

# PLANNING REPORT



Enva Healthcare Risk Waste Facility  
Development at 402 Grants Drive,  
Greenogue Business Park, Rathcoole,  
Co. Dublin, D24 AP04

April 2024

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## Planning Report

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**Prepared by:**

**RPS**

**Prepared for:**

**Enva**

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 The Registered office of each of the above companies is West Pier  
 Business Campus, Dun Laoghaire, Co. Dublin, A96 N6T7



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# 1 INTRODUCTION

This report relates to the assessment of a planning application made direct to An Bord Pleanála (ABP) by



**Figure 1-1: Site location within Greenogue Business Park**

### 1.1.2 Site Layout

The existing facility comprises two main buildings (Building 1 & Building 2) within which are housed three operations and an ancillary support office (Building 3). Enva is the sole occupant of the site, and controls access to the facility with security arrangements including gates, fencing and personnel monitoring access. An aerial overview of the existing site layout is shown in **Figure 1-2**.

The existing facility layout provides for the following:

- Containment of each facility to prevent pollution to either soil or water.
- All operations take place within fully enclosed buildings, which mitigate potential noise, odour, and dust impacts.
- The separate control of foul and surface waters on site.
- Sufficient road areas within the site to accommodate queuing and the free flow of vehicles on site.
- On site administration facilities for site staff.
- Sufficient room for vehicle parking and landscaping of the site.

A weighbridge located beside the office building weighs waste on arrival at the site, where details are logged at the office before being moved into the site.

The concreted marshalling yard provides storage area and access to buildings 1 and 2.

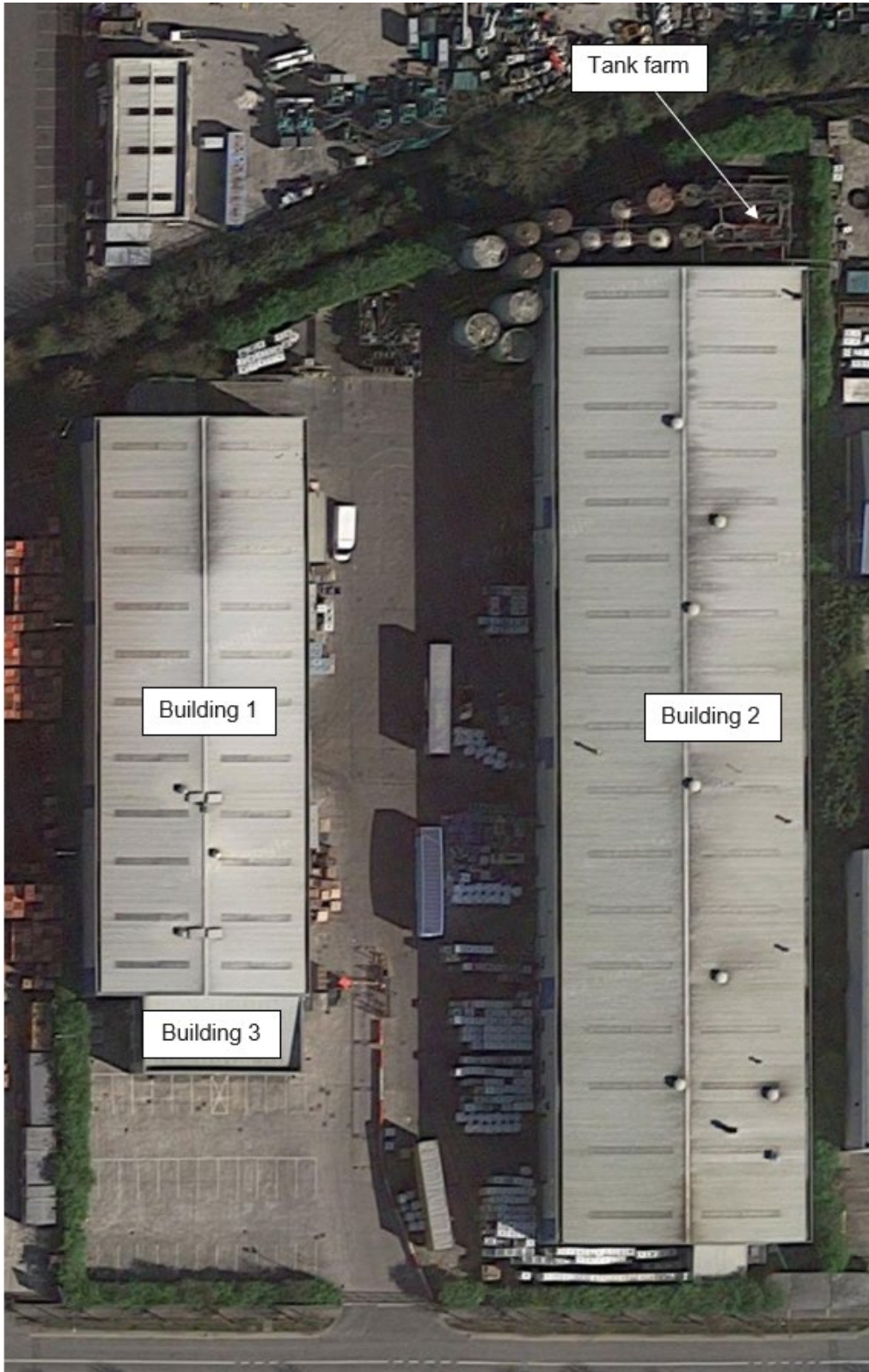
A tank farm is located at the northernmost part of the facility.

