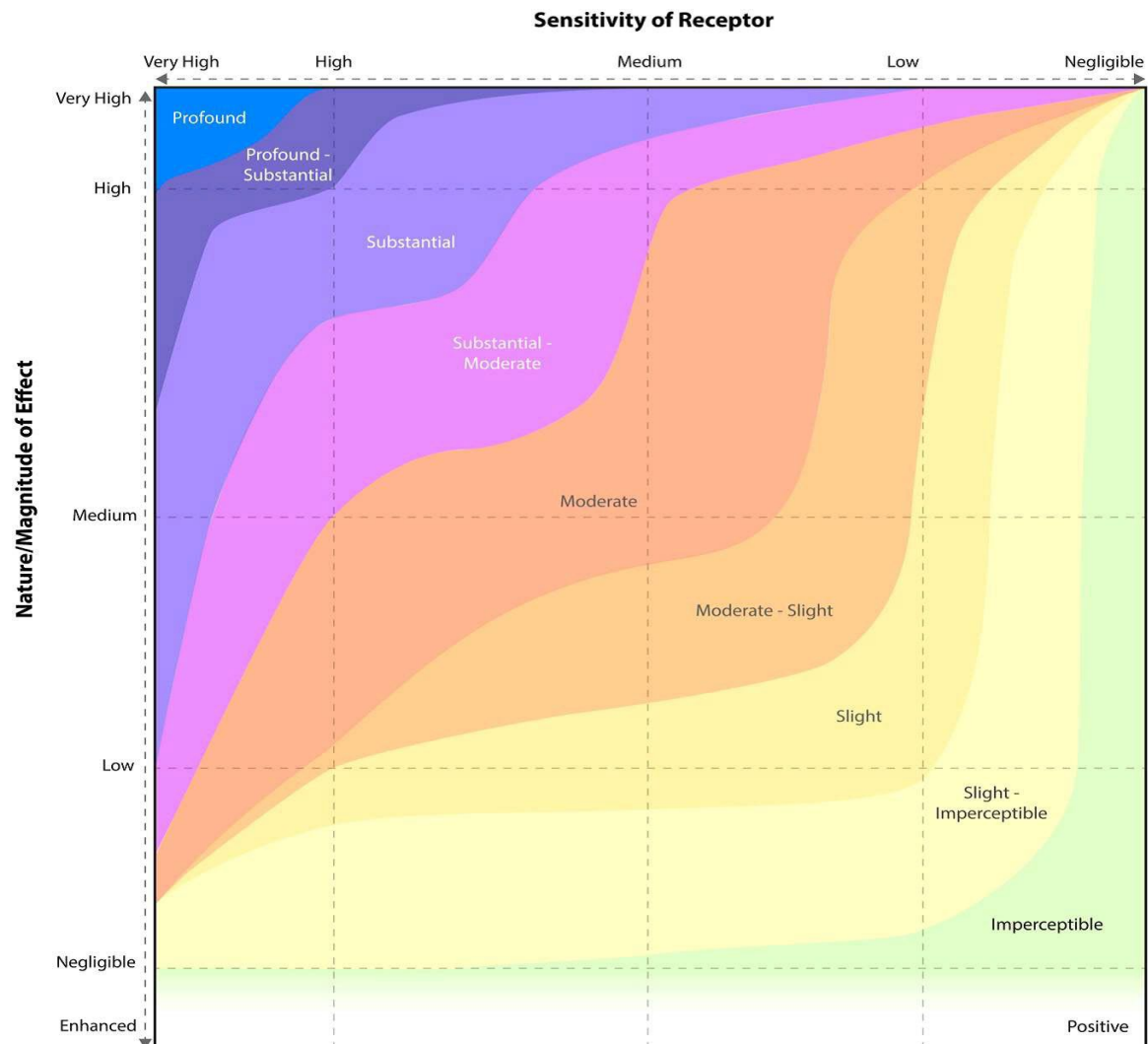
The Recycling Centre development on the current site location would be determined as a medium to high sensitivity value.

Table 3: Landscape/Townscape Value and Sensitivity

Sensitivity	Description
Very High	Areas where the landscape character exhibits a very low capacity for change in the form of development. Examples of which are high value townscapes, protected at an international or national level (e.g., World Heritage Site), where the principal management objectives are likely to be protection of the existing character.
High	Areas where the landscape character exhibits a low capacity for change in the form of development. Examples of which are high value townscapes, protected at a national or regional level, where the principal management objectives are likely to be considered conservation of the existing character.
Medium	Areas where the landscape character exhibits some capacity and scope for development. Examples of which are townscapes, which have a designation of protection at a county level or at non-designated local level where there is evidence of local value and use.
Low	Areas where the landscape character exhibits a higher capacity for change from development. Typically, this would include lower value, non-designated townscapes that may also have some elements or features of recognisable quality, where management objectives include, enhancement, repair, and restoration.
Negligible	Areas of landscape character that include derelict sites and degradation where there would be a reasonable capacity to embrace change or the capacity to include the development proposals. Management objectives in such areas could be focused on change, creation of townscape improvements and/or restoration.



Impact Significance Matrix – Table 4.



**Table 4. Impact Significance Matrix**

Magnitude	Typical Criteria for Landscape Receptors
High	Major removal or addition of landscape features or removal of localised but unusual or distinctive landscape features and/or addition of new conspicuous features and elements which may alter the character of the landscape (with uncharacteristic features being negative and characteristic features being positive). Physical loss of landscape features that are not replaceable or are replaceable only in the long term.
Medium	Moderate removal or addition of landscape features and/or addition of new noticeable features and elements which would be clearly visible but would not alter the overall character of the landscape (with uncharacteristic features being negative and characteristic features being positive). Physical loss of landscape features that are replaceable in the medium term.
Low	Minor removal or addition of landscape features and/or addition of new discrete features and elements which would be perceptible within but would not alter the overall character of the landscape (with uncharacteristic features being negative and characteristic features being positive). Physical loss of landscape features that are readily replaceable in the short term.
Negligible	Barely perceptible removal or addition of landscape features would occur, and the development would be barely perceptible in visual/ character terms.

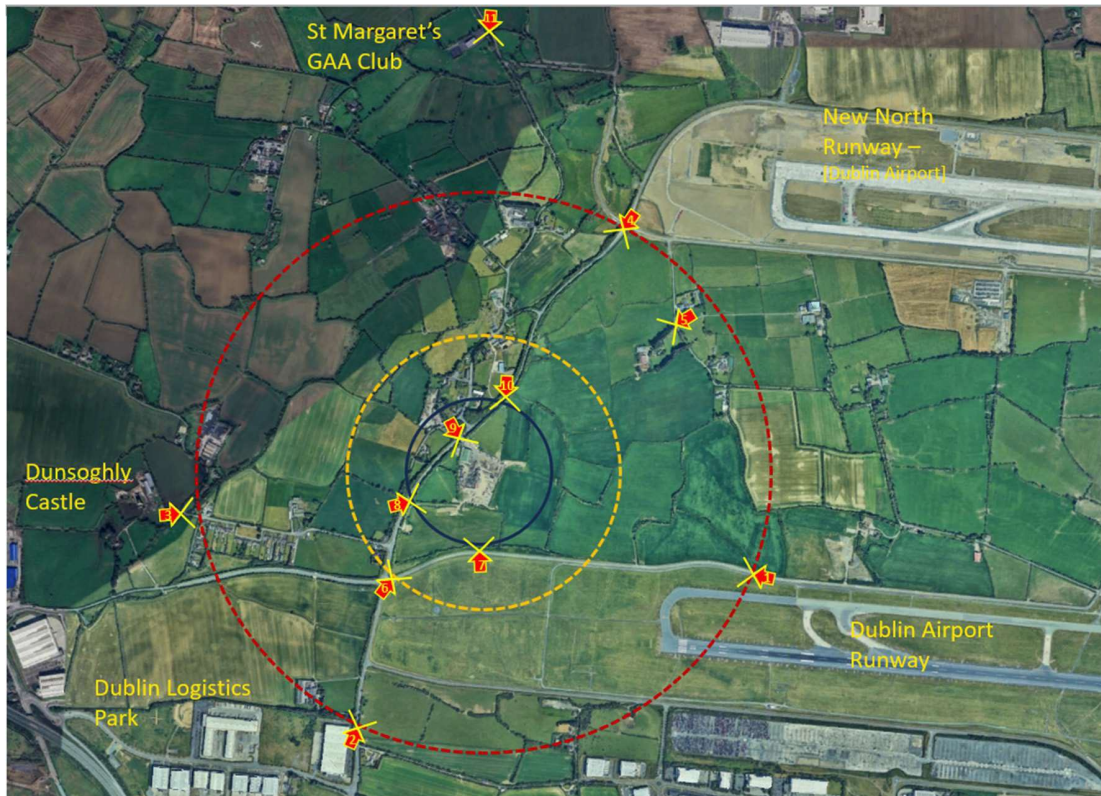


Fig. 3. – Visual Receptors – Development Visual receptors 1 - 11

11.14 Visual Selector Interaction

A collection of 11 no. images have been prepared surrounding the site to fully illustrate the physical and visual nature of the proposed development. Please note the proposed photo location points (receptors) were prepared by RMDA in conjunction with CWPA from publicly accessible viewpoints around the location of the subject site.

11.14.1 Sensitivity – Susceptibility of Receptors.

A visual receptor is a human user of the landscape. The practice has adopted the principle that the sensitivity for each type of visual receptor is inherent to the nature of the activity they are undertaking rather than the view itself.

In accordance with the Institute of Environmental Management and Assessment (“IEMA”) Guidelines for Landscape and Visual Assessment (3rd edition 2013) visual receptors most susceptible to changes in views and visual amenity are:

- Residents at home.
- Individuals, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on views.



- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience.
- Communities where views contribute to the landscape setting enjoyed by residents in the area.
- Travellers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened.

Visual receptors that are less susceptible to changes in views and visual amenity include.

- Individuals engaged in outdoor sport or recreation, which does not involve or depend upon appreciation of views of the landscape.
- Individuals at their place of work whose attention may be focussed on their work or activity, not their surroundings and where the setting is not important to the quality of working life

11.14.2 Visual Receptors

A collection of 11 no. visual receptors have been prepared surrounding the site to fully illustrate the physical and visual nature of the proposed development. Please note the proposed photomontage photo location points were prepared by RMDA and CWPA from publicly accessible viewpoints around the location of the subject site.

Table 5: Visual Receptor Sensitivity

Sensitivity	Typical Criteria for Visual Receptors
High	Users of residential properties, public rights of way, named viewpoints and scenic roads or railways. Users of cultural heritage features including World Heritage Sites, Registered Parks and Gardens, Scheduled Monuments, Listed Buildings and Conservation Areas where they are known to be tourist destinations or places used by local communities.
Medium	Users of public rights of way (urban or industrial areas) play areas, sporting and outdoor active recreational facilities and rural roads.
Low	Users of office and employment areas, industrial areas and the main road and rail network.

11.14.3 Visual Impact Assessment Viewpoints

We have noted images from various receptor points as per the aerial plan (Fig.4), enclosed in the accompanying landscape receptor views. They have been prepared to illustrate the




impacts, if any, with respect to the proposed development along associated roads, R112 & R108, St. Margaret's, Town and the surrounding landscape.

The images selected, while incorporating the proposed development sought to provide context in terms of building form, vegetation, and landform. Therefore, the images have the unit sitting into the landscape to give an understanding of the sensitivities of the town and landscape


Table 6 – List of Receptor Points.

View	Description
1	Above Dublin Airport Runway – Looking West on Road R108.
2	Alongside the Dublin Logistics Park, on the R122, Looking North Northeast. Nothing may be viewed of the Recycling Centre
3	Directly beside Gate to Dunsoghly Castle – and Newtown Cottages to the east. Looking East.
4	Junction/Crossroads of the R108, L3132 and Kilreesk Road, west of the New North Runway at Dublin Airport. Looking Southwest.
5	Dunbro Lane – Looking down a Farmyard Driveway (South West) to location of the Recycling Centre.
6	Roundabout – junction of the R108 & the R122 – Looking Northeast.
7	On the R108, Shanganhill, Northwest of the Dublin Airport Runway – Looking Due North.
8	View looking Northeast along R122
9	At Entrance to St Margaret's Recycling Centre – Looking East
10	On R122 – Looking South.
11	Entrance to St Margaret's GAA Club Looking South




View 1	
Existing View	Above Dublin Airport Runway – Looking West on Road R108. No visual on the Recycling Centre
Proposed View	 <p>Building cannot be seen, hidden from view by landform and vegetation.</p>
Impact – Construction Stage	Imperceptible
Impact – Operational Stage	Imperceptible
Landscape & Townscape Sensitivity	Low-Medium
Visual Receptor Sensitivity	Low
Magnitude of Change for Landscape Receptors	Medium
Significance of Effects	None - No Impact
Duration	Not Applicable - No Impact




View 2	
Existing View	Alongside the Dublin Logistics Park, on the R122, Looking North Northeast. Nothing may be viewed of the Recycling Centre.
Proposed View	 <p>The proposed building cannot be seen and is hidden by existing vegetation and landform</p>
Impact – Construction Stage	None - No Impact
Impact – Operational Stage	None - No Impact
Landscape & Townscape Sensitivity	Low-Medium
Visual Receptor Sensitivity	Low
Magnitude of Change for Landscape Receptors	Medium
Significance of Effects	None
Duration	None




View 3	
Existing View	Directly beside Gate (East of) to Dunsoghly Castle – and Newtown Cottages to the east. Looking East, Nothing may be seen of the Recycling centre at this position.
Proposed View	 <p>The proposed Recycling Centre / building cannot be seen, the red outline of the building is screened by landform, buildings, and the vegetation</p>
Impact – Construction Stage	None - Imperceptible
Impact – Operational Stage	Imperceptible
Landscape & Townscape Sensitivity	Very High
Visual Receptor Sensitivity	High
Magnitude of Change for Landscape Receptors	High
Significance of Effects	No Impact
Duration	None - No Impact




View 4	
Existing View	Junction/Crossroads of the R108, L3132 and Kilreesk Road, west of the New North Runway at Dublin Airport. Looking Southwest – Nothing may be viewed from this location
Proposed View	 <p>Crossroads/Junction</p>
Impact – Construction Stage	No Impact - Imperceptible
Impact – Operational Stage	No Impact - Imperceptible
Landscape & Townscape Sensitivity	Low.
Visual Receptor Sensitivity	Low
Magnitude of Change for Landscape Receptors	Low
Significance of Effects	No impact
Duration	None - No Impact




View 5	
Existing View	Dunbro Lane – Looking down a Farmyard Driveway (SouthWest) to location of the Recycling Centre. No visual line to the recycling centre
Proposed View	 <p>The Entrance to the Farmyard – Recycling Centre screened by Mature trees and Farmyard Buildings.</p>
Impact – Construction Stage	No Impact - Imperceptible
Impact – Operational Stage	No Impact - Imperceptible
Landscape & Townscape Sensitivity	Low-Medium
Visual Receptor Sensitivity	Medium
Magnitude of Change for Landscape Receptors	Medium
Significance of Effects	No Impact
Duration	No Impact




View 6	
Existing View	Roundabout – junction of the R108 & the R122 – Looking North East
Proposed View	 <p>Recycling Centre screened by Hedges & Vegetation.</p>
Impact – Construction Stage	Imperceptible
Impact – Operational Stage	Imperceptible
Landscape & Townscape Sensitivity	Low
Visual Receptor Sensitivity	Low
Magnitude of Change for Landscape Receptors	Medium
Significance of Effects	No impact
Duration	No impact




View 7	
Existing View	On the R108, Shanganhill, Northwest of the Dublin Airport Runway – Looking Due North.
Proposed View	 <p>No View of the Recycling Centre.</p>
Impact – Construction Stage	Imperceptible
Impact – Operational Stage	Imperceptible – Slight
Landscape & Townscape Sensitivity	Low
Visual Receptor Sensitivity	Low
Magnitude of Change for Landscape Receptors	Medium
Significance of Effects	No Impact
Duration	No Impact

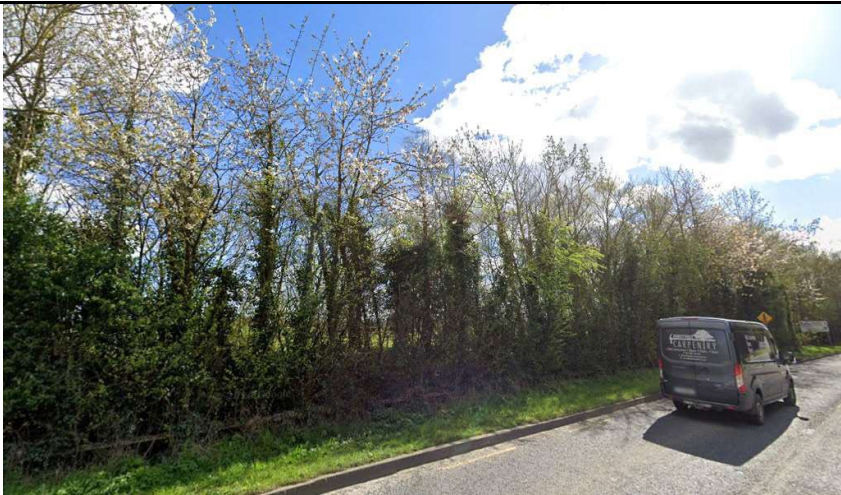


View 8	
Existing View	View looking Northeast along R122
Proposed View	 <p>The development cannot be seen from this view.</p>
Impact – Construction Stage	Imperceptible - Imperceptible
Impact – Operational Stage	Negligible
Landscape & Townscape Sensitivity	Low
Visual Receptor Sensitivity	Low-Medium
Magnitude of Change for Landscape Receptors	Medium
Significance of Effects	Negligible
Duration	No Impact




View 9	
Existing View	At Entrance to St Margarets Recycling Centre – Looking East
Proposed View	 <p>The existing development is visible from the entrance on the R108. There is no view of the site of the proposed development works</p>
Impact – Construction Stage	imperceptible
Impact – Operational Stage	imperceptible
Landscape & Townscape Sensitivity	Low-Medium
Visual Receptor Sensitivity	Low
Magnitude of Change for Landscape Receptors	Low
Significance of Effects	Negligible - although continued existence of development results in maintenance of buildings on site.
Duration	No Impact - The proposed sheds and buildings are in existence, with no changes proposed to this view.



View 10	
Existing View	On R122 – Looking South.
Proposed View	 <p>The Recycling Centre cannot be seen from this location</p>
Impact – Construction Stage	No Impact – Imperceptible
Impact – Operational Stage	No Impact - Imperceptible
Landscape & Townscape Sensitivity	Low-Medium
Visual Receptor Sensitivity	Low
Magnitude of Change for Landscape Receptors	Negligible
Significance of Effects	No impact
Duration	Not applicable – none



View 11.	
Existing View	Entrance to St Margarets GAA Club Looking South
Proposed View	 <p>The Recycling Centre is not visible from this location. It is too far, approximately 1556m to the south.</p>
Impact – Construction Stage	Imperceptible
Impact – Operational Stage	No impact - Imperceptible
Landscape & Townscape Sensitivity	Medium
Visual Receptor Sensitivity	Medium
Magnitude of Change for Landscape Receptors	Medium
Significance of Effects	No impact
Duration	No Impact



11.15 Monitoring

An overall design team shall be appointed to oversee any works.

A Landscape Architect will be included as part of the overall team. They will consult with other project members in relation to the development of the proposal.

The landscape architect shall overview the management of the field system, including hedges and trees, liaise with resident engineer, project team and contractor. The landscape architect will also inspect the trees; however, most of the monitoring works shall be during and post-civil construction stage. The landscape architect shall review and instruct on details of soft planting, trees and hedges as required.

During the operational stage, the Landscape Architect will review the condition of all planting, trees and hardscape works. The landscape architect will review for period of 18 months, from practical completion of each stage and to ensure the standard and quality of the materials and workmanship. A final certificate of completion shall be issued by the landscape architect in respect of this.

11.16 Interactions & Cumulative Effects

Inter-relationships are the interaction/interrelations between the impacts and proposed mitigation for one discipline with another associated discipline.

11.16.1 Archaeology Architecture Cultural Heritage

The development of the proposed building both including and following the selection of the preferred design will give due consideration to the existing habitats and development of the area. The development took account of the impact on the archaeological, architectural, and cultural heritage aspects.

11.16.2 Material Assets & Land – Property

The retention submission is a welcome intervention. It shall regularise the outstanding planning items, while retaining the field system with hedges and trees.

11.16.3 Biodiversity

The current scheme has a natural landscape plan which provides for existing native trees and hedges to be retained. The Recycling Centre will benefit from the proposed landscape proposals and management thus preserving existing biodiversity found in the hedgerows and trees that will be retained.

The addition of an above-ground detention basin will support the renewal of biodiversity in the area, as it will be managed with native vegetation. Previously, the basin's location was traditional farmland that was typically used for monoculture vegetable cropping. This new



feature will enhance the variety and abundance of flora and fauna, resulting in a significant biodiversity gain for the area.

11.16.4 Population & Human Health

Visual impacts will arise for residents located close to or adjoining the site boundary, during construction. However, the Recycling Centre will not exacerbate the impact, as the programme shall take into consideration the Recycling Centre as part of the overall scheme.

The Recycling Centre will benefit from the implementation of a construction management plan. Specific mitigation measures will include the retention of existing hedgerows and trees.

During the Operational phase, the landscape & visual impacts will only be visible from the R122.

The impacts of the Recycling Centre will be positive for the area as it reinforces the existing agricultural boundaries and will maintain the rural ambience and character of the area.

11.16.5 Difficulties Encountered in Compiling

There were no difficulties encountered on visiting and assessing the development area, during the daytime period.

11.17 References

- Fingal County Council Development Plan 2023 - 2029
- Advice Notes on Current Practice in the preparation of Environmental Impact Statements (1995)
- Guidelines on the Information to be Contained in Environmental Impact Statements (2002).
- Revised Guidelines on the information to be contained in Environmental Impact Statements Draft (September 2015)
- Guidelines On the Information to Be Contained in Environmental Impact Assessment Reports Draft (August 2017)
- Landscape Institute and Institute of Environmental Management & Assessment (2013). Guidelines for Landscape and Visual Impact Assessment.
- Planning and Development, Act 2000, as amended.
- EPA EIAR Guidelines (August 2017)
- Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) - Technical Guidance Note 1/20 (10 Jan 2020) – Landscape Institute



12.0 Material Assets

12.1 Introduction/Methodology

The prescribed environmental factor of Material Assets is described in the 2022 EPA Guidelines as including built services and infrastructure.

The related topics of water (supply and wastewater) and roads and traffic are separately addressed in other chapters of this EIAR, principally:

- Chapter 8 Water & Hydrology
- Chapter 13 Traffic & Transportation
- Chapter 14 Waste Management

This chapter covers the proposals for built services (except traffic) – comprising energy demand and supply (electrical and gas) and water services.

12.2 The Subject Development

The proposed development, subject of this EIAR is as follows –

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and



6. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

12.3 The Receiving Environment

The immediate environs of the facility are primarily industrial in nature and surrounded by agricultural land. Due to this the following assessment has been carried out with respect to the economical assets of the site and environs only.

12.4 Energy Demand

Electrical Supply

The facility has solar panels installed on the roof of the main shed. Currently 53% of the current electrical consumption is being powered by solar power, with the rest being provided from the national grid. Due to the use of solar power on the site, 30 metric tons of CO₂ equivalent is saved annually compared to standard electricity from the national grid. There are plans to increase use of solar power if permanent planning is granted to the site. The granting of permanent planning permission makes improvements in terms of energy generation viable as the site can improve infrastructure with the view of a longer term than 5 years.

Electricity will also be used on-site for lighting, power tools, etc., a portion of which can be obtained from renewable sources on site.

If permanent planning is granted for the site, there is an intention for all 'St Margaret's Waste Recycling & Transfer Facility Ltd' commercial vehicles overtime to be replaced to EVs which will be powered by electricity to decrease the CO₂ emissions from the site. This electricity would be supplemented by existing solar power generated on site (as solar panels are existing on the roofs of the Industrial Buildings).





12.5 Water

Potable Water

Water sourced from the local mains water network is utilised for wash water and drinking water. Groundwater sourced from PW1 is used for on-site toilets.

Foul Water

Welfare facilities (canteen and toilets) are sited in the northwestern corner of the site. Domestic wastewater from these sources is transferred to an existing on-site waste water treatment system. Treated effluent from the wastewater treatment system is discharged to ground via an existing percolation area, approximately 120m². The percolation area was designed, with installation supervised and certified by Enviropo Ltd in 2013.

Firewater Retention

The site currently provides for surface water attenuation under ground, and is sufficiently sized to accommodate fire water retention, which was and is deemed to be acceptable. No recorded incidents of inadequate capacity or pollution as a result of surface water runoff overflow has been recorded.

The proposed on-going use includes for provisions for updated attenuation, to include below ground surface water retention, part of which is to be used as water storage for firewater. The tank has an overall capacity of 675m³, with auxiliary firewater storage consisting of 135m³ of this capacity.

12.6 Vehicle Fuel Usage

During the construction phase diesel will be used in excavators and other construction machinery on site carrying out landscaping works.

During the operation phase diesel will be used by generators serving compactors, and engines associated with forklifts or similar machinery.

12.7 Predicted Impacts

It is considered that there is sufficient capacity within the utility supplies to the site to accommodate the proposed development. Therefore, the material assets are not anticipated to be impacted by the development.

The overall predicted impact of the proposed Changes to the site can be classed as imperceptible long-term and neutral with respect to material assets.



Construction Phase

There will be a slight increase in fossil fuel usage during the construction phase of the development. Due to the small amount of construction machinery which will be used, it is predicted that the impact from the changes to the site will be short-term imperceptible and neutral.

There is predicted to be no change in the usage of electricity or water during the construction phase.

Operational Phase

When the permanent planning permission is granted some significant changes to the material assets will be planned as St Margaret's Recycling and Transfer Station Ltd will invest in more electric driven plant and sustainable energy generation as promoted in the Fingal Development Plan 2023-2029:

Policy IUP33 – Renewable Energy - Continue to develop and implement climate action and energy related initiatives in Fingal and continue to support the recording and monitoring of renewable energy potential in Fingal in partnership with other stakeholders including the East Midlands Regional Assembly EMRA, the Dublin Energy Agency (Codema) and the Climate Action Regional Office (CARO).

The predicted impacts will be **long term, positive and moderate**.

Do-Nothing Scenario

One such alternative is to do nothing, and to allow the current temporary permission to expire and the existing recycling centre to be discontinued. This would result in the closure of an essential piece of waste infrastructure for Fingal, a reduction in waste recycled within the Fingal Area and indeed will result in job losses for the local community. This would also be against the following policies and objectives set out in the Fingal Development Plan 2023 – 2029:

- Policy IUP22 – Transition From A Waste Economy Towards A Green Circular Economy: “Support the principles of transition from a waste economy towards a green circular economy and implement good waste management and best practices to enable Fingal to become self-sufficient in terms of resource and waste management and to enhance employment and increase the value recovery and recirculation of resources, in accordance with the Whole-of-Government Circular Economy Strategy 2022.”
- Objective IUO29 – Sustainable Waste Recovery And Disposal: “Provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping with the EU waste hierarchy, national legislation and regional waste management policy to adequately cater for Fingal’s growing population.”



- Policy IUP24 – Recycling / Re-Use: “Promote and encourage the establishment of re-use, recycling and repair activities to prevent and minimise waste generation and disposal, in accordance with the Eastern Midlands Region Waste Management Plan 2015–2021 (or any subsequent plan).”
- Policy IUP33 – Renewable Energy - Continue to develop and implement climate action and energy related initiatives in Fingal and continue to support the recording and monitoring of renewable energy potential in Fingal in partnership with other stakeholders including the East Midlands Regional Assembly EMRA, the Dublin Energy Agency (Codema) and the Climate Action Regional Office (CARO).
- Policy IUP10 – Water Conservation and SuDS - Promote the inclusion of water conservation and SuDS measures in all developments, to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions.

12.8 Mitigation and Monitoring Measures

Construction Phase

There are no mitigation measures necessary for material assets during the construction phase.

Operational Phase

If the permanent planning permission is granted some significant changes to the material assets will be planned as St Margaret’s Recycling and Transfer Station Ltd will invest in more electric driven plant and sustainable energy generation. The predicted impacts will be **long term, positive and moderate**.

Residual Impacts

Construction Phase

There is predicted to be no residual effects on the material assets during the construction phase.

Operational Phase

There is predicted to be no residual effects on the material assets during the operational phase.

12.9 Cumulative Impact



There will be no cumulative impacts on the material assets with other developments, as no other plans or projects are anticipated to have a cumulative impact

12.10 References

- Environmental Protection Agency (EPA) Advice notes on current practice in the preparation of Environmental Impact Statement (EPA, 2015)
- Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2022).
- Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)



13.0 Traffic & Transportation

13.1 Introduction/Methodology

13.1.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) provides an assessment of the impact that the existing development / use subject of retention, in combination with the existing, permitted and proposed development on the subject site at St Margaret's Metal Recycling at Sandyhill, St Margarets, Co Dublin, has had and would have, if permitted on the traffic and transportation infrastructure and network in the surrounding area.

This chapter sets out the existing receiving environment in terms of roads conditions, traffic activity and transportation accessibility. It also describes the existing and permitted development in terms of operational traffic impact on the receiving environment.

This chapter was completed by Brian McCann, BE, MSc (Eng), DIC, CEng, FIEI, MIStructE, MConsEI. Brian has in excess of 30 years' experience of transportation planning and assessment. Brian McCann, BE, MSc (Eng), DIC, CEng, FIEI, MIStructE, MConsEI. Brian has in excess of 40 years' experience of transportation planning and assessment. Brian joined Waterman Moylan in 2005, where he has headed up the firm's traffic and transportation division and has played a leading role in the provision of traffic and transportation consultancy services for the firm. He works on a wide range of projects, including industrial and commercial development and has been responsible for all of the necessary engineering assessments and reports to secure planning permission, including Traffic Statements, Travel Plans and other technical reports required to accompany the planning applications.

A full description of the development can be found in Chapter 4: Project Description of this EIAR.

A Traffic & Transport Assessment (TTA) was prepared by Waterman Moylan in August 2024. The TTA presents survey data for the existing traffic conditions in 2019 and 2023 together with the ongoing transport demand that was generated by the development. The traffic generated during both the morning and evening peak times was also assessed. An assessment of the percentage impact of traffic on local junctions, and accessibility of the site by sustainable modes including walking, cycling and public transport is included. The TTA also addresses the existing capacity on the public transport network.



13.1.2 Methodology

The methodology for the preparation of this chapter included: -

- (a) Desktop review of the documentation provided by the project design team.
- (b) Visits to the site and surrounding area including survey of existing transportation facilities and observation of traffic movements.
- (c) Review of public transport services, routes, and timetables.
- (d) Review of proposals for transportation improvements by Transport Infrastructure Ireland (TII), National Transport Authority (NTA) and Fingal County Council (FCC).
- (e) Review of trips to and from the development for different annual waste throughputs
- (f) Review of public transport, both existing and proposed.
- (g) Assessment of the transportation impacts of the development.
- (h) Assessment of the mitigation and monitoring measures in place.

13.1.3 Standards

The Preliminary Traffic & Transport Assessment (PTTA) has been prepared in accordance with Section 14.17.4 Traffic and Transport Assessment of the Fingal County Development Plan 2023- 2029.

It has also been prepared in compliance with the requirements of the TII Traffic and Transport Assessment Guidelines and the UK's Institution of Highways and Transportation Guidelines.

13.1.4 Thresholds

Thresholds for transport assessments are set out in Table 2.1 of the TII Traffic and Transport Assessment Guidelines (2014).

Where traffic to and from a development does not exceed 10% of the traffic flow on the adjoining road, a transport assessment is not required.

This threshold reduces to 5% of the traffic flow on the adjoining road where congestion exists or the location is sensitive.

13.1.5 Project Timescale

In compliance with the requirements of the Transport Assessment Guidelines (2014), the TTA included junction impact assessment at base year, year of opening, year of opening plus 5 years, and year of opening plus 15 years.



The following timetable has been adopted for the transportation assessment of the subject development:

- 1997 Parent Planning Permission (Waste throughput of 21,000 tonnes)
- 2024 Opening Year (Waste throughput of 21,900 tonnes)
- 2029 Design Year (Opening Year + 5) (Waste throughput of 21,900 tonnes)
- 2039 Future Year (Opening Year + 15) (Waste throughput of 21,900 tonnes).

Traffic surveys were carried out at the site access in 2019 and again in 2023.

The project timetable has been used in the assessment of the impact that the proposed development would have, if permitted at its current intensity, on the traffic and transportation infrastructure and network in the surrounding area

13.2 Receiving Environment

13.2.1 Site Location

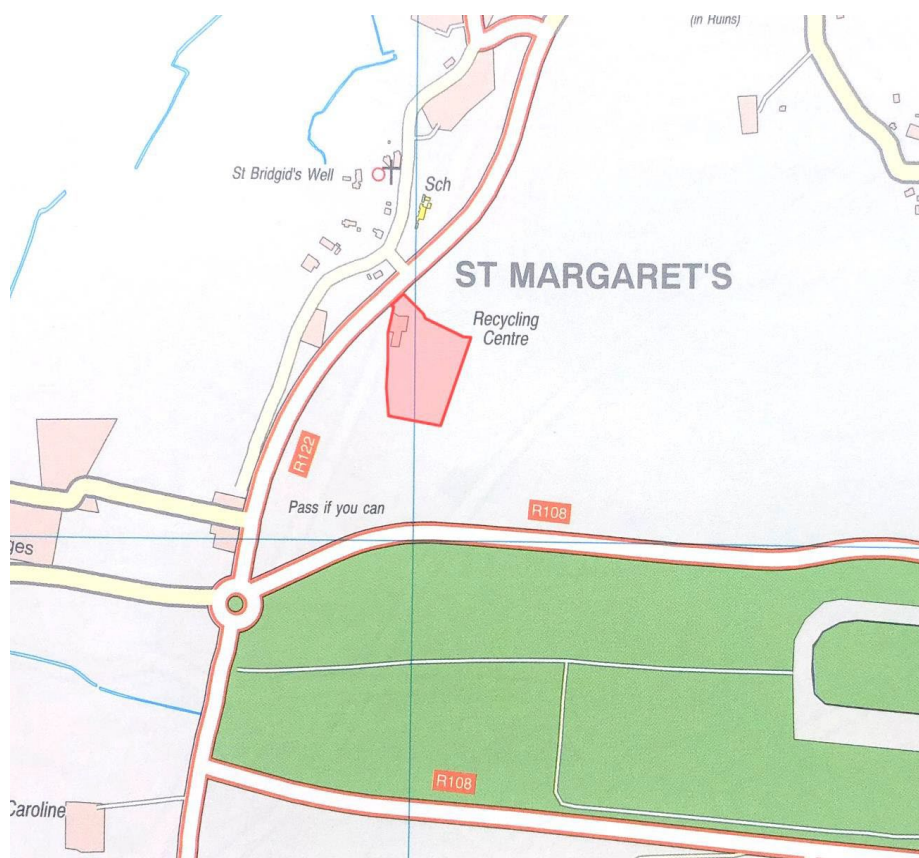


Figure 13.1 Location Map

The site occupied by St Margaret's Metal Recycling is located on the R122 to the south of St Margaret's at Sandyhill, St Margaret's, Co Dublin as shown in Figure 13.1.



13.2.2 Local Road Network

The R122 is a Regional Route linking Finglas to the south with Balbriggan to the north via St Margaret's, Naul and Oldtown.

It is a two-lane road with a carriageway width of 7.5 metres. In the area of the subject site, the alignment is relatively flat with a gentle horizontal curvature. See Figure 13.2.

Centreline road markings are dashed white lines in need of renewal with dashed yellow lines delineating the edges of the carriageway.

Grass verges are provided on both sides with a footpath for pedestrians along the west side. There are no cycle facilities on the R122.

Public lighting is provided from lamp standards along the west side.

The posted speed limit on the R122 in the area of the subject site is 80 kph.



Figure 13.2: R122 looking south near the entrance to the subject site.

13.2.3 Traffic Conditions

A classified traffic survey on the R122 St Margaret's Road at the entrance to the subject site was carried out by Traffinomics Ltd on Wednesday 3rd April 2019 some 2.5 weeks before Easter which fell on 21st April 2019. The survey covered the 12-hour period between 07.00 and 19.00. The survey confirmed the AM and PM Peak Hours to be 08:00 – 09:00 and 17:00 – 18:00.



The 12-hour traffic flow recorded on the R122 was 6,468 vehicles northbound at the subject site and 7,551 vehicles southbound. The HGV content recorded was 11% northbound and 10% southbound. The total flows for the R122 included 55 buses travelling northbound and 68 buses travelling southbound.

The 2019 survey recorded a total of 178 arrivals to the recycling centre and 170 departures during the 12-hour survey period. These were almost equally divided between car, LGV and HGV.

A second traffic survey was carried out by IDASO on Wednesday 18th October 2023 some two weeks before the Halloween school break. The survey covered the 24-hour period between 00.00 and 00.00. The survey confirmed the AM and PM Peak Hours to be 08:00 – 09:00 and 17:00 – 18:00.

The 12-hour traffic flow recorded on the R122 was 12,950 vehicles at the subject site with 5,893 vehicles travelling northbound and 7,057 vehicles travelling southbound. The HGV content recorded was 10% northbound (606 vehicles) and 9% southbound (632 vehicles). The total flows for the R122 included 66 PSV travelling northbound and 97 PSV travelling southbound (97 vehicles).

The 2023 survey recorded a total of 115 arrivals to the recycling centre and 121 departures during the 12-hour survey period. There were only 3 arrivals and 0 departures outside the 07.00 – 19.00 period.

A comparison between the results of the 2019 and 2023 surveys revealed that all of the surveyed traffic movements fell between the pre-Covid survey in 2019 and the post-Covid survey in 2023.

Traffic conditions on the R122 St Margaret's Road at the access to the subject site are generally free flowing save for occasional short duration incidents or accidents.

13.2.4 Site Access

Access to the site is from the R122 via a 9.0 metre wide gateway on the east side of the R122 set back some 25.0 metres from the edge of the carriageway. See Figure 13.3.

To the north (right), the sightline exceeds the required standard of 160 metres for a Regional Road with a posted speed limit of 80 kph. However, in order maintain a 145 metre sightline to the south (left) continued maintenance of the maturing growth along the western boundary is required.



Figure 13.3: Site Access from R122 St Margaret's Road

13.2.5 Public Transport Facilities

Bus services in the area of the development are a combination of long established services operated by Dublin Bus and new services to be provided under the auspices of Bus Connects.

R122 St Margaret's Road

Dublin Bus Route 40b links Parnell Street with Toberburr along St Margaret's Road. There are 6 services in each direction each day on this route.

There are no bus stops on the R122. The existing bus stops in St Margaret's Village are located at a walking distance of 3 minutes (290 metres) from the subject site.

St Margaret's Village

Route 196 operated by TFI Local Link links Swords Pavilion to St Margaret's Village. The service operates 15 times per day in both directions between 07.00 and 20.00.

The present terminus of Local Link Route 196 is in St Margaret's Village at a walking distance of 3 minutes (290 metres) from the subject site.

Junction R122 and R108

Dublin Bus Route 83: Kimmage – Harristown operates along the R122 and R108 between the City Centre and Harristown at a frequency of 12 minutes in both directions.



The junction of the R122 / R108 to the south of the subject site is located at a walking distance of 12 minutes (950 metres) from the subject site.

Bus Connects

Proposals by Bus Connects for the Finglas area envisage the following routes serving the subject site as illustrated in Figure 13.4: -

- City Bound Route 24: Dublin Airport – Merrion Square
- Local Route L89: Finglas - Swords

It is expected that these services could be altered and / or extended as the surrounding area develops.

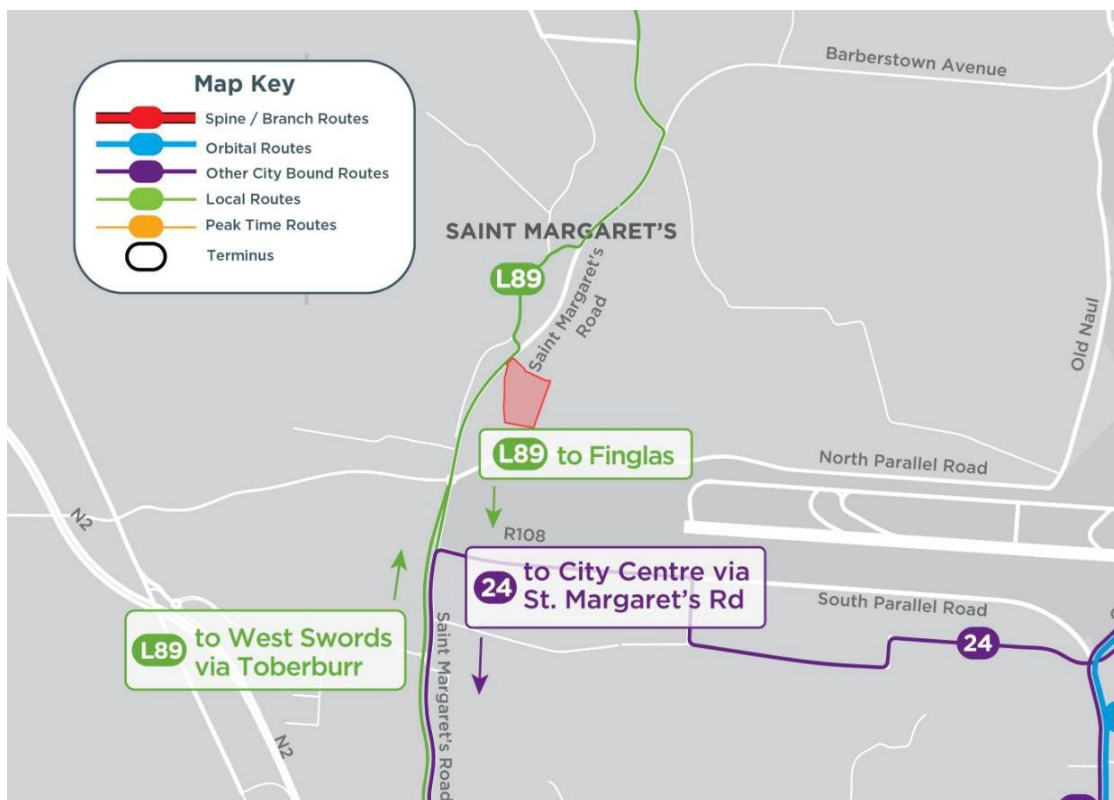


Figure 13.4: Extract from Bus Connects Map for Finglas Area



13.3 Characteristics of the Development

13.3.1 Description of Existing Development

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

The existing site layout is shown in Figure 13.5 and the proposed site layout in Figure 13.6.

13.3.2 Operational measures

The impact of the subject development on the surrounding transportation network during recent years has been and will continue to be positive due to the mitigation measures implemented by the applicants of eliminating individual / smaller vehicles arriving at the site, and focussing on larger commercial waste collectors, thereby reducing vehicle numbers to / from the site, and improving efficiency and recycling capabilities on site.

As a result of these mitigation measures, there has been a 33% reduction in the number of vehicles accessing the site between 2019 and 2023.



Figure 13.5: Existing Site Layout

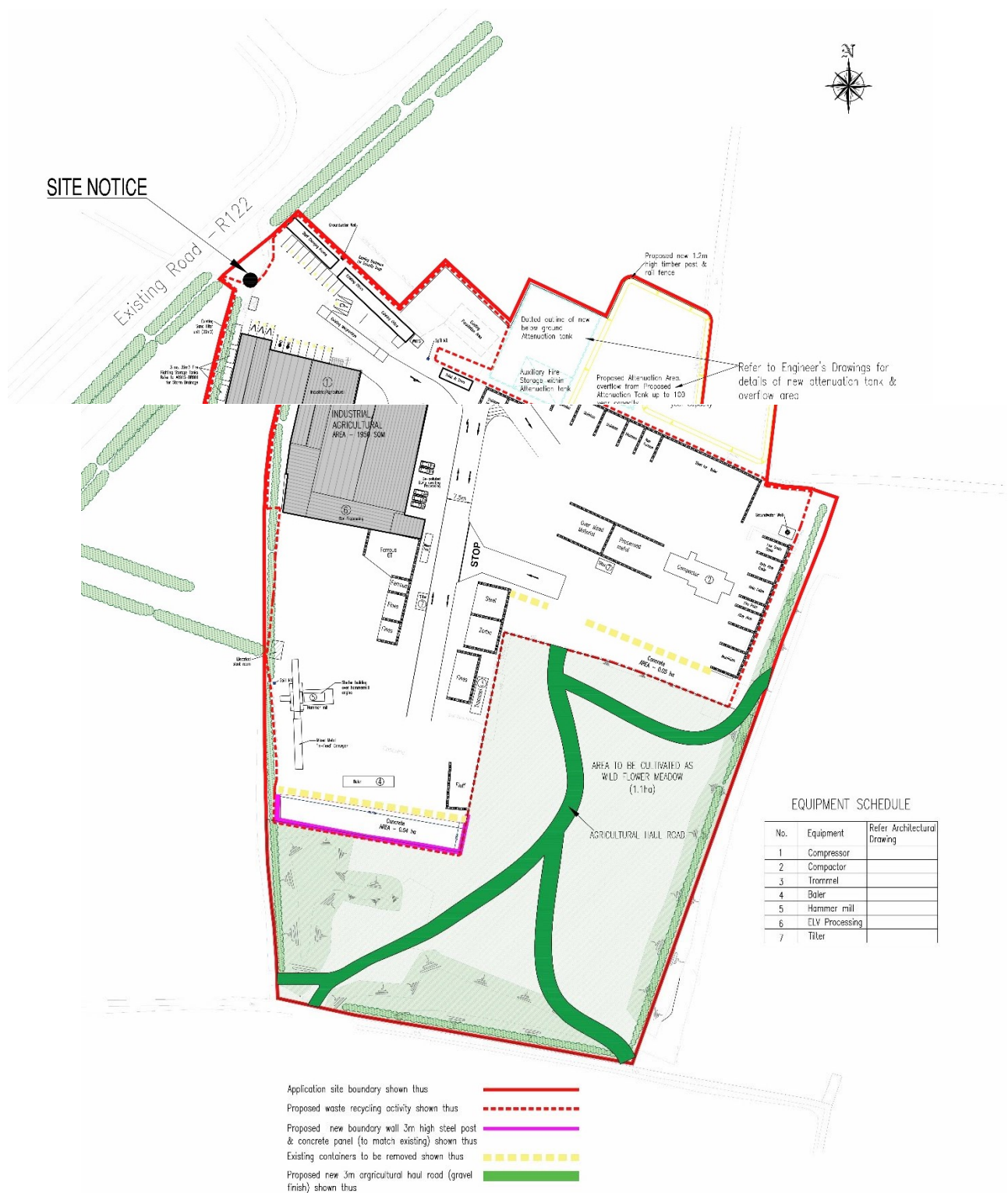


Figure 13.6: Proposed Site Layout



13.3.3 Site Access

Access to the site is from the R122 through a 9.0 metre wide gateway on the east side of the R122 set back some 25.0 metres from the edge of the carriageway. See Figure 13.3.

The existing sightlines at the access to the subject site from St Margaret's Road at a setback of 3.0metres are 60 metres to the left (south) and in excess of 160 metres to the right (north).