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A strip of landscaping, up to 2 m wide, is maintained and managed along the inside perimeter of the site.

The facility car park with thirty-two parking spaces is located between the office space and Grants Drive, and to the west of the facility entrance.

The existing site layout showing building subdivisions is set out at **Figure 1-3**.



**Figure 1-2: Existing Site Layout of the existing Enva Facility at Greenogue Business Park**





## 2 PROJECT OVERVIEW

The proposed development and change of activity at the site comprise the addition of a HRW process to the existing waste processing facility and a reduction in other existing hazardous waste processing. It is understood that the addition of HRW will not increase the level of waste being processed beyond that which is permitted under Reg. Ref. SD07A/0260 and will not lead to any intensification of use.

### 2.1 Project Rationale

HRW levels are increasing globally and in Ireland. Global Market Insights projects<sup>1</sup> a 6.8% compound annual growth rate in HRW arisings from 2022 to 2030 in Europe and a global increase of 84% in the market size from 2021 to 2030.

The growth in HRW arisings combined with the fixed production capacity in Ireland at two authorised HRW management facilities has meant that it has been necessary to ship HRW to alternative treatments in Ireland and abroad for appropriate management at times in recent years.

Enva is proposing a HRW management development that will add significant capacity, and thereby strengthen the resilience, and preparedness of Ireland's HRW treatment sector by expanding capacity and reducing reliance on the export of HRW.

### 2.2 Healthcare Risk Waste Proposed for Treatment

HRW is solid or liquid waste arising from medical activities such as diagnosis, monitoring, treatment, prevention of disease or alleviation of handicap in humans or animals, including related research performed under the supervision of a medical practitioner or veterinary surgeon.

HRW may have the following hazard characteristics: biological; infectious; chemical, toxic, or pharmaceutical including cytotoxins; sharp (e.g., needles, scalpels, sharp broken materials).

HRW management is a critical aspect of ensuring the safety and well-being of both healthcare professionals and the public. Proper management of healthcare risk waste helps to prevent the spread of diseases and ensures that the environment is protected from the potential harmful effects of such waste.

### 2.3 Waste Intake and Activities

Enva does not propose to change the current 111,000 gross annual tonnage intake limits at the subject site. The annual intake of other waste at the facility will be reduced by 24,000 tonnes, meaning that the gross annual tonnage intake at the facility will remain unchanged at 111,000 tonnes, including 24,000 of HRW treatment services.

The volume of HRW will be reduced during the shredding and treatment process by an estimated 80% compared to incoming HRW accepted at the facility.

### 2.4 Key Processes of Proposed Facility

The three processes proposed for the management of HRW are described below.

#### 2.4.1 Process 1 – reception and disinfection of HRW

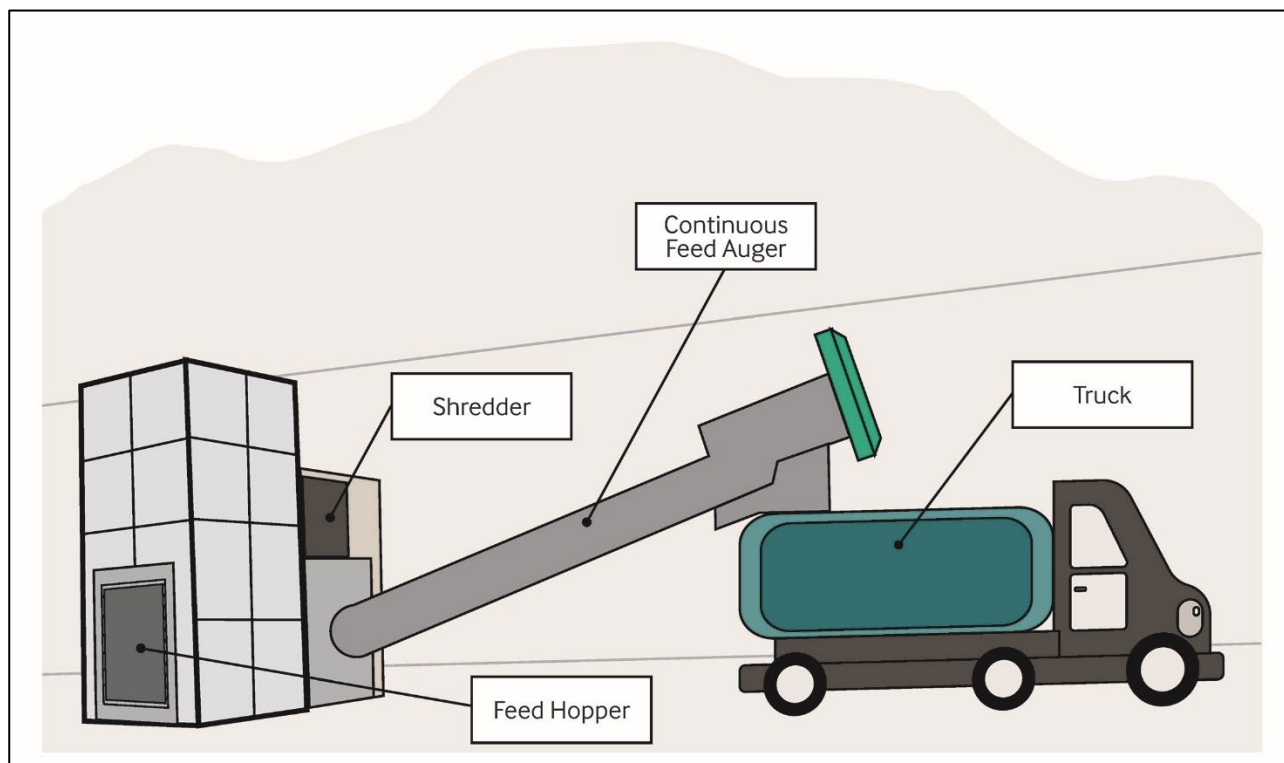
Initially materials received will be moved into a reception area in Division 2 of Building 1. Here, the materials will be registered, weighed, and consigned as appropriate.