The sightline to the left (south) from 60 metres to 160 metres is being increased by cutting back the existing boundary hedge to a point 3m from the road side edge. Sightline visibility is maintained by ongoing maintenance of the existing hedgerow.

13.3.4 Car Parking

Based on the standards in the County Development Plan, the car parking for the subject site is a maximum of 45 spaces calculated as follows:-

•	Offices	177 sqm x 1 spaces per 40sqm	5 spaces
•	Industrial buildings	1,950 sqm x 1 spaces per 50sqm	40 spaces
		Total	45 spaces

It is noted that a significant amount of this floor space is ancillary storage, and this is reflected in the staffing numbers of 20 No. on site.

The existing car parking provision at the subject site is 20 spaces as shown in Figure 13.5 and on the drawings accompanying the planning application. This car parking provision is below the maximum permitted and reflects the existing staff and visitor parking patterns at the subject site. The parking provided includes 1 disabled parking space, 3 visitor bays, and 2 EV charging bays. Additionally, 1 motorcycle parking has been allowed for. In additional 8 No. cycle parking spaces are provided.

13.3.5 Truck Parking

The existing truck parking at the subject site is located on the concrete hard standing as shown as shown in Figure 13.6 and on the drawings accompanying the planning application.

13.3.6 Cycle Parking

Based on the standards in the County Development Plan, the cycle parking for the subject site is a total of 56 spaces comprising 45 long stay spaces for staff and 11 short stay spaces for visitors.

The staff travel survey in 2022 recorded that none of the 30 staff travelled by bicycle.



13.4 Existing and Predicted Impacts

13.4.1 Construction Phase

There are no existing or predicted impacts arising from the construction stage which has been completed. The construction phase has minimal impacts, currently and potentially, due to the minimal construction proposed.

13.4.2 Operational Phase 2019 Surveyed Traffic Flows

The traffic movements for the access junction to the subject site during the AM Peak Hour 8 – 9 and the PM Peak Hour 5 – 6 as surveyed in October 2023 are set out in Figure 13.7.

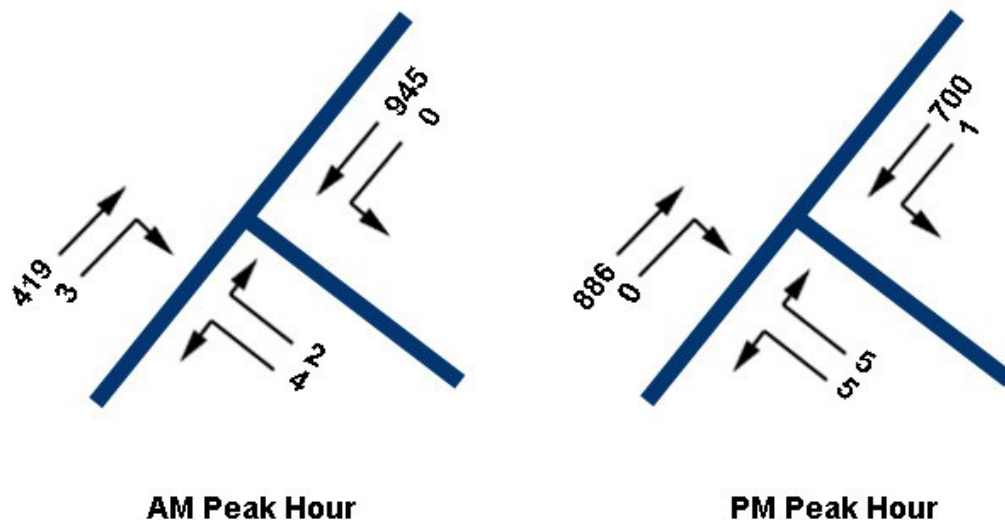


Figure 13.7: Surveyed Traffic Movements 2023

Trip Generation and Assignment

The surveyed traffic movements in Figure 13.7 are those generated by a waste turnover of 33,696 tonnes per annum in 2023. They include 3 arrivals and 6 departures during the AM Peak Hour 8 – 9 and 1 arrivals and 10 departures during the PM Peak Hour 5 – 6.

Modelling Background

The existing access to the subject site from St Margarets Road was assessed using the computer program PICADY which is a software for modelling priority-controlled junctions. This programme utilises junction's geometry and traffic flows input by the user to determine Ratio of Flow to Capacity (RFC) and queue length for each link on the junction. Typically, a junction is said to be working satisfactorily when the RFC of each arm does not exceed 90% / 0.9.



Acceptable RFC values are considered to be in the range of 0.8 to 1.0 with higher values indicating restrained movements.

The site access was modelled as a priority junction in its existing configuration. The HGV proportion was taken at 11% on the major road (R122) and 40% on the minor road (site access).

Results of Traffic Modelling 2023

The results of the junction assessment confirmed that the access from the R122 to the subject site operated satisfactorily and within capacity in 2023 for a waste throughput of 33,696 tonnes per annum.

12.4.3 Operational Phase 2029 and 2039

Base Traffic Flows

The base traffic flows for the Design Year 2029 and Future Year 2039 were obtained by factoring up the 2023 surveyed traffic flows using factors from the TII Publication – *Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections* (May 2021).

The projected base flows for the R122 at the access junction to the subject site during the period 7am – 7 pm are 14,011 vehicles in 2029 and 16,395 vehicles in 2039.

Development Traffic

Based on an ongoing waste throughput of 21,900 tonnes per annum, the traffic generated by the subject development in the Design Year 2029 and the Future Year 2039 will be less than the 118 arrivals and 121 departures generated in 2023 when the waste turnover was 33,695 tonnes per annum).

Traffic Impact

As the traffic generated by the subject development will continue to be significantly less than the 10% threshold set out in the Transport Assessment Guidelines published by TII in 2014, no further traffic assessment is required.

12.4.4 Transportation Impact

Roads

The extent of traffic impact from the development was determined by checking whether the total traffic generated by the subject development during the 12-hour period between 7am and 7pm exceeded 10% of the traffic flow on the adjoining road during the same period.



The traffic generated by the St Margarets Recycling & Transfer Centre varied from 186 vehicles per day for a waste throughput of 25,000 tonnes per annum in 2019 to 121 vehicles per day for a waste throughput of 33,696 tonnes per annum in 2023.

Externally, the traffic flow on the R122 over a period of 12 hours reduced from 14,019 vehicles in 2019 to 12,950 vehicles in 2023. The generated traffic was therefore equivalent to some 1 - 2% of the flow on the adjoining road.

As the traffic generated by the subject development was significantly less than the 10% threshold set out in the Transport Assessment Guidelines published by TII in 2014, no further traffic assessment is required.

This is borne out by the results of the discretionary PICADY junction assessment described in Sections 13.4.2

Road Junctions

The results of the junction assessment confirmed that the access from the R122 to the subject site operated satisfactorily and within capacity for a waste throughput of 25,000 tonnes per annum in 2019 and 33,696 tonnes per annum in 2023.

Public Transport – Passenger Demand

Based on a staff of 18 -22 persons in 2019 and up to 29 persons in 2023 persons together with a modal split for public transport of 20%, the peak demand from the development for travel by bus was up to 6 passengers during the AM Peak.

Based on the location of the development, it is assumed that 50% of these passengers travelled from Finglas and 50% from St Margaret's.

Bus Capacity

Based on a review of the fleet of double deck buses operated by Dublin Bus in the area of the development, the average capacity of each bus including standing passengers was found to be 87 passengers per bus.

Demand v Capacity

The demand of 3 passengers per hour in each direction during the AM Peak Hour is significantly within the existing capacity of up to 400 passengers per hour provided by the current timetable for Dublin Bus Routes 40b, 83 and 196.

13.4.5 Summary



The conclusion of the Traffic and Transport Assessment was that the access junction from the R122 to the subject site operated satisfactorily and within capacity with a waste turnover of 25,000 tonnes per annum in 2019 and a waste turnover of 33, 696 tonnes per annum in 2023.

The TTA also concluded that the access junction from the R122 would continue to operate satisfactorily through the Design Year of 2029 to the Future Year of 2039 with a waste turnover of 21,900 tonnes per annum.

The public transport demand will significantly within the existing capacity of the bus services in the area of the subject site.

The impact of the subject development on the surrounding transportation network during recent years has been positive due to the mitigation measures implemented by the applicants of eliminating individual / smaller vehicles arriving at the site, and focussing on larger commercial waste collectors, thereby reducing vehicle numbers to / from the site, and improving efficiency and recycling capabilities on site.

As a result of these mitigation measures, there has been a 33% reduction in the number of vehicles accessing the site between 2019 and 2023. This reduction has significantly reduced the Ratio of Flow to Capacity for the access junction notwithstanding the normal increases in traffic flow on the R122.

13.5 Mitigation and Monitoring Measures

13.5.1 Construction Phase

No mitigation and monitoring measures are proposed for the construction phase which has been completed.

13.5.2 Operational Phase

The mitigation measures in place at the St Margaret's Metal Recycling are based on an ongoing transfer of incoming waste from a combination of private cars, vans and trucks to trucks operated by the larger licensed waste collection companies and trade / construction companies resulting in an ongoing reduction in the number of vehicle accessing the site each day.

Other ongoing mitigation and monitoring measures during the Operational Phase include

- (a) Monitoring of truck numbers and weights of incoming waste loads.
- (b) Ongoing maintenance of the sightline to the south of the access onto the R122.

Due to the mitigation measures outlined above, the residual impact of the development during the operational stage is moderate, positive and long term for the duration of the operation of the St Margaret's Metal Recycling.



As a consequence, no further mitigation measures are required over and above those already in place.

13.6 Residual Impacts

13.6.1 Construction Phase

The applicants are not aware of any residual impacts on traffic and transportation arising from the construction phase.

13.6.2 Operational Phase

The residual impact for operational traffic is likely to have a long-term moderate impact which will improve safety at the site access

There is also enhanced safety for vehicle movements existing the site onto the R122 St Margaret's Road arising from the ongoing maintenance of the sightline to the south.

13.7 Cumulative Impact

For the purpose of cumulative impact, the Traffic and Transport Assessment Guidelines, issued by TII in May 2014 require that 'Traffic and Transport Assessment should consider all committed developments within the vicinity of the site. This includes sites which have previously been granted planning permission, but which are yet to become operational as well as any planning applications that have been submitted but have yet to be determined.'

No other significant construction projects have been identified in the area of the subject site which has or could result in a significant cumulative impact on Traffic and Transportation either during the construction or operational phases.

However, measures currently being considered by NTA, TII and Fingal County Council for the intensification of public transport services and cycle facilities in the surrounding area are likely to have a cumulative long term significant impact.

13.8 Monitoring & Reinstatement

13.8.1 Construction Phase



There will not be a need for monitoring or reinstatement measures due to the minor construction proposed. Construction of the development has been completed and all monitoring / reinstatement measures have been addressed.

13.8.2 Operational Phase

During the Operational Phase, the applicants will monitor the operation of the access from the R122 on an ongoing basis and with a view to advising Fingal County Council in relation to any operational or safety issues noted.

No reinstatement is proposed during the Operational Stage other than the ongoing maintenance of roads, footpaths, buildings, and services.

13.9 References

The following documents were reviewed by Waterman Moylan during the preparation of this chapter of the Preliminary TTA and Remedial EIAR:-

- Fingal County Development Plan 2023 – 2029.
- Greater Dublin Area Transport Strategy 2022 – 2042, NTA
- Traffic and Transport Assessment Guidelines, TII, May 2014
- Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated and compact grade separated junctions), TII, May 2023.
- Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections, TII, May 2021.

The extent to which these various documents have been consulted is set out in the Traffic and Transport Assessment and in earlier sections of this chapter.



14.0 Waste Management

14.1 Introduction/Methodology

14.1.1 Methodology

The assessment of the impacts of the proposed development, arising from the consumption of resources and the generation of waste materials, was carried out taking into account the methodology specified in relevant guidance documents, along with an extensive document review to assist in identifying current and future requirements for waste management; including national and regional waste policy, waste strategies, management plans, legislative requirements and relevant reports.

This Chapter is based on the proposed development, as described in Chapter 4 (Description of the Proposed Development) and considers the following aspects:

- Legislative context;
- Construction phase (including site preparation, demolition, excavation and construction);
- Operational phase; and

A desktop study was carried out which included the following:

- Review of applicable policy and legislation which creates the legal framework for resource and waste management in Ireland;
- Description of the typical waste materials that will be generated during the Construction and Operational phases; and
- Identification of mitigation measures to prevent waste generation and promote management of waste in accordance with the waste hierarchy.

This chapter was prepared by Martijn Leenheer.

Martijn Leenheer holds a 1st Class BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo) and has 11 years' experience in Ireland in soil remediation, invasive species commercial Wastewater Treatment, Discharge Licences, Waste Permits and Licences has been involved in Risk Assessments, NIS and EIAR reports for various commercial projects. Before moving to Ireland Martijn worked in the Netherlands as an Environmental Field Technician in soil research. He has been an Operations Director of Environmental Services Consultancy for 11 Years and a Founding Director of ESC Environmental LTD since 2021.



14.1.2 Legislation and Guidance

Waste management in Ireland is subject to EU, national and regional waste legislation and control, which defines how waste materials must be managed, transported and treated. The overarching EU legislation is the Waste Framework Directive (2008/98/EC) which is transposed into national legislation in Ireland. The cornerstone of Irish waste legislation is the Waste Management Act 1996 (as amended). European and national waste management policy is based on the concept of 'waste hierarchy', which sets out an order of preference for managing waste (prevention > preparing for reuse > recycling > recovery > disposal) (Figure 14.1).



Figure 14 1 Waste Hierarchy (Source: European Commission)

EU and Irish National waste policy also aims to contribute to the circular economy by extracting high- quality resources from waste as much as possible. Circular Economy (CE) is a sustainable alternative to the traditional linear (take-make-dispose) economic model, reducing waste to a minimum by reusing, repairing, refurbishing and recycling existing materials and products. (Figure 14.2).

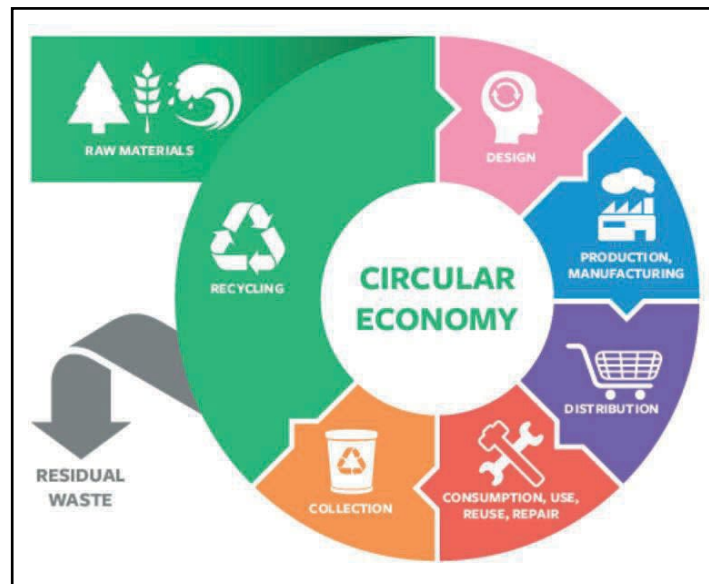


Figure 14 2 Circular Economy (Source: Repak)

The Irish Government issues policy documents which outline measures to improve waste management practices in Ireland and help the country to achieve EU targets in respect of recycling and disposal of waste. The most recent policy document, Waste Action Plan for a Circular Economy – Waste Management Policy in Ireland, was published in 2020 and shifts focus away from waste disposal and moves it back up the production chain. The move away from targeting national waste targets is due to the Irish and international waste context changing in the years since the launch of the previous waste management plan, A Resource Opportunity, in 2015.

One of the first actions to be taken from the WAPCE was the development of the Whole of Government Circular Economy Strategy 2022-2023 'Living More, using Less' (2021) to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021.

The Circular Economy and Miscellaneous Provisions Act 2022 was signed into law in July 2022. The Act underpins Ireland's shift from a "take-make-waste" linear model to a more sustainable pattern of production and consumption, that retains the value of resources in our economy for as long as possible and that will to significantly reduce our greenhouse gas emissions. The Act defines Circular Economy for the first time in Irish law, incentivises the use of recycled and reusable alternatives to wasteful, single-use disposable packaging, introduces a mandatory segregation and incentivised charging regime for commercial waste, streamlines the national processes for End-of-Waste and By-Products decisions.

The strategy for the management of waste from the construction phase is in line with the requirements of the EPA's 'Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects' (2021). The guidance documents, Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects and Construction and Demolition Waste Management: A Handbook for Contractors and Site Managers (FÁS & Construction Industry Federation, 2002), were also consulted in the preparation of this assessment.



There are currently no Irish guidelines on the assessment of operational waste generation, and guidance is taken from industry guidelines, plans and reports including the Eastern Midlands Region (EMR) Waste Management Plan 2015 – 2021, BS 5906:2005 Waste Management in Buildings – Code of Practice, the Meath County Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018), the EPA National Waste Database Reports 1998 – 2018 and the EPA National Waste Statistics Web Resource Terminology.

Note that the terminology used herein is consistent with the definitions set out in Article 3 of the Waste Framework Directive. Key terms are defined as follows:

Waste - Any substance or object which the holder discards or intends or is required to discard.

Prevention - Measures taken before a substance, material or product has become waste, that reduce:

- the quantity of waste, including through the re-use of products or the extension of the life span of products;
- the adverse impacts of the generated waste on the environment and human health; or
- the content of harmful substances in materials and products.

Reuse - Any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.

Preparing for Reuse - Checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.

Treatment - Recovery or disposal operations, including preparation prior to recovery or disposal.

Recovery - Any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II of the Waste Framework Directive sets out a non-exhaustive list of recovery operations.

Recycling - Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.

Disposal - Any operation which is not recovery even where the operation has as a secondary consequence the reclamation of substances or energy. Annex I of the Waste Framework Directive sets out a non-exhaustive list of disposal operations.



Fingal County Development Plan 2023-2029

The relevant parts of the Fingal Development Plan 2023-2029 in regard to Waste Management are listed below:

Policy CAP10 – Climate Mitigation Actions in the Built Environment Promote low carbon development within the County which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation. New development should generally demonstrate/provide for:

f. Minimising the generation of site and construction waste and maximising reuse or recycling;

Policy IUP22 – Transition from a Waste Economy Towards a Green Circular Economy *Support the principles of transition from a waste economy towards a green circular economy and implement good waste management and best practices to enable Fingal to become self-sufficient in terms of resource and waste management and to enhance employment and increase the value recovery and recirculation of resources, in accordance with the Whole-of-Government Circular Economy Strategy 2022.*

Policy IUP24 – Recycling / Re-Use

Promote and encourage the establishment of re-use, recycling and repair activities to prevent and minimise waste generation and disposal, in accordance with the Eastern Midlands Region Waste Management Plan 2015–2021 (or any subsequent plan).

Objective IUO29 – Sustainable Waste Recovery And Disposal

Provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping with the EU waste hierarchy, national legislation and regional waste management policy to adequately cater for Fingal's growing population.

14.2 The Subject Development

The subject development is described in full in Chapter 4 of this Environmental Impact Assessment Report but in summary consists of the following:

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.



2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

14.2.2 Construction Phase

Given the minimal scope of the proposed construction, the impact during the construction phase will be negligible.

14.2.3 Operational Phase

There has been a waste facility since 1997 on this site. During the operational phase relating to this application, the subject site had an annual throughput of 26,000 to 42,500 tonnes, and from 2024 has an annual tonnage of 21,900 tonnes per annum. This tonnage is consistent with the tonnage from 1997 to 2018. The plant before 2019 and after 2019 were the same with the exception of the hammermill which was added to the waste process in 2020.

The installed hammermill ensures for better quality of product resulting in higher reuse rate of recovered material.

The hammermill essentially makes mixed metals into smaller fragments which are then sorted into Ferrous and Non-Ferrous metals. The hammermill and the sorting line contribute to a significantly increased recovery and recycling rate as the end product is a properly sorted waste. There are two residual wastes which are dirt/fines (classed as one as it is the same EWC code) and fluff. The fluff still contains metal and is exported for further treatment and recovery. The other outputs are essentially a product that will be recycled.

The on-going use, will be consistent with what is onsite currently, the rEIAR submitted alongside this EIAR, discusses the retention necessities of the application.

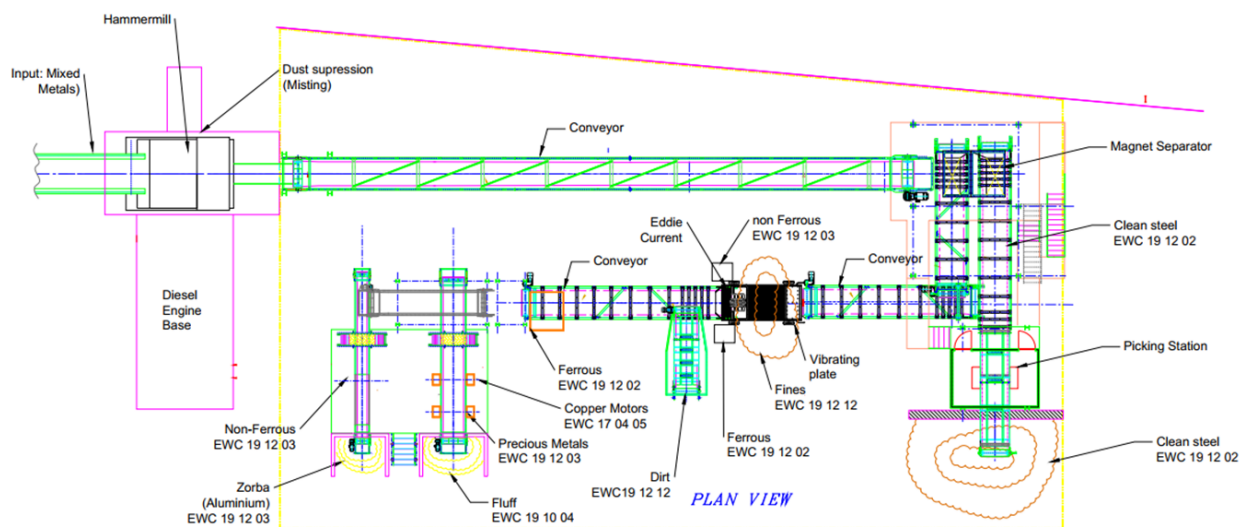
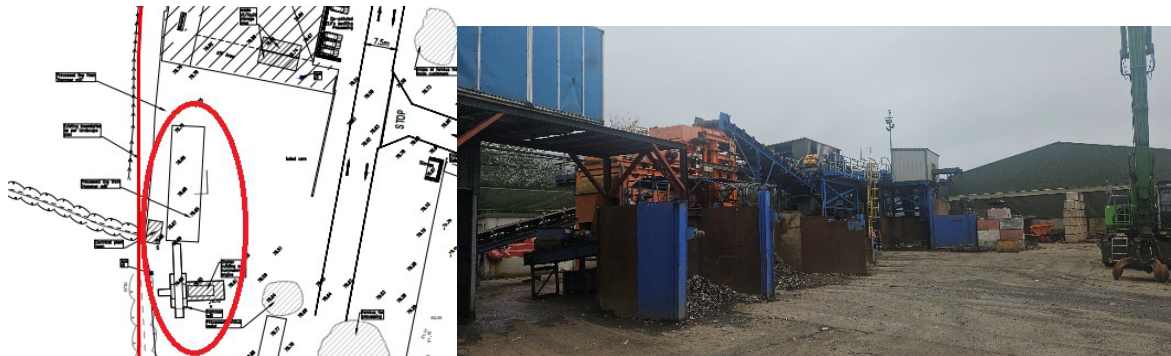


14.2.4 Processes

Hammermill

The hammermill makes metal into small fractions which is transported via a conveyor belt to a sorting machine consisting of conveyor belts, vibrating plate, magnets, an eddy current and a manned sorting area.

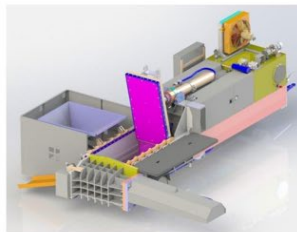
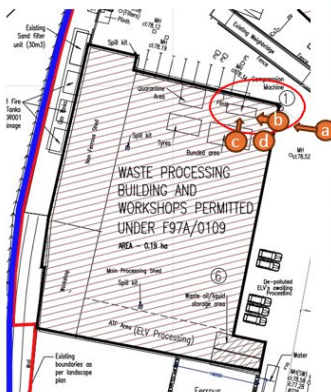
It is driven by a diesel engine and does not have a stack or scrubbers.



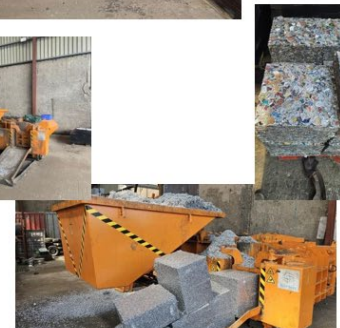


Compact Press/Small Scrap Baling Press

This small press is used for pressing and baling of a single waste product such as swarf or coffee pods, to facilitate greater compaction for transportation and reuse elsewhere. (Typically, in use 4 days per week, with hours of operation during those days as required/subject to demand.)

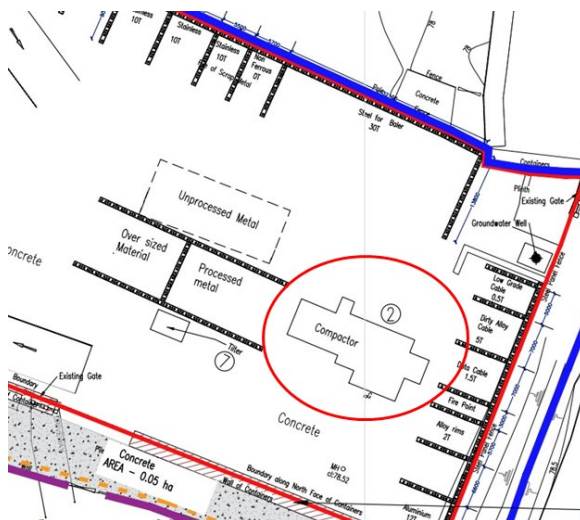


LION 44-100 55KW BALER PRESS



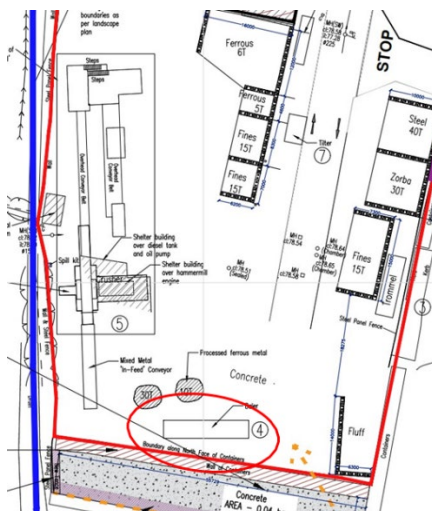
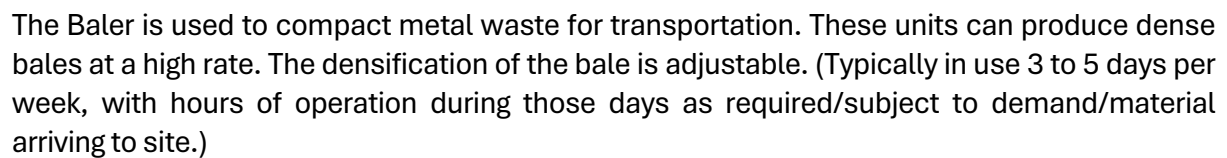
Compactor – Press/Shear

Processes metal – shearing and baling/compacting of larger metal waste material, which is returned to economy for reuse elsewhere. (Typically in use 2 to 3 days per week, with hours of operation during those days as required/subject to demand/material arriving to site.)

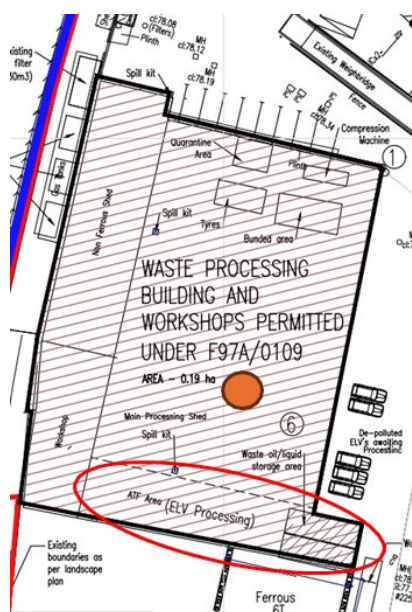


The map shows the layout of the Fukushima Daiichi nuclear power plant site. Key features include:

- Buildings and Structures:** Steel 401, Zorba 301, Fines 151, Ferro 61, Shelter building over diesel tank and oil pump, Shelter building over household engine, Steel 401, Zorba 301, Fines 151, Ferro 61.
- Infrastructure:** Road, Ditchway, Boundary along North Face of Ditchway, Concrete AREA = 0.04 ha.
- Environmental Features:** Mud Metal To-Face Conveyor, Concrete, Baler, Fluff, Steel Pallet.
- Other Labels:** Steel 401, Zorba 301, Fines 151, Ferro 61, Shelter building over diesel tank and oil pump, Shelter building over household engine, Steel 401, Zorba 301, Fines 151, Ferro 61.



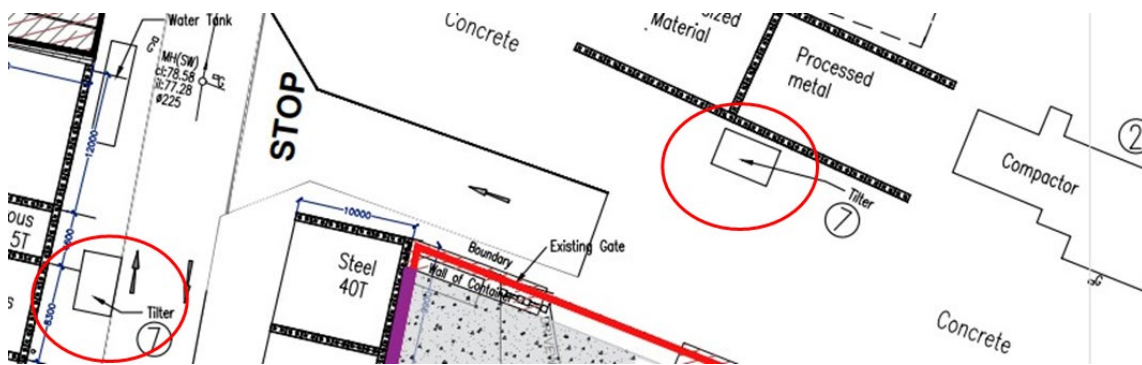
This facility is one of only three authorised facilities in Fingal and provides an essential service within the county.





Tilters

Within the site there are 2 no. Tilters. This plant holds and tilts containers as required to facilitate optimal loading, prior to placement on to trucks. Hours of operation, as required, to facilitate transport of recycled material off site.



14.3 The Receiving Environment

In terms of waste management, the receiving environment is largely defined by Fingal FCC as the local authority responsible for setting and administering waste management activities in the area. This is governed by the requirements set out in the Eastern Midlands Region Waste Management Plan 2015 – 2021, which sets out the following targets for waste management in the region:



- A 1% reduction per annum in the quantity of household waste generated per capita over the period of the plan;
- Achieve a recycling rate of 55% of managed municipal waste by 2025; and
- Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices.

The Plan sets out the strategic targets for waste management in the region and sets a specific target for C&D waste of “70% preparing for reuse, recycling and other recovery of construction and demolition waste” (excluding natural soils and stones and hazardous wastes) to be achieved by 2020.

Ireland achieved 84 per cent material recovery of such waste in 2019, and therefore surpassed the 2020 target and is currently surpassing the 2025 target. The National Waste Statistics update published by the EPA in November 2021 identifies that Ireland’s current against “Preparing for reuse and recycling of 50% by weight of household derived paper, metal, plastic & glass (includes metal and plastic estimates from household WEEE)” was met for 2020 at 51% however they are currently not in line with the 2025 target (55%).

The Fingal County Development Plan 2017 – 2023 (2017) and the Fingal County Development plan 2023-2029 set out objectives for the FCC area which reflect those sets out in the regional waste management plan.

Both the Development Plan and the Eastern Midlands Region Waste Management Plan 2015-2021 recognise that the European Union (End of Life Vehicles) Regulations 2014 help facilitate the achievement of a rate of reuse and recovery of a minimum of 95% by an average weight per vehicle and year and the reuse and recycling of a minimum of 85% by an average weight per vehicle and year from January 2015.

St Margaret’s Recycling has the infrastructure to allow the East Midlands to achieve these targets and C&D waste collectors and other ELV waste facilities depend on St Margaret’s to achieve these targets.

14.4 Predicted Impacts

14.4.1 Construction Phase

The predicted impacts during the construction phase, are minor due to the small nature of proposed works.

14.4.2 Operational Phase

The site is a functioning waste facility which contributes to the reaching of recovery targets as presented in 14.3 Receiving Environment. Many waste facilities within the catchment area rely on St Margaret’s to for further recovery of their waste and diversion of waste to landfill. St



Margaret's also contributes to the aims of The Circular Economy and Miscellaneous Provisions Act 2022 by providing a high-quality product that is used for recycling. The outputs of the facility are exported for reuse in production processes which reduces the need for raw materials to be mined and waste going to landfill.

The effect on the local and regional environment is likely to be **long-term, positive and significant**.

14.4.3 Do nothing Scenario

This is not relevant to this EIAR. , as the existing use onsite is to be continued.

14.5 Mitigation Measures

14.5.1 Construction Phase

In this case there were no mitigation measures necessary for the construction phase in regard to waste management, as no waste was produced. Topsoil will be used on the 1.1 HA, taken from within the overall landholding (i.e. Site of proposed SUDs tank and basin).

14.5.2 Operational Phase

The site is an existing waste facility that has a high recovery rate and is contributing to the aims set in the Circular Economy and Miscellaneous Provisions Act 2022 and waste hierarchy and reaching EU recycling and recovering targets. The site could be viewed as mitigation measure for reducing waste on a regional level. The waste management of the accepted waste is currently dealt with under the existing Waste Facility Permit (WFP-FG-13-0002-03). With the increased of annual throughput, the amount of residual waste was increase. These wastes have EWC codes 19 10 04 (fluff-light fraction and dust other than those mentioned in 19 10 03) and 19 12 12 (wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11). The 19 10 04 - fluff-light fraction from the hammer mill will be sent off-site for further recovery and 19 12 12 wastes will be returned to the source site.

All existing plant, infrastructure and accepted tonnage should therefore be viewed as a mitigation measure for the recovery and reuse of waste.



14.6 Residual Impacts

14.6.1 Construction Phase

As no waste was produced during construction the effects are **momentary, imperceptible and neutral**. The proposed construction works are small-scale, as it includes the introduction of an underground attenuation tank, implementing EV parking spaces. The construction effect are momentary, imperceptible and neutral.

14.6.2 Operational Phase

During the operational phase the site was beneficial in both local and national respects as the operation of the site contributes to the reaching of waste recovery targets. A high rate of reuse, recycling and recovery was achieved, the impact of the operational phase on the environment will be **long-term, slight and positive**.

14.7 Cumulative Impacts

14.7.1 Construction Phase

As there will be no waste produced during the construction phase, there will be no cumulative effects, as any excess soil left over from the digging will be spread across grass.

14.7.2 Operational Phase

The cumulative with other facilities in the area would be that a higher recovery/recycle rate was achieved as St Margaret's has a high recovery rate with a high-quality end product ready for reuse. The annual throughput of 26,000 to 42,500 tonnes would prevent waste from being transported further away from the source sites and out of the state as is currently the case. The carbon footprint would be reduced as the proximity principle would be adhered to. Therefore, the cumulative impact of the operational phase on the environment will be **long-term, significant and positive**.

The Fingal Development Plan 2023-2029 Policy IUP22 – Transition from a Waste Economy Towards a Green Circular Economy states:

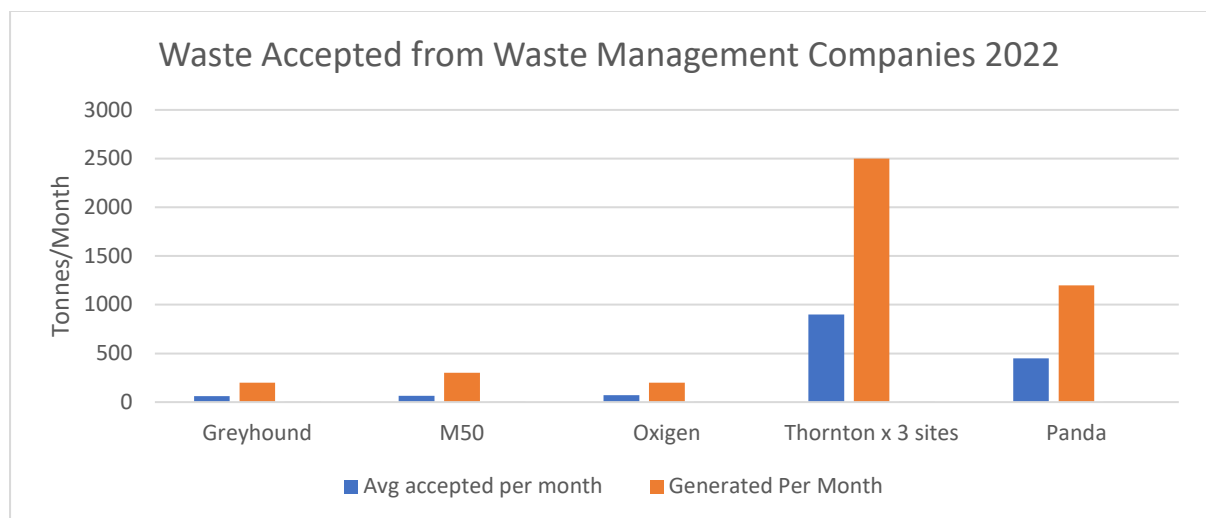
Support the principles of transition from a waste economy towards a green circular economy and implement good waste management and best practices to enable Fingal to become self-sufficient in terms of resource and waste management and to enhance employment and increase the value recovery and recirculation of resources, in accordance with the Whole-of-Government Circular Economy Strategy 2022.



14.8 Interactions

14.8.1 Traffic & Transport

In 2022 St Margaret's took in on average 1,545 tonnes per month from the 4,400 tonnes produced by their clients. On average the transportation emits 57 grams CO₂/tonne/km (International Council on Clean Transportation website 2023). An HGV will load 20 tonnes and the distance to the nearest waste facility with the capability to recover this type of waste is in Belfast at c.145km distance.



The most conservative calculations for the CO₂ emissions from transport alone are:

4400 tonnes/month	–	1545 tonnes/month	=	2855 tonnes/month
2855 tonnes/month	/	20 tonnes/load	=	142.75 HGV loads/month
57grams CO ₂ /tonne/km	x	20 tonnes/load	=	165.3kg CO ₂ /load
142.75 HGV loads/month	x	165.3kg CO ₂ /load	=	23,596.6 kg CO ₂ /month
23,596.6 kg CO ₂ /month	x	12months	=	283,159.2 kg CO ₂ /annum

Some loads are transported to facilities in Limerick and Cork which would almost double the distance and CO₂ emissions. A typical tree can absorb around 21 kilograms of carbon dioxide (CO₂) per year, however this figure is only achieved when the tree is fully grown. In order to offset the most conservative transport emissions 13,483.8 trees would need to be planted.



14.9 References

- Environmental Protection Agency (EPA) Advice notes on current practice in the preparation of Environmental Impact Statement (EPA, 2015)
- Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2022).
- Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)
- Environmental Protection Agency's (EPA) document 'Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects' (2021)
- Environmental Protection Agency's (EPA) document 'Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects' National Construction and Demolition Waste Council (NCDWC) (2006)
- BS 5906:2005 Waste Management in Buildings – Code of Practice
- EPA National Waste Database Reports 1998 – 2018
- EPA National Waste Statistics Web Resource
- Waste Management Act 1996, as amended
- Litter Pollution Act 1997
- EMR Waste Management Plan 2015 – 2021
- Meath Council Development Plan 2017 – 2023.
- Eastern Midlands Region Waste Management Plan 2015 – 2021
- Waste Action Plan for a Circular Economy – Waste Management Policy in Ireland, (2020)
- Sustainable Urban Housing: Design Standards for New Apartments, (2020), Department of Housing, Planning and Local Government
- Transport for Ireland (TFI): www.transportforireland.ie



15.0 Archaeology & Cultural Heritage

15.1 Introduction

This archaeological impact assessment undertaken for the St Margaret's Recycling Centre, St Margaret's, Sandyhill, Co. Dublin (ITM 712936, 743315, Figure 13.1) has been prepared by Joe Corr and Fran Whelan of CWPA.

Joe Corr was the founder and Managing Director of Corr & Associates Spatial Planning and is now Director of Planning with CWPA Planning & Architecture. He holds a Master's Degree in Spatial Planning which was obtained from Technological University Dublin. Joe is also a former President of the Irish Planning Institute (2018 – 2020). Throughout his career, Joe has worked on large scale strategic infrastructural projects including the Poolbeg GSE, Hunstown Power Station and Dublin Port Tunnel.

Fran Whelan is a member of the Royal Institute of Architects Ireland and is Director of Architecture with CWPA. Fran was a founding member of Whelan Corcoran Smith Architects and was Managing Director of WCA Architects since its formation in 2011. Fran has wide experience in residential, commercial, educational and healthcare design and in recent years he has focused on the specialist design of nursing homes, care for the elderly and dementia care. Fran was President of Fingal Chamber of Commerce in 2007 and 2008.

The desk-based study and field survey for this assessment was undertaken in May 2024 by CWPA Planning Ltd. It aims to identify and describe known and potential archaeological and cultural heritage constraints within the site and offer recommendations for the mitigation of such impacts.

15.1.1 Subject Development

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,



4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attenuation tank and basin (noted above, at item 2).

15.2 Site Description

This site is in north county Dublin, to the south west of the Townland Sandyhill (Sandyhill Townland, St. Margaret's Parish, Coolock Barony, Co. Dublin, ITM 712936, 743315. It shares a border with St Margaret's townland on the west and Shanganhill to the south. The surrounding landscape is under crop.

The site is entered from the NW corner at the R122 (New Road). It has been previously developed and is largely covered with a concrete slab. A series of temporary offices are situated at the entrance along the northern boundary and large shed/workshop areas located along the western boundary. The remainder of the area contains stockpiles of recycling materials. The surrounding area is predominantly arable land with a cluster of domestic houses along the R122 Road and St Margaret's c.0.5km village to the NW.

15.3 Methodology

Desktop study carried out. The following sources were consulted in the preparation of this report:

- Record of Monuments and Places (RMP)/ Sites and Monuments Record1
- Aerial photography
- Historical maps
- Documentary research
- Relevant on-line databases (e.g. Excavation Bulletin; NRA Archaeological Database).

Site of proposed attenuation tank was visited and no above ground features of archaeological or cultural heritage interest were apparent.

15.4 Archaeological Background



15.4.1 Brief Archaeological & Historical Background

Records compiled with the Down Survey of the mid-1660's details the towns and landowners of the parish of St. Margaret's including the Barnewall and Plunkett families and state that the land is of arable and pasture fields with no 'unproductive land'. A 'good castle' is mentioned in Dunsoghly while an 'old castle' is listed for all the rest, including St. Margaret's presumably. Lewis' topographical dictionary of 1830 goes into great detail about Dunsoghly Castle which lies c. 0.3km north of the subject area.

"The church is in ruins. Over the door of a small adjoining chapel is a Latin inscription purporting that it was built by Sir John Plunkett, formerly chief justice of the king's bench in Ireland. In the R. C. divisions, the parish also forms part of the union or district of Finglas and has a neat chapel in the village, in which is also a national school. About a mile distant are the ruins of Dunsoghly castle, consisting of a tower, still roofed, and the remains of a large hall, or dining room, and kitchens: the tower is vaulted at the bottom, and it had three stories; the floors of the two upper stories have fallen in, but the room of the principal floor is in tolerable repair: the view from the top is very extensive.

The ancient family of Plunkett originally owned this property, which now belongs to Mrs. Cavenagh, who inherits it through her grandfather. Adjoining the ruins are the remains of a private chapel, over the doorway of which is a tablet of freestone, exhibiting the emblems of the crucifixion, in high relief, with the letters and date i. P. M. o. 6. s. 1573, at the bottom. Mr. B. Shew, on planting an elevated spot in his grounds, a few years since, discovered a great quantity of human bones, supposed to be some of those who fell in the various skirmishes which at different periods have taken place in this district. Near the chapel is a tepid well, or bath, dedicated to St. Bridget, said to contain lime, muriate of soda, nitrate of kali and sulphur, but the last in only a small proportion."

15.4.2 Record of Monuments & Places

The Record of Monuments and Places (RMP) is a statutory inventory of archaeological sites protected under the National Monuments Acts 1930-2004 (Section 12, 1994 Act), compiled and maintained by the Archaeological Survey of Ireland (ASI). The inventory concentrates on pre-1700 AD sites and is based on a previous inventory known as the Sites and Monuments Record (SMR) which does not have legal protection or status (see www.archaeology.ie). There are no recorded monuments located within the application area. There are a number in the immediate area, listed below in Table 13.1.



SMR No	Class	Townland	ITM	Distance to Site
DU014-002001	Church	ST MARGARETS'S	712966, 743901	c. 500m North
DU014-002002	Graveyard	ST MARGARETS'S	712966, 743913	c. 500m North
DU014-002003	Chapel	ST MARGARETS'S	712971, 743889	c. 500m North
DU014- 003----	Ritual Site – holy well	ST MARGARETS'S	712768, 743648	c. 300m NW
DU014- 004----	Building	ST MARGARETS'S	712832, 743627	c. 300m NW
DU014- 099----	Ringfort unclassified	SHANGANHILL	712747, 743085	c. 200m SW
DU014- 108----	Enclosure	SANDYHILL	713241, 743742	c. 450m NE
DU014- 109----	Enclosure	SANDYHILL	713336, 743441	c. 250m East

Table 15.1: Archaeological sites within 0.5km of the proposed development

15.4.3 Cartographic Sources

Analysis of historic mapping can show human impact on landscape over a prolonged period. Large collections of historical maps (pre- and early Ordnance Survey maps as well as estate or private maps) are held at the Glucksman Map Library, Trinity College and other sources (UCD Library, Ordnance Survey Ireland, local libraries and published material). The development of the site and its vicinity recorded through nineteenth and twentieth century cartography are described in Table 15.2 below. No potential archaeological features were recorded within the subject site.

15.4.4 Aerial Photography

Aerial photography (or other forms of remote sensing) may reveal certain archaeological features or sites (earthworks, crop marks, soil marks) that for many reasons may not be appreciated at ground level. Online orthostatic photographs of the site were examined (Ordnance Survey Ireland 1995, 2000 & 2005; Google/Bing Maps 2018/9). **No potential archaeological features were recorded within the subject site**



Map	Date	Description
Taylor and Skinner, Road Maps of Ireland	1777	(Map 40, Dublin to Slane). This map depicts the n/s roadway which passes by an area called 'Pass if you can' and carries on through to St Margaret's Village. This road runs to the west of the site.
Chapman and Hall, Dublin Environs	1837	This map also notes the n/s road running from Dublin to Slane. St Margaret's Village is depicted in more detail with more structures and a church marked along the roadside.
Historic 6 inch	1844	This map is the first detailed one of the subject site. The Western Boundary of the site comprises the townland boundary between St Margaret's and Sandyhill. The southern boundary of the site comprises the townland boundary between Sandyhill and Shanganhill townlands. The site itself is marked as an irregular rectangular shaped field with no structures on it.
Historic 25 inch	1935-8	The subject site and surrounding landscape remains relatively unchanged. There is a small rectangular building located in the NW corner of the field.