<sup>1</sup> <https://www.gminsights.com/industry-analysis/medical-waste-management-market> and [https://apps.who.int/iris/bitstream/handle/10665/67350/WHO\\_CDS\\_CSR\\_EPH\\_2002.12.pdf](https://apps.who.int/iris/bitstream/handle/10665/67350/WHO_CDS_CSR_EPH_2002.12.pdf)

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The proposed treatment process for the bulk of the waste material is a fully automated technology that provides shredding followed by application of steam heat disinfection of biohazardous, hospital, and biomedical waste, with agitation being applied and with the shredded and treated material then being bulked into a bulk trailer and consigned off site for recovery. This process is described in the following section.

**Figure 2-1** below shows a simplified outline of the HRW management process proposed.



**Figure 2-1: Schematic of Treatment Unit**

Waste is weighed prior to being manually loaded into a continuous operation feed hopper.

From the hopper, waste is moved into a shredder and is shredded. Integral shredding ensures efficacy under all circumstances.

Air is drawn into the system and around the waste via negative pressure and high-efficiency particulate absorbing (HEPA) filters. HEPA filters capture and remove airborne pathogens prior to the air being released to the atmosphere. An odour control agent may be automatically applied to the waste.

The shredded material then enters the continuous feed, steam treatment auger (an Archimedes “thermal screw”) where steam is applied through multiple ports to raise the temperature within the unit and provide decontamination and disinfection of the waste. The process reduces the waste by up to 80% in volume.

Liquid condensate arising from the waste is captured after exiting the auger, having been disinfected, and is dispatched under licence consent to foul drain.

Once the process is complete the disinfected waste is discharged from the treatment lines into a self-contained enclosed conveyer system. This conveyer system moves the disinfected waste and discharges it into the bulking trailers, which are equipped with walking floors to aid loading, for onward dispatch to recovery.

Two separate, treatment units are proposed, which together will treat 24,000 tonnes per annum.

### 2.4.2 Process 2 – Automated management, reusable sharps containers

Reusable sharps containers will be conveyed to the facility in a range of container sizes. These containers will be received, weighed, logged, and fed to an automated line. The line will feed the containers into an automated emptying, washing and disinfection system. The empty, washed, and disinfected containers will then be moved to a storage area for outwards dispatch to customers.

Resultant waste will be moved manually in wheeled containers into the disinfection units for management.

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### 2.4.3 Process 3 – Bulking and transportation offsite (transfer)

Certain waste streams will be gathered in a dedicated HRW transfer station within the facility. These waste streams will be transported onsite in purpose-made containers.

This material for “transfer” will be stored in a mezzanine floor that will be installed over the automated sharps management area. It will be bulked up and transported offsite for management by recovery processes. No treatment processes are proposed for these materials.

The schematic at **Figure 2-2** presents an indicative layout of the proposed development, showing these three processes. This shows the material flows within the facility and the processes applied.

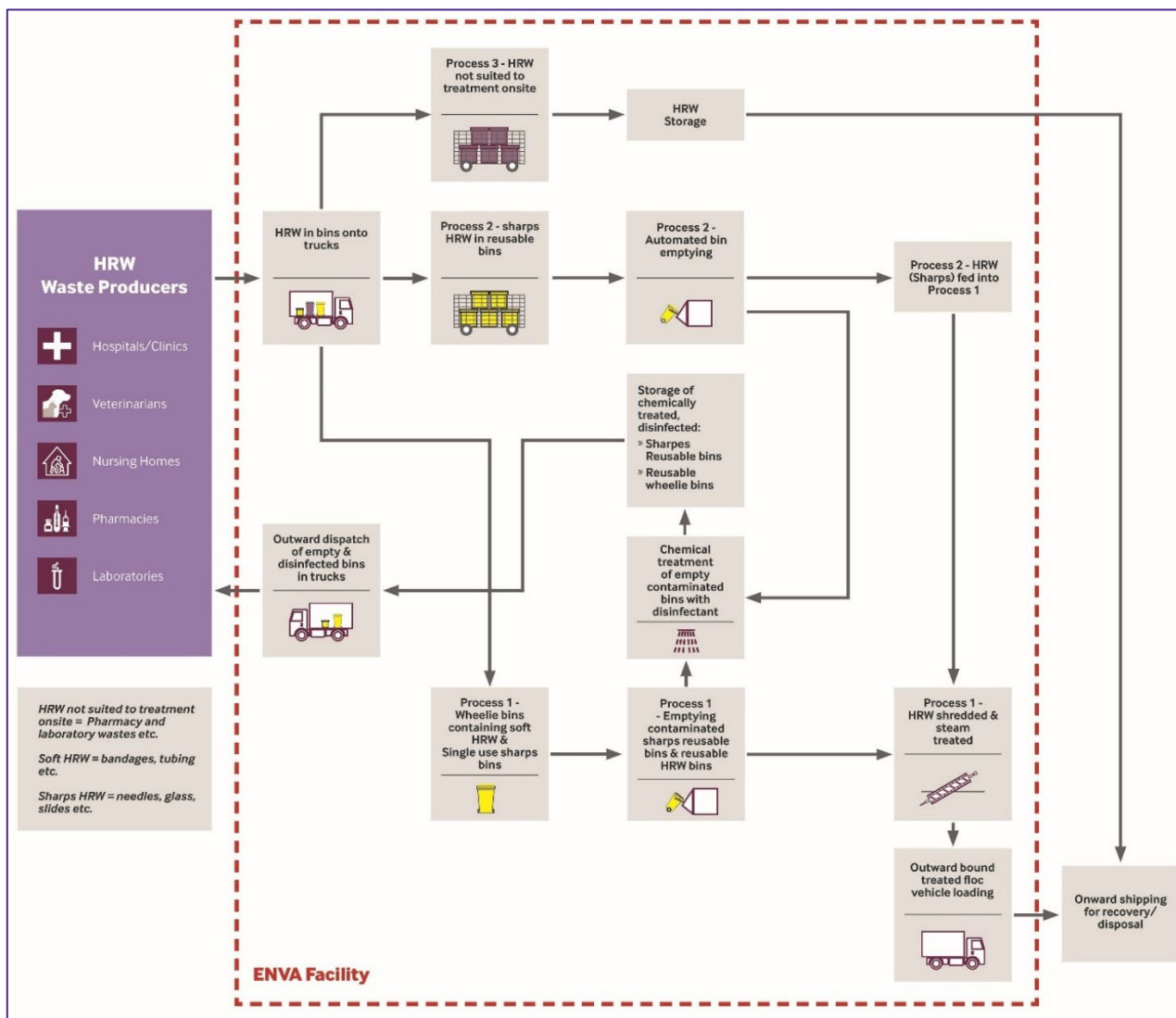


Figure 2-2: Schematic Layout of the Proposed Development

## 3 CONSULTATION

### 3.1 South Dublin County Council

A Section 247 pre-application meeting was held with the prospective applicant, RPS and South Dublin County Council (SDCC) in attendance on 25 April 2022. At the meeting, the applicant set out the scope of the proposed development to the Council. The Planning Authority indicated the project was generally acceptable, and identified key issues to be addressed:

- Decontamination required for cessation of soil use.

Contaminated soils have been stored in the warehouse proposed to house the HRW processing plant for more than 15 years.

Before the HRW operational plant is commissioned, the whole building will be washed down and inspected. Any minor repairs will be undertaken, but currently it is not expected that any extra groundwater monitoring, outside the current regime, will be required.

- Hours of delivery and operation require justification.

The facility has approval for 24-hour operations. Under Reg. Ref. SD09A/0050: permission was granted for 24-hour operations at the facility (after daytime hours) for activities within the existing shed relating to the drill cutting waste processing and recovery.

The HRW facility will require 24-hour traffic movements and operation to service the health sector including large hospitals which operate 24/7. Access to many of the hospital sites is heavily congested between the hours of 07:00 and 18:00 so the practical solution, to enable health services function efficiently is to schedule the waste collections outside of these hours.

- Details of changes in staff to be provided.

There will be a small reduction in employment at the Enva facility arising from the proposed development, but these staff will be redeployed to other Enva facilities

- SEVESO and Environmental Impact Assessment Report (EIAR) should be considered.

The closest SEVESO site is Brenntag Chemicals Distribution (Ireland) Ltd, Unit 405, Greenogue Business Park, Rathcoole, Dublin 24, approx. 50m to the east of the Proposed Development. The Proposed Development does not have the potential to cause an accident at the Seveso site, nor does it intensify activity or increase staffing levels at the subject site. An EIAR has been submitted with the planning application.

- SID consent route.

A pre-application consultation was held with ABP on 07 February 2023 seeking an opinion as to whether the proposed development was considered SID. In a letter dated 02 June 2023, ABP confirmed the development would be strategic infrastructure within the meaning of Section 37A of the Act.

- Bicycle and EV parking to be considered.

Bicycle parking now forms part of the proposed development.

- Access in and out of the site to be indicated.

The Enva site is primarily accessed from the south, with traffic travelling north off the M7 motorway via the R120 road that leads to the Greenogue Business Park. There are no changes proposed regarding access to the site as part of the proposed development.

- TTA to include current data, as well as route from N7.

An assessment of traffic and transport impacts has been undertaken and is set out in Chapter 7 of the enclosed EIAR.

- Consideration for green roofs and porous surfaces where possible.

A full consideration of design has informed the approach which focusses on reducing demolition activities and align with a sustainability-oriented approach. The decision to use the existing building and yard space and to forgo an alternative building design stems from a pragmatic assessment of how to optimise the

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existing structures, facilitate HRW treatment processes, and uphold environmentally conscious practices by minimising material waste and maximising resource utilisation.

- Ensure no adverse impact on flood risk.

A review of OPW flood mapping on the MyPlan online system indicates that the site is not subject to or at risk of flooding.

At the request of South Dublin County Council this application has also been forwarded to the Department of Defence.