Table 15.2: Cartographic sources relating to the site

Aerial Photograph	Date	Description
OSI	1995	Black and white photograph. This photo depicts the field as under crop. There is a building located in the NW corner of the field. The entrance to the field appears to run from the NW corner towards the winding Dublin-Slane road to the west. The E/W Airport runway is located 200m south of the subject area.
OSI	2000	A new road (R122), bypassing St Margaret's village, has been constructed since the previous Aerial photograph. It is located between the subject site and the original winding Dublin – Slane road. It bisected the two fields to the west of the subject site. The area in question has been partially developed with a large shed in the NW corner and an entrance leading to the new road (R122). There is also a car park running south from the structure, along the St Margaret's and Sandyhill townland boundary. The remainder of the subject area is under crop.
OSI	2005	The area of utilised land within the subject area has expanded south and eastward along the north of the field



OSI	2005-12	The area of utilised land within the subject area has expanded yet further to the SE corner along the southern field and townland boundary between Shanganhill and Sandyhill townlands. The utilised land within the development area now fills the whole development area.
Google Earth	2019	The entire subject area is utilised to store various piles of recycling and rows of cars and shipping containers with dirt track roadways between them
Apple Maps	2024	The entire subject area is utilised to store various piles of recycling and rows of cars and shipping containers

Table 15.3: Aerial Photographs

15.4.5 Previous Archaeological Excavations

There were no previous archaeological excavations within the subject site and only four excavations were noted as having taken place in the surrounding townlands

Excavation No.	RMP	OS Ref	Location	Ex. Bulletin Ref.	Author
99E0028	N/A	E711927m, N741825m	Newtown Link Road, St Margaret's, Dublin	1999:269	Claire Walsh

A second phase of monitoring of topsoil-stripping was undertaken from 10 to 12 March 1999. The area to be stripped lay outside and to the north of the area that had previously been studied archaeologically for the construction of the new road. The area had to be stripped to allow the laying of a drainage pipe leading from the road north to the stream that flows north-eastwards just east of Connaberry Motte and for the construction of a paddock.

As this area lay outside the study area and was close to Connaberry Motte and Dunsoghly Castle, the topsoil was removed using a toothless grading bucket. A series of cultivation furrows was uncovered. They were aligned roughly north-south and were regularly spaced, 3m apart. They varied from less than 55m wide and from 20mm or less to 60mm wide. They were only visible where they cut into subsoil and did not survive in the north-west side of the stripped area, owing to the stony nature of the underlying subsoil there. The furrows were filled with grey, loamy silt, and no finds were retrieved from any of them. However, several sherds of medieval pottery (North Leinster cooking wares and wheel-thrown Dublin wares) were uncovered from the topsoil that overlay them.

The furrows are the remains of ridge-and-furrow cultivation, which is probably of medieval date. The proximity of the site to both the Connaberry Motte and to Dunsoghly Castle means that the cultivation system could have been used by the occupants of either site.



18E0729	DU014-123	E713983m N742125m	Merryfalls Unit, Dublin 9, Dublin	2018:305	Muireann Ní Cheallacháin, IAC
Nothing of archaeological significance was uncovered during the course of the works.					
05E0058	N/A		St Margaret's Road, Finglas, Dublin	2005:486	Kara Ward
Nothing of archaeological significance was uncovered during the course of the works.					

Table 15.4: Previous archaeological investigations in the wider area

15.4.6 Architectural Heritage

The National Inventory of Architectural Heritage (NIAH) was established on a statutory basis under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999. Its purpose is to identify, record, and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently as an aid in the protection and conservation of the built heritage. It is intended to provide a basis for recommendations of the Minister of Culture, Heritage and the Gaeltacht (DCHG) to Local Authorities for the inclusion of particular structures in Records of Protected Structures (RPS).

Local Authorities have a statutory responsibility to safeguard architectural heritage in accordance with Part IV of the Planning and Development Act 2000. Under S.51 (1), a Council must compile a Record of Protected Structures (RPS), which lists all structures which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The protection, unless otherwise stated, includes the exterior and interior of the structure, lands lying within its curtilage (boundary), other structures and their interiors within the curtilage, plus all fixtures and fittings which form part of the interior or exterior of any of these structures. Buildings can be added to, or deleted from the RPS at any time, though generally this occurs when the development plan is being reviewed. The details of nearby protected structures are shown below in Table 15.5.

There are no Protected Structures within the site. The closest protected structures to the site are situated in St. Margaret's village and comprise St Bridget's Well (0624), the RC church (0625) and the Cofl church and graveyard (0626).



RPS	NIAH Reg	Address	Description	Date	Distance from Site
626	11348001	Saint Margaret's, Fingal	Remains of medieval parish church and of chantry chapel within enclosed graveyard that contains historic grave markers including 18 th century mausoleum to Morgan family.	1700 - 1740	600m to NW
624		Saint Margaret's, Fingal		Well enclosed in 16C. Current structure is much later.	300m NW
625		Saint Margaret's, Fingal	19th century catholic church	19C	200m NW
	11342008	Killreesk Bridge, Fingal	Double-arch rubble stone road bridge over river, c.1750, with concrete capping to parapet.	1700 - 1800	c.800m to NW

Table 15.5: Recorded Structures from NIAH in vicinity of proposed development

15.4.5 Topographical Files

The National Museum of Ireland Topographical Files is the national archive of all known antiquities recorded by the National Museum listed by county and townland/ street. These files relate primarily to artefacts but also include references to monuments and contain a unique archive of records of previous archaeological excavations. The Museum files present an accurate catalogue of objects reported to that institution from 1928. Five townlands Sandyhill, St. Margaret's, Shanganhill, Harristown and Millhead were researched. Only one townland, Harristown, produced 14 stray archaeological finds. There were no finds from the other townlands.



Townland	Museum No.	Find	Circumstances of Discovery
Harristown	1975:277	Ceramic Inkwell	Found in a field during ploughing
Harristown	1975:276	Clay Pipe	Found in a field during ploughing
Harristown	1975:275.1	Glass bottle	Found in a field during ploughing
Harristown	1975:275.2	Glass bottle	Found in a field during ploughing
Harristown	1975:275.3	Glass bottle	Found in a field during ploughing
Harristown	1975:275.4	Glass bottle	Found in a field during ploughing
Harristown	1975:225.1	Ceramic Object	Found in a field during ploughing
Harristown	1975:225.2	Ceramic Plate	Found in a field during ploughing
Harristown	1975:225.3	Pottery	Found in a field during ploughing
Harristown	1975:225.4	Pottery	Found in a field during ploughing
Harristown	1975:225.5	Pottery	Found in a field during ploughing
Harristown	1975:225.6	Pottery	Found in a field during ploughing
Harristown	1975:225.7	Pottery	Found in a field during ploughing
Harristown	1975:225.8	Pottery	Found in a field during ploughing

Table 15.6: Stray archaeological finds in the vicinity of the subject area

15.4.6 Toponyms

Research into a site or areas place name (or toponym) can provide information relating to an areas heritage or previous land use. Many townland names were anglicised by the time the Ordnance Survey (OS) began in the 1830s and when townland names were standardised in the Townland Index (1851).

The Place name of ‘Sandyhill’ townland appears to have come from the local geography. The ordinance Survey archive files recorded a lease, dated 16th Feb 1696 which stated:

“...the lands of St Margaret’s and Harristowne in the County of Dublin aforesaid called and known by the names following, Knavin’s Farm, Part of Trassey’s Farm and about 20 acres of Sandhills. “

There is a ‘Sand pit’ recorded to the north of the townland on the 1844 OS map which supports the theory that the name originates from the sandy soil.

Details were taken from www.logainm.ie .

15.4.7 Site Visit

The site was visited by CWPA Ltd on 29 May 2024 in dry, sunny conditions.

The site is entered from the north-west corner at the R122 (New Road). It has been previously developed and is largely covered with a concrete slab. A series of temporary offices are situated at the entrance along the northern boundary and large shed/workshop areas located along the



western boundary. The remainder of the area contains stockpiles of recycling materials. The extent of development on the site has lessened the possibility for survival of sub-surface archaeological features.

15.5 Predicted Impacts

A desk-based study and field survey was carried out on a site located 4km due west of Dublin Airport on the R122 (ITM 712936, 743315). The site covers an area of c. 1.63 hectares on the southern side of St. Margaret's village. This Archaeological Impact Assessment report sought to identify and describe known and potential archaeological or cultural heritage constraints within and/or immediately adjacent to the site. The following factors were identified in the course of desktop study:

- The site is moderate in scale occupying an area of roughly 1.63 Ha.
- There are no recorded monuments situated within the site boundaries, there are 8 sites within 500m of the site boundaries.
- No potential archaeological features were recorded in aerial photos of the subject site.
- Examination of the cartographic sources indicates no archaeological features.
- There were no previous archaeological excavations within the subject site
- The site visit shows that the site has been extensively disturbed and little of the original ground profile remains.

These factors indicate that, prior to any groundwork's taking place; this site has slight potential (based on the site's size) for the survival of buried archaeological remains. However, the extent of development on the site, including the on-going agricultural farming practices (crops and tillage) has lessened the possibility for survival of sub-surface archaeological features.

Predicted impact imperceptible, short-term and neutral.

Mitigation

It is recommended that any further groundworks at this site be subject to archaeological monitoring by a suitably qualified archaeologist.

There is the potential to relocate if archaeology found, subject to agreement with DAU, the Department of Culture, Heritage and the Gaeltacht (DCHG) and the relevant local authorities.

Residual Effect

Subject to mitigation, the predicted impact is considered to be imperceptible, short term, and neutral.

Cumulative Impact

N/A



15.6 References

- Gilbert, J.T. (ed) 1884, The Chartularies of St. Mary's Abbey, Dublin, 2vols, London.
- Joyce, Weston St. John, 1921, The Neighbourhood of Dublin, 2nd ed, Dublin.
- Otway-Ruthven, A.J. 1961 The Medieval Church lands of County Dublin, in J.A.
- Smyth, W.J. 1992, Social and Cultural Topographies, in F.H.A. Aalen & K. Whelan (eds) Dublin City and County from Prehistory to Present. Dublin.
- Watt et. al (eds). Medieval Studies presented to Aubrey Gwynn, Dublin.

15.6.1 Web References

- Online Excavations bulletin <https://excavations.ie> [accessed 10th May 2024]
- Aerial Photography <https://webapps.geohive.ie/mapviewer/index.html> [accessed 10th May 2024]
- Online Archaeological Survey of Ireland <https://www.archaeology.ie> [accessed 12th May 2024]
- Architectural Heritage <https://www.buildingsofireland.ie/> [accessed 12th May 2024]
- Fingal Co.Co. Development Plan [accessed 10th May 2024]



16.0 Accident & Disaster Risks

16.1 Introduction/ Methodology

INTRODUCTION

Methodology

In this EIAR assessment, consideration is given to both the importance of an attribute and the magnitude of the potential environmental impacts of the proposed activities on that attribute. The principal attributes (and impacts) to be assessed include the following:

- Potential hazard arising from risk of major accident.
- Localised flooding (potential increase or reduction) and floodplains including benefitting lands and drainage districts (if any)
- Loss of containment of fuel/chemical materials

This chapter was prepared by Martijn Leenheer. Martijn holds a 1st Class BSc (Hons) degree in Environmental Science from Atlantic Technological University (previously IT Sligo) and has 11 years' experience in Ireland in soil remediation, invasive species commercial Wastewater Treatment, Discharge Licences, Waste Permits and Licences has been involved in Risk Assessments, NIS and EIAR reports for various commercial projects. Before moving to Ireland Martijn worked in the Netherlands as an Environmental Field Technician in soil research. He has been an Operations Director of Environmental Services Consultancy for 11 Years and a Founding Director of ESC Environmental LTD since 2021.

Sources of Information

The collection of baseline regional data was undertaken by reviewing the following sources:

- Office of Public Works (OPW) flood mapping data (www.floodmaps.ie).

Site specific data was derived from the following sources:

- Various site plans and drawings (ref. accompanying planning document set)
- Records of past events



16.2 The Subject Development

Permission is sought for –

1. The on-going use of the existing Waste Recycling and Transfer facility with a proposed waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.
2. A new underground surface water attenuation tank comprising c.675 cubic metres, and a new above ground overflow connected to same comprising 1500 sqm.
3. Enhancement of car parking provision, including installation of 2no. EV charging point and bicycle parking,
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, and augmentation of dust netting where applicable, and
5. Revisions to the site area, such that the site will comprise c.1.75 ha subject of the retention application and an additional 2,616 sqm which will comprise the proposed surface water attention tank and basin (noted above, at item 2).

16.3 The Receiving Environment

The subject lands are located at Sandyhill, St. Margaret's, on the east side of the R122 (Finglas - Balbriggan Regional Road), on a site located directly south of the main settlement known as St. Margaret's. To the south are lands that support the main southern runway to Dublin Airport with the M50 located further south of the subject site. The surrounding area is comprised primarily of greenfield agricultural lands with clusters of housing and commercial developments located along the R 122 road both to the north and south of the application site.

The subject lands comprise an existing waste transfer and recycling centre that has been in existence since 1997 (albeit in different ownership) on circa 1.6 ha of lands. The site functions as an Authorised Treatment Facility (ATF) for end-of-life vehicles (ELVs), and waste recovery and recycling facility which is permitted to accept waste metals, C & D waste material and batteries. The site comprises, concrete hardstanding entrance laneway and public parking area in the northwestern corner; hardstanding for the storage of cars awaiting depollution, covered waste processing shed, site offices, welfare facilities and a weighbridge at the entrance and secure perimeter fencing.

The active waste recycling site sits within a larger 2.93 ha site, with the residual 1.1 ha no longer in use associated with the waste recycling activities since so conditioned in 2014. The 1.1 ha comprises compacted hard core and had been used on an ad hoc and sporadic basis for the storage of unused/surplus plant, empty skips and trucks from 2014 to 2023. It is no longer in use for this purpose.



It is ultimately proposed to reinstate this field to managed grassland/wildflower meadow with agricultural haul roads, however, for the purposes of this application and EIAR it is assessed as compacted hardcore, but as was the case, no active use.

16.4 Predicted Impacts

16.4.1 Water Bodies and Flood Risk

There is no risk of flooding affecting the site from fluvial or coastal sources, since the site lies within Flood Zone C (i.e. where the probability of flooding from rivers is less than 0.1% or 1 in 1000). This takes full account of historical flood risk data and of standard allowances to take account of climate change effects. St Margaret's has a drainage system on site and improve the surface water drainage on site, minimizing the possibilities of flooding on site.

16.4.2 Seismic Activity

Much of the Earth's surface is covered by unconsolidated sediments which can be especially prone to instability. Water often plays a key role in lubricating the slope failure. Instability is often significantly increased by man's activities in building houses, roads, drainage and agricultural changes. Landslides, mud flows, bog bursts (in Ireland) and debris flows are a result.

In general, Ireland suffers few landslides. Landslides are more common in unconsolidated material than in bedrock, and where the sea constantly erodes the material at the base of a cliff landslides and falls lead to recession of the cliffs. Landslides have also occurred in Ireland in recent years in upland peat areas due to disturbance of peat associated with construction activities.

There are no active volcanoes in Ireland.

In Ireland, seismic activity is recorded by the Irish National Seismic Network. The Geophysics Section of the School of Cosmic Physics, Dublin Institute for Advanced Studies (DIAS) has been recording seismic events in Ireland since 1978. The station configuration has varied over the years. However, currently there are five permanent broadband seismic recording stations in Ireland including IWEX on Carrickbyrne Hill, Co. Wexford, running from 01/01/2011 and operated by DIAS. The seismic data from the stations comes into DIAS in real-time and are studied for local and regional events.

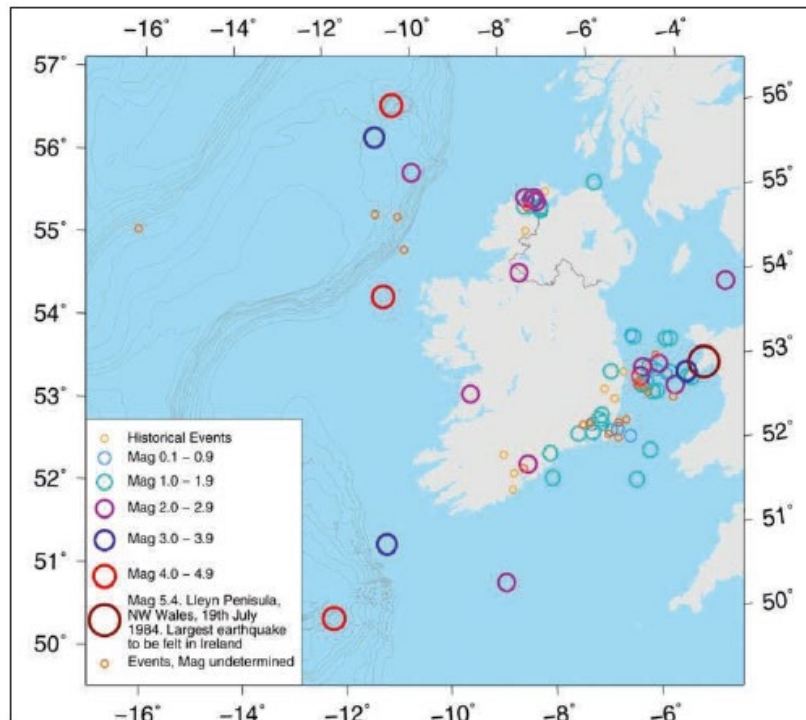


Figure 16.1: Seismic Activity in and around Ireland

16.4.3 Outer Public Safety Zone (PSZ)

St. Margaret's Recycling is located within the Outer Public Safety Zone (PSZ) of Dublin Airport. The ERM Public Safety Report 2005 states that the principal purpose of the outer PSZ is to minimise the possibility of a multiple fatality accident. The purpose of PSZ is to protect the public on the ground from the small but real possibility that an aircraft might crash in a populated area. Essentially, a PSZ is used to prevent inappropriate use of land where the risks to the public is greatest.

According to the report from ERM (2005), the likelihood of an accident in the outer safety zones is less than in the inner zones, and future development will be permitted, subject to a number of restrictions. The existing waste processing and transfer facility is located within the outer public safety zone. The ERM report seeks to limit any further developments within outer PSZs, but to allow certain exemptions such as airport related development and existing developments to remain. Section 6.2.3 of the ERM report also notes that exceptions to permitted development in the Outer PSZ including 'Extensions to Existing Developments'. In this regard Table 6.1 indicates that working premises in the outer Public Safety Zone is permitted at a density of less than 110 persons per half hectare. In this regard the proposed development provides for c.25 persons (noting the overall site area of 1.63 hectares) within the overall waste processing and transfer facility and thus is in accordance with the provisions of the ERM Public Safety Report.

In terms of major accidents and disasters, there is potential such an incident could occur within the St. Margaret's Recycling & Transfer Centre facility given the location of the lands adjoining Dublin Airport. However, these lands are not significantly populated noting that the nature of



site is for the processing recyclable waste material. Therefore, the vulnerability of the project to the risk of a major accident and disaster is considered to be low. This is reinforced by the ERM guidelines which note the development's location within the Outer Safety Zones and that the main buildings and offices with c. 20-25 workers is in accordance with permitted developments. The potential for a major accident is considered extremely unlikely with a risk rating of 1 in one million per year applying to the Outer Public Safety zone. Therefore, the potential risk posed by a major accident and or disaster have been considered based on a low vulnerability of such a risk and the overall risk is considered to be low.

16.4.4 Fire Risk

St Margaret's Recycling holds combustible materials on site, and therefore there is a potential risk of fire or explosion occurring, causing health and safety risk to workers, contamination of surface waters and reduction in air quality. A fire on the St Margaret's site also has the potential to be detrimental to the airport in terms of smoke. The site has a detailed fire strategy and risk assessment report prepared to deal with any potential fire emergencies that can occur on site.

16.5 Mitigation and Monitoring Measures

16.5.1 Water Bodies and Flood Risk

As stated in Section 16.4, there is limited potential for an impact on the site from flood risk. The proposed change in operation of the site includes an improvement of the surface water drainage on site and increasing the stormwater attenuation availability which will minimise the flooding potential significantly.

16.5.2 Seismic Activity

There is no risk of seismic activity on site and therefore no mitigation measures or monitoring is necessary.

16.5.3 Fire risk

St Margaret's has a detailed fire strategy and risk assessment report prepared to ensure the proper measures to prevent any major impacts from a fire.

The primary objectives of the Fire Strategy & Risk Assessment Report will include the following:

- I. To arrange the premises so that the likelihood of a fire occurring is minimised;
- II. To arrange the premises so that the likelihood of a fire spreading is minimised;
- III. To provide the necessary training for employees to enable them to identify the type of fire and to select the appropriate fire-fighting equipment therefor;



- IV. To provide the necessary training for employees to enable them to control a fire utilising the appropriate fire-fighting equipment to hand;
- V. To aim to have any fire extinguished within four hours.

Ongoing and regular reviews of the site layout and associated issues and identifying potential problems and remedying same. The most up to date Fire Prevention Plan has been submitted to Fingal County Council as part of the ongoing monitoring and review of the waste permit on site.

From 2019 to 2024, an increase in the stormwater attenuation for the site in respect of fire water retention was provided for. This is dealt with in the rEIAR. The current proposal deals with flood events in particular, and will accommodate a flood and fire event occurring at the same time, although this may be unlikely. The total area of the proposed existing stormwater attenuation is 1500m³, and 135m³ is included as dedicated auxiliary fire storage.

Although there was a recorded fire event on site in 2018, this was brought under control with no loss of life, injury or damage to property.

16.6 Residual Impact

16.6.1 Water Bodies and Flood Risk

Due to the limited potential for flooding on site, the residual impact from the changes in the existing facility are considered to be long-term, neutral and negligible in both the construction and operational phase.

16.6.2 Seismic Activity

As there is no potential for seismic effects, the residual impact on the site from seismic activity is considered to be long-term, neutral and negligible in both the construction and operational phase.

16.6.3 Fire risk

The facility operated in line with the relevant fire safety plan associated with the current licence during the relevant period, and therefore due to this, i.e.. after the mitigation measures the residual impact from the site is considered to be **long-term, positive** and **moderate**.



16.7 References

- Environmental Protection Agency (EPA) Advice notes on current practice in the preparation of Environmental Impact Statement (EPA, 2015)
- Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2022).
- Environmental Impact Assessment of Projects, Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)
- Reducing Risks Protecting People (UK HSE, 2001)
- Office of Public Works (OPW) flood mapping data (www.floodmaps.ie)
- Major Accident Prevention Policy for Unilin Limited, Navan, Co. Meath
- environmental risk assessment methodology recommended by the Chemical and Downstream Oil Industries Forum (CDOIF, 2017)
- Geophysics Section, Dublin Institute



17.0 Interactions & Cumulative Effects

17.1 Introduction

The matrix incorporated in Table 17.1 below, inter-relates Chapters 5.0 to 16.0 of the Environmental Impact Assessment Report to the various impacts referred to in the relevant Environmental Impact Assessment Regulations.

17.2 Interactions

Listed below are the interactions between the various significant environmental impacts generated by the proposed development:

Table 16.1 Interactions identified in the EIAR

No	Heading	Pop & Human Health	Biodiversity	Land, Soils Geology	Water	Air & Climate	Noise	Landscape	Mat Assets	Traffic & Transport	Waste	Archaeology
5	Pop & Human Health	✓		✓		✓	✓	✓	✓	✓	✓	
6	Biodiversity			✓	✓			✓				
7	Land, Soils Geology	✓	✓		✓			✓				
8	Water		✓									
9	Air & Climate	✓	✓							✓		
10	Noise	✓								✓		
11	Landscape	✓	✓									
12	Mat Assets								✓			
13	Traffic	✓				✓	✓					
14	Waste									✓	✓	
15	Archaeology											

17.2.1 Population & Human Health / Population & Human Health

The population and human health content of this application will impact on the existing environment in terms of the provision of services facilities and employment. Chapter 5 of this EIAR found that the impact on Population and Human Health as a result of the development will be positive or neutral in the general area of the proposed development. The continued use of the waste transfer and recycling facility at the facility to accept up to 21,900 tonnes per



annum with minor infrastructural works as part of the planning application will help maintain current employment in the area.

17.2.2 Population & Human Health / Land, Soil & Geology

As the development in question is already largely constructed, direct discharges to ground may arise during the construction works proposed as part of the installation of upgrades to the surface water drainage system, including the installation of a surface water tank and an above ground overflow area.

The attribute is considered to be of only low importance. The impact is not considered to be permanent, in that a portion of this material shall be re-instated as backfill. Any excess overburden will be used to augment existing perimeter berms.

Additionally, there are no direct discharges to ground from the current or proposed operations on site. Chemical pollution (e.g. hydrocarbon spillages as a result of operational activities) has the potential to occur at the site. However, as the entire footprint of the site has been capped with hardstanding for the purposes of site operations and storing of de-polluted vehicles, there will be no resultant impacts to the underlying geological environment as a result of the continued operation and minor infrastructure works.

17.2.3 Population & Human Health / Air Quality & Climate

As the development in question is already largely constructed, dust emissions may arise during the construction works proposed as part of the upgrades to the surface water drainage system, including the installation of a surface water tank and an above ground overflow area. In order to ensure that any dust nuisance is minimised, a series of mitigation measures have been set out in Chapter 9. If the construction contractor adheres to good working practices and dust mitigation measures, the levels of dust generated will be minimal and are unlikely to cause an environmental nuisance.

No project specific mitigation measures have been identified but emissions of pollutants from site traffic can be controlled by either controlling the number of road users or by controlling the flow of traffic. For the majority of vehicle-generated pollutants, emissions rise as speed drops, although the opposite is true at very high speeds (i.e. speeds greater than 120 km/hr). Emissions also tend to be higher under stop-start conditions when compared with steady speed driving. The free flow of traffic into and out of the site and limiting the idling time of vehicles and plant will allow for the generation of lower concentrations. In light of the above, emissions arising as a result of any traffic associated with the proposed development is unlikely to impact on air quality standards.



17.2.4 Population & Human Health / Noise & Vibration

Construction activity will be on a relatively small scale, consisting of the proposed surface water tank, and any ancillary site development works necessary to facilitate the development. Nevertheless, minor short-term vibration impacts may occur during the construction phase as a result of the use of heavy plant and machinery; however, these impacts will be unlikely to propagate beyond the construction site boundary.

It is not anticipated that there will be any significant changes in the operational noise levels attributable to the development site and the operational vibration will have negligible adverse impacts on sensitive receptors as a result of the operational phase of the proposed development.

17.2.5 Population & Human Health / Landscape & Visual Effect

The subject lands are characterised as having ‘Low Lying Landscape Character Type’ and ‘Low Lying Agriculture Landscape Character Area’. Chapter 11 indicates that there will be no visual effects arising from the proposed development within the wider study area.

The introduction of the proposed development will not modify the landscape character locally or outside of the development site. The potential direct and indirect effects on landscape character at the site location and within the wider area will be of negligible neutral significance.

The proposed development will integrate into the existing landscape and due to its location and screening effects of the existing vegetation the significance of visual effects will range from none to negligible adverse for viewpoints close to the site entrance.

The only potential and residual visual effects will occur at areas close to the site entrance and temporary negligible adverse visual effects will occur from construction operations and increased traffic to and from site.

17.2.6 Population & Human Health / Traffic & Transportation

The traffic impacts and the level of traffic generated at the R122 by the use of the waste transfer and recycling facility have been calculated and are considered relatively low. As a result, it is deemed that no mitigation measures are required.

No specific monitoring proposals are considered necessary during the operation of this development other than normal monitoring undertaken by Fingal County Council.



17.2.7 Biodiversity / Land, Soils & Geology

It has been seen that the application site is not within, or adjacent to, any area that has been designated for nature conservation at a national or international level.

There are no examples of habitats listed on Annex I of the Habitats Directive or records of rare or protected plants. There are no alien invasive species. There will be no effects to biodiversity as a result of the proposed development.

17.2.8 Biodiversity / Water & Hydrology

During the construction and operational phases hydrocarbon and silt interceptors will be serviced and maintained on a regular basis by an independent licensed contractor to ensure that there is no impact on aquatic flora and fauna. Good site management practices will also ensure that pollution to existing watercourses, does not occur during the construction and operation phases. No negative effects to biodiversity are predicted to occur due to the continuation of use of these lands.

17.2.9 Biodiversity /Landscape and Visual Impact

The existing flora on the site is limited and not of any general merit. The body of the site is entirely composed of buildings and artificial surfaces. The proposed development will remain integrated into the existing landscape and due to its location and screening effects of the existing vegetation will continue to make an overall positive contribution.

17.2.10 Land Soils & Geology / Water & Hydrology

The implementation of upgrades to the surface water drainage system, including the installation of a surface water tank and an above ground overflow area requires removal of soils/subsoils which is considered to be a direct and adverse impact. This attribute is considered to be of only low importance. The impact is not considered to be permanent, in that a portion of this material shall be re-instated as backfill. The removal of topsoil during earthworks and the construction of a surface water tank may expose subsoil to weathering and may result in the erosion of soils, particularly during adverse weather conditions. Storm water runoff from the surface of the excavated areas may result in silt discharges to local streams. However, appropriate mitigation measures are specified in order to minimise and prevent the accidental release of hazardous material to soil and waters. Thus, no significant adverse impacts are envisaged.

17.2.11 Air Quality & Climate / Traffic & Transportation

The development will give rise to direct emissions from onsite and offsite vehicles and also indirect emissions relating to the energy demand of the onsite site buildings, power tools and electrical equipment. However, as the site is currently operational and there are no proposed changes to the permitted activities at the site, it is anticipated that there will be no significant



change in terms of air quality as a result of the site's continued operation. No project specific mitigation measures have been identified but emissions of pollutants from site traffic can be controlled by either controlling the number of road users or by controlling the flow of traffic. For the majority of vehicle-generated pollutants, emissions rise as speed drops, although the opposite is true at very high speeds (i.e. speeds greater than 120 km/hr). Emissions also tend to be higher under stop-start conditions when compared with steady speed driving. The free flow of traffic into and out of the site and limiting the idling time of vehicles and plant will allow for the generation of lower concentrations. No monitoring is deemed necessary due to the negligible impact of the development on air quality.

17.2.12 Air Quality & Climate / Air Quality & Climate

As the development in question is already constructed, the construction phase assessment will be limited to the development of the proposed stormwater attenuation storage tanks and associated stormwater treatment infrastructure, and any ancillary site development works necessary to facilitate the development. While small in scale, the construction phase of the scheme has the potential to generate a number of short-term emissions to atmosphere. Construction activities are likely to generate some dust emissions and the potential quantity of dust emissions will depend on the type of construction activity being carried out, the weather conditions and the proximity to sensitive receptors. No monitoring is deemed necessary due to the negligible impact of the development on air quality.

17.2.13. Noise & Vibration / Population & Human Health

The potential sources of environmental noise during the construction phase of the proposed development will primarily arise from increased traffic on the surrounding road network (from construction workers and delivery of plant and materials) and actual on-site works where heavy plant and earth moving machinery may be required.

The assessment considered noise impacts associated with the proposed continued use of the existing waste processing and transfer facility. As such, with no changes to the permitted activities, it is not anticipated that there will be any significant changes in the noise levels attributable to the development site.

17.2.14. Noise & Vibration / Traffic & Transportation

The potential sources of environmental noise during the construction phase of the proposed development will primarily arise from increased traffic on the surrounding road network (from construction workers and delivery of plant and materials) and actual on-site works where heavy plant and earth moving machinery may be required. Overall the noise climate in the area was dominated by road traffic noise from the R122 and M50, and aircraft landing and taking off from the airport.



17.2.15. Air Quality & Climate / Biodiversity

The development will have no effect on climatic conditions that would be sufficient to affect animal populations on or in the vicinity of the site.

17.2.16. Traffic & Transportation / Biodiversity

While traffic associated with the construction and operation stages may disrupt fauna, impacts are unlikely to be significant.

17.2.17. Traffic & Transportation / Air Quality & Climate

During the operational phase a scheme of this nature has the potential to generate greenhouse gases through vehicular traffic into and out of the site as well as from the site operations, plant and machinery, space heating and energy use within the site buildings. Transport emissions, including greenhouse gases, from light and heavy duty vehicles are continually being reduced through EU and national initiatives. As such, transport mitigation of GHG emissions are primarily delivered by EU legislation to ensure an ongoing reduction in emissions per car. Other national initiatives to reduce emissions include fiscal measures to promote the use of electric vehicles and the biofuels obligation scheme. No monitoring is deemed necessary due to the insignificant impact of the development on climate.

17.2.18. Waste Management / Traffic & Transportation

In 2022 St Margaret's took in on average 1,545 tonnes per month from the 4,400 tonnes produced by their clients. On average the transportation emits 57 grams CO₂/tonne/km (International Council on Clean Transportation website 2023). An HGV will load 20 tonnes and the distance to the nearest waste facility with the capability to recover this type of waste is in Belfast at c.145km distance.

The assessment considered the traffic impacts associated with the proposed continued use of the existing waste processing and transfer facility. As such, with no changes to the permitted activities, it is not anticipated that there will be any significant changes in the emissions levels attributable to the development site.

17.3 Residual Impacts and Cumulative Impacts

Residual impacts can be defined as the final impacts that occur after proposed mitigation measures have taken effect. Many of the findings of the EIA have been incorporated into the design of the development and have contributed to the reduction or amelioration of potential impacts. Where residual impacts arise, they are detailed in the relevant chapters and further



mitigation measures detailed where necessary. Cumulative impacts are defined as: “The addition of many small impacts to create one larger, more significant, impact” (EPA 2002). Cumulatively, these impacts may be significant if they occur close together in terms of location and time. The cumulative impact of the proposed development is categorised as neutral and moderate.

17.4 Environmental Commitments and Mitigation Measures

Mitigation measures to be adopted during the construction and operational phases of the proposed development are detailed within each chapter. These measures should be implemented through planning conditions imposed by An Bord Pleanála.

Mitigation measures will be managed by the contractor(s) as part of the Construction Management Plan and by the developer/ landowners thereafter.

17.5 Summary

The EIAR has identified potential for interactions between a range of factors identified in Table 17.1. These interactions require the implementation of suitable mitigation measures to ameliorate the impact of the development on the environment. This EIAR has found that subject to the full implementation of the various mitigation measures specified by the EIAR team, the development will have no significant negative impact on the environment.

The Environmental Impact Assessment Report has assessed the characteristics of the proposal for significant environmental impacts. Each topic was examined and the resultant environmental impact, if any, noted and mitigation or reductive measures have been put in place. Accordingly, the proposed development will result in no significant negative impacts on the environment.

The proposed development, in terms of physical works comprises 3 environmental improvement measures – namely the installation of additional SUDs measures to reflect possible 1:30 and 1:100 year flood events, ultimately a positive, short-term, slight-moderate impact, installation of EV charging, which will tie in to the solar powered electricity available on site, resulting in a positive, long-term, slight impact (reducing carbon footprint through use of renewable energy sources), and lastly the replacement of steel container boundary treatments with steel post and concrete panel walls, improving the visual amenity, albeit only within the site, and as such is an imperceptible, long-term, positive impact.

The on-going use of the existing facility as a waste recycling and transfer centre is a more sustainable option than development of a greenfield site or transporting the county’s waste to Northern Ireland. In respect of metal waste, c.70 to 80% would be required to be transported to Northern Ireland if the Centre were not to accept it, as there is no other centre that can cater and process the metal waste as per St Margarets. The proposed development, comprising the on-going use of the centre, is considered to be a long-term, positive, moderate impact.



APPENDICES

- Appendix 1 Planning History
- Appendix 2 Fire Prevention Report
- Appendix 3 Wastewater Treatment Plant Suitability Report
- Appendix 4 Traffic & Transportation Assessment
- Appendix 5 EIAR Non-technical summary
- Appendix 6 Schedule of Drawings (List)



APPENDIX 1

Table A.1 Planning History

Planning Reference	Development Description	Decision	Comment
F97A/0109	Retention of existing use with extension and alteration of existing buildings, alterations and widening of existing entrance and septic tank to Waste Recycling and Transfer Depot	Grant (10,000 tonnes; 0.6ha)	Operated by Greenstar. Waste Licence EPA (EPA Licence No. 134-1). granted for 60,000 tonnes per annum. Operated at 21 to 22,000 tonnes per annum from 1998, on an enlarged site.
F03A/1561	The permanent retention of 5 no. existing prefabricated single storey buildings, comprising: office accommodation, canteens, toilets, and weighbridge control room. Permanent retention is also sought for existing security fencing to the boundary and skip storage area to the south of the site. All on an enlarged site from previously granted permission	Decision Grant Permission & Grant Retention (for 3 years)	Expired in Sept 2007 No condition re. tonnage; Conditioned to return to 1997 permitted boundary. Never complied with & No enforcement. EPA waste licence (No. 134-1). Prefabs to be removed and site restored to Jan 1995 condition on or before Sept. 2007.
F03A/1682	The retention of an existing stone road serving the existing agricultural entrance located on the St. Margarets Road, stone area for use as agricultural storage, hard standing for use as parking of trucks ancillary to waste transfer depot on adjoining site.	Decision Grant Permission & Grant Retention	To be used for agriculture only.
F05A/0233	Development of a concrete batching plant, bunded fuel oil tank, 3 no. 6m x 3m aggregate storage bays, water recycling unit and all other associated works.	Refuse	



F10A/0177	Retention permission for onsite prefabricated buildings comprising weighbridge control room, office, canteen and toilets, retention of existing 1500 sq.m. skip storage area to the south of the existing process building, change of use of existing 6458 sq.m. agricultural storage area to the south of the site as granted under F03A/1682 to storage area for construction demolition waste, retention of 10172 sq.m. area to the east of the site for processing of construction demolition and other inert non-hazardous waste, retention of existing boundary treatments and planning permission for bulking and transfer of green garden waste within the facility.	Grant Retention & Permission (for a period of 3 years)	<p>Expired Dec 2013.</p> <p>At the time of assessment, the proposed development was considered to be non-conforming “having regard to the established nature of the recycling facility at this location together with the planning permissions detailed in the report.”</p> <p>At this time, i.e. in 2009, tonnage exceeded 27,000 tonnes and permission granted limited tonnage to 25,000 tonnes.</p>
F11A/0272	Change of use of existing green waste storage building as granted under planning ref: F10A/0177, to a depollution/recovery building for end of life vehicles and permission to store end of life vehicles on 325 sq.m. of existing concrete hard standing which will be associated with a new authorised treatment facility within the existing recycling facility (Waste Facility Permit WFP-FG-11-00012-01).	Refuse	



F11A/0443	For the establishment of an authorised treatment facility for the de-pollution/recovery of end-of-life vehicles (ELVs) at an existing and established waste recycling facility (Planning ref. F97A/0109; Waste Facility Permit WFT-FG-11-00012-01). A change of use of the existing green waste storage building as granted under planning ref: F10A/0177 to carry out ELV de-pollution activities within this building. Modifications to the external facade of the existing storage building on site to facilitate the internal storage of all ELVs delivered to the facility pending de-pollution and an external metal crusher/baler is proposed along the northern boundary of the site, with the crushed bales stored on an adjacent mobile flatbed trailer (on concrete hardstanding), site works.	Grant – 3 years	<p>Expired June 2015</p> <p>Related to ATF for ELV's</p> <p>The car dismantling use had existed on site previously, however, legislation required that ELVs be specifically called out as a 'waste intake'</p>
F13A/0409	5-year permission for the continuation of use of a facility for the bulking, transfer and recycling of metals, construction & Demolition waste, bulky/skip waste, batteries, Waste Electrical and Electronic Equipment (WEEE), other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles. Permission is also being sought for a new 5-bay metal-clad portal frame storage building, with external finish to match existing adjacent storage building and associated site works. the new building (447.95m ²) will be used for the storage & shredding of wood/timber products and bulky/skip waste segregation. the site is an established waste facility and operates under Waste Facility Permit WFP-FG-10-00012-02; the following planning permissions apply: F11A/0443, F10A/0177, F03A/1682, F03A/1561	Grant - 5 years	<p>Expired August 2019</p> <p>At the time permission was granted activities on site were unauthorised, but non-conforming.</p>



FW19A/0135	<p>Planning permission is sought (i) the permanent continuation of use of the existing and permitted waste processing and transfer facility at St. Margaret's which is currently operated under and in accordance with temporary planning permission Reg. Ref. F13A/0409 and permanent planning permissions Reg. Ref. F03A/1682 and Reg. Ref. F97A/0109; (ii) an increase in waste throughput at the facility (to accept up to 49,500 tonnes per annum); (iii) continued use of the existing buildings on site associated with the daily operations of the facility; (iv) proposed stormwater attenuation storage tanks and associated stormwater treatment infrastructure; (v) and all ancillary site development works necessary to facilitate the development erected under and in accordance with Reg. Ref's. F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109. This application is accompanied by An Environmental Impact Assessment Report (EIAR).</p>	Withdrawn	
FW20A/0029 / ABP-310169-21	<p>Retention planning permission is sought for the permanent continuation of use of the existing waste processing and transfer facility for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end of life vehicles, accepting up to 24,900 tonnes of waste per annum. Retention permission is also sought for the continued use of the existing buildings on site associated with the daily operations of the facility including processing shed, offices, plant room, shelter buildings etc.,</p>	Refused on appeal	Granted by PA, refused on appeal.



	<p>existing site services, boundary treatments and all ancillary site development works necessary to facilitate the development erected under and in accordance with Reg. Ref's. F13A/0409, F11A/0443, F10A/0177, F03A/1561, F03A/1682 and F97A/0109. Planning permission is sought for new proposed stormwater attenuation storage tanks and associated stormwater treatment infrastructure to serve the existing development with permission also sought to restore part of the lands to agricultural use.</p>		
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FIRE PREVENTION PLAN
for the
RECYCLING CENTRE
at
ST. MARGARET'S RECYCLING & TRANSFER CENTRE LTD,
SANDYHILL,
ST. MARGARET'S,
CO. DUBLIN.
WFP-FG-0002-03.



<u>DATA PAGE.</u>	
Client:	<i>St. Margaret's Recycling & Transfer Centre Ltd.</i>
Address:	<i>Sandyhill, St. Margaret's, Co. Dublin.</i>
Date of Assessment:	<i>25th May 2023 & 20th December 2023 & June 2024.</i>
Assessor:	<i>Thomas P. English, Chartered Engineer.</i>
Responsible Person(s):	<i>Brian McDonnell, Managing Director – 086 2654884.</i>
Use of Premises:	<i>Waste Recycling & Transfer Centre.</i>
Number of Floors:	<i>Lofty single storey production building with several levels of open mesh access platforms. Single storey portacabins.</i>
Construction:	<i>The main building is constructed and roofed with PVC coated metal sheeting on a steel portal frame. Ground floor is of concrete and upper levels and stairs thereto are of open mesh steel.</i>
Maximum No. of Employees & Visitors:	<i>There are approx. 30 employees and usually less than 5 visitors / members of the public on the premises at any time. Similarly with vehicle drivers.</i>

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STATEMENT BY THE CHIEF EXECUTIVE OFFICER (C.E.O.).

Notwithstanding the specific requirements of legislation, St. Margaret's Recycling & Transfer Centre Ltd recognises the need to ensure proper and effective fire safety precautions are implemented about the premises, to ensure that the potential threat of fire is minimised in so far as is reasonably practicable.

St. Margaret's Recycling & Transfer Centre Ltd has a commitment to continually monitor fire safety precautions throughout the premises under its control in order to ensure compliance with the *Fire Services Acts 1981 & 2003* and all prevailing statutory fire safety legislation, including the requirements of *Technical Guidance Document B – Fire Safety (2006) (Reprint 2020)*. This commitment undertakes to ensure the priority of life over that of property at all times.

The aim of the Fire Prevention Plan is to detail the structure of the organisation and the management of fire safety within the premises with all procedures for dealing with fire related incidents can be found enclosed within this document.

It is vital to the effectiveness of the Fire Prevention Plan that the document is available to all operators / staff, that they know and understand its contents and are aware of their own role in ensuring a fire safe environment.

A copy of the Fire Prevention Plan document will be held in the Document File of St. Margaret's Recycling & Transfer Centre Ltd (which is available and accessible to all employees on Bright HR), and further soft and hard copies will be kept in the Main Office on site for reference purposes for all staff members and contractors requiring same and in particular detailing their roles in the event of a fire occurrence within the operations of St. Margaret's Recycling & Transfer Centre Ltd.

All new operators / staff joining St. Margaret's Recycling & Transfer Centre Ltd will be made aware of the existence and location of the Fire Prevention Plan document(s) at the mandatory staff induction.

The scope of the Fire Prevention Plan document is to ensure that, if possible, outbreaks of fire do not occur on these premises and that, if they do, they are rapidly detected, effectively contained and quickly extinguished.

The Fire Prevention Plan is designed to give guidance on fire safety and fire prevention matters to the Person(s)-In-Control, the Board of Directors, the Line / Department Management and operators / staff and should be a ready source of reference / information at all staff levels.

Signed:

Brian McDonnell.
Chief Executive Officer.

Date: / / .

1. INTRODUCTION.

- 1.1.** This document presents the Fire Prevention Plan for the premises known as **St. Margaret's Recycling & Transfer Centre Ltd, Sandyhill, St. Margaret's, Co. Dublin.**
- 1.2.** The Fire Prevention Plan has been prepared in accordance with and using the plan template included in the guidance provided by the U.K. Environment Agency Guidance – *Fire Prevention Plans: Environmental Permits* (2021).
- 1.3.** The Fire Prevention Plan addresses the entire premises including the buildings, the yards and all areas where combustible materials are handled and stored. It is designed to meet the following 3 key objectives:
- (i)** Minimise the likelihood of a fire happening;
 - (ii)** Aim for a fire to be extinguished within 4 hours;
 - (iii)** Minimise the spread of fire within the site and neighbouring sites.
- Minimising the likelihood of a fire happening is the highest priority to prevent environmental harm.
- 1.4.** The Fire Prevention Plan has been developed on the basis of the drawings {*Appendix I – Site Layout Plan*} and other design information and considerations detailed in *Appendix II – Roads for Permit Review*.
- 1.5.** It is vital to the effectiveness of the Fire Prevention Plan that the document is available to all operators / staff, that they are trained in and understand its contents and are aware of their own role in ensuring a fire safe environment.
- 1.6.** A copy of the Fire Prevention Plan document will be held in the Document File of St. Margaret's Recycling & Transfer Centre Ltd (which will be available and accessible to all employees on Bright HR), and further soft and hard copies will be kept in the Main Office on site for reference purposes for all staff members and contractors requiring same, and in particular detailing their roles in the event of a fire occurrence within the operations of St. Margaret's Recycling & Transfer Centre Ltd.
- 1.7.** All new operators / staff joining St. Margaret's Recycling & Transfer Centre Ltd will be made aware of the existence and location of the Fire Prevention Plan document(s) at the mandatory staff induction and will be given relevant guidance / training thereon.
- 1.8.** Management is responsible for ensuring that fire prevention procedures are established and enforced, that fire suppression systems and extinguishers are inspected regularly and maintained and that employees are trained to use fire extinguishers for incipient fires whilst all employees are trained in relation to evacuation routes and procedures.