### 3.2 An Bord Pleanála

On 11 November 2022, ABP received a request from Enva Ireland Limited to enter into pre-application consultation under Section 37B of the Planning and Development Act, 2000 (as amended) regarding the proposed development (ABP Ref. 315084). A pre-application consultation was held on 07 February 2023. The Application detailed how the proposed development would fall within a class of development under the Seventh Schedule of the Planning and Development Act. The Applicant sought an opinion as to whether the proposed development is or is not SID.

Further Information was submitted on behalf of the applicant to ABP on 29 March 2023. In the Inspector's Report dated 10 May 2023, the concluding remarks stated that *"the developments within the class of environmental infrastructure relating to a waste installation as set out in the Seventh Schedule of the Planning and Development Act 2000, as amended ... therefore constitutes a Strategic Infrastructure Development"*.

In a letter dated 02 June 2023 ABP confirmed that the proposed development falls within the scope of paragraphs 37A(2)(a), (b) and (c) of the Planning and Development Act and that the proposed development would be strategic infrastructure within the meaning of section 37A of the Act.

### 3.3 EIAR

Chapter 6 of the EIAR describes consultation undertaken which has informed the EIAR.

### 3.4 Prescribed Bodies

As per correspondence from ABP dated 02 June 2023 this application has been forwarded to prescribed bodies:

- An Taisce.
- Department of the Environment, Climate and Communications.
- Eastern and Midland Regional Assembly.
- Environmental Protection Agency.
- Health Service Executive.
- Irish Water.
- Transport Infrastructure Ireland.
- Dublin City Council.
- Dún Laoghaire – Rathdown County Council.
- Fingal County Council; and
- South Dublin County Council.

### 3.5 Additional Consultation

The applicant has also consulted with the Greenogue Business Park owner regarding the proposed development.

## 4 PLANNING HISTORY

A desktop review of SDCC’s online planning search facility was undertaken in July 2023 to examine the planning history for the subject site and adjacent lands. The sections below set out a summary of relevant planning applications.

### 4.1 Planning History: Application Site

#### 4.1.1 Reg. Ref. SD22A/0326

Permission was granted on 28 September 2022 for the installation of 410 solar PV panels mounted over the roof of existing industrial building (Building No. 2 as shown in Figure 1-2) and associated site works and services. It is understood that this has not yet been constructed.

#### 4.1.2 Reg. Ref. SD09A/0050

Permission was granted on 12 May 2009 for an extension to the currently licensed oil recovery activities at the existing integrated waste management facility. Permission was also granted for 24-hour operations at the facility (after daytime hours) which will only apply to activities within the existing solid shed relating to the drill cutting waste processing and recovery.

#### 4.1.3 Reg. Ref. SD07A/0260

Permission was granted on 17 July 2007 for an increase in the annual waste throughput at existing integrated Waste Management Facility from 62,500 tonnes to 111,000 tonnes per annum. The facility currently operates in accordance with Waste Licence No. 192-1. The planning application was accompanied by an Environmental Impact Statement (EIS), in accordance with the Planning and Development Regulations 2001, as amended.

#### 4.1.4 Reg. Ref. SD02A/0313, ABP Ref. PL 06S.201534:

Permission was granted on 18 July 2003 to conduct developments on lands at Greenogue Industrial Estate as described hereunder. An integrated Waste Management Facility which consists of four components namely: Hydrocarbon Waste Treatment Centre (1,858sq.m), Drum Recovery Centre (1,858sq.m), Hazardous Waste Transfer Station (1,859sq.m) and Non-Hazardous Waste Recycling Centre (3,251sq.m). The development also includes additional ancillary infrastructure including site office (200sq.m) 4 no. weighbridges, 2 no. reception kiosks (14. 44sq.m), 2 no. bunded fuel storage tanks (20sq.m), site roads, surface, and foul water drainage, 2 no. storm water attenuation tanks (666sq.m), 2 no. firewater retention tanks (151.5 square meters) and car and truck parking areas. An Environmental Impact Statement (EIS) accompanied this planning application.

### 4.2 Planning History: Adjacent Lands

**Table 4-1** below provides a summary of the relevant planning history within lands adjoining the subject site.

**Table 4-1: Planning History - Adjacent Lands**

Planning Reference	Summary of Proposed Development	Decision
SD23A/0080 (Lands to the west)	On 21 April 2023, Linen Direct applied for permission for an extension to the existing warehouse facility including a new loading bay.	Declared Withdrawn

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Planning Reference	Summary of Proposed Development	Decision
SD16A/0285 (Lands to the west)	On 09 August 2016, Goggin's Transport Company Ltd applied for retention permission for subdivision of site 401, retention permission for two portacabins, and planning permission for a surface water drainage system and perimeter landscaping.	Granted – 30 September 2016
SD11A/0281(Lands to the east)	On 28 November 2011, Brenntag Chemicals Distribution Ireland Limited applied for permission for an extension to an existing approved warehouse to provide for storage containers of pure chlorine. COMAH Regulations apply to the facility.	Granted – 31 January 2012
SD10A/0298 (Lands to the east)	On 05 October 2010, Sandymark Investments Plc applied for permission for a 148sq.m. warehouse extension to the rear of an existing 967sq.m. warehouse at site 405.	Granted – 25 November 2010
SD10A/0285 (Lands to the east)	On 24 September 2010, Star Window Furnishings Limited applied for permission for a warehouse extension of 278 sqm to the rear of an existing 1.156sq.m. warehouse at site 404	Granted – 09 November 2010
SD04A/0678	On 21 December 2004, Olympic Oil Company Limited applied for permission for a fuel distribution depot and a two-storey office	Granted – 20 January 2005
SD03A/0457 (Lands to the northeast)	On 23 January 2004, Mary and Jeremiah Ryan applied for permission to construct 520m.sq. of light industrial unit (7.5m high) at site 404a.	Granted – 19 February 2004
SD03A/0393 (Lands to the east)	On 07 August 2003, Star Window Furnishings Limited applied for permission to construct a 1518 sqm warehouse at site 404.	Granted – 07 August 2003

Having regard for the above, the planning history for the subject site and its environs demonstrates the industrial / commercial nature of the area and that industrial uses are acceptable and accord with planning policy. No planning application listed above has been subject of an appeal to ABP.





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- Demolition of the existing office space (393 sqm and 7.6m in height).
- Construction of a new roofed enclosure approx. 130 sqm (dimensions 6.5 m wide x 19.9 m long and 6.2 m high) for storage of clean bins.
- Construction of a security hut (7.45sqm) and 2.7m in height at the main entrance to the facility.
- Construction of a new structure of approximately 194 sqm and 9.1m in height for bulk trailers.
- Construction of a new mezzanine of 91sqm and associated stairs and service lifts.
- Addition of an air emissions point (stack) at roof level of c. 2m in height.
- Provision of internal openings between divisions of the existing building.
- Construction of a pedestrian walkway to allow for pedestrian movement, removal of 5 no. car parking spaces and provision of 10 no. bicycle parking spaces; and
- All associated site development works, including provision of internal plant.

### 5.1

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- A pedestrian walkway is also proposed that will link the car park, located to the south of Building 1 to the relocated office, located to the west of the main entrance to the Enva facility. This pedestrian walkway will allow for pedestrian movement of staff.
- Removal of 5 no. car parking spaces and provision of 10 no. bicycle parking spaces.
- Provision of internal openings between divisions of the existing building.
- Installation of a steam thermal treatment (Process 1) area in Division 1 of Building 1, supported by the following new plant and equipment:
  - A bin-emptying unit that collects waste into a hopper and shredder. The shredded waste is subsequently fed into thermal screws.
  - Two thermal screws designed to disinfect healthcare risk waste through steam heat application.
  - An air management system
  - A natural gas-fired steam generation boiler, complete with associated pipework and a mains connection.
  - A blast chiller situated on the western face of Building 1 to cool hydraulic oils.
  - Weighing cells and reception area for recording incoming and outgoing materials.
  - Washing units to wash and disinfect emptied bins.
  - A bin reception and marshalling area for temporary storage of incoming bins prior to emptying and subsequent washing.
- Installation of sharps management (Process 2) equipment and facilities, including:
  - A loading area equipped with a robotic arm to empty sharps containers into a wheeled bin.
  - A sharps container wash conveyor belt, loaded by the robotic arm, for washing and disinfecting sharps containers.
  - A storage area for short-term storage of washed and disinfected sharps containers.
- Installation of a healthcare risk waste bulking-up transfer area (Process 3), comprising:
  - A new mezzanine floor in Division 2, attached to the interdivisional space between Divisions 2 and 3.
  - A steel staircase and two service lifts for transporting incoming and outgoing waste.
  - A storage area for healthcare risk waste during the bulking-up process.
- Installation of office, canteen, and welfare facilities on the upper floor of the interdivisional space between Divisions 2 and 3. This area will include:
  - Office space
  - Shower, wash, and toilet facilities
  - A kitchen and break room

## 5.4 Drainage Infrastructure and Surface Water Management

The site is currently operational and is primarily covered in hard standing “made ground.” Stormwater and rainwater are captured and managed appropriately through a hydrocarbon interceptor prior to discharge.

There will be no net change to the volume or quality of stormwater arising. Therefore, minor changes only are proposed to the management of the existing stormwater arrangements. These minor changes will simply reflect the change of rainwater capture arrangements on roofing and the yard.

## 5.5 Foul Water Management

Drainage from site operations is made to sewer following wastewater treatment and with appropriate monitoring in accordance with the facility EPA IED licence.

Wastewater will arise from the washing of bins and management of condensate from the treated HRW will be discharged into the sewer.

Minor changes only are proposed to the management of the existing stormwater arrangements, these are shown in the enclosed *Proposed Drainage Plan* drawing.

## 5.6 Boundary Treatment

There are no proposals to change the existing boundary treatment.

## 5.7 Access and Traffic

The existing Enva site is primarily accessed from the South, with traffic travelling north, off the M7 motorway, via the Regional R120 road that accesses Greenogue Business Park. The proposal does not propose any changes to the existing site access arrangements.

There are minor changes proposed to car parking arrangements including provision of EV charging, removal of car parking spaces and bicycle parking, pedestrian walkway provision.

## 5.8 Air Quality

The existing IED Licence requires that no emissions, including odours, from the activities executed at the site shall result in an impairment of, or an interference with amenities or the environment beyond the facility boundary or any other legitimate uses of the environment beyond the facility boundary.

An emissions point will be added to the roof of Building 1. The emissions point will have a maximum height of 2m above eaves. The emissions point will capture and remove any airborne pathogens prior to the air being released into the atmosphere.

## 5.9 Employment

There will be no significant change in employment levels at the site arising from the proposed development, with employment projected to be c. 29 no. employees.