St. Margaret's Recycling & Transfer Centre Ltd.

- 1.9.** Management is responsible for monitoring the use of combustible materials, training employees in the safe storage, use and handling thereof and for ensuring that the storage areas for combustible materials are properly maintained as described in this document.
- 1.10.** All operators and staff are responsible for following the requirements of this Fire Prevention Plan for the safe storage, use and handling of flammable and combustible materials.

2. DESCRIPTION OF THE PREMISES – LOCATION & LAYOUT.

2.0. Premises Location & Description.

- 2.1.** The premises are located at Sandyhill, St. Margaret's, Co. Dublin adjoining St. Margaret's by-pass, R122. Dublin Airport is to the east with the southern run-way to the south east. Dublin Airport lands extend to within 240m of the south of the subject site. Lands bounding to the north, south and west are currently in agricultural use. Those to the north and east are within the ownership of the applicant. The premises has been in operation here since 1997.
- 2.2.** The site is located close to the village of St. Margaret's, which is located across the regional road (R122). The R108 is located to the south.
- 2.3.** The site is currently occupied as a Recycling & Transfer Centre, the main activity of which is the metal recycling and de-polluting of End-Of-Life Vehicles (E.L.V.) where they are brought to site, sorted, stored, processed, broken up and prepared for transfer to the next stage of the recycling process. Metals involved are both ferrous and non-ferrous.



Google Earth View of St. Margaret's Recycling & Transfer Centre.

St. Margaret's Recycling & Transfer Centre Ltd.

The site until recently also provided a metal skip and battery collection service as well as a tipping point (for a wide range of customers to promote recycling and reduce the occurrence of illegal fly tipping). This service is no longer available.

2.4. The site area is given as 2.93ha (5.9acres).

2.5. The facility comprises of the following:

- (i)** Concrete hardstanding entrance laneway and public parking area in the north-western corner;
- (ii)** Concrete hardstanding area for storage of cars awaiting de-pollution (per Standard Operating Procedure Doc. Ref. P7.0.C / DEPOL) and storage of parts;
- (iii)** Large covered waste processing shed including de-pollution area in the western portion of the site;
- (iv)** Site offices, welfare facilities and a weighbridge located in close proximity to the entrance along the northern boundary of the site;
- (v)** Concrete hardstanding area for storage of de-pollution cars;
- (vi)** Secure perimeter fencing about the site.

2.6. The layout and operational aspects of the facility is as follows:

- (i)** The main processing buildings and structures are predominantly located to the north and north-west and clustered around the site entrance. This includes a large extended shed to the south of the entrance referred to as the Main Processing Shed and a number of portacabins, welfare facilities and site offices located to the northern site boundary. A septic tank and percolation area are located to the rear of these portacabin units. A weigh-bridge is positioned immediately south of the portacabins for weighing of incoming and outgoing vehicles.
- (ii)** Compartmentalised storage areas / bunkers are located to the northern and eastern boundary of the premises. These contain materials such as stainless steel, aluminium, wheel alloys, cables and non-ferrous materials. The majority of the operations and storage / sorting of materials takes place in the open, centrally within the premises, and to the east and south of the Main Processing Shed.
- (iii)** The area to the south contains an electrical plant room, and is shown as accommodating baled cars, de-polluted end-of-life vehicles awaiting processing and ferrous materials for processing and post-processing. The hammer mill and a movable grab (used for feeding materials for processing) are also located in the south end of the premises.
- (iv)** To the east of the premises is a gated area which is separated from the main site by concrete panels and containers. This is intended to be restored to agricultural use in due course and has a separate and independent access via a driveway and entrance to the R122, 95m north of the junction of the R122 and the L7231 Newtown Cottages access road.

St. Margaret's Recycling & Transfer Centre Ltd.

- 2.7.** Metal recycling and de-polluting end-of-life vehicles are the main activities at the facility. Metals are both ferrous & non-ferrous. There is no public access to the facility except for the delivery of end-of-life vehicles by their owners.
- 2.8.** The Waste Facility Permit on these premises is regulated to take in 21,900 tonnes per annum. The layout drawing in *Appendix 8* enclosed (*Drawing No. 1522-DR02 Rev. 04*) shows the infrastructure and designated storage areas of the premises.

Table 1 below provides the applicable approximate volumetric capacity limits.

The site is separated into 3 x zones for purposes of surface water management as per layout drawing No. 1522-DR01 Rev. 03. The table below is an approximation of volumetric capacity per zones (Zone A – South, Zone B – North-West, Zone C – North-East).

WASTE.	CAPACITY (m³).	WASTE.	CAPACITY (m³).
ZONE A {South}.		ZONE B {North-West}.	
Ferrous for Processing.	1500.	Storage Bays (x 2).	135.
Processed Ferrous Metals.	1500.	Intake of Ferrous from Trade Customers.	480.
Baled E.L.V.'s.	350.	Main Processing Shed.	350.
De-Polluted E.L.V.'s.	2000.	Smaller Non-Ferrous Shed.	150.
ZONE C {North-East}.		Combustible Waste.	Capacity (m³).
Storage Bays (x 10).	675.	Non- De-polluted E.L.V.'s.	1000 (max. 132m³ Stockpile).
Processed Steel.	3000.	Fragmentizer Waste.	1000 (max. 132m³ Stockpile).
		Paper, Tyres, Plastic.	132.

2.9. Primary Combustible Materials.

- (a) The types of materials on-site that could be considered combustible are primarily:
- (i) Paper / cardboard;
 - (ii) Plastics;
 - (iii) Rags;
 - (iv) Scrap metals (contaminated or mixed with other waste such as oils or plastics) (refer to Standard Operating Procedure Doc. Ref. P5.2.K / OILFUEL);
 - (v) De-polluted and un-depolluted E.L.V.'s;
 - (vi) Rubber (natural or synthetic including whole tyres, baled tyres, tyre shred/ crumb / fibre);
 - (vii) Fragmentizer waste (including waste from the processing of E.L.V.'s, plastics and metal wastes);
 - (viii) Waste oil (petrol, diesel, hydraulic, transmission and engine oils);
 - (ix) Batteries;
 - (x) Hydraulic, Transmission and Engine Oils;
 - (xi) Diesel.

(b) Engine Oil:

The first activity as part of the de-pollution process is the draining and removal of any residual engine oils. Other activities are conducted in parallel, but the engine oil removal can typically take 20 minutes to reach the point where no further draining is visible.

Engine oil is usually gravity drained by removing the drain plug at the bottom of the sump and collecting the oil for a minimum of 20 minutes or until such time as no visible further draining of oil is witnessed. The oil is collected in a suitable container which has a minimum volume of 10 litres.

(c) Transmission Oils:

Transmission oils, i.e. manual or automatic gearbox and rear differential oils, are allowed to gravity drain for a minimum of 10 minutes or until such time as no visible further draining of the oil is witnessed. Transmission oil is collected in a suitable container which has a minimum volume of 5 litres. Gearboxes without drain plugs may be gravity drained by suitable drilling or piercing.

Power steering oils are extracted from both the reservoir and the connecting hose. For the reservoir, similar equipment as the brake fluid (see below) should be used. For the hose, fluid can be removed by either cutting at the lowest point and allowing gravity drainage or piercing and sucking out the fluid.

(d) Hydraulic Oils:

Hydraulic oils, i.e. brake and clutch fluid where applicable, is removed using equipment which uses suction and / or pressure on both the reservoir, brake pipes and cylinders. Drainage time is usually approx. 10 minutes until no visible fluid left in the reservoir and there is no visible further drainage following removal of the suction equipment.

(e) Coolant:

Coolant is gravity drained by removing the bottom hose from the radiator for a minimum of 10 minutes or until such time as no visible further draining of oil is witnessed. Coolant is collected in a suitable container which has a minimum volume of 10 litres.

(f) Screen Washing Fluid:

Screen washing fluid is sucked from the bottom of the reservoir. In E.L.V.'s with bent filler pipes, it is usually preferable to drain from below. No visible amount of fluid should be left in the reservoir(s).

(g) Fuel Tank (except L.P.G.):

Batteries are always removed before the fuel tank is de-polluted to prevent the possibility of electrical discharge igniting the fuel. Batteries have usually been removed by others prior to the E.L.V. coming onto the premises.

To achieve a high level of de-pollution, a hole should be pierced or drilled into the lowest point of the fuel tank and suction used to remove any residual fuel. No vapours should be released using this method.

Piercing or drilling should be done with a suitable non-sparking material and pneumatically powered with an earthing connection made between the vehicle and the extraction equipment. Commercial equipment should meet these requirements.

If a saddle-shaped fuel tank is fitted to the E.L.V., it may be appropriate to pierce or drill two low points so all the fuel can be extracted.

(h) Suspension System:

Suspension systems usually consist of shock absorbers, gas shock absorbers or sealed suspension systems.

Shock absorbers should have the fluid / oil removed from both the inner and outer cylinders without removing the shock absorber from the E.L.V.

Gas shock absorbers should have the gas removed. The equipment required therefor should be confirmed for suitability with the Manufacturer of the equipment, and any other additional safety requirements specified should be followed.

Sealed suspension systems should be drained using appropriate equipment as per Manufacturer's Instructions.

In each situation, no further visible draining of fluids should occur after the procedures above.

(i) Catalyst:

Catalysts can be removed safely with the use of the correct cutting equipment by cutting the exhaust pipe, both in front of and behind the catalyst unit. This may also be done more for financial benefits rather than de-pollution activities.

(j) Air Conditioning Refrigerant:

Air conditioning refrigerants are removed using specialist equipment and separate collection cylinders for both of the refrigerant gases in use i.e. R12 (a CFC) and R134a (a HFC). The equipment must be securely attached to the air conditioning valve to remove all the fluid whilst transferring it to the appropriate cylinder.

Fluorinated gases (F-gases) require operatives to be formally trained and in possession of a duly accredited certificate of competence.

(k) L.P.G. Tank:

As with electric or hybrid vehicles, no L.P.G. vehicles are accepted at the facility for de-polluting.

(l) Switches Containing Mercury:

Switches which are identified as containing mercury should be removed during the de-pollution procedure.

(m) Other Hazardous Items:

Older E.L.V.'s may contain asbestos containing materials (A.C.M.) in brake pad linings which must be removed if present. Procedures used to remove asbestos containing materials (A.C.M.) should follow the applicable health and safety guidelines for asbestos containing materials (A.C.M.).

In the event of fire, asbestos is indestructible and will be released into the surrounding air creating additional environmental and health & safety problems.

(n) Removal or Deployment of Air Bags:

Potentially explosive materials such as those contained in air bags and seat belt pre-tensioners should either be removed or set off / deployed in situ (which is the the recommended option).

Only appropriately trained personnel, using appropriate equipment, should carry out airbag removal or deployment.

Where deployment is the chosen option, it should be conducted in a secure non-hazardous area. No person should be within 10m during deployment. Once deployed the explosive content is neutralised.

(o) Post De-pollution:

After de-pollution activities, all gravity drained holes should be plugged, either with their own drain plug or a suitable plastic bung, to prevent any residual leakage. Once an E.L.V. is fully de-polluted it should be stored on a hardstanding or impermeable surface.

Maximum pile sizes should be in accordance with the following table:

Material.	Maximum Height (m).	Maximum Length / Width (m)	Maximum Volume (m³).	Maximum Area (m²).	Maximum Separation (m).
Rubber (incl. Tyres).	5.	20.	450.	235.	6.
Frag Waste from De-polluted E.L.V.	5.	20.	450.	235.	6.

St. Margaret's Recycling & Transfer Centre Ltd.

(p) Rubber:

The rubber (natural or synthetic) on the premises including whole tyre, baled tyre, tyre shred, crumb and fibre is currently being phased out in the near future as the intention is that these materials will be removed for recycling by others prior to the end-of-life vehicles arriving here.

(q) Frag Waste:

The frag waste here includes waste from processing E.L.V.'s and plastics and metal wastes from materials recovery facilities.

NOTE: *There are no Persistent Organic Pollutants (P.O.P's) or W.E.E.E. on these premises.*

NOTE: *Gas cylinders and aerosols are not accepted on site.
{In case of entry into site the items will be quarantined and removed from site by the producer without delay}.*

2.10. The plant and equipment in use on the premises and their function are listed in the following table:

Description.	No. Off:	Function.
Weighbridge.	1.	Evaluate / Weigh Loads in & out.
Telehandler.	1.	Loading / Unloading / Moving / Sorting.
360° Excavator.	5.	Loading / Unloading / Moving / Sorting.
Baler.	1.	Baling of Metal for Export.
Pre-Shredder.	1.	Segregate Waste prior to Shredder.
Shredder.	1.	Reduce Size of Mixed Waste.
Forklift Trucks.	5.	Loading / Unloading / Moving / Sorting.
H.G.V.'s.	7.	Movement of Waste to / from the Site.

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NOTE: *This Fire Prevention Plan is of the view there are in effect no non-combustible materials on site as all materials are potentially combustible. However, each one will have varying auto-ignition temperatures so their reaction to fire may be delayed but also may, given sufficient time, ignite.*

2.11. Security.

There is a manned reception area at the front during opening hours where all persons accessing the premises must call into. There is a management presence on the premises at all times during opening hours.

There is a manned security (P.S.A. licensed) presence on the premises outside of opening hours.

(i) Method used to record & manage storage times.

The premises logs all incoming wastes to record the dates and relevant information. These records are kept within the Main Office along with remaining storage capacity within the bays, details of pick-ups, etc. to ensure that the site does not stockpile combustible materials for prolonged periods of time.

(ii) Stock Rotation Policy.

Stock rotation involves the ongoing use of material handlers to either remove the waste to disposal for further treatment or to continuously rotate the stock to ensure no waste remains in storage for more than a week.

(iii) Monitor & Control Temperature.

Visual inspections of the stockpiles are carried out supplemented by means of the use of multiple CCTV units (31 units in total at present) located about the premises.

There is an ongoing exercise to upgrade 16 of the existing appropriately located CCTV units to Hikvision Bi-Thermal CCTV cameras in coming months.

(iv) Manage Waste Stockpiles.

The equipment and resources utilised in the operation at the site expedite the treatment and export of the wastes, whether segregated or prepared for onward treatment, for disposal within days of delivery, usually within one week.

(v) Storing Waste Materials in their Target Form.

End-Of-Life Vehicles in the designated storage bays of the de-pollution area are stored and assigned, as per material specifications.

(vi) Maximum Stockpile Sizes.

The site Waste Facility Permit is regulated to take in 21,900 tons per annum. See table showing stockpile limitations and separations in *Section 2.8* above and *Appendix IV - Current Stockpile Storage In Tonnage {As At 4/5/2024}* and storage bay dimensions in *Appendix II*.

2.13. Site Plans & Maps.

This Fire Prevention Plan includes a Site Layout Plan {shown in *Appendix I*}, Site Layout {as at 13/5/2024} {shown in *Appendix II*} and Roads Layout for Permit Review {shown in *Appendix III*}.

This is a scale to size copy of the overall Site Layout Plan {which is drawn to A1 scale size}. The A1 scale layout plan should be utilised for all references to drawings. A copy thereof will be maintained on site. The A1 sized drawings show the following details:

- (i)** The layout of the buildings on the premises;
- (ii)** Any areas where hazardous, combustible or flammable materials are stored on the premises (i.e. process areas, chemical storage, stacks of combustible wastes, oil / fuel tanks, etc.);
- (iii)** The location of all permanent ignition sources on the premises and their relative position to any storage of combustible and flammable waste;
{Best practice suggests a minimum gap of at least 6m};
- (iv)** Any areas where combustible waste or combustible non-waste materials are being treated or stored;
- (v)** All relevant separation distances between buildings, storage, stacks, etc.;
- (vi)** Any areas where combustible liquid wastes are being stored;
- (vii)** Any areas where de-pollution of E.L.V.'s take place;
- (viii)** Any areas where crushing, shredding, baling of metals or E.L.V.'s take place;
- (ix)** The main access routes for fire engines and any alternative access routes;
- (x)** The location of any access points around the perimeter of the premises to assist fire-fighting;
- (xi)** The location of hydrants, water supply sources and bulk water storage / supplies;
- (xii)** Areas of natural and unmade ground;
- (xiii)** The location of drainage runs, pollution control features (i.e. drain closure valves, etc.) and fire water containment systems (i.e. bunded or kerbed areas, etc.);
{These details are also on a separate drainage plan for the premises, a copy of which is maintained on site};
- (xiv)** Location of storage areas with stack / pile dimensions and fire wall details (where applicable);
{This includes details of wastes stored in a building, bunker or containers, with indicative pile layouts and geographically representative};
- (xv)** The specification, construction and dimension of all Fire Walls and Bays that offer a thermal barrier, plus the actual fire rating thereof;

- (xvi)*** The location of the designated quarantine area and the volume of waste that it can hold;
- (xvii)*** The location of fixed plant / machinery and where mobile plant is stored / parked when not in immediate use;
- (xviii)*** The location of emergency spill kits;
- (xix)*** The location of quarantine areas;
- (xx)*** The location of fire-fighting points (See *Appendix XII*);
- (xxi)*** The location of Sensitive Receptors (See *Appendix XI*);
- (xxii)*** The location of anything site specific that may need to be added from time to time from experience.

3.0.

SENSITIVE RECEPTORS.

Sensitive receptors may include:

- (i)** Schools, hospitals, nursing and care homes, residential areas, workplaces;
- (ii)** Protected habitats, watercourses, groundwater, boreholes, wells and springs supplying water for human consumption;
- (iii)** Roads, railways, bus stations, pylons (on or immediately adjacent to the site only), utilities, airports, etc.

See attached Sensitive Receptor Plan (*Appendix XIV* below).

NOTE: *The facility is located between the junction of the R122 and R108 regional roads, in close proximity to Dublin Airport and its runway. St. Margaret's National School is about 200 metres northwest from the facility boundary and St. Margaret's church is about 250 metres northwest from the facility boundary.*

There are a number of one-off houses to the west of the R122. The site is approximately 500 metres from the Huntstown River and the site drainage outfall has connectivity therewith overseen by the Fingal County Council. There is a groundwater well serving the site, PW1.

4.0. FIRE PREVENTION OBJECTIVES.

4.1. Objectives:

The Fire Prevention Plan can be defined as a "coherent and purposeful arrangement of the fire protection and fire prevention measures which are, and will be, developed in order to attain specified fire safety objectives" which are as follows:

- (i)** The prevention, or at least the minimisation, of a fire occurring in the first instance;
- (ii)** The minimisation of the potential for the spread of fire within the premises and to neighbouring premises;
- (iii)** The implementation, development and maintenance of appropriate measures to ensure that any fire on the premises is controlled within 4 hours;
- (iv)** The implementation and maintenance of measures to ensure that adequate sources of water for fire –fighting purposes are available when required;
- (v)** The provision of appropriate training to all staff which is sufficient to enable them fulfil their role as an Emergency Incident Manager in a fire or similar emergency;
- (vi)** The provision of such information, methodologies and techniques necessary to carry out an appropriate risk assessment of any situation in order to manage it successfully by means of team building, the assignment of tasks and the enabling of good decision making.



4.2. Access to the Fire Prevention Plan.

The designated Fire Safety Manager will ensure all of the following parties have access to the Fire Prevention Plan at all times and have read and understood the Plan:

- (i)** All members of staff – both permanent and part-time;
- (ii)** All third party contractors coming onto the premises for specific purposes;
- (iii)** Emergency / Fire Services Personnel / Officers.

4.3. Duties & Responsibilities of the Fire Safety Manager:

The Fire Safety Manager of St. Margaret's Recycling & Transfer Centre Ltd is responsible for the implementation and development of the Fire Prevention Plan. This will involve reviewing the Fire Prevention Plan on an annual basis and amend when required due to changes to legislation, best Practices, E.P.A. / Fingal Co. Co. requirements, etc. or when changes occur to the operations or activities of St. Margaret's Recycling & Transfer Centre Ltd.

4.4. Management of the Fire Prevention Plan.

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The Fire Prevention Plan will be uploaded to the Document File of St. Margaret's Recycling & Transfer Centre Ltd (which is available and accessible to all employees on Bright HR), and a soft and hard copy will be kept in the Main Office on site for reference purposes for all staff members and contractors requiring same and in particular detailing their roles in the event of a fire occurrence.

Effective implementation of the Fire Prevention Plan will require support from all employees. This Fire Prevention Plan will be made available to all new employees at induction

4.5. Testing the Fire Prevention Plan & Staff Training.

Testing of the Fire Prevention Plan will be ongoing and elements thereof will be checked e.g. fire- fighting equipment to be checked daily, water fire-fighting equipment (i.e. hoses, hydrants, etc.) where possible, operated at least weekly, etc., all overseen by the Fire Safety Manager and undertaken by the Fire Warden for the particular area.

Recording of the weekly inspections will be on the Record Sheet in Appendix VIII.

All members of staff will attend annual fire-fighting training which will include training on Risk Assessments.

4.6. Achievement of the Objectives of the Fire Prevention Plan:

The objectives detailed above in this Fire Prevention Plan will be achieved by means of a combination of the following measures:

- (i) The design and layout of buildings;
- (ii) The management of any areas where hazardous and flammable materials are stored on site;
{Note: This includes the management, location and segregation of quantities of gas cylinders, process areas, chemicals / substances / materials, piles of combustible wastes, oil and fuel tanks, etc.};
- (iii) The identification of all permanent ignition sources on the site and ensuring that they are a minimum of 6m away from where any combustible and / or flammable waste is being treated or stored;
- (v) The identification and management of separation distances between storage areas;
- (vi) The identification and management of areas where combustible liquid wastes is stored;
- (vii) The identification and management of areas where de-pollution of E.L.V.'s takes place;
- (viii) The identification and management of areas where crushing, shredding, baling of metals or E.L.V.'s take place;
- (ix) The provision and maintenance of unobstructed access routes for fire engines;
- (x) The provision and maintenance of access points around the site perimeter to assist fire-fighting operations;
- (xi) The provision and maintenance of hydrants and adequate supplies of water supplies for fire-fighting purposes;

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- (xii)** The identification and management of areas of natural and / or unmade ground;
- (xiii)** The provision and maintenance of drainage runs, pollution control features (i.e. drain closure valves, etc.), and fire water containment systems (i.e. bunded or kerbed areas);
- (xiv)** The provision and maintenance of storage areas with pile dimensions and fire walls (where applicable);
{Note: This includes wastes stored in a building, bunker or containers}.
- (xv)** The appropriate location of fixed plant and the management of areas where mobile plant is parked when not in immediate use;
- (xvi)** The provision and appropriate location of spill kits about the site and the training of staff in the correct use thereof;
- (xvii)** The provision and maintenance of appropriate quarantine areas;
- (xviii)** The development of any additional site-specific measures that may need to be added from time to time; and
- (xix)** The use of Permit-To-Work formats and procedures when required for all Hot Works and other potentially hazardous practices.

The Permits-To-Work will either:

- (i)** have a specific condition requiring you to take appropriate measures to prevent fires on site and minimise the risk of pollution from them, including but not limited to those measures in an approved Fire Prevention Plan, or
- (ii)** require you to maintain a Fire Prevention Plan as part of the written management system which identifies and minimises the risks of pollution from the operations.

4.7. Use of the Fire Prevention Plan.

The Fire Prevention Plan forms part of the Management System for St. Margaret's Recycling & Transfer Centre Ltd. It is a stand-alone document within the overall Management System and both the Management and the operators / staff can easily refer to it.

In the event of an incident, the Emergency / Fire Services should be provided with a copy of the Fire Prevention Plan, if it is safe and practical to do so.

All operators / staff and external contractors working on the premises must be aware of and understand the contents of the Fire Prevention Plan so that they know what they must do in particular circumstances to initially prevent a fire happening and what to do if one actually does break out. These details should be provided to the employees of the relevant contractors at Induction on arrival on the premises and prior to commencing work. Formal records of this training must be maintained and the training should be refreshed every quarter for all contractors on site for long periods.

The operators / staff for St. Margaret's Recycling & Transfer Centre Ltd must receive appropriate and regular training in relation to the contents and use of the Fire Prevention Plan, as detailed in *Appendix IV*

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Regular exercises (at least one per year) should be held to test how well the Fire Prevention Plan works. These exercises will include (but not be limited to what operators / staff need to do to prevent a fire occurring) what they are expected to do during a fire if one breaks out and any other site specific information as may arise from the exercises or from best practice knowledge.

The exercises will be designed to fully test the Fire Prevention Plan, in addition to regular straightforward fire evacuation drills. Where considered necessary, external support will be introduced to review and oversee the Fire Prevention Plan exercises.

4.8. Review of the Fire Prevention Plan.

The Fire Prevention Plan will be formally reviewed at least once annually, usually following the completion of the test exercises therefor or where necessary if there is any reason to suspect it no longer meets the objectives of the referred guidance or there is a fire (actual or near miss), there is a change in some or all of the activities on the premises or there is a sizeable new residential development or school constructed nearby, etc. All revisions made should be formally recorded and operators / staff notified formally thereof.

Following revision of the Fire Prevention Plan, the revised version thereof should be advised to the operators / staff and other relevant shareholders and updated copies thereof should be added to the relevant copy locations as specified in *Section 4.6. above*

5.0. FIRE PREVENTION PLAN – IMPLEMENTATION.

5.1. Activities at the Premises.

The site is currently occupied as a Recycling & Transfer Centre the main activity of which is the metal recycling and de-polluting of End-Of-Life Vehicles (E.L.V.) where they are brought to site, sorted, stored, processed, broken up and prepared for transfer to the next stage of the recycling process. Metals involved are both ferrous and non-ferrous. A number of machines were in use, including two grab / handlers and a hammer-mill.

The general fire prevention techniques available for use here, as applicable, are as follows:

- (i)*** Keep storage, working areas and offices free of trash and clutter, i.e. maintain good housekeeping standards throughout the premises;
- (ii)*** Ensure that all passageways / corridors utilised as emergency evacuation routes are kept clear and unobstructed at all times, i.e. no materials are to be placed or stored in or across any such circulation routes;
- (iii)*** All emergency evacuation exit / doors are maintained secured but unlocked when the premises or a portion thereof the building is occupied;

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- (iv) The propping open of fire rated door sets or of emergency evacuations doors is strictly prohibited never be propped open;
- (v) Scheduled and random inspections of fire extinguishers (i.e. the location, accessibility and condition thereof) and the emergency evacuation routes is carried out by the E.H.S. Manager, with formal records thereof maintained;
- (vi) Operators and staff will be trained on fire safety matters {i.e. Fire Safety Awareness, Safe Use of Fire Extinguishers and Hose-Reels, Fire Warden / Marshall training, etc.} to a regular schedule, with training records thereon retained in the Main Office for review by authorised persons on request;
- (vii) Do not store combustible materials of any kind in electrical, mechanical / plant or communication equipment rooms;
- (viii) Regular maintenance is carried out as part of an ongoing Preventative Maintenance Programme (PPM) for all mechanical, mobile and production equipment and formal records thereof are maintained on file;
- (ix) Follow proper storage and handling procedures as directed by the product manufacturers;
- (x) Do not re-fuel gasoline / diesel-powered equipment while it is hot;
- (xi) Ensure that open flames are not permitted in any setting, except for supervised training drills or maintenance by third party contractors under appropriate Hot Work Permit-To-Work systems;
- (xii) Identify all potential heat sources and ensure that the areas about are maintained free and clear of materials with ample space around any heat source; and
- (xiii) Instruct external third party competent Fire Safety Consultants to carry out regular reviews of fire safety conditions and procedures on site.

5.2. Manage Common Causes of Fire.

Common sources of ignition include smoking materials, electrical faults, cooking, arson, hot processes, naked flames as a result of Hot Works (cutting, welding, brazing, etc.), spontaneous combustion, etc.

(i) Arson:

The key pillars of arson prevention are the presence of robust perimeter protection (2.5m high metal security fencing), CCTV (at present approximately 31 units distributed about the premises) and security measures, including the presence of P.S.A. Licenced security personnel on site outside of opening hours.

The main site entrance from the public roadway is locked at night and the site is patrolled by security guard dogs under the control of the security operative. Day time access is controlled to the main site via barriers which are lifted when access has been granted, with further access to the offices controlled by swipe / mag-lock doors.

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Access for small loads is at Customer Reception which is supervised during opening hours. All buildings are secured at night prior to the dogs being released. The site is also monitored by CCTV units at all time, with notifications of activity to the central monitoring station and to the directors' / key persons' mobile phones.

5.3. Plant & Equipment.

- (i)** The Facilities Manager will be responsible for maintaining equipment to prevent or control potential sources of ignition or fires therefrom as well as the proper mandated testing and maintenance thereof. All plant and equipment is serviced and maintained as part of the ongoing Planned Preventative Maintenance (PPM) programme and formal records thereof are maintained on file.
- (ii)** Details of the available fire suppression systems and manual fire-fighting equipment are detailed in *Appendix X* {Fire Inspection / Drill / Evacuation Document} and *Appendix XIII* {Fire-Fighting Points}.
- (iii)** The maintenance and inspection of all fire extinguisher and suppression systems under annual contract, and of the associated records, is the responsibility of the Facilities Manager.
- (iv)** A copy of the annual and weekly confirmation certification for each item of plant and equipment, and all in-house inspections by the E.H.S. Manager, must be kept with the Fire Register files for review by authorised persons on request.
- (v)** The plant and equipment in use on the premises and their function are listed in the table in *Section 2.10* earlier in this document
- (vi)** Only trained competent (and ticketed, if necessary) personnel are permitted to use / operate / drive any plant or equipment at any time.
- (vii)** Appropriate fire extinguishers are installed in each item of mobile plant / vehicles;
- (viii)** When not in immediate operation, all mobile plant must be parked well away from any combustible waste.
- (ix)** The following table details the plant & equipment used on site during the site waste operations.
{Note that only trained / competent, and where necessary ticketed, personnel are permitted to use / operate or drive the plant or equipment at any time}.

Description of Plant / Equipment.	Number of:	Function of Plant / Equipment.
Weighbridge.	1.	Evaluate & weigh loads in and out.
Telehandler.	1.	Loading / Unloading / Moving / Sorting.

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360° Excavators.	5.	Loading / Unloading / Moving / Sorting.
Baler.	1.	Baling of Metal for Export.
Pre-Shredder.	1.	Segregate Waste prior to Shredder.
Shredder.	1.	Reduce Size of Mixed Waste.
Forklift Trucks.	5.	Loading / Unloading / Moving / Sorting.
H.G.V.'s.	7.	Movement of Waste to / from the Premises.

5.4. Electrical Faults {including damaged or exposed Electrical Cables}.

- (i)** Any new or replaced elements of the existing electrical installation will be designed, installed and certified by a Registered Electrical Contractor (R.E.C.) in accordance with the requirements of *I.S.10101: 2020 – National Rules for Electrical Installations*, with at least Ingress Protection (IP65) Level 6 Solids Objects (Dust), Level 5 Protection against Water.
- (ii)** Appropriate confirmation certification will be available for all new installation work and a copy thereof will be retained in the Fire Register files.
- (iii)** The original / existing electrical installations about the premises were installed to the requirements of the previous version of the National Rules for Electrical Installations. Periodic inspections and testing of the various electrical installations must be carried out by a Registered Electrical Contractor (R.E.C.), with follow-up Periodic Inspection Reports (P.I.R.) issued at least every three years. Annual reports on any inspections and testing should also be provided as required, as well as the required certification detailed in *I.S.10101: 2020 – National Rules for Electrical Installations*.

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The following basic measures are also essential to minimise the risk of fire as a result of any faulty electrical equipment:

- (i)** Do not overload electrical outlets at any time;
- (ii)** Maintain free and clear access to all electrical panels and do not store materials (whether combustible or non-combustible) within at least 1m thereof;
- (iii)** All cupboards / enclosures about electrical panels along emergency evacuation routes should have a 60minute fire resistance rating;
- (iv)** All electrical cabinets should be vacuumed to a regular schedule to prevent the accumulation of dust, etc. therein;
- (v)** All portable electrical equipment should be checked and tested as part of a Portable Appliance Testing (P.A.T.) programmes at least on an annual basis for electrical safety of users, including a visual examination of any frayed or damaged cables, etc. {Formal records thereof will be retained in the Fire Register files};
- (vi)** The use of extension cords / leads should be prohibited other than for temporary use following a formal Risk Assessment of the specific requirements of the situation; connections, etc.;
- (vii)** Small electrical items / coffee makers shall not be placed on combustible surfaces (plastic or cloth mats, wooden counte-rtops, etc.) and all should be regularly P.A.T. tested to a specific schedule.

5.5. Discarded Smoking Materials.

Smoking is strictly prohibited throughout the premises at all times and clear signage to this effect has been erected about the premises.

5.6. Cooking.

There is no cooking on the premises at any time.

5.7. Hot Works.

- (i)** Standard Operating Procedures are in place in regard to Hot Works anywhere on the premises. The relevant contractor carrying out any such works will liaise in detail with the E.H.S. Manager prior to the commencement of works and produce a suitable agreed R.A.M.S. / Method Statement on the works including full details of the fire safety measures governing all such hot works. The contents thereof must be approved by the E.H.S. Manager prior to the commencement of any work on the premises.
- (ii)** A formal Hot Works Permit-To-Work must be completed and issued by the relevant contractor, and approved by the E.H.S. Manager of St. Margaret's Recycling & Transfer Centre Ltd, prior to every such work and the parameters thereof must be fully and closely followed at all times. The Hot Works Permit-To-Work will specific the applicable safety measures to be applied at

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all times, including requirements for the wearing of suitable PPE, the carrying out of a fire watch during and after the works and at the end of the working day, the presence and availability of suitable fire extinguishers, etc.

- (iii) Clear signage has been erected about the premises warning of the hazards of any type of Hot Works.
- (iv) No flammable substances will be allowed in or near any areas where any cutting or welding operations are likely to occur.

5.8. Industrial Heaters.

There are no industrial heaters on the premises at present and unlikely to be.

5.9. Hot Exhausts.

- (i) Random visual inspections / fire watches of all plant and equipment, including mobile plant / vehicles, are to be carried out during the day and during the final inspection at the end of each day prior to the closure of the premises by the relevant Line Manager and / or the E.H.S. Manager.
- (ii) All plant and equipment is regularly serviced and maintained and the condition (physical and operational) of the exhaust thereon are checked and reviewed.

5.10. Ignition Sources.

- (i) Potential ignition sources include naked flames from Hot Works, electrical faults, hot surfaces / processes, arson, spontaneous combustion, etc. The issues associated with each of these are dealt with in the appropriate section below.
- (ii) In the event that there are any ignition sources in place (whether from naked flames, space heaters, furnaces, incinerators, other sources of ignition), they must always be located at least 6m away from all combustible and flammable waste / materials. This will be checked on an ongoing basis as part of the daily and end-of-day fire watch inspections.

5.11. Batteries.

- (i) Batteries for disposal / recycling are stored in a designated storage area under cover which is fitted with a suitable automatic fire suppression system. Protocols in respect to storage include consideration of Manufacturer's Recommendations and Instructions. In addition, any damaged batteries are stored separately away from the undamaged ones.

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- (ii) Batteries have been removed for all End-Of-Live Vehicles (E.L.V.) prior to arriving at these premises.
- (iii) Batteries for disposal / recycling are removed off premises to a regular schedule.
- (iv) Separate arrangements will be put in place to store lithium batteries and Li-ion batteries from electric vehicles in a separate location from other batteries so that they cannot come into contact with any liquids or be damaged.

Should the requirement arise for any reason and, if damaged, lithium and Li-ion batteries will be stored in a waterproof container filled with sand or similar inert material and well away from any buildings or other combustible materials.

5.12. Leaks & Spillages.

- (i) The end-of-live vehicles are checked on arrival to ascertain if there are any fuels or combustible liquids / oils therein. If identified the particular materials are drained to suitable containers for onward recycling, as detailed above in Section 2.9..
- (ii) In the event of any leaks or spillages, the area is designed to contain such spillage which is immediately cleaned up to prevent transfer / trailing thereof by mobile vehicles or persons about the premises.
- (iii) Mobile vehicles on the premises are serviced to a regular schedule. In the event of any leakage of combustible liquids noted the vehicle is removed from operation and parked in a designated quarantine area until the leak is repaired without undue delay.
- (iv) All oily rags used for wipe-down and clean up purposes are placed in a covered metal container and disposed of properly and regularly, which also reduces any risk of spontaneous combustion arising therefrom.
- (v) Smaller quantities of flammable and combustible liquids are stored in suitable approved storage containers and cabinets and larger quantities in suitable bunded container tanks.

5.13. Build-up of loose Combustible Waste, Dust & Fluff.

- (i) Accumulations of loose combustible waste, dust & fluff will be swept up and removed on an ongoing basis. Daily visual inspections of the relevant areas will be carried out and, if not already noted by the operator, appropriate instructions for clean-up will be given thereto.
- (ii) Good housekeeping standards are essential and critical to the efficient operation of these premises.

5.14. Reactions between Wastes.

- (i) There are no recorded chemical or biological reactions in materials processed on these premises and no expectation of same.

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- (ii) In the event that there may be a reaction between any waste materials on these premises a quarantine area therefor will be set up.

5.15. Waste Acceptance & Deposited Hot Loads.

- (i) No hot loads or loads with elevated temperatures are accepted at these premises.
- (ii) When loads arrive, they are checked to ensure that the contents thereof are within the acceptance parameters of these premises, including inspecting for signs of heating (e.g. steam or smoke emissions, batteries (and in particular lithium-ion batteries), oils or other contaminants or rags soaked in oils or chemicals. If any such situation is noted the load is not accepted and is turned away.

5.16. Hot & Dry Weather.

- (i) The storage piles are constantly sprayed with a water mist as a dust reduction measure which has the additional effect of preventing a rise in temperature. Storage times are also minimised to enable fresh materials to come through the premises.
- (ii) Ongoing efforts are being made to ensure that there are little or no reflective surfaces about the premises.
- (iii) In the event of the materials resting for extra-long periods on the premises, a rotation policy will be applied, the frequency of which will be determined by temperature monitoring, the size and height of the stockpile, the materials therein and whether there is any risk of spontaneous combustion conditions developing.

5.17. Prevent Spontaneous Combustion (Self-Combustion).

- (i) Some materials can spontaneously combust, or self-combust, under certain conditions. Spontaneous Combustion (self-combustion) occurs when a material which can self-heat generates heat at a faster rate than it can be lost to the environment. The temperature continues to rise until the auto-ignition temperature is reached and the material then self-combusts or spontaneously ignites.
- (ii) Where there is any risk of spontaneous combustion conditions developing, a rotation policy for the stockpiles and continuous temperature monitoring will be applied, the frequency of which will be determined by the temperature monitoring, the size and height of the stockpile and the materials therein.

Where there is a potential risk of spontaneous combustion (self-combustion), the regular rotation policy will ensure that the waste remains cold and that any localised warming is dissipated quickly.

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- (iii)** To help prevent spontaneous or self-combustion, a maximum storage time for all materials on the premises is detailed to control and monitor this potential hazard.
- (iv)** The storage of all waste on the premises is recorded from arrival to departure and where necessary temperature monitoring is utilised in addition to good and regular stock rotation, which depends on the materials and the temperature conditions.
- (v)** All stock on the premises longer than a week is rotated, whether it requires to be or not. It is quite seldom that any specific materials are retained on the premises for more than 3 – 4 weeks at most (whether as a result of market conditions, strikes or seasonal variations) whether combustible or non-combustible wastes.
- (vi)** The usual policy here is that materials come and go on the principle of 'first in, first out'.
- (vii)** During planned and un-planned shutdowns of the premises, it is policy that all materials on the premises will be rotated on a weekly basis with temperature monitoring using a calibrated probe (with formal records of the result retained).
- (viii)** The heat generated in the materials from shredding, chipping or producing crumb is allowed dissipate naturally before the materials are placed in stacks / piles for storage.
- (ix)** Alarm triggers in relation to temperature and possible spontaneous (self-) combustion will include temperature, rates of temperature change over time, visual signs of heating, etc. The operators / staff will be advised and trained in what to look for and advised to raise any queries of concern in this regard without undue delays.

5.18. Waste Bale Storage.

- (i)** Baling here basically consists of baling of the E.L.V. metal for export or tyres with the stacks thereof being for short-term storage and to await collection thereof once or twice a week at least.
- (ii)** All E.L.V.'s are fully de-polluted before being baled.
- (iii)** Measures to enable storage of materials in baled form includes managing the stacks, rotating the materials therein regularly, minimise the stack sizes and height, store the materials in their largest form to minimise the risk of spontaneous / self-combustion and to limit the scale of any fire that may break out.
- (iv)** Treating waste to reduce particle size can increase the risk of fire due to spontaneous / self-combustion. Therefore to reduce the risk of spontaneous / self-combustion, store the waste material in its largest form for as long as practicably possible before treating and moving it off premises.

St. Margaret's Recycling & Transfer Centre Ltd.

- (v) For all waste piles, the maximum height allowed is 4m.
- (vi) When measuring height, you must use the longest measurement between the base of the pile and the top. This is to allow for any uneven ground beneath the waste. For all waste piles, the maximum length or width allowed (whichever is the longest) is 20m.
- (vii) If the waste piles contain a mixture of combustible wastes, the maximum limits based on the type of waste that makes up most of a mixed pile must be evaluated.
- (viii) If storing waste within a building, the design, access and layout of a building needs to be carefully considered so a fire can be extinguished easily and quickly by the Emergency / Fire Services.

The majority of bulk waste at these premises is in the open. The applicable maximum stockpile sizes are as follows:

MAXIMUM PILE SIZES.			
WASTE TYPE.	Loose & more than 150mm.	30mm to 150mm or baled.	Less than 30mm.
Tyres & Rubber.	450m³.	300m³.	300m³.
Wood.	750m³.	450m³.	300m³.

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<i>Compost & Green Waste (excluding during the Active Composting Process).</i>	<i>750m³.</i>	<i>450m³.</i>	<i>450m³.</i>
<i>R.D.F. & S.R.F.</i>	<i>450m³.</i>	<i>450m³.</i>	<i>450m³.</i>
<i>Plastics.</i>	<i>750m³.</i>	<i>450m³.</i>	<i>300m³.</i>
<i>Paper & Cardboard.</i>	<i>750m³.</i>	<i>750m³.</i>	<i>450m³.</i>
<i>Textiles.</i>	<i>750m³.</i>	<i>750m³.</i>	<i>400m³.</i>
<i>W.E.E.E. containing Plastics, including Fridges, Computers & Televisions.</i>	<i>450m³.</i>	<i>450m³.</i>	<i>450m³.</i>
<i>Metals other than W.E.E.E. (including crushed E.L.V.'s, which are classed as 'Baled' Waste for the Purpose of this table - for whole E.L.V.'s see the Section 'Whole End-Of-Life Vehicles'.</i>	<i>750m³.</i>	<i>450m³.</i>	<i>450m³.</i>
<i>Fragmentizer Fluff.</i>	<i>450m³.</i>	<i>450m³.</i>	<i>450m³.</i>

(ix) Whole E.L.V.'s, when stacked, must comply with the following conditions i.e.

- each vehicle must be accessible from at least one side (to allow active fire-fighting and so unburnt vehicles can be accessed and moved to prevent the fire spreading);
- any row must be limited to a depth of 2 vehicles and no more than 3 vehicles high (whether on racking or free-standing, so the stack can remain stable during a fire); and
- a separation distance of 6m must be maintained between rows / blocks of vehicles.

The quantities of stacked whole E.L.V.'S are minimal at these premises at any time.

(x) If waste is stored in containers that can be moved, the maximum pile size requirements do not apply. Each container must be accessible from at least one side so a fire can be extinguished.

{Examples of these types of containers include skips, roll-on roll-off skips, or shipping containers}.

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If there is a fire in a container, it must be possible to move the other containers away as soon as is reasonably practicable to prevent the fire spreading. There will be only a small number of containers on these premises at any time.

(xi) The two main methods to prevent a fire from spreading are:

- the maintenance of Minimum Separation Distances between stacks / piles / adjacent buildings / other combustible or flammable materials (usually a minimum of 6m) {to minimise the risk of fire spread between and to assist in enabling the Emergency / Fire Services to gain clear access to all sides for fire-fighting purposes}; or
- the erection of Fire Walls & Bays {which can resist fire (both radiative heat and flaming) and provide a fire resistance period of at least 120 minutes to allow wastes to be isolated and to enable a fire to be extinguished within 4 hours and thereby enable a reduction in separation distances}.

Sketches in *Appendix 1 (Pages 97 - 100)* of the Waste Industry Safety & Health Forum Guidance - *Waste 28 - Reducing Fire Risk at Waste Management Sites* - can be utilised as necessary to select and confirm the appropriate separation distances required.

(xii) A quarantine area is a designated area to place fire affected waste to ensure that it is fully extinguished or to move unburnt wastes into to isolate and prevent them catching fire.

The designated quarantine area is within the boundary of the site for which the permit has been granted and should be large enough to hold at least 50% of the volume of the largest pile / stack, row or block of E.L.V.'s or containers on the premises and have a separation distance of at least 6m around the quarantined waste (which can be reduced if concrete bunkers / walls are used). ***The current quarantine area is signposted within the large open sided building and adjacent to the tyre and battery storage.***

5.19. External Fire Spread:

- (i)** The office accommodation is within 3m of the Western elevation and there are no un-protected openings.
- (ii)** The main building and the hammer mill are located on the Southern elevation within 3m of the boundary fence and once again there are no unprotected openings.

The dust accumulation from the hammer mill does collect on the nearby fencing / foliage and this requires regular attention and wash-down as part of the management control therefor.

Consideration is currently being given to water spray projection along this elevation.

- (iii)** Stockpiles will not be stored on the boundary line and appropriate separation distances are applied.

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- (iv) Where concrete walls / barriers are utilised, the fire resistance rating thereof is at least 90minutes with much of it being 120minutes fire resistance rating.
- (v) The boundary line of the premises is appropriately managed to control any possibility of foliage spreading into the neighbouring fields.
- (vi) Containment of fire water run-off is achieved via bunds and storage lagoons.

5.20. Firewater Retention.

Containment of fire water run-off is achieved via bunds and storage lagoons.

5.21. Detecting Fires.

- (i) The primary means of fire detection during working hours is a combination of operator / staff awareness and the use of the CCTV units (with visual flame detection and / or spark, infrared and ultraviolet detection incorporated) which can detect significant thermal increases in stacks / piles (especially outside of working hours) and buildings and alert the remote alarm monitoring centre (A.M.C.).
- (ii) There is also automatic smoke and heat detection and suppression systems installed within the various buildings about the premises, which will activate a fire alarm with the remote alarm monitoring centre (A.M.C.) and activate an early response thereto.
- (iii) The confirmation Certificates for the Design, Installation, Commissioning and Servicing / Testing of the various automatic fire detection and alarm systems on the premises have been provided by the competent third party installers in accordance with the requirements of the relevant Irish Standard {I.S. 3218: 2013 + Amendment No. 1: 2019} therefor. A copy of these certificates are retained in the Fire Register files for review by authorised persons on request.
- (iv) A similar situation applies for the installed automatic fire suppression system. A copy of the confirmation Certificates for the Design, Installation, Commissioning and Servicing / Testing therefor are retained in the Fire Register files for review by authorised persons on request.
- (v) All automatic fire detection and alarm systems and automatic fire suppression systems are serviced and maintained on a quarterly basis by competent third party contractors and a Certificate of Servicing / Testing for each system is issued thereafter for each system, a copy of which is retained in the Fire Register files for review by authorised persons on request.