## 5.10 Operating Hours

The existing facility has approval for 24-hour operations. Under Reg. Ref. SD09A/0050: permission was granted for 24-hour operations at the facility (after daytime hours) for activities within the existing solid shed relating to the drill cutting waste processing and recovery.

The proposed HRW facility will require 24-hour traffic movements and operation to service the health sector including large hospitals which operate 24/7. For health and safety reasons, HRW cannot be compacted, therefore the HRW is low density and high volume in nature. Access to many of the hospital sites is heavily congested between the hours of 07:00 and 18:00 so the practical solution, to enable health services function efficiently is to schedule the waste collections outside of these hours.

## 5.11 Environmental Emergency Procedures

The Proposed Development is in an existing business park with a range of business types in operation. The closest Seveso site is Brenntag Chemicals Distribution (Ireland) Ltd, Unit 405, Greenogue Business Park, Rathcoole, Dublin 24, approx. 50m to the east of the Proposed Development. This is a lower tier premises. The Proposed Development does not have the potential to cause an accident at the Seveso site, and there is no mitigation by design measures that can reduce the risk of an accident at a Seveso site. The existing Seveso facility is considered further in the enclosed EIAR.

## 5.12 Construction and Phasing

The duration of the construction works for the Proposed Development would be approximately 18 weeks. Enva will appoint a contractor for the construction phase of the project. Site environmental controls to be implemented during the construction phase. Similarly, there will be management of construction related traffic to and from the site. Following grant of planning permission, plans will be finalised by the contractor in advance of the commencement of construction works.

## 5.13 Ancillary Development

### 5.13.1

## 6 STRATEGIC AND STATUTORY PLANNING POLICY CONTEXT AND ASSESSMENT

### 6.1 Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF states that the Government will address our environmental challenges through overarching aims, one of which is for 'resource efficiency and transition to a low carbon economy'. Goals are identified for this aim including:

#### **Sustainable Land Management and Resource Efficiency**

*"Adopting the principles of the circular economy to enable more sustainable planning and land use management of our natural resources and assets."*

#### **Managing Waste**

*"Adequate capacity systems to manage waste in an environmentally safe and sustainable manner."*

The Plan notes that although improvements have taken place in waste management systems in Ireland, Ireland is still heavily reliant on the export markets for the treatment of residual waste.

The proposal accords with National Strategic Outcome 9 of the NPF as it provides *"necessary and appropriate hazardous waste management facilities to avoid the need for treatment elsewhere"*.

National Policy Objectives related to Resource Efficiency and Transition to a Low Carbon Economy, and which are of relevance to the current proposal to extend the operational lifespan of the permitted solar farm to 40 years are as follows:

#### **National Policy Objective 52**

*"The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital"*.

#### **National Policy Objective 53:**

*"Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development."*

#### **National Policy Objective 54**

*"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions."*

The NPF supports circular economy principles that minimise waste going to landfill and maximise waste as a resource. **National Policy Objective 56** states the following:

*"Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society."*

Improving sustainability in terms of energy, waste management, and resource efficiency are a number of the key future growth enablers as set out in the NPF. The proposal for modifications at the existing facility to process HRW will improve waste management systems in Ireland, reduce the reliance on export markets for HRW, while also supporting the circular economy principles set out in the NPF. Modifying an existing waste facility maximises the existing land uses of the site and reduces the need for a new land use on a brownfield site.

## 6.2 Eastern and Midlands Regional Spatial and Economic Strategy

The *Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031* (RSES) outlines the spatial and economic policies and targets for the region. The RSES is a strategic plan and investment framework to shape the future of the region to 2031 and beyond.

In developing the vision for the RSES several key national policy documents were considered including NPF. The Strategy is based on three key principles. The RSES states that these principles reflect the three pillars of sustainability: Social, Environmental and Economic. The three principles are:

- Healthy placemaking.
- Climate action; and
- Economic opportunity.

The RSES sets out 16 Regional Strategic Outcomes (RSOs) to achieve the shared goals set out in the National Strategic Outcomes (NSOs) of the NPF. One of the Climate Action RSOs is “*Sustainable management of Water, Waste and other Environmental Resources.*” Under this Objective the RSES seeks to “*Conserve and enhance our water resources to ensure clean water supply, adequate wastewater treatment and greater resource efficiency to realise the benefits of the circular economy.*”

The RSES also supports the circular economy. In terms of waste management, it defers to the strategic objectives, targets and goals set out in the Eastern and Midlands Region Waste Management Plan 2015-2021, noting that 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*”.

**Waste Management Regional Policy Objective 10.25** is:

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

The proposal, which includes alterations to an existing waste process facility to be facilitate processing HRW will deliver a new facility to process the increased capacity for the treatment of HRW in Ireland and will reduce the reliance on the export of unprocessed HRW. In this regard, the proposed development will contribute to the practical realisation of the aims and objectives as set out in the RSES, enhancing our waste treatment as set out above.

## 6.3 South Dublin County Development Plan 2022-2028

The *South County Dublin County Development Plan 2022-2028* came into effect on 03 August 2022

### 6.3.1 Land Use Zoning

The existing site is designated in the South Dublin County Development Plan (SDCDP) 2022 - 2028 “*EE – to provide for employment and enterprise related uses.*” The predominant land cover type is ‘*artificial surfaces*’ – primarily of industrial, commercial and transport units.