(i) Access & Facilities for the Emergency / Fire Services:

Basis of compliance is *Section 5, T.G.D. B (2006) (Reprint 2020)*, Technical Guidance Note *TGN7.01 – Reducing Fire Risk at Sites Storing Combustible Materials* and Guidance Note: *Fire Safety at Non-Hazardous Waste Transfer Stations*.

St. Margaret's Recycling & Transfer Centre Ltd has a Standard Operating Procedure (S.O.P.) in place in respect to the actions required in the event of fire, which utilises trained personnel using fire-fighting equipment provided i.e. hand-held extinguishers and hose reels fed from the various hydrants about the premises.

The strategy is simply to control and delay the fire until the local Emergency / Fire Services arrive and take control of the situation.

- (ii)** For Emergency / Fire Service operations to be successful, they must be able to access the site and fight the fire from as many avenues as possible. Therefore an alternative access has been identified to the south eastern elevation which will greatly enhance fire service intervention.
- (iii)** There must be enough water available for fire-fighting purposes so as to manage a reasonable worst case scenario. This could be a combination of water in storage tanks or lagoons on site and / or access to hydrants or a mains water supply.

The minimum reserves of water required for 4 hours operation for fire-fighting purposes have been determined by means of a Fire Safety Assessment as 960,000 litres.

If measures such as creating a fire break are in place, the fire-fighting water requirements for a 300 m³ pile of combustible material is at least 2,000 litres / minute for a minimum of 3 hours, which equates to a water supply of 360 000litres in total and which may be reduced further if an automatic infill or re-circulation system is present.

If storing E.L.V.'s, the requirement will be 1800 litres of water to extinguish each vehicle.

- (iv)** The current reserves of fire-fighting water reportedly consist of the following:

4 industrial sized water storage tanks, each with a reported capacity of 32,000 litres and 2 mobile water storage tanks with reported capacities of 10,000 and 20,000 litres respectively. This gives a combined water storage availability of 158,000 litres which, if maintained to the reported capacities, equates to 44% of the required total of 360,000 litres. Therefore, on a pro rata basis, stack sizes should not exceed 44% of 300m³ i.e.132m³.

It is proposed to augment the static supply with a hydrant supply to be provided by Irish Water from a local water supply. This will increase the capacity necessary to achieve the necessary reserve capacity.

St. Margaret's Recycling & Transfer Centre Ltd.

The provision of hydrants therefor is in accordance with the requirements of *Sub-Section 5.1.7 - Diagram 30 of T.G.D. B (2006) (Reprint 2020)*, and. *B.S. 750: 2012 - Specification for Underground Fire Hydrants & Surface Box Frames & Covers* {recently updated to *B.S. 750:2023 - Underground Fire Hydrants. Surface Box Frames & Covers*}.

- (v) It is noted the current above ground static supply does not meet the standard for the provision of static water supply as yet. As stated above it is intended to rectify this at the earliest date in conjunction with Irish Water.
- (vi) Additional measures to assist fire-fighting operations include the management of stacks in accordance with the requirements of *TGN7 / 01 Section 8* and the spacing between stockpiles in accordance with the requirements of *Figure 1, Table's 1 & 2 of TGN7 / 01*.

In addition, the robust segregation of stockpiles, protection from wind and improved definition of applicable spacing are all measures being implemented to provide increased prevention of fire spread between the stockpiles.

The increase in stock rotation periods of fragmentiser waste will also assist in reducing and minimising the applicable fire load.

- (vii) Stockpiles are no longer stored against buildings and fire-walls are used to enclose the fragmentiser.

7.0. EMERGENCY INCIDENT MANAGEMENT / CONTINGENCY PLANNING.

7.1. Assessment of Situation / Major Emergency Planning.

The decision to declare a Major Emergency Incident will be taken by the Fire Officer / Incident Commander who will take charge on arrival to the site and who will carry out an assessment having liaised with the Managing Director / Fire Safety Manager.

7.2. Major Incident.

One of the first actions to be taken, after calling the Emergency / Fire Services, will be to notify neighbouring properties.

7.3. Fire Safety Manager.

The Fire Safety Manager is the person who finds themselves in charge of an emergency in any premises which, in an emergency, is a very delicate, dynamic place and time controlled space. Their immediate actions and those of other team members will be vital to the outcome of the emergency. This will usually be the Managing Director who lives within 1km of the premises.

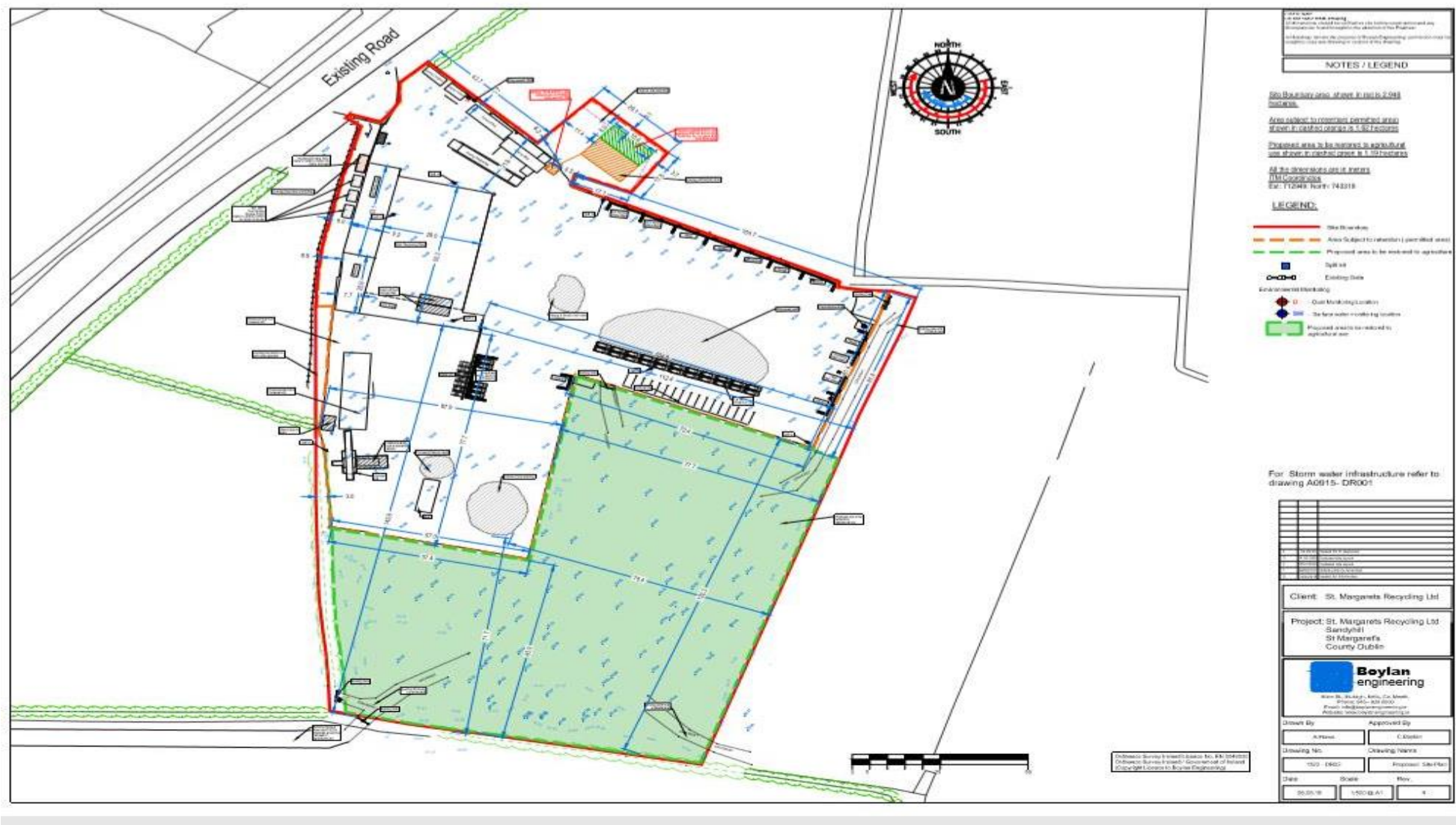
Based on existing Fire Safety Strategies, the Person-In-Charge will be the Emergency Incident Manager (E.I.M.) who will find themselves in charge of a disparate team who have come together in this unique once in a lifetime event. The E.I.M. has to assume all the emergency team members have received adequate training, have a good knowledge of the building / premises and of Emergency Incident Protocols.

The knowledge of the Fire Safety Manager has to be superior and their leadership qualities and management skills have to be excellent in an emergency situation. These attributes do not arrive overnight but are honed over time with previous experiences and training. Fire is usually a once in a lifetime event and is not a normal day-to-day activity. The training of staff is to provide them with the necessary tools and to prepare them for that once in a lifetime event for which we prepare but may never happen.

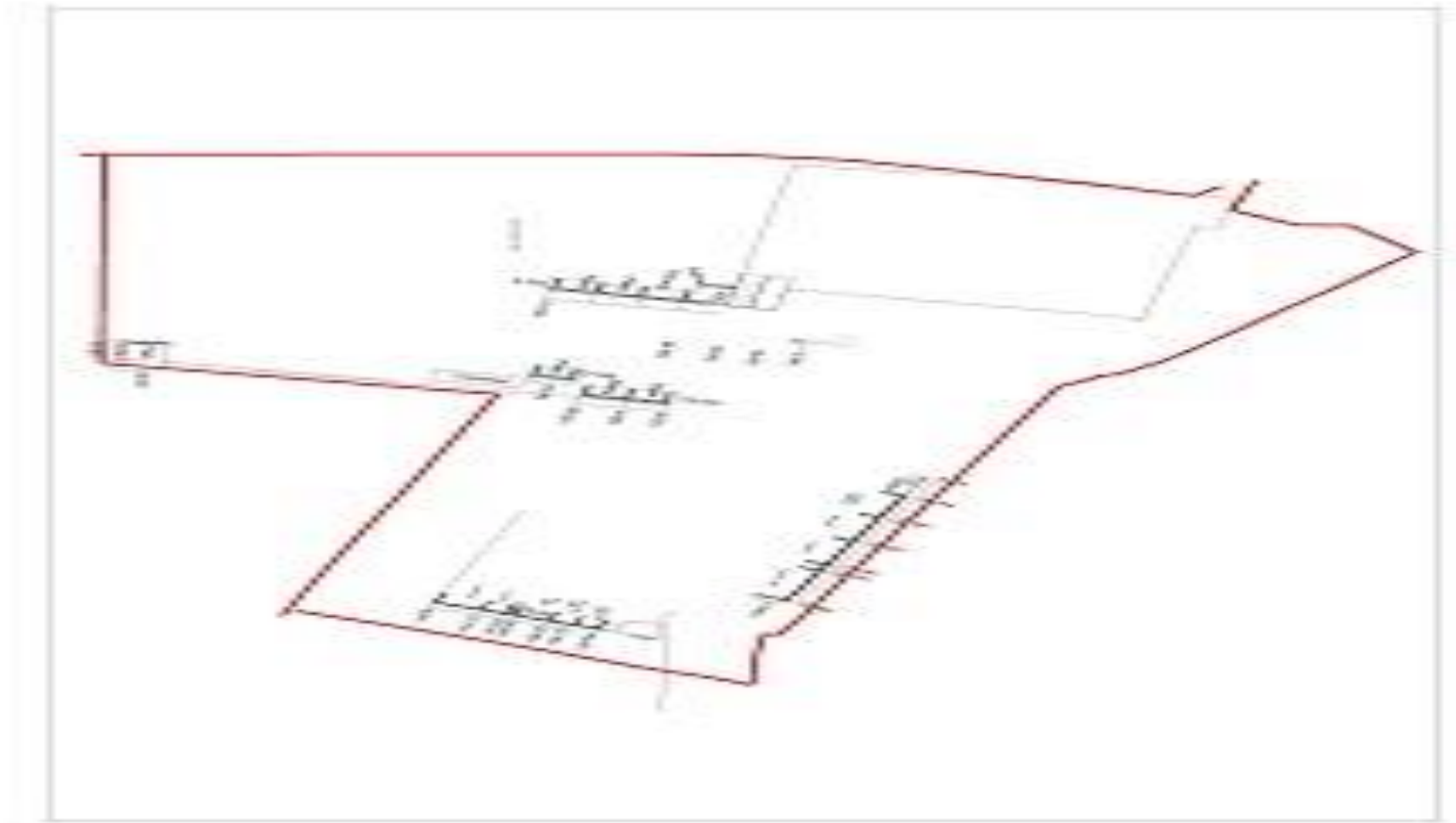
The Fire Safety Manager's primary duty is to ensure that all persons are removed to safety as soon as practicable, and to brief the Emergency / Fire Services Incident Commander on this / her arrival on site. On arrival the Incident Commander takes over and manages the emergency situation.

After fire has been extinguished and the Emergency / Fire Services have vacated the site, it will be necessary to clean up and decontaminate the site to make it operational again.

APPENDIX I: SITE LAYOUT PLAN.



APPENDIX II: **SITE LAYOUT {as at 13/5/2024}.**

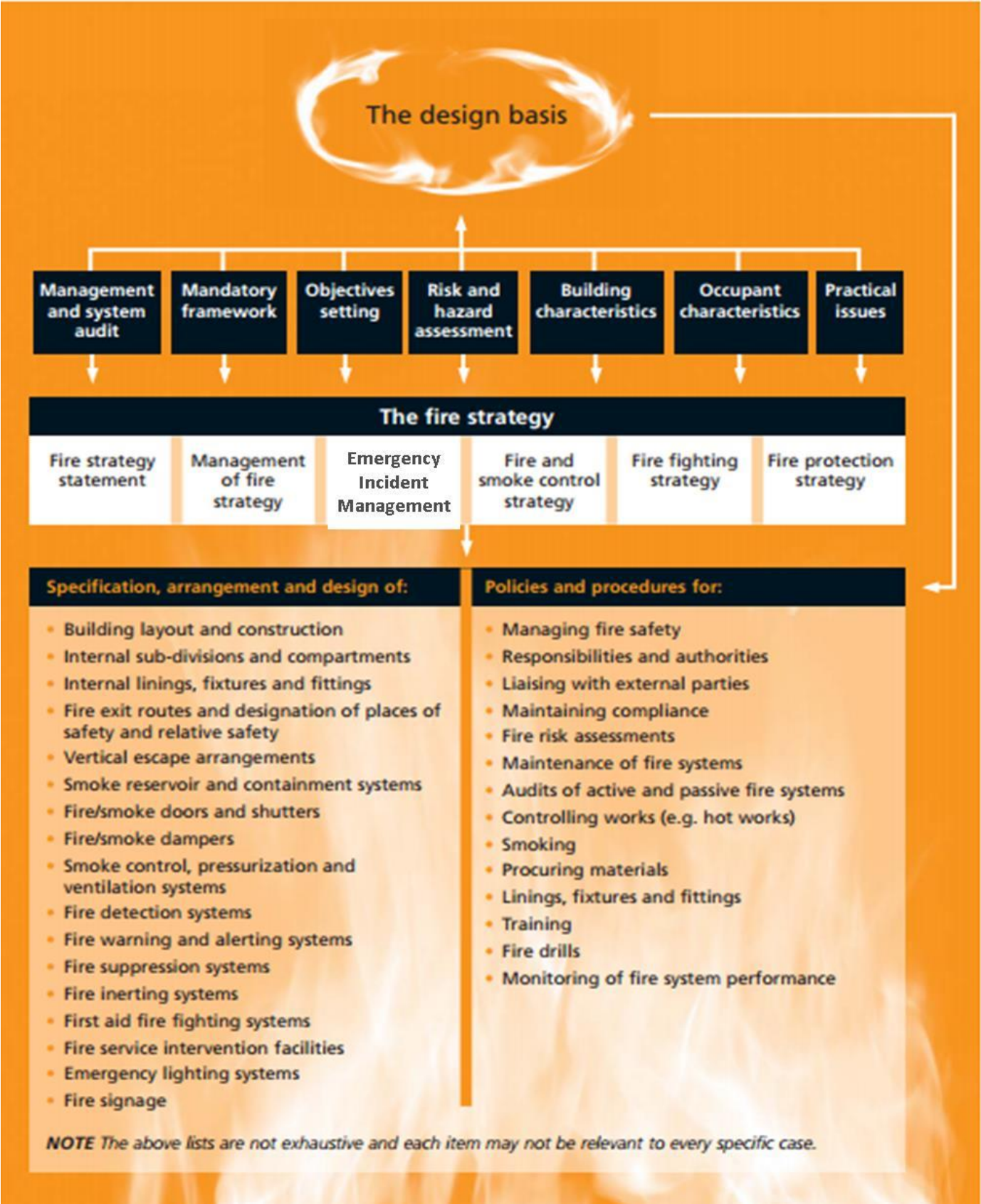


APPENDIX III: ROADS LAYOUT FOR PERMIT REVIEW.





APPENDIX V: DESIGN BASIS FOR THE FIRE PREVENTION PLAN.



APPENDIX VI: STAFF TRAINING PLANS.

It is the policy of St Margaret's Recycling & Transfer Centre Ltd to provide new staff members with the earliest possible fire safety information prior to commencing their duties. This will be achieved at induction.

Induction training takes two forms viz. Orientation Training and Induction Training.

No new staff member will commence their duties without receiving Orientation Training, which will be provided by a member of the Fire Safety Management Committee. Orientation is based on the buddy system, in the event of an emergency; the new staff member will be assigned to a regular more experienced and competent staff member.

During the Orientation Training, the following information, in addition to the usual HR and safety range of information, will be delivered:

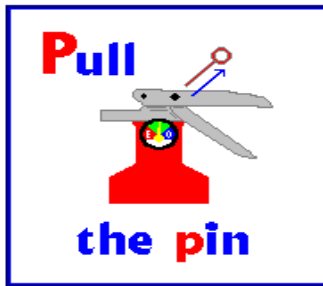
- (i)** The layout of the facility will be given and a tour thereof indicating all of the emergency evacuation routes, location of fire-fighting and emergency equipment, etc.;
- (ii)** The emergency signals for the facility will be explained and demonstrated.
- (iii)** The required actions to be taken in the event of a fire or emergency;
- (iv)** Instructions on how and when to raise the alarm and what to look out for during ongoing operations;
- (v)** Details of the Person(s)-In-Charge;
- (vi)** Details of the Fire Prevention Plan, including the method of access to a copy thereof as and when required.

Induction fire safety training will be provided once per month. It is a condition of employment that all members of staff attend the course and completes the training assessment. Induction training will cover all of the fire safety aspects necessary for new staff members to function effectively in the event of an emergency.

In addition all staff members will receive formal training on Fire Safety Awareness, the Safe Use of Fire Extinguishers & Fire-Fighting Equipment and Fire Warden / Fire Marshal training.

APPENDIX VII:

P.A.S.S. METHOD FOR THE SAFE USE OF A FIRE EXTINGUISHER.



Pull the pin. This will allow you to squeeze the handle in order to discharge the extinguisher.



Aim at the base of the fire. Aiming at the middle will do no good as the agent will pass through the flames.



Squeeze the handle. This will release the pressurized extinguishing agent.

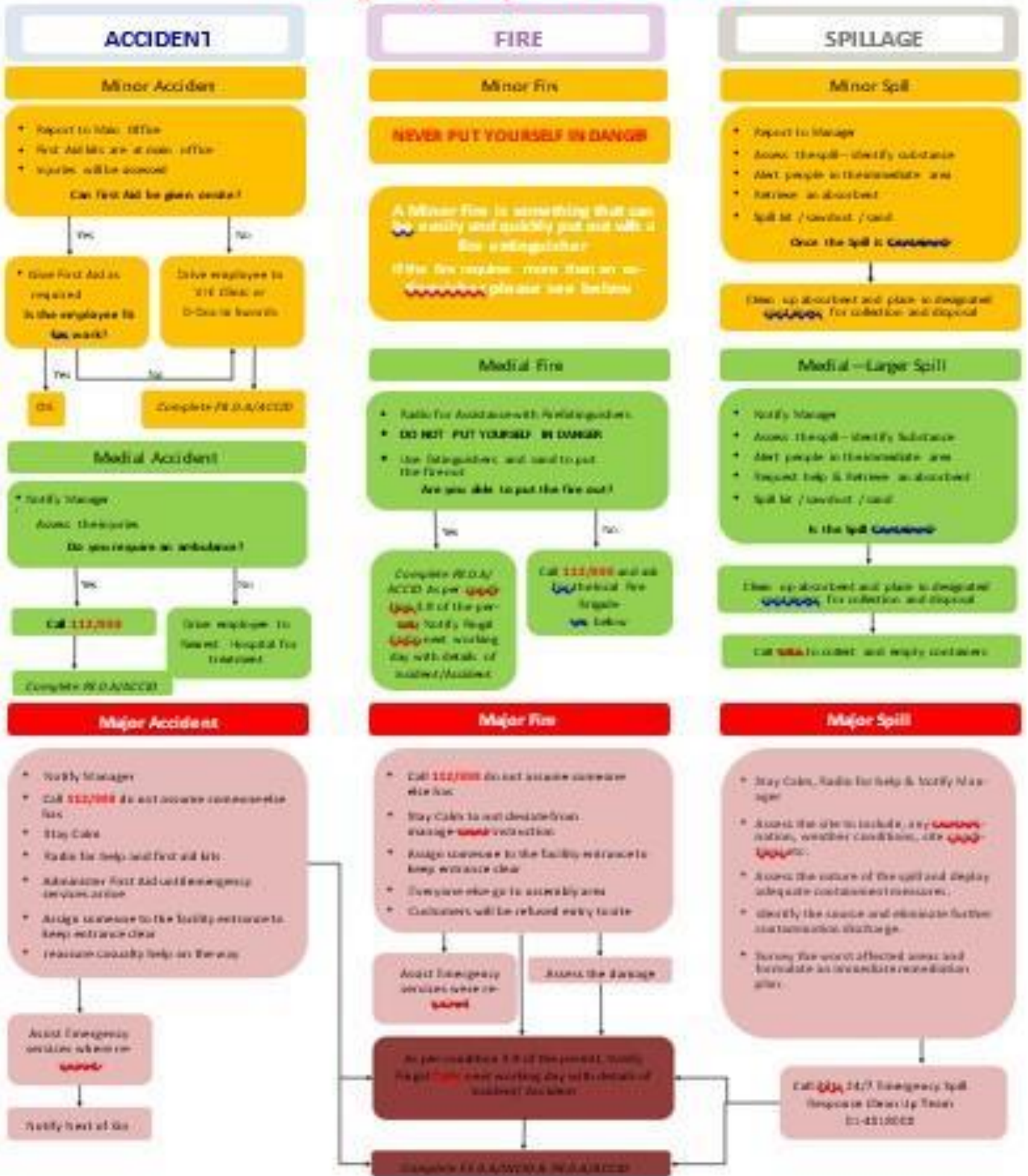


Sweep from side to side. Cover the entire area that is on fire. Continue until fire is extinguished. Keep an eye on the area for re-igniting.

APPENDIX VIII: EMERGENCY RESPONSE PROCEDURE {E.R.P.}.

DOCUMENT REF: PS.O.F/ERP	St. Margarets Metal Recycling	St. Margaret's Recycling & Transfer Centre Ltd
DOCUMENT TITLE: Emergency Response Procedure		Sandhill, St. Margaret, Co. Dublin, K67 EW7.

Emergency Response Procedure



APPENDIX IX: FIRE EMERGENCY PLAN – GENERAL.

NEVER PUT YOURSELF IN DANGER

FIRE PLAN

NEVER PUT YOURSELF IN DANGER

A Minor Fire is something that can be easily and quickly put out with a fire extinguisher. If the fire requires more than an extinguisher please see below

ON DISCOVERING A SMALL / SMOULDERING FIRE

- Fight with local extinguishers and sand if possible. Notify the site Agent immediately
- If unable to extinguish – Call **112/999** on nearest available phone and give clear instructions
- Evacuate the area and buildings and proceed to the assembly point (facility entrance) – Radio all staff to assembly point and sound the alarm
- Do not put yourself in danger and Do Not Deviate from management instruction

SITE MANAGEMENT

On being informed of a fire the Site Agent or his representative must:

- Call the emergency services on **112/999** do not assume someone else has done so and ensure evacuation of the buildings and site
- Fire Warden shall isolate surface water valve to prevent contamination
- Proceed to the assembly point (facility entrance) and await the Fire Brigade
- Ensure facility entrance is clear from traffic and weighbridge gate is open

PERSON TO TAKE CHARGE

- Mr. Brian McDonnell 086 265 4884
- Outside Normal working hours: As Above

REMEMBER!

Dial **112 / 999**,

Ask for Fire Services and give instructions

ST. MARGARETS RECYCLING & TRANSFER CENTRE LTD

ST. MARGARET'S ROAD, R122, K67 EW73

NOTE: Take EXTRA care when using power tools (i.e., converse / welders)

Take time to look at your surroundings before starting a power tool, if you think there is a material close by which could be flammable then DO NOT start your power tool and remove the material from the area in which you are working

APPENDIX X: EVACUATION PROCEDURES – Managers / Operatives / Staff.

A.	MANAGERS:
IF YOU DISCOVER AN EMERGENCY FIRE or SERIOUS ACCIDENT:	
1.	<i>Managers should immediately implement the Emergency Response Plan (E.R.P.).</i>
2.	<i>Contact the Emergency Services / Fire Brigade on 112 or 999. Do not assume someone else has unless you are otherwise advised.</i>
3.	<i>Get all staff to evacuate immediately to the designated Assembly Area (by the front facility entrance).</i>
4.	<i>Advise any waiting vehicles on the weighbridge to clear the weighbridge to leave access for emergency vehicles, if necessary.</i>
5.	<i>Bring the Visitor Book, the Fire Inspection / Drill / Evacuation Document and the Emergency Response Plan (E.R.P.) with you. Do not bring anything else.</i>
6.	<i>Go to the designated Assembly Area yourself.</i>
7.	<i>Nominate one person to manage traffic out of the site and keep the exits and road into the premises clear and unobstructed.</i>
8.	<i>Complete the Role Call at the designated Assembly Point to ensure all the staff and visitors are present and safe.</i>
9.	<i>Do not permit anyone to return to the buildings or the site until the ALL CLEAR is given by the Emergency Services Coordinator or the Management.</i>
DO NOT PANIC OR DEVIATE FROM THESE INSTRUCTIONS.	

B.	OPERATIVES / STAFF:
IF YOU DISCOVER AN EMERGENCY FIRE or SERIOUS ACCIDENT:	
1.	Contact the Emergency Services / Fire Brigade on 112 or 999. Do not assume someone else has unless you are otherwise advised.
2.	Warn anyone else in your sight to evacuate immediately to the designated Assembly Area (by the front facility entrance).
3.	Warn the drivers / operators of any lorries / vehicles on site to switch off their engine and walk to the designated Assembly Area (by the front facility entrance).
4.	Do not go to the designated Assembly Area in your lorry / vehicle as this will cause congestion and possible further unnecessary risk. Switch off your engine and walk to the Assembly Area without delay.
5.	Bring the Visitor Book, the Fire Inspection / Drill / Evacuation Document and the Emergency Response Plan (E.R.P.) with you. Do not bring anything else.
6.	Follow the instructions given to you by the Manager-In-Charge and do not leave the Assembly Area until you have been instructed to do so by either the Manager-In-Charge or the Emergency / Fire Services Coordinator.
7.	Always ensure that you have informed the Manager-In-Charge that you are leaving or relocating to another location.
DO NOT PANIC OR DEVIATE FROM THESE INSTRUCTIONS.	

APPENDIX XI:

WEEKLY INSPECTION RECORD.

MONTH:		WEEK No.	1.	2.	3.	4.	WEATHER:	Hot.	Dry.	Wet.	Calm.	Windy.	Bad.

MAIN ENTRANCE:

<i>Entrance clear of debris / rubbish / fly tipping, etc.?</i>		<i>Main electric gate working properly?</i>	
<i>Facility signs at entrance all intact & correct?</i>		<i>Is the barrier operational?</i>	
<i>Is the weighbridge & weighbridge clock working?</i>		<i>Is the yard lighting working properly?</i>	
<i>Do any nearby trees / hedging need to be cut?</i>		<i>Is the interceptor working correctly?</i>	

OFFICES:

<i>Is the automatic fire detection & alarm system operating correctly?</i>		<i>Are both combination door locks working properly?</i>	
<i>Are the panic / emergency buttons in order?</i>		<i>Is the intruder alarm working properly?</i>	
<i>Are the computers & software working?</i>		<i>Are the CCTV units fully operational?</i>	
<i>Are the canteen / tea room appliances in order?</i>		<i>Are all toilets fully functional?</i>	
<i>Is the heating in operational order?</i>		<i>Is all internal lighting working?</i>	

NON-FERROUS SHED:

<i>Are all scales in working order?</i>		<i>Is (are) the printer(s) in working order?</i>	
<i>Are fire extinguishers in place & operational?</i>		<i>Are the floor areas clear & tidy?</i>	
<i>Are all non-ferrous materials in tonne bags?</i>		<i>Are the CCTV units (2off) in working order?</i>	

MAIN PRODUCTION SHED:

<i>Are all batteries stored in a wrapped pallet or in a banded box?</i>		<i>Does a shipment need to be organised (e.g. for pallet removal, etc.)?</i>	
<i>Are all tyres stacked in a safe manner?</i>		<i>Do tyres need to be collected for removal?</i>	
<i>Are fire extinguishers in place & operational?</i>		<i>Are the floor areas clear & tidy?</i>	

DE-POLLUTION AREA:			
<i>Are the floor areas clear & tidy?</i>		<i>Are all hoses inside bunds?</i>	
<i>Are fire extinguishers in place & operational?</i>		<i>Do any of the tanks need to be emptied?</i>	
BACK YARD:			
<i>Are there any major cracks or fissures visible?</i>		<i>Are fire extinguishers in place & operational?</i>	
<i>Is the Kobelo unit operating correctly & well?</i>		<i>Are the 2 x Sennebogen units operating correctly & well?</i>	
<i>Is the LeFort baler unit operating correctly & well?</i>		<i>Are the ground areas clear & tidy?</i>	
FRONT YARD:			
<i>Are fire extinguishers in place & operational?</i>		<i>Is the external fencing intact?</i>	
<i>Do any of the non-ferrous bays need to be emptied?</i>		<i>Are the dog pens secure?</i>	
<i>Are the ground areas clear & tidy?</i>			
COMMENTS:			
1.			
2.			
3.			
4.			
5.			
6.			

APPENDIX XII: FIRE INSPECTION / DRILL / EVACUATION DOCUMENT.



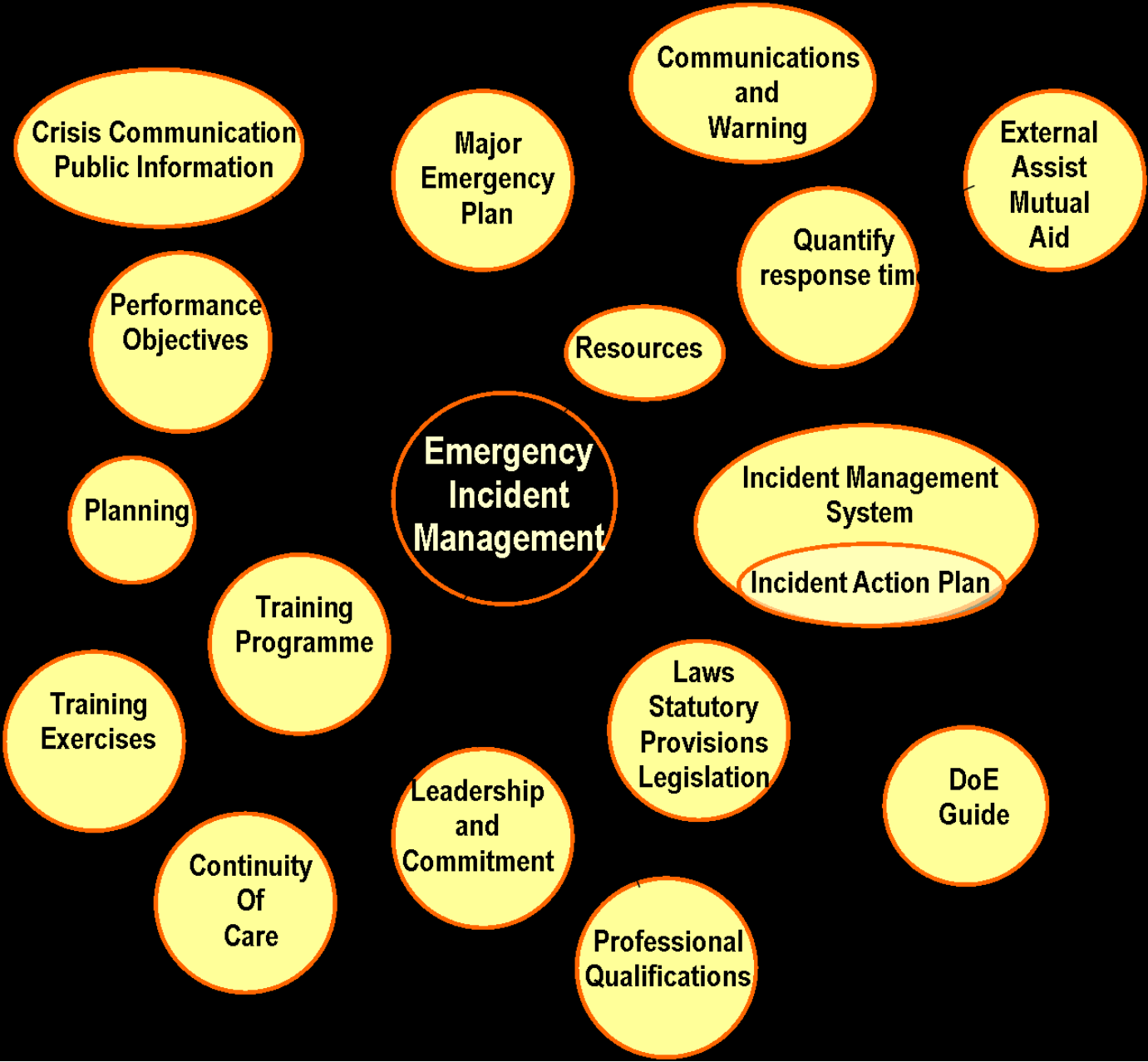
Employee	Main Work Area	Nearest Fire Point to your work Area	Are the Extinguishers sealed	Are they accessible? YES / NO.	Fire Drill Roll Call.	
					Absent.	Present.
Brian McDonnell.	Office / Yard.	ALL.			<input type="checkbox"/>	<input type="checkbox"/>
Daryna Sobol.	Office.	1, 2.			<input type="checkbox"/>	<input type="checkbox"/>
Raluca Serban.	Office.	1, 2.			<input type="checkbox"/>	<input type="checkbox"/>
Gemma Rock.	Office.	1, 2.			<input type="checkbox"/>	<input type="checkbox"/>
Mary Hayden.	Office.	1, 2.			<input type="checkbox"/>	<input type="checkbox"/>
Caroline Kinahan.	Office.	1, 2.			<input type="checkbox"/>	<input type="checkbox"/>
Alan Reilly.	Office / Yard.	ALL.			<input type="checkbox"/>	<input type="checkbox"/>
Niall Farrell.	Machine Operator / Back Yard.	8, 15.			<input type="checkbox"/>	<input type="checkbox"/>
Viktor Dorzds.	Non-Ferrous Shed / Open Shed / Yard.	4, 5, 6, 7, 9.			<input type="checkbox"/>	<input type="checkbox"/>
JJ Harris.	Machine Operator / Back Yard.	8, 9, 15.			<input type="checkbox"/>	<input type="checkbox"/>
Adrian Martinas.	De-Pollution.	8, 9, 14.			<input type="checkbox"/>	<input type="checkbox"/>
Vasyl Semeshchuk.	De-Pollution.	8, 9, 14.			<input type="checkbox"/>	<input type="checkbox"/>
Janis Stasis.	Non-Ferrous Shed / Open Shed.	4, 5, 6, 7.			<input type="checkbox"/>	<input type="checkbox"/>

St. Margaret's Recycling & Transfer Centre Ltd.

Artem Sliusar.	Open Shed.	4, 6, 7, 10.			<input type="checkbox"/>	<input type="checkbox"/>
Nasari Kuksin.	Open Shed.	4, 6, 7, 10.			<input type="checkbox"/>	<input type="checkbox"/>
Valentyn Kutsenko.	Open Shed.	4, 6, 7, 10.			<input type="checkbox"/>	<input type="checkbox"/>
Oleksandre Lazarenko.	Open Shed.	4, 6, 7, 10.			<input type="checkbox"/>	<input type="checkbox"/>
Vasyl Semeshchuk.	Open Shed.	4, 6, 7, 10.			<input type="checkbox"/>	<input type="checkbox"/>
Fredir Nehaliuk.	Open Shed.	4, 6, 7, 10.			<input type="checkbox"/>	<input type="checkbox"/>
Le Duc Duy.	Open Shed.	4, 6, 7, 10.			<input type="checkbox"/>	<input type="checkbox"/>
Sean Bruton.	Driver.	ALL.			<input type="checkbox"/>	<input type="checkbox"/>
James McDonnell,	Driver.	ALL.			<input type="checkbox"/>	<input type="checkbox"/>
Eddie O Connell,	Driver.	ALL.			<input type="checkbox"/>	<input type="checkbox"/>
Tom Ryan,	Driver.	All.			<input type="checkbox"/>	<input type="checkbox"/>
Fire Drill: <input type="checkbox"/>	Fire Evacuation: <input type="checkbox"/>	Fire Fighting Equipment Drill: <input type="checkbox"/>	Date : Signature			

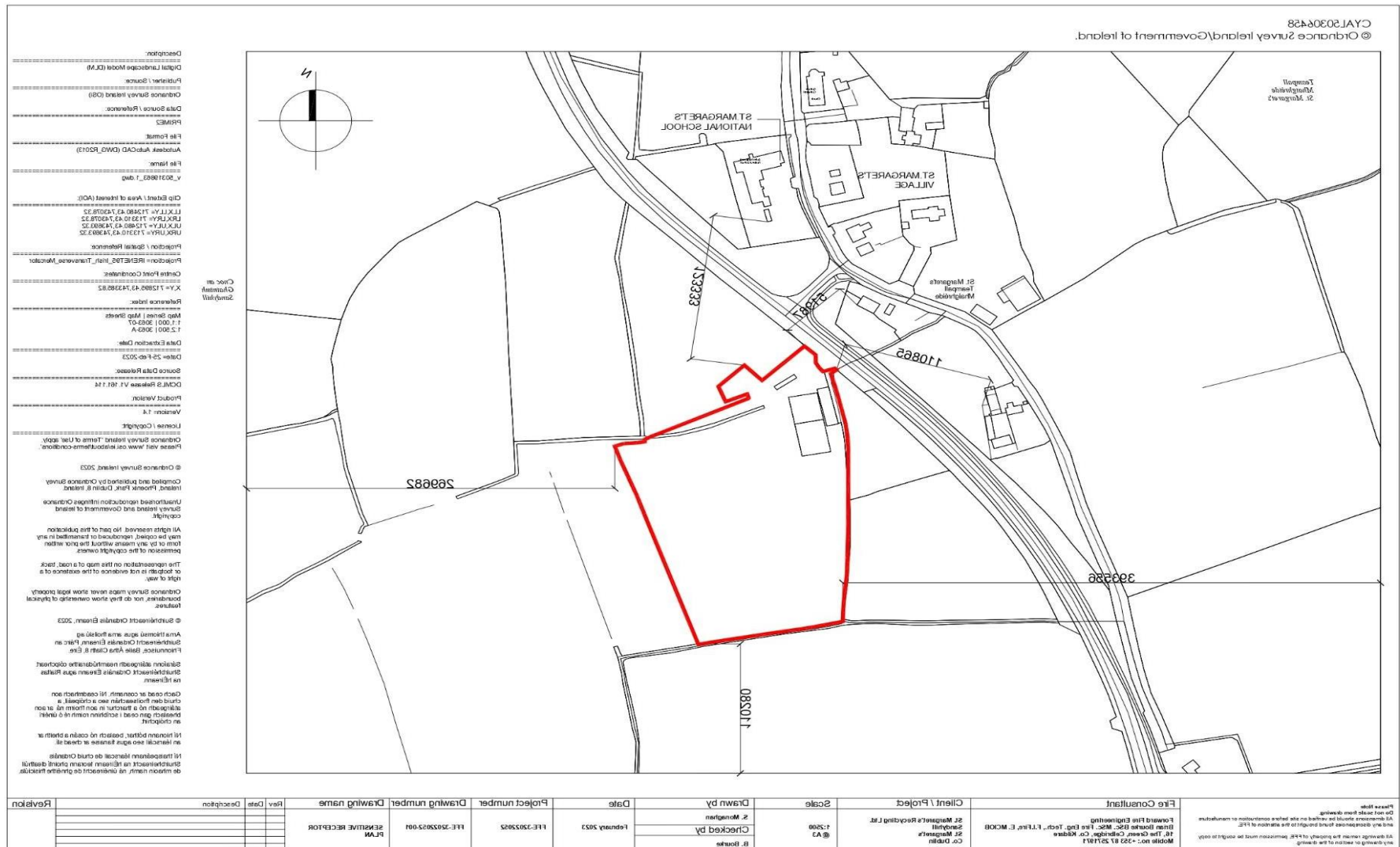
RECORD of FIRE DRILL.				No.	
TIME of FIRE DRILL:			DATE of FIRE DRILL:		
NATURE of ALARM ACTIVATION:	<i>Fire Alarm - Actual.</i>		<i>Accidental Activation.</i>		
	<i>Emergency Activation.</i>		<i>Planned Fire Activation / Drill.</i>		
NATURE of EVACUATION:	<i>Fire Drill.</i>		<i>Bomb Threat.</i>		
	<i>Fire Ignition.</i>		<i>Telephone Threat</i>		
	<i>Postal Threat.</i>		<i>Uncontrolled Gas Release.</i>		
OBSERVATIONS:	1.				

APPENDIX XIII: EMERGENCY INCIDENT MANAGEMENT – OVERVIEW.





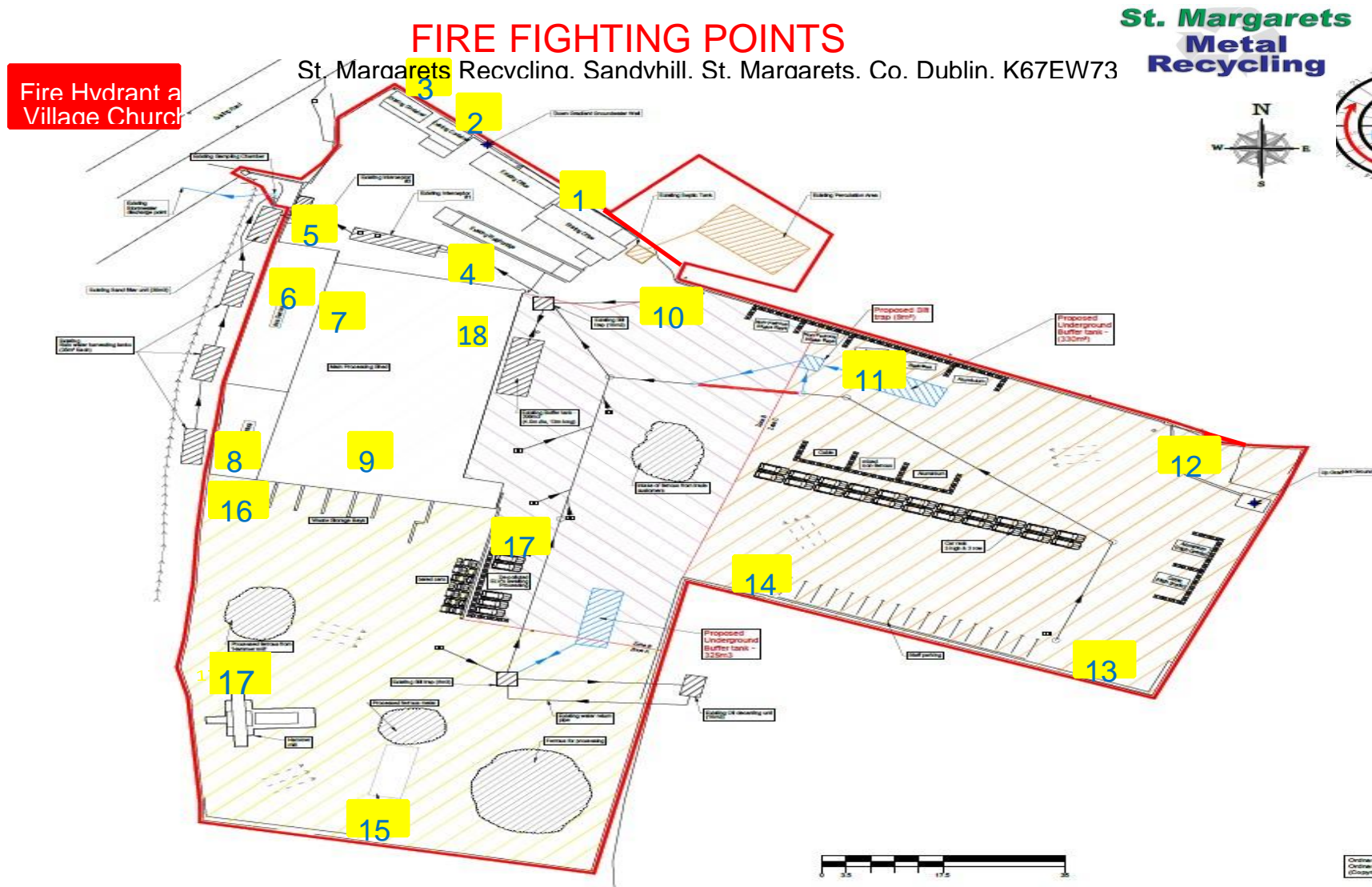
APPENDIX XIV: SENSITIVE RECEPTOR PLAN.



APPENDIX XV:

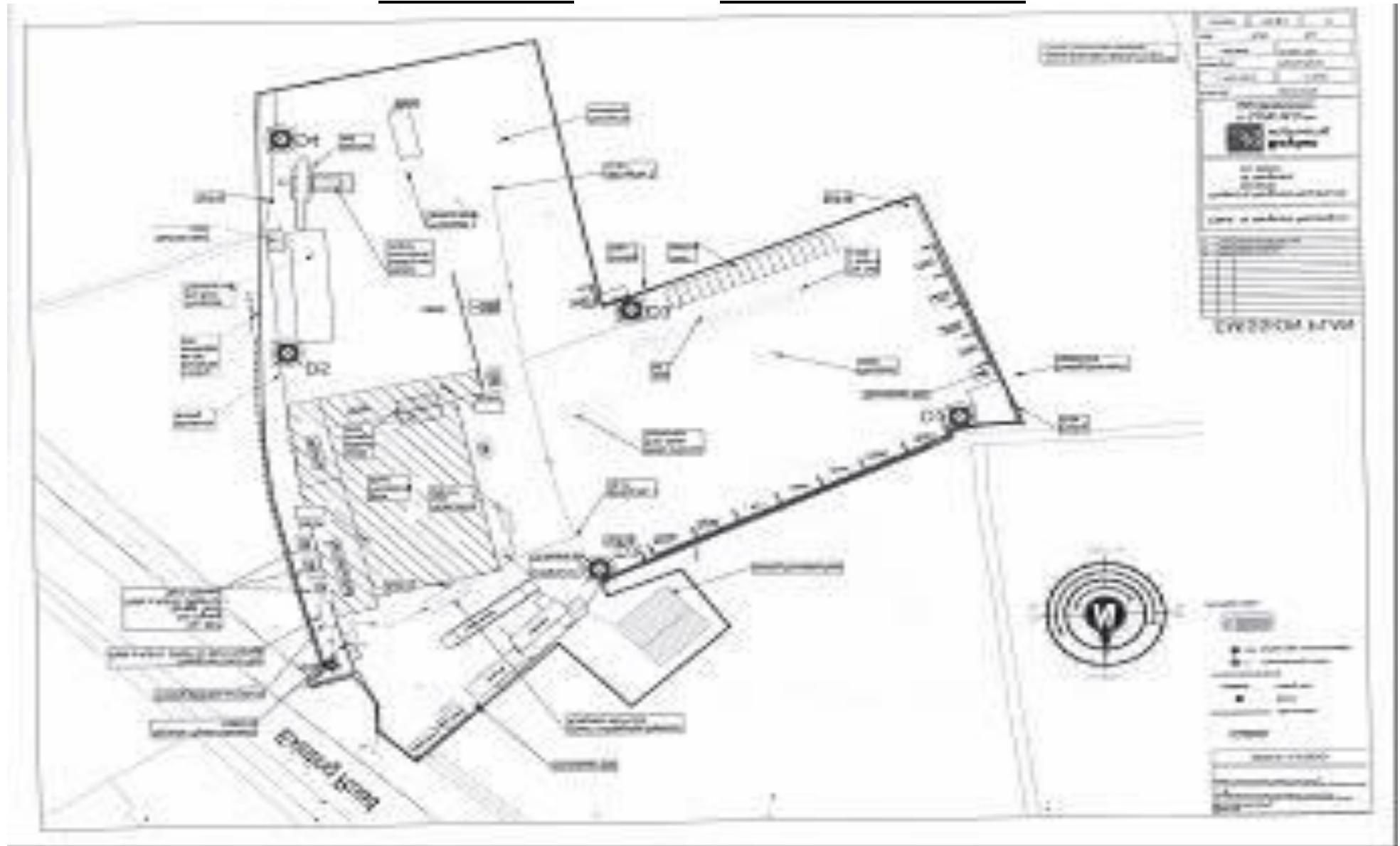
FIRE FIGHTING POINTS.

No.	Area.	No. of Extinguishers.	No.	Area.	No. of Extinguishers.
1.	Main Office.	9.	11.	Between Non-Ferrous Bays.	2.
2.	Drying Room.	2.	12.	Beside Dog Pens.	2.
3.	Canteen.	2.	13.	Staff Parking Top Corner.	2 + 1 x 50kg.
4.	Side of Weighbridge.	2 + 1 x 50kg.	14.	Staff Parking.	2.
5.	Front of Non-Ferrous Shed.	2.	15.	Behind Baler.	2.
6.	Inside Non-Ferrous Shed.	2 + 1 x 50kg.	16.	Outside Workshop.	2.
7.	Inside Open Shed back to back with Point 6.	2 + 1 x 50kg.	17.	Hammermill.	13 + 1 x 50kg.
8.	Workshop.	2 + 1 x 50kg.	18.	Lithium Battery Blanket & Fire Extinguisher.	1 + 1.
9.	De-Pollution Area.	4 + 1 x 50kg.	19.	Mobile Water Tanker.	1.
10.	Beside Toilets.	2.			



APPENDIX XVI:

EMISSION PLAN – 2021.



APPENDIX XVII: HEAVY MOBILE PLANT & VEHICLES – GUIDANCE.

Most waste management sites use heavy mobile plant, such as loading shovels, grabs and telescopic handlers. This plant can lead a hard life and is inevitably in direct contact with waste, much of which may be combustible. Other vehicles, such as visiting lorries, may also pose a risk.

Mobile plant can pose ignition risks to the wastes they come in contact with:

- (i) Hot exhausts can ignite wastes trapped near them. Plant operators must be informed and instructed of this risk and ensure that all wastes are cleared from around exhausts and other hot parts of the plant / machines at the end of each shift.**
- (ii) Appropriate fire extinguishers must be fitted in each item of mobile plant and operators must be provided with appropriate training in the safe use of same.**
- (iii) It is advisable to install automatic fire extinguishing equipment under the bonnet of each plant engine and in other high-risk areas.**
{Note that this may be a requirement of your Insurers and you should formally check with same}.
- (iv) Ensure that all mobile plant is serviced and maintained well to a strict schedule, with close attention given to the electrical systems (which are often a source of fire ignition), with formal records thereof retained on file for review by authorised persons on request.**
{Note that the schedule of maintenance suggested by the Manufacturers / Suppliers may not be sufficient in waste management conditions / use and consideration should be given to whether more frequent maintenance / servicing is required}.
- (v) Mobile plant / equipment should be parked well away from waste stacks, waste left in reception / receiving areas or any other places where waste may be present.**
{Ideally the mobile plant / equipment should be parked in a sterile / protected area e.g. in an empty block / building / bunker, behind a fire compartment wall, in the open well away from any waste materials , etc.}.
- (vi) Mobile plant / equipment shovels, blades, etc. may produce sparks when being scraped along a concrete or metal floor / surface / wall. Operators must be made aware of this and be instructed to maintain awareness thereof at all times.**
{For high-risk areas and materials, consideration should be given to utilising specialist coatings for the mobile plant / equipment shovels, blades, etc. to limit the generation of sparks from these sources}.

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- (vii) If the condition of the concrete in reception, storage and other areas is poor to the extent that the metal reinforcing bars or similar are exposed, then the risk of metal-on-metal contact and the production of higher energy sparks may well increase. It is essential therefor that the condition of the concrete surfaces are checked and assessed to a regular schedule and that operators are instructed to report same at all times.**
- (viii) The timely maintenance and repair of damaged concrete surfaces will assisting in mitigating any risks from this source.**
- (ix) If practical and possible, utilise non-flammable hydraulic oils. This is likely to be easier and as efficient for new plant / machines and more difficult for older types. Check the situation out with the Manufacturer / Supplier as appropriate. Record findings formally.**

APPENDIX XVIII:

HAMMER MILL STANDARD OPERATING PROCEDURE - Draft.

DOCUMENT REF.:	PS.2.1 / HAM.	St. Margaret's Recycling & Transfer Centre Ltd, Sandyhill, St. Margaret's, Co. Dublin.
DOCUMENT TITLE:	Hammer Mill Operating Procedure.	

1.0. Purpose:

This document describes the Standard Operating Procedure (S.O.P.) that will provide employees with a set of guidelines that have been developed to mitigate hazards associated with this work task, as identified through the work-place hazard identification process.

2.0. Scope.

This document covers the Standard Operating Practices during the use of the Hammer Mill, which is used to separate / breakdown materials prior to export.

3.0. Responsibility.

The Managing Director ultimately has overall responsibility the Standard Operating Procedures are followed safely and that the maintenance and service schedule of equipment is adhered to.

4.0. Procedure.

4.1 On site we use an American Pulveriser Hammer Mill to separate waste materials of scrap and aluminium. The following instructions must be followed to ensure the safe use of the machine:

- (i)** The Hammer Mill must not be operated solo. At least two employees must be present when in use;
- (ii)** Keep fingers and arms away from the hopper;
- (iii)** Ensure valves are completely closed and any protection devices are secured;
- (iv)** Carefully feed bundles of material into the hopper and feed only at the rate that the Hammer Mill can process material;
- (v)** Follow proper procedures and use the right equipment, including safety glasses, heavy duty gloves and protective foot-wear;
- (vi)** Ensure safety measures, such as caps or guards, are securely installed;
- (vii)** On completion of use, turn off the motor, clean work areas, allow the motor to cool down and monitor.

4.2. Scrap materials are selected after appropriate segregation and separation of materials that have been accepted to site.

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- 4.3.** The Hammer Mill itself is fixed on a flat concrete pad.
- 4.4.** Material containing EWC 17 04 05 (iron and steel) and EWC 17 04 07 (mixed metal) is placed onto a conveyor using an excavator grab before being top fed through an in-line crusher into a fine in-feed hopper.
- 4.5.** Material is given shredder treatment through the spider and end disc cap crusher and swing hammers.
- 4.6.** Lighter fractions are separated through gyrating assembly screener line and passes out onto a stockpile which is diverted to a designated area for recovery / disposal off site.
- 4.7.** Appropriate operator supervision through operational panels and visual checks on materials passing through the in-line conveyor system.
- 4.8.** The unit shall be serviced through a preventative maintenance programme (PPM) in accordance with Manufacturer's Instructions.
- 4.9.** Where unplanned maintenance is required, enclosures on housing, covers and guarding shall be replaced for safety and prevention of diffuse emissions of noise, dust and spilled material.
- 4.10.** Processed metals such as Shredded 211 / Meatballs (17 04 05 EWC), Ali TT (17 040 07) is then stored in designated areas awaiting export from the site.
- 4.11.** Lighter fractions discharged from the process is further processed using a trammel to remove fines and remainder residue (19 10 04). The light fraction residue is then stored in designated areas awaiting export from site for disposal. Appropriate stockpile thresholds for fire safety shall be observed on stockpile volume.

<i>Author:</i>	<i>Caroline Kinahan.</i>	<i>Version:</i>	<i>002.</i>	<i>Date:</i>	<i>4th February 2021.</i>	<i>WFP – FG – 13 – 0002 – 03.</i>
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APPENDIX XIX:

REFERENCES / STATUTORY INSTRUMENTS / LEGISLATION.

A: BUILDING REGULATIONS 1997 – 2021:

- (i) The buildings are subject to the provisions of the Building Regulations 1997 – 2021 and the Fire Services Acts 1981 & 2003.
- (ii) For fire safety, the functional requirements of the Building Regulations, as espoused in *Technical Guidance Document B – Fire Safety (2006) (Reprint 2020)*, are set out under the following headings, which will be expanded on when submitting Fire Safety Certificate submissions:
 - Requirement B1 - Means of Warning & Escape.**
 - Requirement B2 - Internal Fire Spread (Linings).**
 - Requirement B3 - Internal Fire Spread (Structure).**
 - Requirement B4 - External Fire Spread.**
 - Requirement B5 - Access & Facilities for the Fire Service.**
- (iii) The original Fire Safety Certificate for the premises was issued in March 1998 {Register Reference No. FSC / 076 / 98}.
- (iv) Guidance on compliance with the requirements of Part B of the Building Regulations is presented in *Technical Guidance Document B – Fire Safety (2006) (Reprint 2020)*, which applies to applications under Part B Building Regulations.

B: FIRE SERVICES ACTS 1981 & 2003:

- (i) The are the primary pieces of fire safety legislation in Ireland. Responsibility for compliance with fire safety in any premises rests with the “Responsible Person”.
- (ii) In a Waste Recycling and Transfer facility, the duties and responsibilities of the Responsible Person lies with the operators and the Management Team for the Centre and has been delegated from the Managing Director thereto. At any particular time, the “Responsible Person(s)” will be the person(s) who has (have) control of part or all of the premises.
- (iii) Where building work and fire protection measures comply with the requirements of *Technical Guidance Document B – Fire Safety (2006) (Reprint 2020)* as prima facie evidence of compliance with the Building Regulations, additional physical measures should not normally be required under the fire safety exercise unless high-hazard materials or processes are introduced to the premises (*which will not be the case here*).

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- (iv) The *Fire Services Acts 1981 & 2003* places specific duties on the “Responsible Person” such as carrying out a Fire Risk Assessment of the premises, providing first-aid fire-fighting equipment, training up employees in relation to Fire Safety Awareness, Safe Use of Fire Extinguishers and appropriate training for Fire Wardens and Fire Marshals.



C: OTHER RELEVANT STATUTORY INSTRUMENTS / LEGISLATION.

- (i) The Building Control Acts / Regulations 1990 – 2014.
- (ii) Safety, Health & Welfare at Work Act 2005.

D: INFORMATIVE REFERENCES.

- (i) Technical Guidance Document J (T.G.D. J) - Heat Producing Appliances;
- (ii) B.S. 558: 2004 - Part 12 - Managing Fire Safety;
- (iii) C.I.B. Report – Publication 269: 2001 - Rational Fire Safety Engineering Approach to Fire Resistance of Buildings – W014: Fire;
- (iv) I.S. 3218: 2013 + Amendment No. 1: 2019 - Fire Detection & Fire Alarm Systems for Buildings – System Design, Installation, Commissioning, Servicing & Maintenance;
- (v) I.S. 3217: 2013 + Amendment No. 1: 2017 - Emergency Lighting;
{Note updated to I.S. 3217: 2023 – *Emergency Lighting*}.
- (vi) I.S. 291:2015 + Amendment No. 1: 2022 - Selection, Commissioning, Installation, Inspection & Maintenance of Portable Fire Extinguishers;
- (vii) WASTE 28 (Waste Industry Safety & Healthy Forum – W.I.S.H.) - Reducing Fire Risk at Waste Management Sites (Issued in March 2020).
- (viii) Fire Safety Guide for Building Owners and Operators (2023) - DoHLG.
- (ix) Fire Safety at Non-Hazardous Waste Transfer Stations – Guidance Note (2013) – E.P.A.
- (x) Risk Assessment –Generic - Non-Hazardous Waste Recycling-SR2022-No5-EPA.
- (xi) Technical Guidance note (TGN 7.01) - Reducing Risks at Sites storing Combustible Materials (March 2015, Vers. 2- Withdrawn 2016) - Environment Agency;
- (xii) I.S.10101: 2020 – National Rules for Electrical Installations.
- (xii) European Union (End-of-Life Vehicles) Regulations 2014.

APPENDIX XX: **ORIGINAL GRANT OF FIRE SAFETY CERTIFICATE – Copy.**

	Comhairle Chontae Fhine Gall Bosca 174, 46/49 Sráid Uí Chonaill Uacht, Baile Átha Cliath 1. Fingal County Council P.O. Box 174, 46/49 Upper O'Connell Street, Dublin 1.	Tel: (01) 872 7777 Fax: (01) 872 0195
		PLANNING DEPT.
GRANT OF A FIRE SAFETY CERTIFICATE		
Register Reference: 98/4034		
Application Received: 10th February 1998		
Time Extension To:		
Additional Info.:		
Development: Waste recycling and transfer depot.		
Location: Sandyhill, St. Margaret's, Co. Dublin.		
Applicant: Fingal Waste Recycling Ltd.,		
App. Type: Fire Certificate		
Decision Order No.: FSC/076/98		
Date of Decision: 24th March 1998		
<p>Fingal County Council being the Building Control Authority for the County of Fingal, by order dated as above, pursuant to Section 6 of the Building Control Act 1990 and in accordance with the Building Control Regulations 1991 (as amended), hereby certifies that the building or works to which this application relates will, if constructed in accordance with the plans, documents, and information submitted, comply with the requirements of Part B of the First Schedule to the Building Regulations, 1991.</p> <p>In considering the application, no assessment has been made as to whether the building or works will comply with the other requirements of the First Schedule to the Building Regulations, 1991 (as amended).</p>		
Signed on behalf of Fingal County Council		 SENIOR ADMINISTRATIVE OFFICER
Larkin & Partners, 1 Fitzwilliam Street Upper, Dublin 2.		Date: 24.3.98
PAGE 1 of 1		

APPENDIX XXI: FIRE PROTECTION / SUPPRESSION SYSTEMS – PLANS, DESCRIPTIONS, LOCATIONS, etc.

(a) AUTOMATIC FIRE DETECTION & ALARM SYSTEM – PRODUCTION BUILDINGS & YARD:

1 x 2 Zone Fire Alarm Control Panel
4 x Manual Call Points.
10 x Smoke Detectors c/w 2 x Sounder Devices.
3 x Visual Sounder Beacons.

The automatic fire detection & alarm system has reportedly been installed to the requirements of *I.S. 3218: 2013 + Amendment No. 1: 2019 – Fire Detection & Fire Alarm Systems for Buildings – System Design, Installation, Commissioning, Servicing & Maintenance*.

The permanent production buildings have a manual alarm system only because of the openness of the areas.

(b) AUTOMATIC FIRE DETECTION & ALARM SYSTEM – OFFICES / PORTACABINS / T.A.U.'S:

1 x 2 Zone Fire Alarm Control Panel
2 x Sounder Devices.
7 x Smoke Detectors c/w 1 x Sounder Devices.

(c) FIRE EXTINGUISHERS / FIREFIGHTING EQUIPMENT:

61 off – Multiple Size / Type Handheld.

Note: As a Place of Work it should be possible to provide an alarm – audible and visual - throughout the site. The hammer-mill area has a particularly high background sound level when operational. Specialist advice should be sought in relation to the noise levels, the associated health & safety implications thereof and to ensure the alarm can be raised and heard in all areas thereof.

Plans are well advanced in relation to installing Heat Detection C.C.T.V. throughout the site.

Fire-fighting water storage arrangements consist of 4 x 32000litre industrial metal tanks, with automatic feed off the public mains and from wells on site. There is also a mobile tractor unit with 2600litre capacity with rain / cannon water gun capabilities constantly available for deployment. There are also two mobile water storage tanks with reported capacities of 10,000 and 20,000 litres respectively available for deployment.

1 x Specialist Lithium Fire blanket.



ESC
Environmental Ltd

Wastewater Treatment System
Inspection Report

St Margarets Recycling and Transfer Centre
Sandyhill
St.Margarets
Co. Dublin



**ESC
Environmental Ltd**

Company Register Number: 687386

W: www.escenvironmental.ie

E: info@escenvironmental.ie

Tobernanina Ballintogher

County Sligo

P: 071 913 4001

M: 086 308 0356

Project Ref : **St Margarets Recycling and Transfer Centre**

Report status: **WwTS Inspection Report**

Address: **Sandyhill, St.Margarets, Co. Dublin.**

Date: **25th November 2024**

Prepared by:

Martijn Leenheer BSc (Hons)

Environmental Scientist

Site Assessor



Introduction

ESC Environmental were engaged to inspect the Wastewater Treatment System (WwTS) at St Margarets Recycling and Transfer Centre to ascertain if the system is functioning efficiently.

Installed System

The tank is an O'Reilly Oakstown 8p.e aeration plant. The 8p.e has a significant spare capacity for future expansion of the facility if so required. We attach herewith drawings and data for this unit. The polishing filter infiltration area which was installed in 2011 and was designed for 15 staff.

Observations

Tank seemed in working order with no evidence of overloading of system. Some floatation of solid/grease material in primary chamber indicating that baffle system is working. Although the general advice is to desludge a septic tank system annually the limited amount of sludge built up which is not warranting a desludging at the time of inspection. The infiltration area showed no ponding and the pump and aeration were working.

Proposed Upgrade

As the proposed staff be 25 x 40 litres/per day the total daily loading will be 1000litres*.

To achieve the p.e. equivalent: 1000litres / 150 which gives 6.7p.e rounded off to 7.

Therefore, the O'Reilly Oakstown BAF P8 treatment unit is sufficient for a possible higher loading.

The Site Characterisation Report of Hydrocare states the T values of 49.42 and table 10.1 in the 2021 EPA Code of Practice gives 30m²/PE for this infiltration rate for option 1. Therefore, the required soil polishing filter total area would be 7PE x 30m² = 210m²

*Calculations according to the EPA (1999) Waste Water Treatment Manuals Treatment Systems for Small Communities, Business, Leisure Centres And Hotels



Traffic & Transport Assessment (TTA)

Proposed Development at St Margarets Metal Recycling,
Sandyhill, St Margarets, Co Dublin.

December 2024

Waterman Moylan Consulting Engineers Limited

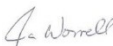
Block S, Eastpoint Business Park, Alfie Byrne Road, Dublin D03 H3F4

www.waterman-moylan.ie

Client Name: St Margaret's Recycling & Transfer Centre Ltd
Document Reference: 23-072r.201
Project Number: 23-072

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015)

Issue	Date	Prepared by	Checked by	Approved by
1	04 December 2024	B McCann	I Worrell	

Comments

Disclaimer

This report has been prepared by Waterman Moylan, with all reasonable skill, care and diligence within the terms of the Contract with the Client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the Client.

We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above.

This report is confidential to the Client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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1. Introduction

1.1 Introduction

This Traffic and Transport Assessment (TTA) has been prepared by Waterman Moylan on behalf of St Margaret's Recycling & Transfer Centre Ltd to accompany a planning application to Fingal County Council for a proposed development at St Margarets Metal Recycling, Sandyhill, St Margarets, Co Dublin.

1.2 Location and Description

The site for the subject development is located on the R122 to the southeast of St Margarets Village and to the west of Dublin Airport in the administrative area of Fingal County Council.

The site extends to 1.75 ha (4.37 acres) and is relatively flat. The site is occupied by an operational metal recycling and transfer centre.

Access to the site is from the R122 via a 9.0 metre wide gateway on the east side of the R122 set back some 25.0 metres from the edge of the carriageway.



Figure 1: Location Map

1.3 Project Timetable

In compliance with the requirements of the *Transport Assessment Guidelines* (2014), this TTA includes junction impact assessment at base year, year of opening, year of opening plus 5 years, and year of opening plus 15 years

The following timetable has been adopted for the transportation assessment of the subject development:

- 1997 Parent Planning Permission (Waste throughput of 21,000 tonnes)
- 2024 Opening Year (Waste throughput of 21,900 tonnes)
- 2029 Design Year (Opening Year + 5) (Waste throughput of 21,900 tonnes)
- 2039 Future Year (Opening Year + 15) (Waste throughput of 21,900 tonnes).

Traffic surveys were carried out at the site access in 2019 and again in 2023.

The project timetable has been used in the assessment of the impact that the proposed development would have on the traffic and transportation infrastructure and network in the surrounding area

1.4 Methodology

The methodology for the preparation of this TTA included: -

- (a) Desktop review of the documentation provided by the project design team.
- (b) Visits to the site and surrounding area including survey of existing transportation facilities and observation of traffic movements.
- (c) Survey of existing traffic movements.
- (d) Review of public transport services, routes, and timetables.
- (e) Review of proposals for transportation improvements by Transport Infrastructure Ireland (TII), National Transport Authority (NTA) and Fingal County Council (FCC).
- (f) Review of trips to and from the development for different annual waste throughputs.
- (g) Review of public transport, both existing and proposed.
- (h) Assessment of the transportation impacts of the development.
- (i) Assessment of the mitigation and monitoring measures in place.

1.5 Standards

This Traffic & Transport Assessment (PTTA) has been prepared in accordance with Section 14.17.4 *Traffic and Transport Assessment* of the Fingal County Development Plan 2023 - 2029.

It has also been prepared in compliance with the requirements of the TII *Traffic and Transport Assessment Guidelines* and the UK's Institution of Highways and Transportation Guidelines.

1.6 Threshold

Thresholds for transport assessments are set out in Table 2.1 of the TII *Traffic and Transport Assessment Guidelines*.

Where traffic to and from a development does not exceed 10% of the traffic flow on the adjoining road, a transport assessment is not required.

This threshold reduces to 5% of the traffic flow on the adjoining road where congestion exists, or the location is sensitive. *

2. Receiving Environment

2.1 Regional Route R122

The R122 is a Regional Route linking Finglas to the south with Balbriggan to the north via St Margaret's, Naul and Oldtown.

The R122 is a two lane road with a carriageway width of 7.5 metres. In the area of the subject site, the alignment is relatively flat with gentle horizontal curvature. See Figure 2.

Centreline road markings are dashed white lines in need of renewal with dashed yellow lines delineating the edges of the carriageway.

Grass verges are provided on both sides with a footpath for pedestrians along the west side. There are no cycle facilities on the R122.

Public lighting is provided from lamp standards along the west side.

The posted speed limit on the R122 in the area of the subject site is 80 kph.



Figure 2: R122 looking south near the entrance to the subject site.

2.2 Existing Traffic Conditions

Traffic conditions on the R122 St Margarets Road at the access to the subject site are generally free flowing save for occasional short duration incidents or accidents.

2.3 Traffic Surveys

Classified traffic surveys on the R122 St Margarets Road at the entrance to the subject site were carried out by Traffinomics Ltd on Wednesday 3rd April 2019 and by IDASO on Wednesday 18th October 2023

The surveys recorded the 24-hour traffic flow on the R122 together with the arrivals to and departures from the St Margaret's Transfer and Recycling Centre.

The traffic movements were classified in seven groups as per the standard COBA Classification for traffic surveys:

- Pedal Cycles (P/C) - Includes all types of pedal cycles.
- Motorcycles (M/C) - Includes all types of motorcycles and also those with sidecars.
- Cars (CAR) - Cars, taxis, 'people carriers' and other passenger vehicles (for example, minibuses motorhomes and camper vans), normally ones which have less than 16 seats.
- Light Goods Vehicles (LGV) - All car type delivery vans and those of the next larger carrying capacity such as transit vans. Included here are small pickups, ambulances which look like vans without windows and milk floats. Most of this group are delivery vans of one type or another and goods vehicles (middle-sized trucks) with single rear wheels
- Ordinary Goods Vehicle 1 (OGV1) - All larger rigid vehicles with two or three axles including larger ambulances with double rear wheels, tractors (without trailers), road rollers for tarmac pressing, box vans, similar large vans and middle-sized trucks which have double rear wheels.
- Ordinary Goods Vehicle 2 (OGV2) - Includes all rigid vehicles with four or more axles and all articulated vehicles. Also included in this class are OGV1 goods vehicles towing a caravan or trailer.
- Public Service Vehicle (PSV) - Includes all public service vehicles and works buses with a gross vehicle weight of 3.5 tonnes or more, usually vehicles with more than 16 seats.

2.4 Traffic Survey 2019

Description

A classified traffic survey on the R122 St Margarets Road at the entrance to the subject site was carried out by Traffinomics Ltd on Wednesday 3rd April 2019 some 2.5 weeks before Easter 2019 which fell on 21st April 2019. The survey covered the 12-hour period between 07.00 and 19.00. The survey confirmed the AM and PM Peak Hours to be 08:00 – 09:00 and 17:00 – 18:00.

Results

The results of the 2019 traffic survey are summarised in Tables 1 and 2.

The 12-hour traffic flow recorded on the R122 was 14,019 vehicles at the subject site with 6,468 vehicles travelling northbound and 7,551 vehicles travelling southbound. The HGV content recorded was 11% northbound and 10% southbound. The totals for the R122 in Table 2 include a total of 55 buses travelling northbound and 68 buses travelling southbound.

The survey recorded a total of 178 arrivals to the recycling centre and 170 departures during the 12-hour survey period.

The proportions of traffic movements into and out of the subject site comprised 38% Cars, 27% LGV, 24% OGV1 and 011% OGV2.

Table 1: Summary of Traffic Survey April 2019

Time	R122		Recycling Centre	
	Northbound	Southbound	Arrivals	Departures
07.00 – 08.00	369	952	13	5
08.00 – 09.00	464	980	8	7
09.00 – 10.00	388	661	16	14
10.00 – 11.00	374	448	21	19
11.00 – 12.00	364	431	14	8
12.00 – 13.00	475	442	23	16
13.00 – 14.00	515	525	23	25
14.00 – 15.00	520	502	15	19
15.00 – 16.00	580	502	22	13
16.00 – 17.00	784	625	17	23
17.00 – 18.00	916	797	4	20
18.00 – 19.00	719	686	2	1
Total	6,468	7,551	178	170

Table 2: Arrivals and Departures 2019

Time	Arrivals				Departures			
	Car	LGV	OGV1	OGV2	Car	LGV	OGV1	OGV2
07.00 – 08.00	9	1	2	1	0	0	2	3
08.00 – 09.00	3	4	0	1	1	3	1	2
09.00 – 10.00	8	2	2	4	5	3	3	3
10.00 – 11.00	8	5	5	3	10	3	5	1
11.00 – 12.00	6	3	4	1	1	2	4	1
12.00 – 13.00	6	6	9	2	4	4	5	3
13.00 – 14.00	7	11	4	1	5	12	7	1
14.00 – 15.00	6	3	5	1	7	5	6	1
15.00 – 16.00	9	4	7	2	6	3	3	1
16.00 – 17.00	6	8	2	1	10	6	6	1
17.00 – 18.00	2	0	1	1	13	6	0	1
18.00 – 19.00	2	0	0	0	1	0	0	0
Total	72	47	41	18	63	47	42	18
	178				170			

2.5 Traffic Survey 2023

Description

A classified traffic survey on the R122 St Margarets Road at the entrance to the subject site was carried out by IDASO on Wednesday 18th October 2023 some two weeks before the Halloween school break. The survey covered the 24-hour period between 00.00 and 00.00. The survey confirmed the AM and PM Peak Hours to be 08:00 – 09:00 and 17:00 – 18:00.

Results

The results of the 2023 traffic survey are summarised in Tables 3.

The 24-hour traffic flow recorded on the R122 was 15,729 vehicles at the subject site with 7,127 vehicles travelling northbound and 8,602 vehicles travelling southbound. The HGV content recorded was 10% northbound (705 vehicles) and 9% southbound (768 vehicles). The totals for the R122 in Table 3 include a total of 66 PSV travelling northbound and 97 PSV travelling southbound.

The 12-hour traffic flow recorded on the R122 was 12,950 vehicles at the subject site with 5,893 vehicles travelling northbound and 7,057 vehicles travelling southbound. The HGV content recorded was 10% northbound (606 vehicles) and 9% southbound (632 vehicles). The totals for the R122 in Table 3 include a total of 66 PSV travelling northbound and 97 PSV travelling southbound (97 vehicles).

The survey recorded a total of 118 arrivals to the recycling centre and 121 departures during the 24-hour survey period.

The corresponding arrivals and departures during the 12-hour period between 07.00 and 19.00 were 115 vehicles and 121 vehicles respectively. There were only 3 arrivals and 0 departures outside the 07.00 – 19.00 period.

The proportions of traffic movements into and out of the subject site for 2019 and 2023 are presented in Table 5

Table 3: Summary of Traffic Survey October 2023

Time	R122		Recycling Centre	
	Northbound	Southbound	Arrivals	Departures
00.00 – 01.00	24	33	-	-
01.00 – 02.00	23	20	-	-
02.00 – 03.00	24	28	-	-
03.00 – 04.00	28	31	-	-
04.00 – 05.00	36	59	-	-
05.00 – 06.00	117	185	-	-
06.00 – 07.00	183	454	3	-
07.00 – 08.00	324	908	15	1
08.00 – 09.00	419	945	3	6
09.00 – 10.00	332	694	13	11
10.00 – 11.00	324	414	6	6
11.00 – 12.00	361	416	12	14
12.00 – 13.00	452	452	12	11
13.00 – 14.00	437	490	17	12
14.00 – 15.00	468	491	13	17
15.00 – 16.00	575	482	9	11
16.00 – 17.00	747	623	14	22
17.00 – 18.00	886	700	1	10
18.00 – 19.00	568	442	-	-
19.00 – 20.00	350	308	-	-
20.00 – 21.00	183	189	-	-
21.00 – 22.00	141	105	-	-
22.00 – 23.00	75	90	-	-
23.00 – 00.00	50	43	-	-
Total 07.00 – 19.00	5,893	7,057	115	121
Total 00.00 – 00.00	7,127	8,602	118	121

Table 4: Arrivals and Departures 2023

Time	Arrivals				Departures			
	Car	LGV	OGV1	OGV2	Car	LGV	OGV1	OGV2
00.00 – 01.00	-	-	-	-	-	-	-	-
01.00 – 02.00	-	-	-	-	-	-	-	-
02.00 – 03.00	-	-	-	-	-	-	-	-
03.00 – 04.00	-	-	-	-	-	-	-	-
04.00 – 05.00	-	-	-	-	-	-	-	-
05.00 – 06.00	-	-	-	-	-	-	-	-
06.00 – 07.00	1	2	-	-	-	-	-	-
07.00 – 08.00	12	-	1	2	-	1	-	-
08.00 – 09.00	-	1	2	-	-	1	2	3
09.00 – 10.00	7	2	1	3	4	2	3	2
10.00 – 11.00	-	2	2	2	3	1	-	2
11.00 – 12.00	4	1	2	5	6	1	3	4
12.00 – 13.00	4	5	2	1	2	4	2	3
13.00 – 14.00	7	5	3	2	4	4	2	2
14.00 – 15.00	1	6	2	4	5	6	4	2
15.00 – 16.00	2	5	1	1	3	5	-	3
16.00 – 17.00	4	4	2	4	9	8	2	3
17.00 – 18.00	-	1	-	-	9	1	-	-
18.00 – 19.00	-	-	-	-	-	-	-	-
19.00 – 20.00	-	-	-	-	-	-	-	-
20.00 – 21.00	-	-	-	-	-	-	-	-
21.00 – 22.00	-	-	-	-	-	-	-	-
22.00 – 23.00	-	-	-	-	-	-	-	-
23.00 – 00.00	-	-	-	-	-	-	-	-
Total	42	34	18	24	45	34	18	24
Grand Total	118				121			

2.6 Comparison Between Traffic Surveys

A comparison between the results of the 2019 and 2023 surveys revealed that all of the surveyed traffic movements fell between the pre-Covid survey in 2019 and the post-Covid survey in 2023.

- The total 12-hour traffic volume on the R122 at the subject site fell by 8% from 14,019 vehicles in 2019 to a post-Covid level of 12,950 vehicles in 2023.
- The total 12-hour flow northbound past the subject site fell by 9% from 6,468 vehicles in 2019 to 5,893 vehicles in 2023.
- The total 12-hour flow southbound past the subject site fell by 7% from 7,551 vehicles in 2019 to a post-Covid level of 7,057 vehicles in 2023.
- The proportion of HGV on the R122 fell marginally from 10-11% in 2019 to 9-10% in 2023.
- The number of arrivals to the subject site in the 12-hour period between 7am and 7pm fell by 34% from 178 in 2019 to 118 in 2023.
- The number of departures from the subject site in the 12-hour period between 7am and 7pm fell by 29% from 170 in 2019 to 121 in 2023.
- The proportion of cars and LGVs in the site traffic remained consistent between the 2019 and 2023 surveys at 65 – 66% of site traffic.
- Between 2019 and 2023, the numbers and proportion of the smaller OGV1 reduced while the numbers and proportion of the larger OGV1 increased.

The details are presented in Table 5 below.

Table 5: Proportions of Site Traffic

Type	2019		2023	
	No	%	No	%
Car	67	39%	44	37%
LGV	47	27%	34	28%
OGV1	42	24%	18	15%
OGV2	18	10%	24	20%
Total	174	100%	120	100%

2.7 Existing Pedestrian Facilities

Existing pedestrian facilities in the area of the subject site comprise a footpath on the west side of St Margarets Road.

2.8 Existing Cycle Facilities

No existing cycle facilities were noted in the area of the subject site.

2.9 Existing Car Sharing Service

No car sharing bases operated by Go Car or other companies were noted in the area of the subject site.

2.10 Public Transport – Existing

Bus services in the area of the development are a combination of historic services operated by Dublin Bus and new services to be provided under the auspices of Bus Connects.

R122 St Margarets Road

Dublin Bus Route 40b links Parnell Street with Toberburr. There are 6 services in each direction each day.

There are no bus stops on the R122. The existing stops in St Margaret's Village are located at a walking distance of 3 minutes (290 metres) from the subject site.

St Margarets Village

Route 196 operated by TFI Local Link links Swords Pavilion to St Margaret's Village.

The service operates 15 times per day in both directions between 07.00 and 20.00.

The present terminus of Local Link Route 196 is in St Margarets Village at a walking distance of 3 minutes (290 metres) from the subject site.

Junction R122 and R108

Dublin Bus Route 83: Kimmage – Harristown operates along the R122 and R108 between the City Centre and Harristown at a frequency of 12 minutes in both directions.

The junction of the R122 / R108 to the south of the subject site is located at a walking distance of 12 minutes (950 metres) from the subject site.

2.11 Staff Travel Survey 2022

Surveys by the applicants in 2022 recorded a total staff of 30 persons of which 22 drove to work each day and parked on site.

The remaining 8 staff arrived as car passenger (4), bus (2) and on foot (2).

3. Planned Future Receiving Environment

3.1 Roads and Junctions

The applicants are not aware of any road or junction improvements proposed in the area of the subject site.

3.2 Pedestrian Facilities

The applicants are not aware of any new cycling facilities proposed in the area of the subject site.

3.3 Cycle Facilities

Draft proposals published by the NTA for the Greater Dublin Area Cycle Network envisage secondary cycle routes along the R108 and R122 St Margarets Road. See Figure 3.

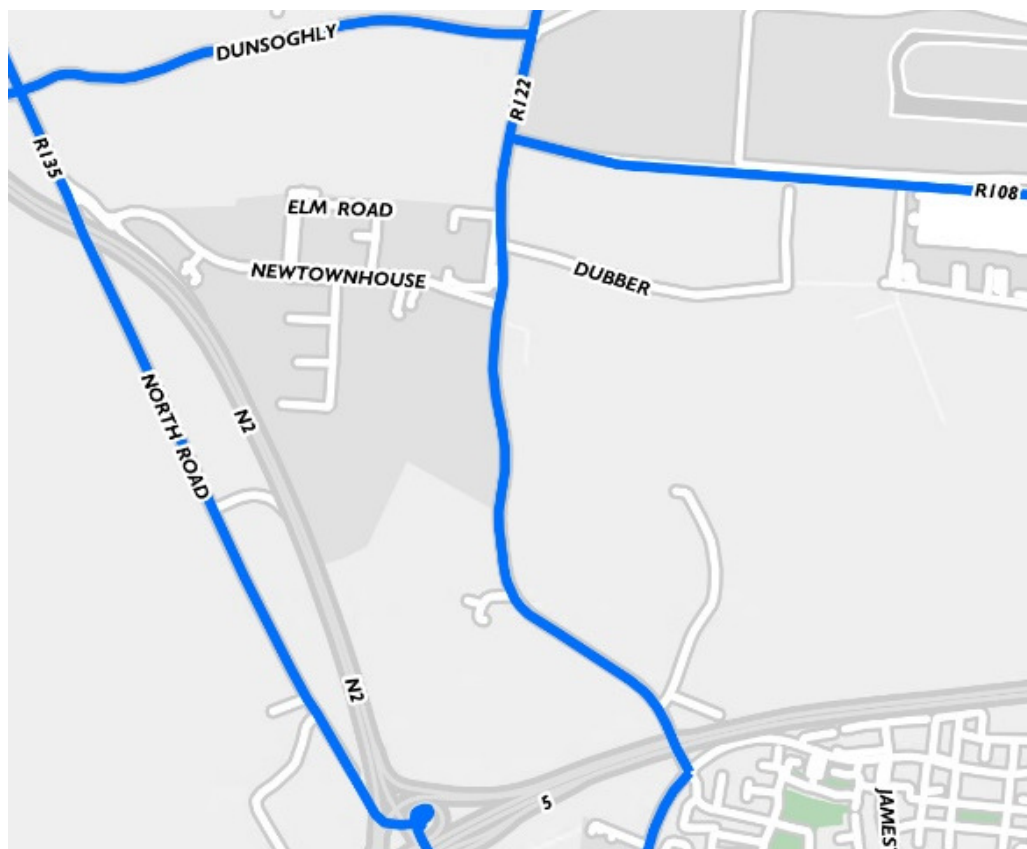


Figure 3: Extract from Sheet 1-9 of Draft GDA Cycle Network

3.4 Car Sharing

The applicants are not aware of any new car sharing facilities proposed in the area of the subject site.

3.5 Public Transport - Bus Services

Bus Connects is an ongoing project by the National Transport Authority to deliver a more efficient, reliable and better bus system for the Greater Dublin Area (GDA).

This is being achieved by: -

- (a) Building a network of bus corridors to make journeys faster and more reliable.
- (b) Redesigning the bus network to provide a more efficient network with high frequency spines, new orbital routes and increased services.

Proposals by Bus Connects for the Finglas area envisage the following routes serving the subject site as illustrated in Figure 4:-

- City Bound Route 24: Dublin Airport – Merrion Square
- Local Route L89: Finglas - Swords

It is expected that these services could be altered and / or extended as the surrounding area develops.

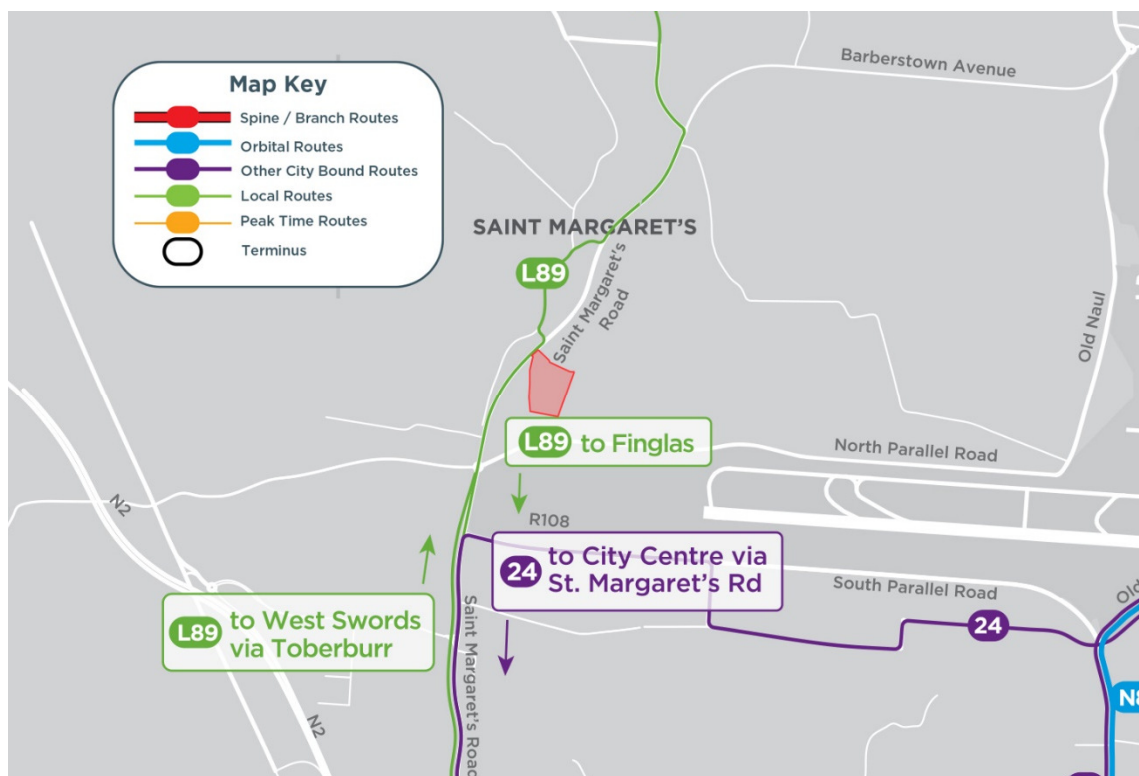


Figure 4: Extract from Bus Connects Map for Finglas Area

4. Characteristics of the Development

4.1 Description of Proposed Development

The proposed development relates to the on-going use of the facility with a waste throughput of up to 21,900 tonnes per annum on a site of c.1.75 ha for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles.

The proposed development also includes for the following development/physical works and additional mitigation including -

- Underground surface water attenuation tank with a capacity of c..675 cubic metres, and an above ground overflow connected to same comprising 1500 sqm.
- Enhancement of car parking provision, including installation of 2 no. EV charging points
- Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc.

The existing site layout is shown in Figure 5 and the proposed site layout in Figure 6.

4.2 Operational Measures

The impact of the subject development on the surrounding transportation network during recent years has been and will continue to be positive due to the mitigation measures implemented by the applicants of eliminating individual / smaller vehicles arriving at the site, and focussing on larger commercial waste collectors, thereby reducing vehicle numbers to / from the site, and improving efficiency and recycling capabilities on site.

As a result of these mitigation measures, there has been a 33% reduction in the number of vehicles accessing the site between 2019 and 2023.

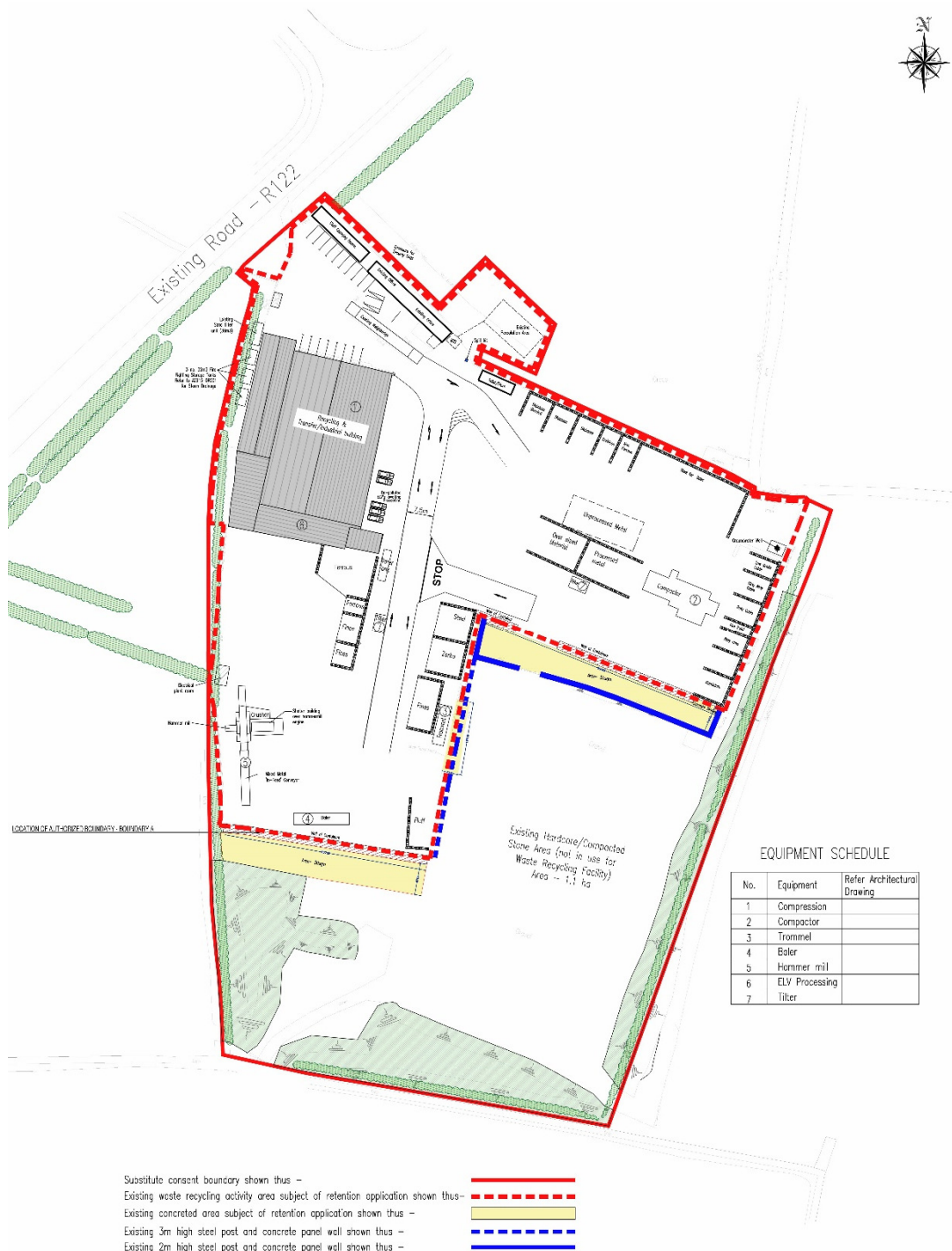


Figure 5: Existing Site Layout
(Extract from CWPA Drawing Site Plan – Retention Permission)



Figure 6 Proposed Site Layout
(Extract from CWP Drawing Proposed Site Plan)

4.3 Site Access

Access to the site is from the R122 through a 9.0 metre wide gateway on the east side of the R122 set back some 25.0 metres from the edge of the carriageway. See Figure 7.

To the north (right), the sightline exceeds the required 145 metres for a Regional Road with a posted speed limit of 80 kph, as required by Fingal County Council. However, in order maintain a 145 metre sightline to the south (left) continued maintenance of the maturing growth along the western boundary is required. Sightline visibility is maintained by ongoing maintenance of the existing hedgerow.



Figure 7: Site Access from R122 St Margarets Road

4.4 Car Parking

The existing and proposed car parking provision at the subject site is 20 spaces as shown in Figure 6 and on the drawings accompanying the planning application.

4.5 Truck Parking

The existing truck parking at the subject site is located on the concrete hard standing as shown as shown in Figure 6 and on the drawings accompanying the planning application.

5. Planning Background

5.1 Fingal County Development Plan 2023 - 2029

Chapter 14 of the Fingal County Development Plan 2023 – 2029 sets out standards and criteria to be applied to developments in the area.

5.2 Car Parking

Standards for car parking are set out in Table 14.19 of Fingal County Development Plan 2023 – 2029.

For the purpose of car parking, the subject site is located in Zone 2: *All Other Areas*.

The maximum standards applicable to the subject development are

- Offices – General 1 space per 40 sqm
- Industry – General 1 space per 50 sqm

For non-residential developments, a minimum of 5% of car parking spaces is required to be provided for disabled car parking.

For non-residential developments, functioning EV charging points are required to be provided at a minimum of 10% of all spaces and all other spaces appropriate infrastructure (ducting) to allow for future fit out of a charging point is required to be provided at all other spaces.

Based on the standards in the County Development Plan, the car parking for the subject site is a maximum of 45 spaces calculated as follows:-

• Offices	177 sqm x 1 spaces per 40sqm	5 spaces
• Industrial buildings	1,950 sqm x 1 spaces per 50sqm	40 spaces
	Total	45 spaces

The proposed car parking provision is 20 no spaces including 1 no. disabled space and 3 spaces for electric charging.

The locations of the car parking spaces are shown in Figure 6 and on the drawings included with the planning application.

5.3 Truck Parking

No standards for truck parking were noted in the Development Plan.

5.4 Motorcycle Parking

For non-residential developments, motorcycle parking is required to be provided on the basis of one motorcycle parking bay per 10 car parking spaces.

5.5 Cycle Parking

Standards for cycle parking are set out in Table 14.17 of Fingal County Development Plan 2023 – 2029.

The minimum standards applicable to the subject development are

- | | | |
|----------------------|------------|---------------------|
| - Offices – General | Long Stay | 1 space per 60 sqm |
| | Short Stay | 1 space per 200 sqm |
| - Industry – General | Long Stay | 1 space per 80 sqm |
| | Short Stay | 1 space per 200 sqm |

Based on the standards in the County Development Plan, the cycle parking for the subject site is a total of 56 spaces comprising 45 long stay spaces for staff and 11 short stay spaces for visitors calculated as follows:-

Long Stay - Staff

- | | | |
|------------------------|--------------------------------|-----------|
| • Offices | 177 sqm x 1 spaces per 60sqm | 5 spaces |
| • Industrial buildings | 1,950 sqm x 1 spaces per 80sqm | 40 spaces |
| Total Long Stay | | 45 spaces |

Short Stay - Visitors

- | | | |
|------------------------|---------------------------------|-----------|
| • Offices | 177 sqm x 1 spaces per 200sqm | 1 spaces |
| • Industrial buildings | 1,950 sqm x 1 spaces per 200sqm | 10 spaces |
| Total Short Stay | | 11 spaces |

A staff travel survey in 2022 recorded that none of the 30 staff travelled by bicycle.

6. Traffic Assessment 2023

6.1 Surveyed Traffic Flow

The traffic movements for the access junction to the subject site during the AM Peak Hour 8 – 9 and the PM Peak Hour 5 – 6 as surveyed in October 2023 are set out in Tables 3 and 4 and illustrated in Figure 9.

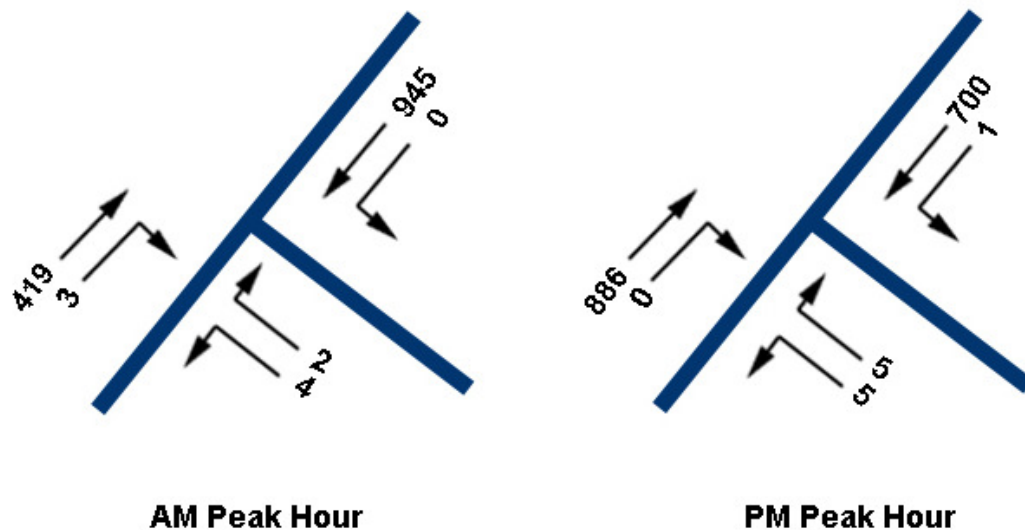


Figure 8: Surveyed Traffic Movements 2023

6.2 Trip Generation and Assignment

The surveyed traffic movements in Figure 9 are those generated by a waste turnover of 33,695 tonnes per annum in 2023.

They include 3 arrivals and 6 departures during the AM Peak Hour 8 – 9 and 1 arrivals and 10 departures during the PM Peak Hour 5 – 6.

6.3 Modelling Background

The existing access to the subject site from St Margarets Road was assessed using the computer program PICADY which is a software for modelling priority-controlled junctions. This programme utilises junction's geometry and traffic flows input by the user to determine Ratio of Flow to Capacity (RFC) and queue length for each link on the junction.

Typically, a junction is said to be working satisfactorily when the RFC of each arm does not exceed 90% / 0.9. Acceptable RFC values are considered to be in the range of 0.8 to 1.0 with higher values indicating restrained movements.

6.4 St Margarets Road / Site Access

The site access was modelled as a priority junction in its existing configuration. The HGV proportion was taken at 11% on the major road (R122) and 40% on the minor road (site access).

Within the PICADY model, the arms of the junction were labelled as follows:

- Arm A: St Margarets Road (north)
- Arm B: Site Access (east)
- Arm C: St Margarets Road (south).

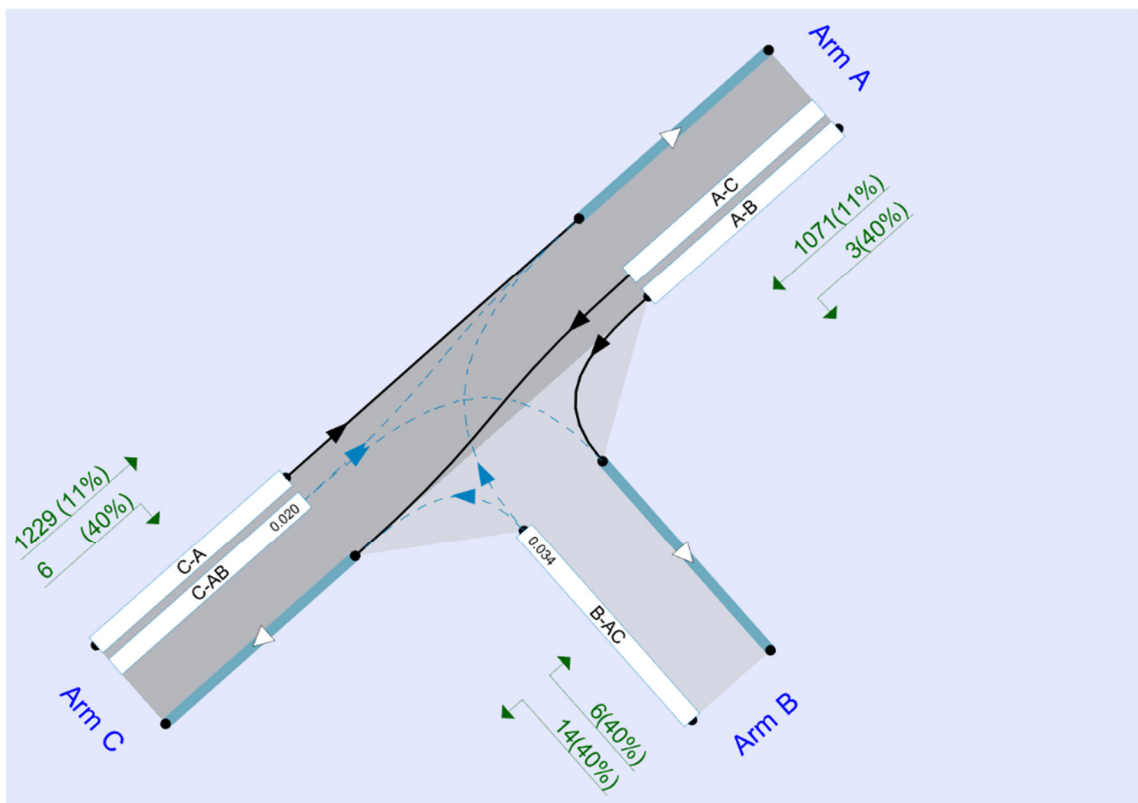


Figure 9: PICADY Layout for Access Junction

6.5 Results of Traffic Modelling

The results of the junction assessment confirmed that the access operated satisfactorily in 2023 with a maximum RFC of 0.11 and a maximum queue length of 1 vehicles in both the AM and PM Peak Hours.

7. Traffic Assessment 2029 and 2039

7.1 Base Traffic Flows

The methodology adopted for the determination of base flows for future years is described below.

Firstly, the surveyed traffic flows on the R122 were extracted from the traffic survey carried out in October 2023.

Secondly and in line with the requirements of '*Transport Assessment Guidelines (May 2014)*', the years for the assessment were selected to be: :

- 2024 Opening Year:
- 2029 Design Year (Opening Year + 5)
- 2039 Future Year (Opening Year + 15)

7.2 Contiguous Development

The applicants are not aware of any contiguous development(s) which would affect the base traffic flows for this development.

7.3 Traffic Growth

Thirdly, the base traffic flows for the selected future years were obtained by factoring up the 2023 baseline traffic flows using factors from the TII Publication – *Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections* (May 2021).

The Central Growth Rate factors extracted from Table 6.1 of that publication are set out below.

- 2023– 2029: 1.082
- 2023 – 2039: 1.266

The projected base flows for the R122 at the access junction to the subject site during the period 7am – 7 pm are 14,011 vehicles in 2029 and 16,395 vehicles in 2039.

7.4 Development Traffic

Based on an ongoing waste throughput of 21,900 tonnes per annum, the traffic generated by the subject development in the Design Year 2029 and the Future Year 2039 will be less than the 118 arrivals and 121 departures generated in 2023 when the waste turnover was 33,695 tonnes per annum).

7.5 Traffic Impact

As the traffic generated by the subject development will continue to be significantly less than the 10% threshold set out in the Transport Assessment Guidelines published by TII in 2014, no further traffic assessment is required.

8. Transportation Impact

8.1 Roads

The extent of traffic impact from the development was determined by checking whether the total traffic generated by the subject development during the 12-hour period between 7am and 7pm exceeded 10% of the traffic flow on the adjoining road during the same period.

The traffic generated by the St Margarets Metal Recycling Centre reduced from 186 vehicles per day for a waste throughput of 33,524 tonnes per annum in 2019 to 121 vehicles per day for a waste throughput of 33,696 tonnes per annum in 2023.

Externally, the traffic flow on the R122 over a period of 12 hours reduced from 14,019 vehicles in 2019 to 12,950 vehicles in 2023. The generated traffic was therefore equivalent to some 1 - 2% of the flow on the adjoining road.

As the traffic generated by the subject development was significantly less than the 10% threshold set out in the Transport Assessment Guidelines published by TII in 2014, no further traffic assessment is required.

This is borne out by the results of the discretionary PICADY junction assessment described in Sections 6.0 and 7.0.

8.2 Road Junctions

The results of the junction assessment confirmed that the access from the R122 to the subject site operated satisfactorily and within capacity for a waste throughput of 33,524 – 33,696 tonnes per annum.

8.3 Public Transport – Bus

Passenger Demand

Based on a staff of 18 -22 persons in 2019 and up to 29 persons in 2023 persons together with a modal split for public transport of 20%, the peak demand from the development for travel by bus was up to 6 passengers during the AM Peak.

Based on the location of the development, it is assumed that 50% of these passengers travelled from Finglas and 50% from St Margarets.

Bus Capacity

Based on a review of the fleet of double deck buses operated by Dublin Bus in the area of the development, the average capacity of each bus including standing passengers was found to be 87 passengers per bus.

Demand v Capacity

The demand of 3 passengers per hour in each direction during the AM Peak Hour is significantly within the existing capacity of up to 400 passengers per hour provided by the current timetable for Dublin Bus Routes 40b, 83 and 196.

9. Summary

This Traffic and Transport Assessment (TTA) assesses the use of the subject site for

- Waste turnover of 21,900 tonnes per annum.
- Opening Year 2024
- Design Year 2029
- Future Year 2039

The conclusion of this TTA is that the access junction from the R122 to the subject site operated satisfactorily and within capacity with a waste turnover of 33,696 tonnes per annum in 2023.

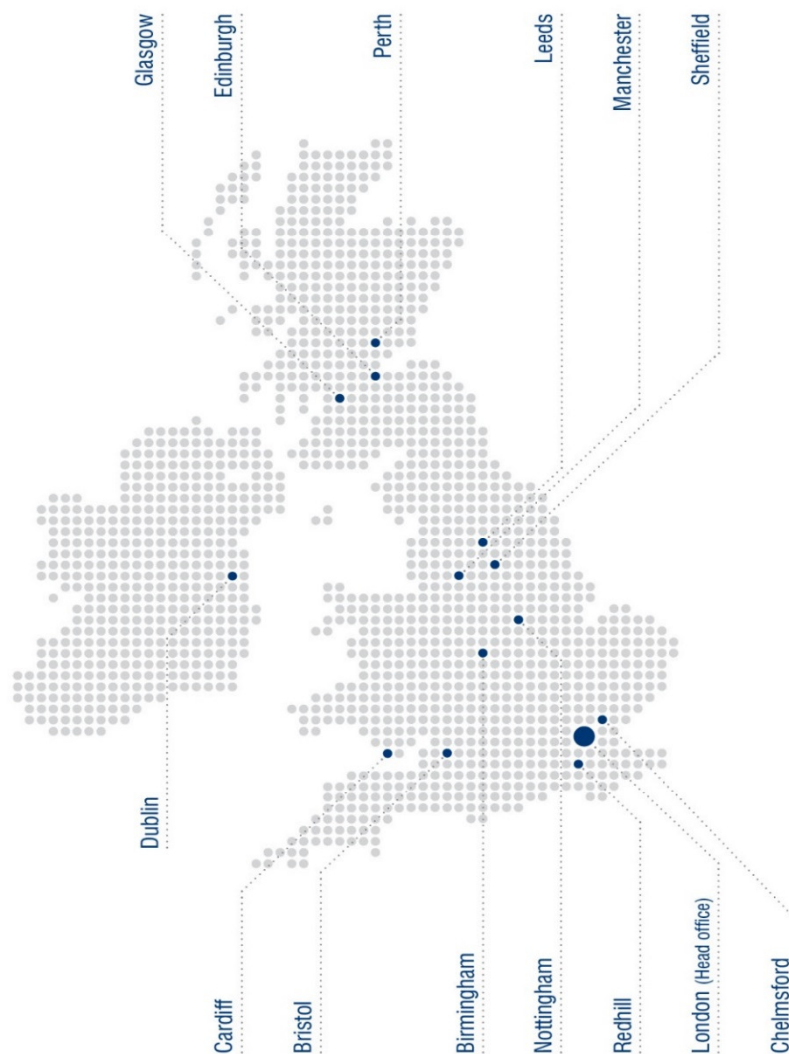
The TTA also concluded that the access junction from the R122 would continue to operate satisfactorily through the Design Year of 2029 to the Future Year of 2039 with a waste turnover of 21,900 tonnes per annum.

The public transport demand is significantly within the existing capacity of the bus services in the area of the subject site.

The impact of the subject development on the surrounding transportation network during recent years has been and will continue to be positive due to the mitigation measures implemented by the applicants of eliminating individual / smaller vehicles arriving at the site, and focussing on larger commercial waste collectors, thereby reducing vehicle numbers to / from the site, and improving efficiency and recycling capabilities on site.

As a result of these mitigation measures the Ratio of Flow to Capacity for the access junction has significantly reduced notwithstanding the normal increases in traffic flow on the R122.

UK and Ireland Office Locations



APPENDIX 4

December 2024

Prepared by CWPA Planning & Architecture

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Appendix 5

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Non- Technical Summary – Environment Impact Assessment Report

In support of Substitute Consent Application
for development at St. Margaret's Waste Recycling & Transfer Centre

**Quality Assurance – Mandate Stature**

This document has been prepared and reviewed in accordance with CWPA Planning & Architecture Quality Assurance team provisions.

Date of Preparation	Prepared By	Checked By	Approved By
December 2024	Rachel Kenny	Rachel Kenny Joe Corr	Joe Corr

Application Information:

Applicant:	St Margaret's Recycling & Transfer Ltd.
Planning Authority:	An Bord Pleanála
Local Authority:	Fingal County Council
RE:	Ongoing use, associated works and activities/tonnage at waste transfer and recycling centre at St. Margaret's, Co. Dublin
Subject Site:	St. Margaret's Recycling & Transfer Centre, Sandyhill, Co. Dublin
Prepared By:	CWPA Planning & Architecture

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1.0 INTRODUCTION

St. Margaret's Recycling & Transfer Centre Ltd. has been in operation for almost 3 decades, with the first application being lodged in 1997 for retention of operations on site. The waste recycling centre was first permitted under F97A/0109, and this was the only permanent permission granted for development and operations on site.

The site has a lengthy and complex planning history, largely as a result of the temporary nature of planning permissions over the last 20 years. While the original permission related to a c.0.6ha site, and limited operations to 10,000 tonnes intake per annum, it has never operated at this level, with tonnage at that time being c.21,000 tonnes per annum.

The waste licence permitted on site allowed for 60,000 tonnes per annum, and this would appear to have been the principal influence and enabler of the tonnages operated on site. EPA records show that tonnages during the period of the Licence ranged from c.60,000 to 95,000 tonnes per annum, on a c.1.5 ha site.

To facilitate the tonnages in an efficient and safe manner the site was enlarged during the late '90s and prior to 2003. This is noted by the planning authority in their report and permission granted under F03A/1561. Notwithstanding this, and conditions seeking the reduction in site size, the site continued to operate without the benefit of planning permission for the larger site and greater waste intake for some 12 years, without any enforcement action being taken and without conditions specifically addressing tonnage (i.e. from 1998 to 2010). It is therefore acknowledged that it is from this point in time, i.e. 1998, that unauthorised development (being that over and above that permitted under F97A/0109) commenced.

The planning authority temporarily permitted this unauthorised development over the subsequent years from December 2003 onwards under F03A/1561, F10A/0177, F11A/0443, and F13A/0409. However, with the lapse of permission in August 2019, the development and operations on site generally reverted to the unauthorised development originally commenced in 1998.

While the development, at its current levels of 22,000 tonnes per annum is unauthorised, as it commenced in 1998, and as no enforcement proceedings were initiated during the preceding 7 years, it is outside of the 'enforcement period'. The granting of temporary permissions does not alter this date. A similar position relates to the site size on which operations are occurring.

Notwithstanding the fact that the majority of the development (and operations at 22,000 tonnes per annum) is outside of the period during which the Planning Authority can take enforcement proceedings, previous operators and the applicant have endeavoured to regularise matters on site, applying for retention on numerous occasions. Most recently under F20A/0029, where the Planning Authority granted permission and An Bord Pleanála overturned this decision.

The applicant is again endeavouring to regularise this non-conforming and unauthorised use and development. St. Margaret's Recycling & Transfer Centre Ltd. is applying to An Bord Pleanála for substitute consent for existing structures, and plant on site, of revised and



extended site area and associated site boundaries, previous recycling use for the period 2019 to 2023 for c.26,000 tonnes per annum to 42,500 tonnes per annum and (from Jan 2024 onwards) continuation of use on a permanent basis of the existing St. Margaret's Recycling & Transfer Centre facility for up to 21,900 tonnes per annum.

The lands upon which the recycling activity takes place extend to c.1.6 hectares, from 0.6 hectares (permitted site area under F97A/0109) and are located to the west of Dublin Airport. The overall site is noted as c.2.93ha, with the additional 1.1ha, the subject included in this application and used as an area of hard standing (compacted hard core) for the temporary and ad hoc storage of plant, machinery, trucks, and skips, and subject of a proposal to convert to a wildflower meadow. The application also includes for the on-going use of the site for this purpose, at 21,900 tonnes per annum, on a c.1.75ha site, and for augmentation of ancillary infrastructure including additional surface, storm and fire water retention attenuation, installation of EV charging points, and improvements to internal boundary arrangements.

As the development operated at tonnages in excess of 25,000 tonnes for a number of years (and therefore required a mandatory EIAR), and noting that it relates to 'Retention', the application must be submitted under 'Substitute Consent' provisions, commenced in December 2023.

This document provides a non-technical summary in respect of the EIAR.



2.0 DEVELOPMENT DESCRIPTION

Planning permission is sought by St. Margaret's Recycling & Transfer Ltd. at St. Margaret's Recycling & Transfer, Sandyhill, St. Margaret's, Co. Dublin, under substitute consent provisions, for -

1. Continuation of the use of the existing metal processing and transfer facility with an increase in waste throughput at the facility to accept up to 21,900 tonnes per annum (in line with waste permit) for the bulking, transfer and recycling of metals, construction & demolition waste, bulky/skip waste, batteries, wood waste, glass, other non-biodegradable non-hazardous wastes, and an Authorised Treatment Facility for end-of-life vehicles, and
2. Permission for upgrades to the underground surface water attenuation tank comprising c.675 cubic metres, and an above ground overflow connected to same comprising 1500 sqm
3. Enhancement of car parking provision, including installation of 2no. EV charging points, and
4. Alterations to site boundary arrangements, including replacement of existing internal boundary comprising stacked steel containers with 3m high concrete panel and steel post wall, augmentation of dust netting where applicable, etc,

This application is accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) and relevant drawings, site layouts, etc.

In tandem, and supporting the above noted development is the application under the same Substitute Consent Provisions for the retention of existing structures, and plant on site, retention of revised and extended site area and associated site boundaries, retention of previous recycling use for the period 2019 to 2023 for c.26,000 tonnes per annum to 42,500 tonnes per annum and retention (from Jan 2024 onwards) and continuation of use on a permanent basis of the existing St. Margaret's Recycling & Transfer Centre facility for up to 21,900 tonnes per annum.



Figure 1 – Site Layout for Proposed Development (Indicative only)

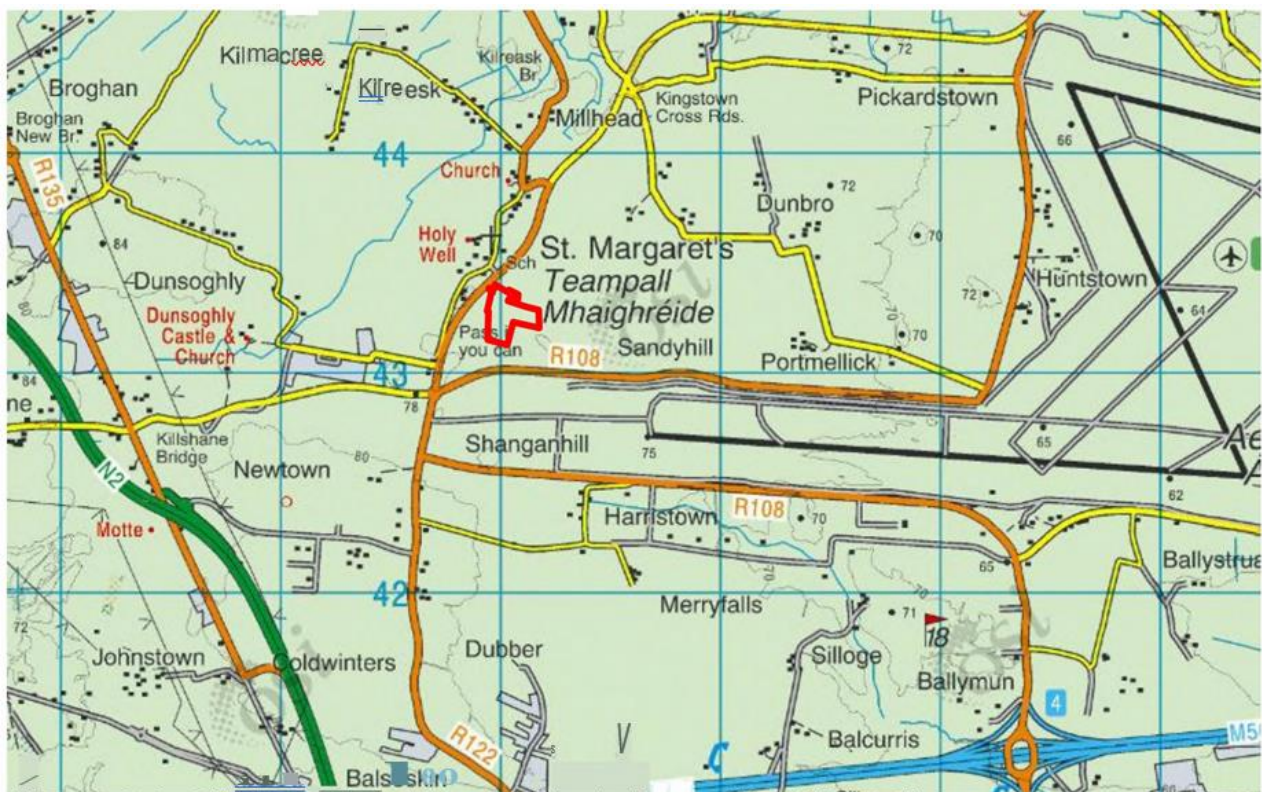


2.1 GENERAL DESCRIPTION OF SITE AND SURROUNDINGS

The site is located in the town land of Sandyhills, approximately 100 m south of St. Margaret's village and 6 km southwest of Swords, County Dublin. The R122 passes in a north-south direction close to the western edge of the site, adjoining the boundary only at the northwestern corner, where the site entrance is located. The R108 lies to the south which runs to the south of the site and Dublin Airport is located immediately to the west within the southern runway lying to the southeast.

The site is relatively isolated, bounded to its southern, western and eastern boundaries by agricultural lands, much of which is in family ownership. The village of St. Margaret's is located on the western side of the R122 and as such, the facility is somewhat disconnected and separate from the village.

Figure 2. Site Location (indicative)



2.2 Site Description

The site is an existing brownfield site, comprising the waste recycling operations in place since 1997, and is relatively isolated, bounded to its southern, western and eastern boundaries by agricultural lands, much of which is in family ownership. The village of St. Margaret's is located on the western side of the R122 and as such, the facility is somewhat disconnected and separate from the village.



Access to the site is from the existing approved entrance onto the R122 and the entrance is formed by a high block concrete wall with metal panel gate. A concrete splayed area is situated between the entrance and roadside boundary. On entering the premises, a car parking area is provided to the left. A weighbridge and several portacabins which function as office space, canteen and toilets are situated within the application site.

The vast majority of the site is hard surfaced with impermeable concrete. A number of galvanised steel sheds are located to the western boundary of the site. These sheds access onto a concrete yard area.

Figure 3. Existing 'Waste Recycling' Site Aerial Photo



Existing buildings and enabling infrastructure on site, include internal roads, internal boundaries and walled open air storage areas, proprietary waste water treatment system, surface water drainage and attenuation (c.206cu.m), fire prevention system, firewater retention attenuation (105cu.m), impermeable concrete surface over approx. 1.7ha, industrial buildings comprising 1917 sqm and prefabricated ancillary office and staff facilities, control room comprising 206 sqm and weigh bridge. Machinery comprising hammermill, shredders, bailers, tilters, forklifts, grabbers, et al are located on site, although not permanent structures.

The extract below is included for illustrative purposes. Please refer to the enclosed scaled plans prepared by CWPA and Waterman Moylan which set out the existing and proposed site layout and the existing and proposed engineering details.

Refer to DWG 22073-PP-01



2.3 General Description of Operations

The site is an established waste facility and has been in operation for the past 28 years (c. 1997) and operates as an authorised treatment for end-of-life vehicles (ATF for ELVs) under Waste Facility Permit from Fingal County Council (WFP-FG-13-0002-02).

All input material is weighed and recorded at the facility weighbridge. Input tonnages are monitored on a monthly and quarterly basis by the applicant. The waste types accepted on site comprise the following:

- Metals
- Construction and demolition waste
- Wood waste
- Glass
- End-of-Life Vehicles (ELVs)
- Batteries

The above waste types, including that from members of the public were recycled on site at the time of the 1997 permission, and at a tonnage consistent with that is in operation today.

The St. Margaret's Recycling Facility does not and will not accept food waste (putrescible wastes) or green waste. Waste acceptance procedures are in place to ensure that food waste is not presented as part of the Construction & Demolition waste or other incoming waste streams. It was noted within the previous application on the lands that there were concerns relating to birds due to its proximity to Dublin Airport Runways. The applicant has adhered to the restriction on green and food waste. The only organic/biodegradable waste stream accepted on site is wood/timber waste, which is not a food source and therefore not deemed to be an attraction to scavenging birds. All handling and processing of Construction & Demolition waste skips is carried out undercover and indoors.

The facility has no record of complaints/non-compliance or history associated with bird nuisance.

In the absence of green waste and food waste, potential impacts relating to bird nuisance are therefore considered to be insignificant for this facility and operation. Continued implementation of the Waste Acceptance Procedure, in line with the requirements of the site's Waste Facility Permit, and the procedure of works as part of the development procedure will continue to be applied.

The Dublin Airport Authority had no objection to the principle of the extant temporary planning permission granted under Reg. Ref. F13A/0409 provided mitigation measures were met. It is submitted that mitigation measures will continue to be implemented on site as there are no proposed amendments in relation to the recyclable waste and material accepted on site.

There are no changes proposed to the existing layout for the site, including in respect of buildings etc.



Operating Hours

The site operates from 8 am to 5.30 pm on weekdays, 8am to 2pm on Saturday, and the site is closed on Sundays and bank/public holidays.

Emissions

This is an existing site with an existing Waste Facility Permit (WFP-FG-13-0002-03) under which the emissions monitoring is required and reported.

While there may be an insignificant rise in emissions due to the continued operation of plant on site, this will be offset by the reduction of transport emissions of 57gr CO₂ /tonne/km which result 283,159.2 kg CO₂/annum at the most conservative calculation.

Noise and vibration on site was measured and considered to be below acceptable levels, whether at the higher or lower tonnage levels.

No other emissions pertain.

Construction

Most of the construction on site took place prior to 2003, and in subsequent years as outlined in the planning history. From 2019 to date, limited construction/new works took place, with the following being the only additional elements –

- 2 no. areas comprising c. 0.05ha and c.0.05 ha of hardstanding and replacement of stacked steel containers as boundary to kerb and steel post and concrete panel wall;
- Replacement of previously permitted prefabricated office buildings with new prefabricated office buildings on the same footprint, replacement of hammermill plant and miscellaneous machinery.
- Enhancement of fire safety measures,
- Enhancement of surface water drainage measures.
- Installation of additional dust monitoring and mitigation measures.

There works are of a very minor nature and, over and above those previously assessed, no material or significant construction works took place during the period 2019 to 2024 that would have resulted in a significant or notable environmental impact. Installation of solar panels on the industrial buildings is understood to be exempt from the requirement for planning permission

Future Construction Works

It is proposed to topsoil and seed an area of c.1.1ha, which was converted to compacted hardcore by the previous operator, i.e. prior to 2010. The Planning Authority sought the reversion of this land to agricultural use by condition in 2014 (under F13A/0409). These works did not take place at that time, however, the applicant proposes to implement this condition subject to Board approval.



A review of storm water attenuation relating to surface water drainage has taken place as part of on-going review of site operations, and it is considered that the existing stormwater attenuation tank of 206 m³ for the purposes of surface water drainage is sufficiently sized so as to meet the needs of the 1.75 ha site. While a proposed of 675 m³ surface water attenuation tank, which includes a 135m³ provision dedicated to auxiliary fire water storage for the purposes of firefighting will be located on lands to the north of the existing site, along with a further and connected overflow of 1500 cu.m surface water attenuation basin, this relates to the future use of the site. This infrastructure is required to meet 1:100 and 1:30 flood events in line with current standards. It was not required at the time of the original permissions.

Other proposed construction associated with proposed mitigation for the on-going use of the site are of a minor nature and include further improvements to site boundaries, and provision of a new car and bicycle parking area, and additional surface water attenuation, and are required only in respect of the proposed development. As such they will be considered in the EIAR, rather than rEIAR.

Irish water had been contacted to extend the current mains water lines for the purpose of installing a hydrant to increase the strategies available for firefighting on site, and this is technically feasible (with the site already being served by public mains), However, it has been determined by the fire consultant that this is not required.

2.4 Alternatives

In so far as the development is existing and has been in existence at this scale (or greater) since before c.2003, and this application is focussed on the continued use of an existing development, with some additional mitigation measures, considerations of alternatives is somewhat limited. The development is a non-conforming use at its current scale, and it has been in operation for over 20 years at this level. The period during which enforcement proceedings can be initiated by the planning authority has passed. For these reasons, alternative sites were not considered.

Alternatives to the proposed mitigation measures, ie. do nothing or install mitigations and environmental improvement measures was not considered in depth, in that these measures were considered to positively reduce potential environmental impacts, and are therefore recommended.

In addition it should be acknowledged that the continued use of the site at the long-established tonnage of c.22,000 tonnes per annum is considered to have a net environmental benefit, complying with the Development Plan objectives regarding recycling and reusing waste, and carrying out this function within the county as opposed to exporting from the county which would occur were the development not to operate. 70-80% of metal waste for the country is recycled at St.Margaret's therefore without this Centre, this waste would be required to be sent to Northern Ireland, and typically exported for there. This is considered to be contrary to the Waste Management requirements for Fingal and Ireland.



3.0 Planning Rationale

Noting the planning history on site, the nature of the permissions which over time essentially would equate to the granting of a temporary permission for approx.20 years for the existing St. Margaret's Recycling & Transfer Centre facility serving the Fingal area, it is now proposed to seek permission for the ongoing use of this unauthorised non-conforming activity which has been in place for almost 3 decades, and for the first c.12 years as a non-compliant, and as such unauthorised, development, which it reverted back to over the last 5 years with the lapse of permission in August 2019.

The reasons and justification for permanent permission are as follows:

- The St. Margaret's Recycling & Transfer facility (SMMR) provides the necessary and key waste processing and transfer facility to the Fingal and wider Dublin area. This would be in accordance with the Fingal Development Plan Policy 2023-2029 Objective IUO29.
- The granting of permanent planning permissions for this site are integral for fulfilling the policy objective Policy IUP22 of the Fingal Development Plan 2023-2029 which seeks to transition from a waste economy towards a green circular economy and make Fingal self-sufficient in terms of resource and waste management.
- St Margaret's Metal Recycling (SMMR) Facility is the only facility in the county which has the capability and capacity to process metals collected in the country (by the permitted commercial operators) and recycle them to the extent that 95% of this was material can be re-used. Without such a facility the permitted existing operators would be required to transport this waste outside of the county and country, therefore being non-compliant with FCC and national objectives to reduce waste and to recycle as close to source as is practicable.
- SMMR facility also provides an invaluable service to An Garda Síochána who are legally obligated to dispose of end of life vehicles (ELVs) in an authorised treatment facility (ATF). 90% of the ELVs disposed of and recycled at SMRR ATF are from the Garda Síochána. Again, the recycling capability of SMMR ATF allows for the maximum level of recycling for reuse.
- As the population of Fingal is increasing significantly, there is an increase in demand for waste facilities to meet waste objectives and achieve binding targets to separate and process waste streams at municipal and national levels. This is the only location within Fingal that can process metal to the extent required to enable its reuse as a raw material, rather than its transfer out of the county and country as a waste product.
- Planning permission for the continuation of the waste processing and transfer facility has been granted planning permission by Fingal County Council on several



occasions since 1997 and the development was considered to be compliant with the policies and objectives of the Fingal Development Plan at those times.

- The waste processing and transfer facility has been operating since prior to 1997. The DAA had no objection to the principle of the extant planning permission granted under Reg. Ref. F13A/0409 provided mitigation measures are being met. It is submitted that the mitigation measures will continue to be implemented as part of the proposed ongoing use.
- The granting of permission does not preclude the lands from any future applications for alternative developments, and it should be noted that there is some 840ha of undeveloped DA zoned lands available for development for DA uses.
- The granting of permanent planning permission will put an end to the costly reoccurrence and administrative burden of repeat applications for temporary planning permissions.
- The granting of permanent planning permission will provide job security to approx.25 employees and the waste facility owner/operator. It will also provide security to ensure that an existing and waste transfer and recycling facility is available to the Fingal Area to safeguard its efficient operation and will have regard to the importance of increased recycling facilities as part of national and regional policy guidance.
- The proposed development is a non-conforming use, and has been granted by Fingal County Council since its establishment having regard to the County Development Plan objectives providing for such non-conforming uses, being *“uses which do not conform to the zoning objective of the area. These are uses which were in existence on 1st October 1964, or which have valid planning permissions, or which are unauthorized but have exceeded the time limit for enforcement proceedings. Reasonable intensification of extensions to and improvement of premises accommodating these uses will generally be permitted subject to normal planning criteria.”*

Permanent planning permission is being sought and is considered appropriate having regard to the established nature of the facility which is fully constructed and in situ. As one of only 3 Authorised Treatment Facilities for End-of-Life Vehicles (ELV's), the granting of permission will be in accordance with waste management strategy for Fingal and particularly Objective WM01 which seeks to facilitate the sustainable expansion of existing Authorised Treatment Facilities for end-of-life vehicles complying with European Union (End of Life Vehicles) Regulations 2014, other relevant legislation and the Eastern Midlands Regional Waste Management Plan 2015-2021.

Permanent planning permission would allow for long term investments such as low carbon and sustainable energy generation. This would be in line with Policy IUP33 and Policy IUP30.



The applicant does not propose to extend operations on site and is in discussion with Fingal County Council to identify, acquire and develop an alternative site, and to facilitate this requires sufficient time, and certainty re. operations and income.

3.1 Fingal Development Plan 2023-2029

Relevant policies from the development Plan are listed below:

Objective IUO29 – Sustainable Waste Recovery and Disposal

Provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping with the EU waste hierarchy, national legislation and regional waste management policy to adequately cater for Fingal's growing population.

Policy IUP22 – Transition From A Waste Economy Towards A Green Circular Economy

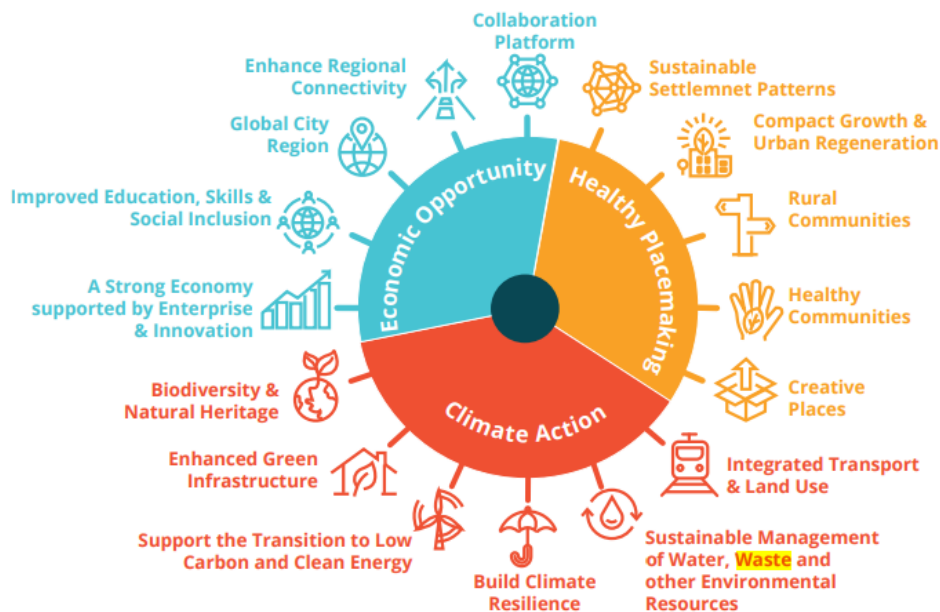
Support the principles of transition from a waste economy towards a green circular economy and implement good waste management and best practices to enable Fingal to become self-sufficient in terms of resource and waste management and to enhance employment and increase the value recovery and recirculation of resources, in accordance with the Whole-of-Government Circular Economy Strategy 2022.

Figure 1.2: National Strategic Outcomes of the NPF





Figure 1.3: Regional Strategic Outcomes of the RSES



Policy CAP10 – Climate Mitigation Actions in the Built Environment Promote low carbon development within the County which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation. New development should generally demonstrate/provide for: *inter alia*

f. Minimising the generation of site and construction waste and maximising reuse or recycling;

5.5.4.1 Circular Economy Chapter 11 Infrastructure and Utilities and Chapter 14 Development Management Standards of this Plan, seeks to integrate a more sustainable approach to waste based on circular economy principles. National climate action policy emphasises the need to take action to address climate action across all sectors of society and the economy. In the waste sector, policy on climate action is focused on a shift towards a ‘circular economy’, encompassing three core principles: designing out waste and pollution; keeping products and material in use; and regenerating natural systems

5.5.4.1 Circular Economy

Chapter 11 Infrastructure and Utilities and Chapter 14 Development Management Standards of this Plan, seeks to integrate a more sustainable approach to waste based on circular economy principles. National climate action policy emphasises the need to take action to address climate action across all sectors of society and the economy. In the waste sector, policy on climate action is focused on a shift towards a ‘circular



economy', encompassing three core principles: designing out waste and pollution; keeping products and material in use; and regenerating natural systems.

Chapter 11 – Infrastructure and Utilities

Supports the promotion and delivery of more sustainable forms of waste management in line with circular economy principles.

Supports minimising/preventing waste and maximising material recycling, reuse and re-purposing.

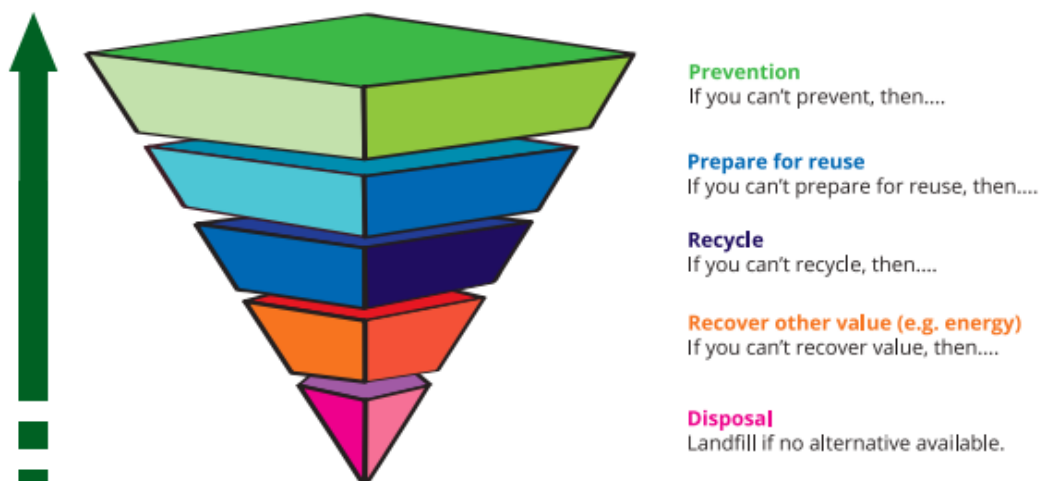
Fingal County Council in their plan, state-

“Successful waste management strategies and policies play an essential role in protecting public health, maintaining a high-quality environment and supporting sustainable development in Fingal and the wider eastern region. In managing our waste needs, we need to minimise waste going to landfill and maximise waste as a valuable resource, as we make the transition from a linear to a circular economy”

“Fingal County Council will continue to support the principle of the circular economy on re-usables and water and waste reduction. Promoting and delivering more sustainable forms of water and waste management in Fingal in line with circular economy principles will be central to the overall approach of the Plan”

3.2 Waste Management Plan 2015 - 2021

Figure WM01: Waste Hierarchy





Fingal County Plan relies on and incorporates the Eastern Midlands Region Waste Management Plan, 2015-2021, as follows –

“The Eastern Midlands Region Waste Management Plan 2015 -2021 was adopted in May 2015. The overall vision of the Regional Waste Management Plan is to rethink the approach taken towards managing waste and that waste should be seen as a valuable material resource. The Plan also supports a move towards achieving a circular economy which is essential if the region is to make better use of resources and become more resource efficient. In the global economy, the demand and competition for finite and sometimes scarce resources will continue to increase, and pressure on resources is causing greater environmental degradation and fragility. Making better uses of these resources, reducing the leakage of materials from our economies, will deliver benefits economically and environmentally. The move to a circular economy replacing outdated industrial take-make-consume and dispose models, is essential to deliver the resource efficiency ambition of the Europe 2020 Strategy.

The Plan contains three targets:

- *1% reduction per annum in the quantity of household waste generated per capita over the period of the Plan.*
- *Achieve a recycling rate of 50% of Managed Municipal Waste by 2020.*
- *Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices.*

Source : Eastern Midlands Region Waste Management Plan 2015-2021”

Objective WM01

Facilitate the sustainable expansion of existing Authorised Treatment Facilities for end of life vehicles complying with European Union (End of Life Vehicles) Regulations 2014, other relevant legislation and the Eastern Midlands Regional Waste Management Plan 2015-2021.

Objective WM04

Facilitate the transition from a waste management economy to a green circular economy to enhance employment and increase the value recovery and recirculation of resources.

Furthermore, the Plan states that *“The Council will promote an increase in the amount of waste reused and recycled consistent with the Eastern Midlands Region Waste Management Plan 2015-2021 and the waste hierarchy. Re-use, preparing for re-use and repair activities can contribute to the community and local economy. Re-use of materials is key to preventing them from becoming waste. Objective WM07 Promote the increased re-use of waste in accordance with the Eastern Midlands Region Waste Management Plan 2015 -2021 (or any subsequent plan). Objective WM08 Promote and encourage the establishment of re-use, preparing for re-use and repair activities in accordance with the Eastern Midlands Region Waste Management Plan 2015 -2021 (or any subsequent plan)”*



“The EC (Waste Directive) Regulations 2011, sets a 70% target for the re-use, recycling and recovery of man-made C&D waste in Ireland by 2020. Objective WM18 Ensure that construction and demolition Waste Management Plans meet the relevant recycling / recovery targets for such waste in accordance with the national legislation and regional waste management policy.

In recent years there has been a move away from the disposal of waste to landfill. In Fingal, Balleally landfill has closed for the acceptance of waste with soil being accepted for restoration / capping purposes only. Dunsink landfill has been closed since the late 1990’s”.

3.3 Land Use Zoning Objectives

Development Plan(s) Zoning Objectives

Since its inception, the zoning and development objective policies for the site have remained consistent, and may be considered in summary as outlined below

DA Land Use Zoning

The lands in question are zoned DA, and under normal circumstances, waste recycling facilities are not permitted on such zoning objective lands.

However, Fingal’s County Development Plans over the years provides for non-conforming land uses even though they are not normally permitted.

Non-Conforming Use

Section 11.5 of the previous 2017-2023 Plan stated -

Throughout the County there are uses which do not conform to the zoning objective of the area. These are uses which were in existence on 1st October 1964, or which have valid planning permissions, or which are unauthorized but have exceeded the time limit for enforcement proceedings. Reasonable intensification of extensions to and improvement of premises accommodating these uses will generally be permitted subject to normal planning criteria.

The current plan considers this in section 13.3 and objective ZO3:

Objective ZO3 – Non-Conforming Uses Generally, permit reasonable intensification of extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria.



The subject development has been permitted in that context for over 20 years. In 2023, notwithstanding the Board decision, the County Development Plan included the above noted objective in the written statement as well as a specific map-based objective for the continued use and reasonable expansion of the non-conforming use on site. Map based objective, no. 57 states *“Generally, permit reasonable intensification of, extensions to and improvement of premises accommodating the non-conforming use, Recycling Centre, subject to normal planning criteria.”*

The development has a permanent parent permission relating to 10,000 tonnes per annum under F97A/0109. The Planning Authority have over the years accepted that the subject development, known to be operating at c.22,000 tonnes per annum, was permissible as a non-conforming use related to the nature and scale of the development and activity which also had the benefit of planning permission under F97A/0109, and nature and extent of unauthorised but long-established development on site subject of various retention applications.

While An Bord Pleanála considered the 2020 retention application in the context of non-conforming relating solely to the permitted development (ie 10,000 tonnes per annum), and that this position was upheld by the HC Judge (following JR proceedings), we are of the opinion that the Fingal Development Plan explicitly allows that non-conforming uses include unauthorized development. This had enabled the Planning Authority to grant permission for retention in accordance with the Plan objectives. It is acknowledged under the F20A/0029 application, that a full understanding and description of the planning and development history and status may not have been sufficiently outlined, and as such it may not have been clear to the Board that the development relating to 22,000 tonnes per annum is in fact the non-conforming use (and not solely the permitted 10,000 tonnes), and equally that the enlarged site size comprising c.1.6ha is part of this same non-conforming use/development. While the development benefited from planning permission under F97A/0109, it was never in compliance with the conditions relating to same, and as such from the date permission was granted (in 1998) the development operated as an unauthorised development, similar to the situation to date. In 2003 the planner’s report noted this, but no action was taken to enforce the conditions of 1997 or 2003. The permission granted in 2003 did not include any specific conditions relating to tonnage. In 2010, temporary permission was granted for the larger site and 25,000 tonnes, but this merely recognised the established development that had been in operation since 1998, and the granting of permission for the unauthorised development did not bring the development within the period during which the Planning Authority can take proceedings.

Prior to the lodgement of the application for retention in February 1997, the site has operated at a tonnage of approx.22,000 tonnes per annum, and had a waste licence for operations of up to 60,000 tonnes per annum. Notwithstanding, the attachment of a condition to limit the waste intake to 10,000 tonnes per annum, the non-compliance relating to the condition limiting the tonnage (attached to the 1997 permission, and in operation since 1997) continued, and no enforcement notice was issued. A period of in excess of 5 years lapsed (from 1997 onwards), being the period available to the planning authority to do so, under the **Planning & Development Act, 1963 - Section 31.**

31.—(1) (a) *Where any development of land, being neither exempted development nor development commenced before the appointed day, has*



*been carried out after the appointed day without the grant of permission required in that behalf under this Part of this Act, or any condition subject to which such permission was granted in respect of any development has not been complied with, the planning authority **within five years of such development being carried out**, or, in case of non-compliance with a condition, within five years after the appropriate date, may, if they decide that it is expedient so to do, and shall, if they are directed by the Minister so to do serve on the owner and on the occupier of the land a notice under this section. (b) In the foregoing paragraph “the appropriate date” means, in relation to a condition, the date specified in the condition (or in default of being specified in the condition, specified by notice served by the planning authority on the owner and on the occupier of the land) as the latest date for compliance with the condition.*

The 2000 Planning & Development Act, as it related to ‘Enforcement’ under section VIII of the Act, did not come into effect until March 2002. At this point in time, the unauthorised operations on site, pertaining to the 22,000 tonnes had been in effect for in excess of five year.

In any event, in December 2003, the applicant applied for permission for “*The permanent retention of 5 no. existing prefabricated single storey buildings, comprising of: office accommodation, canteens, toilets and weightbridge control room. Permanent retention is also sought for existing security fencing to boundary and skip storage area to the south of the site. All on an enlarged site from previously granted permission F97A/0109. This site possesses a current EPA waste licence (EPA Licence No. 134-1)*” under F03A/1561. This permission was granted, although the planner noted in the decision the extension of the site beyond that in the application, and did not include any conditions relating the restriction of the tonnage intake to site.

The site therefore operated without the benefit of permission, from 1997 and from 1998 onwards beyond the permitted tonnage, and did so without enforcement action being taken, and without any introduction of conditions confirming or introducing a tonnage limit when next considered and permitted by Fingal County Council in 2004. In 2010, when assessed again by the Planning Authority, the development was acknowledged as operating at this higher tonnage and permission to retain this tonnage (noted as 25,000 tonnes per annum) was permitted albeit for a period of 3 years (under 10A/0177). However, at this time, the site had operated as a waste recycling centre accepting waste tonnage of c.22,000 tonnes per annum, and had done so for in excess of 13 years, or from Feb.1998 (being the date of permission and the 10,000 tonne limiting condition under F97A/0109) to December 2010, when permission was granted under F10A/0177, a period of 12 and half years. Therefore, the tonnage levels at 22,000 are in effect a non-conforming use and intensity level, part of which is ‘permitted’ and part of which is ‘*unauthorized but has exceeded the time limit for enforcement proceedings*’. Attaching a condition some 12 plus years later does not, in our opinion alter the long-standing unauthorised nature of the use on site.

In addition, under consideration in respect of F03A/1561, the site at this time was also noted as being larger than that permitted in 1997. And exceeded that subject of permission at that time. Under F10A/0177, regularisation of the enlarged site size, was sought, however



operations on the site had been taking place on this larger site prior to 2003. Therefore, in December 2010, when permitted, and a restriction of 3 years placed on the use of the enlarged site was introduced the 7-year period beyond which the planning authority can commence enforcement action had passed. The use of subsequent planning applications (submitted by an applicant to regularise matters) where the Planning Authority attaches a planning condition to deal with planning enforcement through the extension of the period of action is not provided for within the legislation, and case law pertains to this. Therefore, notwithstanding the temporary permissions which proceeded, from 1998 onwards the site was operated without the benefit of planning permission, and was de facto unauthorised (to a large extent) due to non-compliance with conditions. These unauthorised activities continued for a period of in excess of 7 years, and in fact continued for over a minimum 12 years, onwards. The granting of temporary permissions to alter this fact and to endeavour to change the time frame for enforcement action is not a legally sound or reasonable approach.

Therefore, it is now abundantly evident, that the subject development comprises both permitted and long-standing unauthorised development, which during the relevant period was not subject to an enforcement process (ie from 1998 to 2010, at minimum). The development of the 1.6ha site, as a waste recycling centre for up to 22,000 tonnes is therefore a non-conforming use having regard to the criteria in its entirety outlined in the development plan, ie. that a non-conforming use can also include uses *“which are unauthorized but have exceeded the time limit for enforcement proceedings”*. To this end, we can confirm that a non-conforming use, namely waste recycling activities of c.22,000 tonnes has taken place on site since 1997.

We will therefore be asking the Board to consider the proposed development as a non-conforming use, under both provisions available to the applicant and provided for in the Development Plan, ie. being included as *“uses which do not conform to the zoning objective of the area. These are uses which were in existence on 1st October 1964, or which have valid planning permissions, or which are unauthorized but have exceeded the time limit for enforcement proceedings. Reasonable intensification of extensions to and improvement of premises accommodating these uses will generally be permitted subject to normal planning criteria.”*

In summary, while we acknowledge the permitted development and tonnage on site is unauthorised, it has been so since 1998, and therefore, the non-conforming nature of the activity must be considered from this period onwards. This application seeks retention and permission for the existing development and use of the site, and for recent enhancements and improvements to the site to minimise any potential environmental impacts. While the application includes a number of years where the tonnage on site significantly exceeded that associated with the activity levels of the non-conforming use, given the very temporary nature of this increase in tonnage, and the absence of any significant impact associated with same, we believe that the Board can consider this in the overall context of the development subject of permission.

This application will confirm that having regard to the duration of activities on site, and the nature and extent of development on this zoned landbank, that the development does not result in an adverse impact and should be permitted.



The subject development, in particular at the current scale of 21,900 tonnes, is consistent with that permitted on site in 2013, and noting no change in the zoning objectives, and also no material change in the socio-economic or environmental considerations, including the on-going availability of c.840 ha of DA zoned lands, with no significant planning applications lodged to reduce this quantum of available lands there is no planning rationale to preclude the granting of permission for the current and historic unauthorised use of the site, subject of consideration in this application. The use of the site as outlined did not and does not prejudice the development or activity at the airport and therefore did not does not conflict with or prejudice the DA zoning objective for this wider area.

Notwithstanding that the subject development is a non-conforming use, the development has been permitted and operated at this scale (ie. c.22,000 tonnes per annum) since first opening. As such, based on current levels and the levels in place at the time the map based objective was adopted in the current plan, specifically allowing for this use, and the various permissions granted by Fingal County Council over the last two decades, we believe that the level and scale of the non-conforming use is a reasonable and appropriate scale and is not contrary to the County Development Plan objectives.

While it may appear on the face of it that the development has doubled in scale, since first permitted, the nature, scale and intensity of development is consistent with that in place on site 1997, and recorded as such in the 2003 application. Furthermore, if the intensification was measured by reference to the potential adverse impacts then there would in fact be a reduction in intensification – ie. traffic movements have reduced, noise levels are consistent or reduced as machinery has improved, dust levels are consistent, and mitigation has been introduced, surface water run-off is contained within the site and energy consumption is now 50% renewable (solar). On the other hand, employment levels have increased, commercial rates paid have increased, levels of monitoring has increased, and compliance with ‘green and circular economy’ objectives have been introduced. The site provides an essential service to the county, and specifically to An Garda Siochana, and other permitted waste collection operators (e.g. Panda, Thornhills, etc.).



4.0 ENVIRONMENTAL IMPACTS

Potential environmental impacts associated with the subject development have been assessed under the following headings (and within the noted chapters of the EIAR)–

- 5.0 Population and Human Health
- 6.0 Biodiversity
- 7.0 Land, Soils and Geology
- 8.0 Water and Hydrology
- 9.0 Air Quality and Climate
- 10.0 Noise and Vibration
- 11.0 Landscape and Visual Impact
- 12.0 Material Assets
- 13.0 Traffic and Transportation
- 14.0 Waste Management
- 15.0 Archaeology and Cultural Heritage
- 16.0 Accident and Disaster Risks
- 17.0 Interactions and Cumulative Effects

5.0 POPULATION & HUMAN HEALTH

5.1 INTRODUCTION

The subject site was examined in terms of its impact on the human environment in the general area. It was found that because of the nature of the development there would be no effect on population levels. The development would have a positive effect on employment during the minor construction and ongoing operational phase. The continuation of use of the waste transfer and recycling facility will maintain commercial activity associated with the centre at current levels.

5.2 MITIGATION MEASURES

The minor construction phase of the proposed development should not have any direct impact on the population of the area or the subject lands noting the minor nature of the proposed works. It is expected that the work force will generally commute to the site rather than take up residence in the immediate vicinity. However, the construction of any project has potential to give rise to an impact on health and safety of human beings if construction activities are not managed appropriately. Measures to address health and safety concerns will be addressed in the construction management plan.



5.3 RESIDUAL EFFECTS

Having regard to the imperceptible, neutral and short term predicted impacts on human beings, no significant or material mitigation is required. No residual effects are predicted.

6.0 BIODIVERSITY

6.1 INTRODUCTION

A review of the site was carried out on behalf of ESC Environmental Ltd, by Serena Alexander, Ecologist; Peter McCormick, Environmental Scientist and Martijn Leenheer, Environmental Scientist, comprising of a site survey and study of existing information from the area. A site survey was carried out during March and August 2024. The biodiversity value of the proposed development area was assessed and potential impacts of the proposed development on the ecology of the surrounding area and within the potential zone of influence (Zoi), particularly nearby Natura 2000 sites.

The assessment approach followed the Chartered Institute of Ecology and Environmental Management (CIEEM), as well as EPA guidelines. Taken into account, were national planning policy, structure and local plan policies in respect of nature conservation and protected species legislation. Potential impacts to biodiversity and ecology were investigated and mitigation measures proposed.

6.2 MITIGATION MEASURES

It has been determined that the application site is not within or adjacent to any area that has been designated for nature conservation at a national or international level. There are no examples of habitats listed on Annex I of the Habitats Directive. No alien invasive species or plants which are rare or protected were detected on site. Minimal (proxy) evidence of mammalian activity was detected on site. Overall, hedgerows on the site are of local biodiversity value but are not associated with habitats listed on Annex I of the Habitats Directive or for which SACs/SPAs are typically designated. Other habitats are of low or negligible biodiversity value.

The Biodiversity Chapter has identified no impacts that were assessed as significant and as such no further mitigation is required. The proposed development relates to the on-going use of the facility and as such will result in minimal construction. No negative effects to biodiversity are predicted to occur due to the continuation of use of these lands. This application will result in no changes to the scale or nature of built development on these lands. Therefore, it cannot act in a cumulative manner to result in significant effects to biodiversity. Additional mitigation measures are proposed: a surface water attenuation tank, augmentation of dust netting, etc.,



which are expected to have a neutral or even positive effect on the surrounding environment. These measures are included as part of the proposed works subject to this application for permission. No negative impacts are predicted, and so no further monitoring is recommended.

6.3 RESIDUAL EFFECTS

Having regard to the slight to imperceptible, positive and medium term predicted impacts on biodiversity, on foot of proposed mitigation. No residual adverse effects are predicted.

7.0 LAND SOILS & GEOLOGY

7.1 INTRODUCTION

This chapter assesses potential impacts that may arise from the subject site on land, soils, geology, and hydrogeology within the local environment. According to the desktop study of the subject site, the encountered bedrock can be classified as limestone and shale belonging to the Malahide Formation. This unit is classified as Lower Impure Limestones.

The soils on site have been reported as predominantly moderately well-drained grey-brown podzolics of loam to clay loam texture. The soil can become less well-drained in the very flat, lower-lying areas. Where gravels are present in the subsoil the surface texture can contain a higher sand content and exhibit rapid permeability.

The GSI/Teagasc subsoil mapping database of the quaternary sediments in the area of the subject site indicates one principal soil type: Limestone Till Carboniferous (TLs). This till is made up of glacial Clays which are less permeable than alluvium subsoils.

The Groundwater Body (GWB) underlying the site is the Swords GWB. Currently, the most recent WFD groundwater status for this water body (2013-2018) is 'Good' with a current WFD risk score 'Under Review'

The importance of the hydrogeological features at this site is rated as Low. This is based on the assessment that the attribute has a medium quality significance or value on a local scale. The aquifer is not widely used for public water supply or generally for potable use.

There is little potential for an impact on spills and geology as all activities are contained within the boundary of the existing site.



7.2 MITIGATION MEASURES

Mitigation measures which were proposed for the construction stage are as described below. The construction for this project consists of the installation of two tanks, an underground surface water attenuation tank and an above ground overflow, expansion of the existing car park and installation of 2no. EV charging points, and alterations to the site boundary.

Due to the nature of the construction, there is not considered to be many potential impacts on land, soil, and geology due to the construction on site. The main potential for impact are due to accidental spills and leaks, and due to the excavation of soils to install the underground tank.

To alleviate the potential for hydrocarbon leakages, the following mitigation will be carried out:

- Potentially contaminating substances will be stored in designated areas that are isolated from surface water drains or open waters. Hazardous wastes such as waste oil, chemicals and preservatives will be stored in designated, sealed containers. Fuelling, lubrication and storage areas will be in a designated area, not within 30 m of drainage ditches or surface waters.
- All waste containers will be stored within a secondary containment system (e.g. a bund for static tanks or a drip tray for mobile stores and drums).
- Where more than one tank is stored, the bund must be capable of holding 110% of the largest tank or 25% above the aggregate capacity. Drip trays used for drum storage must be capable of holding at least 25% of the drum capacity.
- Regular monitoring of water levels within drip trays and bunds due to rainfall will be undertaken to ensure sufficient capacity is maintained at all times.

During the operational phase, the potential impacts on land, soil and geology is limited to hydrocarbon leakages as there is vehicle depollution which occurs on site. The entire site is situated on concrete hardstanding, and hazardous wastes such as waste oil, chemicals and batteries etc. are currently and will continue to be stored in designated, sealed containers. Fueling, lubrication and storage areas will continue to be stored in designated areas, which are not within 30 m of drainage ditches or surface waters. The surface water drainage from the site includes silt traps and oil interceptors.

7.3 RESIDUAL EFFECTS

Residual impacts refer to the degree to environmental change that will occur after the proposed mitigation measures have taken effect.

After the mitigation, it is determined that the only potential impact on land, soil, and geology due to the construction phase is because of the movement of overburden via mechanical means. With the implementation of the mitigation measures, the residual impacts are assessed to be **short-term, neutral and negligible**.

During the operational phase there will be no direct interaction with the soil or geological resources. Assuming implementation of the mitigation measures described above the residual



impacts on the land, soil and geological environment during the enabling and operational phases are assessed to be **long-term, neutral** and **negligible**.

8.0 WATER & HYDROLOGY

8.1 INTRODUCTION

The site is comprised of a waste treatment site which is fully surfaced with an impermeable surface. Due to this, surface water, rainfall, is discharged from the site into a nearby watercourse via a field drain. The surface water which falls on site is only discharged from site after being treated by a series of silt traps, a buffer tank with oil decanting unit and two hydrocarbon interceptors, which manages and treats runoff from the defined hardstanding areas. The field drain is culverted beneath the R122 and emerges as an open channel 180 m downstream of the site. The field drain outfalls to the Huntstown Stream 500 m downstream of the site.

The Huntstown Stream generally flows in a north-easterly direction to join the River Ward to join the Ward River c. 4.4 km to the northeast of the site (at Saint Margaret Golf and Country Club). The Ward River flows towards Malahide Estuary, a Natura 2000 Site (SPA/SAC/pNHA) located approximately 7.6 km to the northeast of the site after joining the Broadmeadow River.

The Huntstown Stream belongs to the Ward_030 WFD surface water body, which currently, the EPA classifies as having 'Moderate' and is 'At risk of not achieving good status'. This moderate status is related to the nitrogen (nitrate, specifically) and orthophosphate conditions measured in the Ward River.

There is extremely low risk of flooding affecting the site from fluvial or coastal sources, since the site lies within Flood Zone C (i.e., where the probability of flooding from rivers is less than 0.1% or 1 in 1000).

Hydrological features at this site are rated as low in importance, based on the assessment that the attribute has a low-quality significance or value on a local scale.

8.2 MITIGATION MEASURES

The construction for this project consists of the installation of two tanks, an underground surface water attenuation tank and an above ground overflow, expansion of the existing car park and installation of 2no. EV charging points, and alterations to the site boundary.

Due to this, there is not considered to be many potential impacts on water and hydrogeology due to the construction on site. The only potential for impact on water and hydrogeology during



construction is due to accidental spills and leaks, and the following mitigation measures are implemented during construction to reduce the potential.

- Potentially contaminating substances will be stored in designated areas that are isolated from surface water drains or open waters. Hazardous wastes such as waste oil, chemicals and preservatives will be stored in designated, sealed containers. Fuelling, lubrication and storage areas will be in a designated area, not within 30 m of drainage ditches or surface waters.
- All waste containers will be stored within a secondary containment system (e.g. a bund for static tanks or a drip tray for mobile stores and drums).
- Where more than one tank is stored, the bund must be capable of holding 110% of the largest tank or 25% above the aggregate capacity. Drip trays used for drum storage must be capable of holding at least 25% of the drum capacity.
- Regular monitoring of water levels within drip trays and bunds due to rainfall will be undertaken to ensure sufficient capacity is maintained at all times.

During the operational phase there is very little potential for impact on water and hydrogeology due to the design of the site. The potential for impact is reduced by the silt traps and oil interceptors which are part of the surface water management of the site. An Emergency Response Procedure has been developed for the facility will apply to the operational phase incorporating mitigation measures and emergency response measures. The provision of spill kit facilities and training of site operatives in use of same; should be undertaken at the operational stage in line with the Emergency Response Plan in order to manage any leaks from fuel storage and vehicles resulting in surface water quality impacts.

Foul water on site is directed to an on-site wastewater treatment system as per the current operation of the site. The wastewater treatment system has been designed and installed according to the standards outlined in the Code of Practice 2009 for wastewater treatment. Due to this, there is no potential for impact on hydrology and hydrogeology due to foul water on site.

8.3 RESIDUAL EFFECTS

Residual impacts refer to the degree to environmental change that will occur after the mitigation measures have taken effect.

The implementation of mitigation measures highlighted above will ensure that the predicted impacts on the hydrological environment do not occur during the construction phase and that the residual impact will be **long-term, imperceptible** and **neutral**.

The implementation of mitigation measures highlighted above will ensure that the predicted impacts on the hydrological environment do not occur during the operational phase and that the residual impact will be **long-term, imperceptible** and **neutral**.



9.0 AIR QUALITY AND CLIMATE

9.1 INTRODUCTION

The chapter examines impacts during construction and operation – when air-borne factors such as dust can have an impact if not properly planned for.

Air Quality

In terms of the existing air quality environment, baseline data and data available from similar environments indicates that levels of nitrogen dioxide and particulate matter less than 10 microns and less than 2.5 microns are generally well below the National and European Union (EU) ambient air quality standards.

During the construction phase there is the potential for dust emissions to impact nearby sensitive receptors resulting in potential dust soiling and human health impacts.

With regard to larger dust particles that can give rise to nuisance dust, there are no statutory guidelines regarding the maximum dust deposition levels that may be generated during the construction and decommissioning phases of a development in Ireland. With regard to dust deposition, the German TA-Luft standard for dust deposition (nonhazardous dust) sets a maximum permissible emission level for dust deposition of 350 mg/m²/day averaged over a one-year period at any receptors outside the site boundary.

Climate

The existing climate baseline can be determined by reference to data from the EPA on Ireland's total Greenhouse gas (GHG) emissions and compliance with European Union's Effort Sharing Decision "EU 2020 Strategy" (Decision 406/2009/EC).

Based on the scale and short-term nature of the construction works, the potential impact on climate change from the construction of the subject site is deemed to be **momentary** and **imperceptible** in relation to Ireland's obligations under the EU 2030 target.

No significant on-site CO₂ emissions will occur as a result of the construction on the subject site. The construction was small in size and scope and had very little potential for impact on the environment.

During the operation of the site, from a climate perspective the tonnage accepted on the site is a positive impact due to the proximity principle. Although the operation of the site relied on diesel engines, the site's waste activity decreases waste being transported to Belfast. The emissions saved by the transportation of the accepted waste outweighs the emissions of the diesel engines used by the plant on site.



The impact of construction and operation of the subject development is considered to be small, and therefore is considered to be to be neutral, momentary and imperceptible with respect to climate and air quality.

Human Health

The impact of construction of the subject site is considered to be small, and therefore is considered to be to be **neutral, momentary** and **imperceptible** with respect to human health.

For the operational phase of the subject site, dust is the main emission which could have a direct impact on the air quality. However, monitoring results of the current operation show that no dust is transmitted past the boundary of the site after the existing mitigation measures and there was no trend to indicate the hammermill had an adverse impact on the dust before mitigation measures.

Air pollution concentrations due to operations has been assessed and are predicted to be compliant with all National and EU ambient air quality limit values and, therefore, will not result in a significant impact on human health. The impact from the operation phase of the subject site is considered to be **brief, neutral** and **imperceptible**.

9.2 MITIGATION MEASURES

No specific mitigation measures are necessary for the construction in regards to air quality or climate other than standard practice methods such as switching off engines when not in use and dust control during excavation when required.

During the operation of the site the main potential emission from the site is dust. The most recent reliable monitoring results show that there are no exceedances after the existing mitigation measures. Beside the mitigation measures introduced with the installation of the hammermill which consist of misting (at the intake of the hammermill and on the site during dry periods) and dust netting, no other mitigation is required. Alongside this there are existing mitigation measures such as housekeeping, closed fencing, tree lines and earth banks which will be maintained.

9.3 RESIDUAL EFFECTS

On implementation of the mitigation measures outlined in this assessment, the residual impacts on air quality or climate from the construction will be **momentary, neutral**, and **imperceptible**. The residual impacts on air quality for the operational phases of the subject site will be **brief, neutral** and **imperceptible**, while the impacts on climate will be **short-term, positive** and **imperceptible**.



10.0 NOISE AND VIBRATION

10.1 INTRODUCTION

The **Noise and Vibration Chapter** focuses on assessing the noise and vibration impacts associated with the waste processing and transfer facility at St. Margaret's, Co. Dublin. The assessment was conducted by Irwin Carr Consulting, an environmental consultancy based in Ireland with extensive experience in noise impact assessments.

The main objectives of the report are to evaluate the noise and vibration environment during the construction and operational phases of the facility. The study pays particular attention to sensitive receptors, such as residential areas and local amenities like schools, that are located near the site.

The report outlines the following key points:

- The facility's noise and vibration impacts were assessed for the on-going use of the existing metal processing and transfer facility to accept up to 21,900 tonnes.
- The main noise source in the vicinity is Dublin Airport, with consistent airplane movements throughout the day.
- The study follows various guidelines and standards, including NG4 from the Environmental Protection Agency (EPA) and the World Health Organization (WHO), to evaluate the noise levels and their impact on the surrounding area.
- The report includes a baseline noise survey conducted in July 2024 to establish the existing noise levels at the nearest noise-sensitive receptors.
- The assessment also considers the potential vibration impacts during the construction phase, with specific guidelines for allowable vibration levels to prevent damage to nearby properties.

Overall, the report aims to provide a comprehensive evaluation of the noise and vibration impacts of the facility, ensuring that the development complies with relevant guidelines and minimizes any adverse effects on the surrounding environment.

10.2 MITIGATION MEASURES

No mitigation required.

10.3 RESIDUAL EFFECTS

Residual Effects are predicted to be imperceptible, momentary and neutral.



11.0 LANDSCAPE AND VISUAL IMPACT

11.1 INTRODUCTION

The report examines how the ongoing use of the Recycling Centre will potentially affect the surrounding landscape and environment. The facility, which will process up to 21,900 tonnes of material annually, is located on a 1.75-hectare site and includes proposed enhancements such as parking improvements and infrastructure for managing surface water. The report highlights that the recycling centre can harmonize with its surroundings while preserving rural character.

St. Margarets Recycling Centre, by its nature, does not affect the surrounding landscape visually, as it retains all the existing hedges, ditches and landform that surrounds the site. These naturalised features form a strong barrier and screen to the workings of the Recycling business.

The centre performs as traditional farmyard, with outhouses, sheds and hardstanding. It is therefore as per typical farmyards that are located close by and throughout North County Dublin. The physical impact upon the landscape is limited to similar agricultural activity.

11.2 MITIGATION MEASURES

Retention of existing planting and reinstatement of land following installation of SUDs tank and basin.

11.3 RESIDUAL EFFECTS

We would therefore conclude that the Recycling centre has limited to no impact, from a landscape and visual view upon the local landscape. The future proposals only aid in the efficient and sustainable management of the recycling centre. The return of a portion of hardstanding to natural field conditions provides evidence of this and augurs well for a well-managed facility will contribute positively to the local landscape.

Residual Effects are predicted to be imperceptible, short-term and positive.



12.0 MATERIAL ASSETS

12.1 INTRODUCTION

This section of the Environmental Impact Assessment Report (EIAR) has been prepared by CWPA and provides analysis of the potential impact of the proposed development on Material Assets.

The related topics of water (supply and wastewater) and roads and traffic are separately addressed in other chapters of the EIAR, principally:

- Chapter 8 Water & Hydrology
- Chapter 13 Traffic & Transportation
- Chapter 14 Waste Management

This chapter covers the proposals for built services (except traffic) – comprising energy demand and supply (electrical and gas) and water services.

12.2 MITIGATION MEASURES

Mitigation measures as outlined in chapters 8, 13 and 14.

12.3 RESIDUAL EFFECTS

The conclusion of the chapter is that there is predicted to be no residual effects on the material assets during the construction or operational phase and there will be no cumulative impacts on the material assets with other developments.

Residual Effects are predicted to be imperceptible, short-term and positive.



13.0 TRAFFIC AND TRANSPORTATION

13.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) provides an assessment of the impact that the proposed would have on the traffic and transportation infrastructure and network in the surrounding area.

This chapter sets out the existing receiving environment in terms of roads conditions, traffic activity and transportation accessibility. It also describes the existing and permitted development in terms of operational traffic impact on the receiving environment.

A Traffic & Transport Assessment (TTA) was prepared by Waterman Moylan in September 2024. The TTA presents survey data for the existing traffic conditions in 2019 and 2023 together with the ongoing transport demand that was generated by the development. The traffic generated during both the morning and evening peak times was also assessed. An assessment of the percentage impact of traffic on local junctions, and accessibility of the site by sustainable modes including walking, cycling and public transport is included. The TTA also addresses the existing capacity on the public transport network.

Project Timescale

In compliance with the requirements of the *Transport Assessment Guidelines* (2014) the TTA includes junction impact assessment at base year, year of opening, year of opening plus 5 years, and year of opening plus 15 years.

The following timetable has been adopted for the transportation assessment of the subject development:

- 1997 Parent Planning Permission (Waste throughput of 21,000 tonnes)
- 2024 Opening Year (Waste throughput of 21,900 tonnes)
- 2029 Design Year (Opening Year + 5) (Waste throughput of 21,900 tonnes)
- 2039 Future Year (Opening Year + 15) (Waste throughput of 21,900 tonnes).

Traffic surveys were carried out at the site access in 2019 and again in 2023.

The project timetable has been used in the assessment of the impact that the proposed would have on the traffic and transportation infrastructure and network in the surrounding area

13.2 RECEIVING ENVIRONMENT

Site Location

The site occupied by St Margarets Metal Recycling is located on the R122 to the south of St Margarets at Sandyhill, St Margarets, Co Dublin.



Local Road Network

The R122 is a Regional Route linking Finglas to the south with Balbriggan to the north via St Margarets, Naul and Oldtown.

It is a two lane road with a carriageway width of 7.5 metres. In the area of the subject site, the alignment is relatively flat with a gentle horizontal curvature.

Traffic Conditions

Traffic conditions on the R122 St Margarets Road at the access to the subject site are generally free flowing save for occasional short duration incidents or accidents.

Public Transport Facilities

Bus services in the area of the development are a combination of historic services operated by Dublin Bus and new services to be provided under the auspices of Bus Connects.

Proposals by Bus Connects envisage two new routes serving the subject site.

13.3 CHARACTERISTICS OF THE DEVELOPMENT

Description of Development

Access to the site is from the R122 through a 9.0 metre wide gateway on the east side of the R122 set back some 25.0 metres from the edge of the carriageway.

To the north (right), the sightline exceeds the required 145 metres for a Regional Road with a posted speed limit of 80 kph, as required by Fingal County Council. However, in order maintain a 145 metre sightline to the south (left) continued maintenance of the maturing growth along the western boundary is required.

Car Parking

Based on the standards in the County Development Plan, the car parking for the subject site is a maximum of 45 spaces calculated as follows:-

• Offices	177 sqm x 1 spaces per 40sqm	5 spaces
• Industrial buildings	1,950 sqm x 1 spaces per 50sqm	40 spaces
		45
	Total	spaces

The existing and proposed car parking provision at the subject site is 20 spaces.



Truck Parking

The existing truck parking at the subject site is located on the concrete hard standing.

Cycle Parking

Based on the standards in the County Development Plan, the cycle parking for the subject site is a total of 56 spaces comprising 45 long stay spaces for staff and 11 short stay spaces for visitors.

The staff travel survey in 2022 recorded that none of the 30 staff travelled by bicycle.

13.4 EXISTING AND PREDICTED IMPACTS

Construction Phase

There are no existing or predicted impacts arising from the construction stage which has largely completed as the recycling centre is existing and remaining works now proposed are of a minor nature.

Operational Phase 2019

The conclusion of the Traffic and Transport Assessment was that the access junction from the R122 to the subject site operated satisfactorily and within capacity with a waste turnover of 33,696 tonnes per annum in 2023.

The TTA also concluded that the access junction from the R122 would continue to operate satisfactorily through the Design Year of 2029 to the Future Year of 2039 with a waste turnover of 21,900 tonnes per annum.

The public transport demand will significantly within the existing capacity of the bus services in the area of the subject site.

The impact of the subject development on the surrounding transportation network during recent years has been positive due to the mitigation measures implemented by the applicants of eliminating individual / smaller vehicles arriving at the site, and focussing on larger commercial waste collectors, thereby reducing vehicle numbers to / from the site, and improving efficiency and recycling capabilities on site.

As a result of these mitigation measures, there has been a 33% reduction in the number of vehicles accessing the site between 2019 and 2023. This reduction has significantly reduced the Ratio of Flow to Capacity for the access junction notwithstanding the normal increases in traffic flow on the R122.



13.5 MITIGATION AND MONITORING MEASURES

Construction Phase

No mitigation and monitoring measures are proposed for the construction phase which has been completed.

Operational Phase

The mitigation measures in place at the St Margarets Metal Recycling are based on an ongoing transfer of incoming waste from a combination of private cars, vans and trucks to trucks operated by the larger licensed waste collection companies and trade / construction companies resulting in an ongoing reduction in the number of vehicle accessing the site each day. Other ongoing mitigation and monitoring measures during the Operational Phase include

- (a) Monitoring of truck numbers and weights of incoming waste loads.
- (b) Ongoing maintenance of the sightline to the south of the access onto the R122.

Due to the mitigation measures outlined above, the residual impact of the development during the operational stage is moderate, positive and long term for the duration of the operation of the St Margarets Metal Recycling.

As a consequence, no further mitigation measures are required over and above those already in place.

13.6 RESIDUAL IMPACTS

Construction Phase

The applicants are not aware of any residual impacts on traffic and transportation arising from the construction phase.

Operational Phase

During the Operational Stage, there has been a decrease in the use of the surrounding road network by vehicles accessing the development.

The residual impact for operational traffic is likely to have a long term moderate impact which will improve safety at the site access

There is also enhanced safety for vehicle movements existing the site onto the R122 St Margarets Road arising from the ongoing maintenance of the sightline to the south.

The impact of the proposed development is considered to be imperceptible, neutral and long-term.



13.7 MONITORING & REINSTATEMENT

Construction Phase

Construction of the development has been largely completed. No monitoring / reinstatement measures as they relate to the small mitigation works are required in respect traffic and transportation.

Operational Phase

During the Operational Phase, the applicants are required to monitor the operation of the access from the R122 on an ongoing basis and with a view to advising Fingal County Council in relation to any operational or safety issues noted.

No reinstatement is proposed during the Operational Stage other than the ongoing maintenance of roads, footpaths, buildings, and services.

14.0 WASTE MANAGEMENT

14.1 INTRODUCTION

The subject site is a waste facility and is therefore a waste management measure in itself. The facility accepts waste mainly for recovery with metals as a principal activity. The facility is an essential part of the recovering and reuse of waste materials as per waste hierarchy. The facility contributes to set EU targets as it reaches a 95% recovery rate. The end product of the mechanical treatment on site is of a high standard and is sent for reuse.

14.2 MITIGATION MEASURES

Construction Phase

The construction phase will generate some soil spill, which can be re-used on site as part of reinstatement works, being the 1.1ha of managed grass land and SUDs basin.

Operational Phase

In operational phase the facility treats waste for the purpose of recovery and reuse. This is achieved through mechanical selection and separation of metals. The facility is an integral part of the waste management structure in Fingal as Fingal County Council has put in their development plan the aim to make Fingal self-sufficient for waste management. Without this



facility metal waste will be diverted out of Fingal to Belfast. The processes and plant are set out in detail in the EIAR chapter. In essence, the waste is made into smaller fractions to enable sorting through the use of magnets, trommels, vibrating tables, Eddie currents and hand picking.

The site is an existing waste facility that has a high recovery rate and is contributing to the aims set in the Circular Economy and Miscellaneous Provisions Act 2022 and waste hierarchy and reaching EU recycling and recovering targets. The site could be viewed as mitigation measure for reducing waste on a regional level. The waste management of the accepted waste is currently dealt with under the existing Waste Facility Permit (WFP-FG-13-0002-03). There is some residual waste from the sorting process. These wastes have EWC codes 19 10 04 (fluff-light fraction and dust other than those mentioned in 19 10 03) and 19 12 12 (wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11). The 19 10 04 - fluff-light fraction from the hammermill will be sent off-site for further recovery and 19 12 12 wastes will be returned to the source site.

All existing plant, infrastructure and accepted tonnage should therefore be viewed as a mitigation measure for the recovery and reuse of waste.

14.3 RESIDUAL EFFECTS

Construction Phase

As the soil from the excavation during construction can be reused on-site the effects are **momentary, imperceptible** and **neutral**.

Operational Phase

During the operational phase the site will be beneficial in both local and national respects as the operation of the site contributes to the reaching of waste recovery targets. A high rate of reuse, recycling and recovery was achieved, the impact of the operational phase on the environment will be **long-term, slight** and **positive**.

15.0 ARCHAEOLOGY AND CULTURAL HERITAGE

15.1 INTRODUCTION

This section of the Environmental Impact Assessment Report (EIAR) has been prepared by CWPA and provides analysis of the potential impact of the proposed development on features of architectural heritage, archaeological and cultural heritage merit and proposes measures to



safeguard these features associated with the proposed continued use of the existing and permitted waste processing and transfer facility at St. Margaret's, Co. Dublin.

The Archaeological Impact Assessment report sought to identify and describe known and potential archaeological or cultural heritage constraints within and/or immediately adjacent to the site. The following factors were identified in the course of desktop study:

- The site is moderate in scale occupying an area of roughly 1.63 Ha.
- There are no recorded monuments situated within the site boundaries, there are 8 sites within 500m of the site boundaries.
- No potential archaeological features were recorded in aerial photos of the subject site.
- Examination of the cartographic sources indicates no archaeological features.
- There were no previous archaeological excavations within the subject site and only four excavations were noted as having taken place in the surrounding townlands.
- The site visit shows that the site has been extensively disturbed and little of the original ground profile remains.

These factors indicate that, prior to any groundworks taking place; this site had moderate potential (based on the site's size) for the survival of buried archaeological remains.

15.2 MITIGATION MEASURES

It is recommended as a mitigation measure that any further groundworks at this site be subject to archaeological monitoring.

15.3 RESIDUAL EFFECTS

Residual Effects are predicted to be imperceptible, short-term and neutral.

16.0 ACCIDENT AND DISASTER RISKS

16.1 INTRODUCTION

Potential effects associated with accident & disaster risks during the construction and operation of the proposed development have been assessed.

The principal attributes (and impacts) that have been assessed include the following:

- Water Bodies and Flood Risk
- Seismic Activity



- Fire Risk
- Outer Public Safety Zone of Dublin Airport

16.2 MITIGATION MEASURES

Water Bodies and Flood Risk

There is limited potential for an impact on the site due to flooding. Therefore, there are no mitigation measures necessary.

Seismic Activity

There is no risk of seismic activity on site and therefore no mitigation measures or monitoring is necessary.

Fire Risk

St Margaret's Centre prepared a detailed fire strategy and risk assessment report to ensure the proper measures to prevent any major impacts from future fire events, were they to occur. Ongoing and regular reviews of the site layout and associated issues and identifying potential problems and remedying same. The most up to date Fire Prevention Plan has been submitted to Fingal County Council as part of the ongoing monitoring and review of the waste permit on site. Additionally, the proposed retention tanks will contribute to larger storage area for fire water run-off and/or additional firewater.

Outer Public Safety Zone

St. Margaret's Recycling is located within the Outer Public Safety Zone (PSZ) of Dublin Airport. The ERM Public Safety Report 2005 states that the principal purpose of the outer PSZ is to minimise the possibility of a multiple fatality accident. The purpose of PSZ is to protect the public on the ground from the small but real possibility that an aircraft might crash in a populated area. The potential for a major accident is considered extremely unlikely with a risk rating of 1 in one million per year applying to the Outer Public Safety zone. Therefore, the potential risk posed by a major accident and or disaster have been considered based on a low vulnerability of such a risk and the overall risk is considered to be low. There are no mitigation measures which can alleviate this risk, and therefore, no mitigation measures are proposed.

16.3 RESIDUAL EFFECTS

Due to the comprehensive controls and design standards that have been followed during initial design and that will be followed during detailed design, there is no significant potential for the proposed development to give rise to significant adverse effects on the environment due to accidents or disasters. This applies to accidents/disasters arising from external factors as well as accidents arising from activities at the site.

Water Bodies and Flood Risk



Due to the limited potential for flooding on site, the residual impact from the changes in the existing facility are considered to be **long-term, neutral** and **negligible** in both the construction and operational phase.

Seismic Activity

As there is no potential for seismic effects, the residual impact on the site from seismic activity is considered to be **long-term, neutral** and **negligible** in both the construction and operational phase.

Fire Risk

The facility operates in line with the relevant fire safety plan associated with the current Permit during the relevant period, and therefore due to this, ie. after the mitigation measures the residual impact from the site is considered to be **long-term, positive** and **moderate**.

Outer Public Safety Zone

The potential risk posed by a major accident and or disaster have been considered based on a low vulnerability of such a risk and the overall risk is considered to be low. The residual impact from the site is considered to be **long-term, neutral** and **imperceptible**.

17.0 INTERACTIONS AND CUMULATIVE EFFECTS

The interaction of impacts, as considered in the EIAR, and their relationship to the information requirements outlined in the European Communities (Environmental Impacts Assessment) Regulations, are summarised as the following:

- Population & Human Health / Population & Human Health
- Population & Human Health / Land, Soil & Geology
- Population & Human Health / Air Quality & Climate
- Population & Human Health / Noise & Vibration
- Population & Human Health / Landscape & Visual Effect
- Population & Human Health / Traffic & Transportation
- Biodiversity / Land, Soils & Geology
- Biodiversity / Water & Hydrology
- Biodiversity / Landscape and Visual Impact
- Land Soils & Geology / Water & Hydrology
- Air Quality & Climate / Traffic & Transportation
- Air Quality & Climate / Air Quality & Climate
- Noise & Vibration / Population & Human Health
- Noise & Vibration / Traffic & Transportation
- Air Quality & Climate / Biodiversity
- Traffic & Transportation / Biodiversity
- Traffic & Transportation / Air Quality & Climate
- Waste Management / Traffic & Transportation



18. SUMMARY



OVERALL IMPACT ON THE ENVIRONMENT

The Environmental Impact Assessment Report has assessed the characteristics of the proposal for significant environmental impacts. Each topic was examined and the resultant environmental impact, if any, noted and mitigation or reductive measures have been put in place. Accordingly, the proposed development will result in no significant negative impacts on the environment.

The proposed development, in terms of physical works comprises 3 environmental improvement measures – namely the installation of additional SUDs measures to reflect possible 1:30 and 1:100 year flood events, ultimately a positive, short-term, slight-moderate impact, installation of EV charging, which will tie in to the solar powered electricity available on site, resulting in a positive, long-term, slight impact (reducing carbon footprint through use of renewable energy sources), and lastly the replacement of steel container boundary treatments with steel post and concrete panel walls, improving the visual amenity, albeit only within the site, and as such is an imperceptible, long-term, positive impact.

The on-going use of the existing facility as a waste recycling and transfer centre is a more sustainable option than development of a greenfield site, or transporting the county's waste to Northern Ireland. IN respect of metal waste, c.70 to 80% would be required to be transported to northern Ireland if the Centre were not to accept it, as there is no other centre that can cater and process the metal waste as per St Margarets. The proposed development, comprising the on-going use of the centre, is considered to be a long-term, positive, moderate impact.

APPENDIX 6

 <p>CWPA planning & architecture</p> <p>Unit 10 North Street Business Pk. North Street, Swords, Co. Dublin, Ireland T: 01 8909550 F: 01 8408275 E: info@cwpa.com W: www.cwpa.com</p>  <p>IRISH PLANNING INSTITUTE CORPORATE MEMBER</p>					<h2>ISSUE SHEET</h2> <p>PROJECT: SUBSTITUTE CONSENT: ST MARGARETS RECYCLING CENTRE, CO. DUBLIN</p> <p>CLIENT: SAINT MARGARETS RECYCLING & TRANSPORT LIMITED</p> <p>JOB NO: 22073</p> <p>SHEET 1 OF 1</p>																								
ISSUED TO: FINGAL COUNTY COUNCIL					<p>Date: 06/12/2024</p>																								
ISSUE CODE					<p>PP</p>																								
Client Project Manager Structural Engineer Quantity Surveyor Services Engineer Contractor Head office Contractor Site office Local Authority FINGAL COUNTY COUNCIL																													
Drg/Doc No.					Title					Scale					Size					Status									
22073-PP-100					Site Location Map					1:2500					A2					PP /									
22073-EX-01					Existing Portacabins - Floor Plans, Elevations and Sections					1:100					A1					PP /									
22073-EX-02					Existing Industrial Building					1:200					A1					PP /									
22073-EX-03					Existing Equipment Details					NTS					A1					PP /									
22073-EX-04					Existing & Proposed Contiguous Elevations					1:500, 1:250					A1					PP /									
22073-PP-01					Site Plan - Proposed					1:500					A1					PP /									
23073-PP-02					Site Layout - Planning History					1:500					A1					PP /									
					ENGINEER'S DRAWINGS																								
MAR-WMC-ZZ-GF-DR-C-P014					Contiguous Elevations										A1					PP /									
MAR-WMC-ZZ-GF-DR-C-P020					Proposed Drainage Layout										A1					PP /									
MAR-WMC-ZZ-GF-DR-C-P021					Existing Drainage Layout										A1					PP /									
MAR-WMC-ZZ-GF-DR-C-P025					Attenuation Details										A1					PP /									
Status Code:					I - Info. / P - Prelim. / PP - Planning / FSC - Fire Cert / D - DAC / T - Tender / C - Construction																								
Issue Code:					P - Print / CD - Compact Disc / E - e-mail / F - Fax / R - Retention																								
Comments:																													