The permitted in principle uses for the area of the subject site are:

- Recycling Facility.
- Refuse Transfer Station.
- Industry-General.
- Transport Depot.
- Warehousing.

The open for consideration uses for the area of the subject site are:

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- Refuse Landfill / Tip

The proposed development is considered to accord fully with the land use zoning and be permitted in principle at this site.

### 6.3.2 Infrastructure and the Environment

Chapter 11 of the SDCDP relates to *Infrastructure and Environmental Services*.

The SDCP notes that *“Waste Management is integral to sustainable development and is a key element of the circular economy, protecting public health and maintaining a high-quality environment.”*

Policy IE7: Waste Management states to *“implement European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.”*

The following objectives are of relevance to the proposed development:

**IE7 Objective 1:** *To encourage a just transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources through compliance with the provisions of the Waste Action Plan for a Circular Economy 2020-2025 and to promote the use of, but not limited to, reverse vending machines and deposit return schemes or similar to ensure a wider and varying ways of recycling.*

**IE7 Objective 2:** *To support the implementation of the Eastern Midlands Region Waste Management Plan 2015-2021 or as amended by adhering to overarching performance targets, policies, and policy actions.*

**IE7 Objective 8:** *To adhere to the recommendations of the National Hazardous Waste Management Plan 2014-2020 and any subsequent plan, and to co-operate with other agencies including the EPA in the planning, organisation, and supervision of the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.*

**IE7 Objective 9:** *To support the development of indigenous capacity for the treatment of non-hazardous and hazardous wastes where technically, economically, and environmentally practicable subject to the relevant environmental protection criteria for the planning and development of such activities being applied.*

The proposed development will improve waste management infrastructure and will increase the capacity for HRW processing in Ireland. The proposed development accords with the objectives as set out in the extant SDCDP. The proposed development responds to the need to reduce the generation of hazardous risk waste. On this basis, the proposed development accords with the objective as set out in Chapter 11 of the SDCDP.

### 6.3.3 Development Management Standards

Chapter 12 of the SDCDP relates to *Implementation and Monitoring*.

Section 12.11.3 of the Development Plan’s development and design standards relate to waste management. Section 12.11.3 (iii) sets out the key factors that should be considered for waste recovery and waste disposal facilities.

Regarding the siting and scale of any proposed facility, the Plan states that:

*“The provision of waste recovery facilities, pre-treatment infrastructure and development of indigenous secondary waste processing, including Material Recovery Facilities (MRF) and Waste Transfer Stations will be facilitated at appropriate locations within the County. In general, to prevent an excessive concentration, no new facilities will be permitted inside the M50. Facilities will only be permitted where they do not materially detract from the Land Use Zoning Objective and are at a scale appropriate to their surrounding environment and adjoining amenities.”*

The Plan further lists a number of criteria that proposals for waste and recovery facilities should have regard for. These criteria, and their relevance to the proposed development are set out below.

**Criteria no. 1** states that:

*“Avoid siting waste infrastructure or related infrastructure in Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and proposed Natural Heritage Areas (pNHAs or NHAs) or areas protected for landscape amenity, visual amenity, geology, heritage or cultural value or areas of flood risk;”*

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In this regard, it is highlighted that the site of the proposed development is in an established Business Park. The site of the Proposed Development is not located within or adjacent to any nationally or internationally designated sites for nature conservation. Chapter 14 of the accompanying EIAR, which relates to Biodiversity stated that there is potential for hydrological connectivity with downstream coastal European Sites, pNHAs, Ramsar sites, Nature Reserves and Wildfowl Sanctuaries via the surface water network. However, given the scale and nature of the proposed works, the distance between these sites and the Proposed Development (all greater than 18 km from the site) the potential for likely significant effects on these sites is ruled.

Chapter 13 of the accompanying EIAR relates to Cultural heritage. There are no recorded archaeological sites within the Proposed Development and none in proximity to it. There are only four sites within 1km that may be indicators of settlement activity in the surrounding landscape. There will be no effect on any designated Cultural Heritage assets, the closest of which is the site of a ring-ditch (SMR DU021-103) c. 865m to the southeast, now built over within Greenogue Business Park.

Regarding landscape, the scale of the proposed change is so limited as to be almost indistinguishable from the surrounding built up industrial area. The proposed changes are considered to have an indiscernible effect on the industrialised landscape of the Greenogue Business Park.

The Enva facility is not within an area that is subject to flooding or that has any historically recorded flood event, and does not intersect any area associated with low, medium, or high flood probability.

The proposed changes to development are located inshore (approx. 20 km) and away from Dublin Bay, therefore risk coastal flooding is not applicable.

The proposal has regard for the criteria set out for the siting of waste infrastructure in the CDP. The proposal will have no impact on protected sites and will have an imperceptible impact on the wider landscape. The proposed development will allow assimilated into the existing environment and avoid any abrupt changes to the geology, cultural impact, and areas of flood risk.

**Criteria no. 2** states that:

*“Undertake Appropriate Assessment Screening for all waste-related activities requiring development consent;”*

A screening for Appropriate Assessment (AA) report has been prepared by RPS in relation to the proposed development and is enclosed as part of the planning application pack. The AA concludes the following:

- The Proposed Development is not directly connected with or necessary to the management of any European site.
- The Proposed Development alone is not predicted to result in any Likely Significant Effects on any European site(s) within the Zol of the facility.
- The Proposed Development will not give rise to potential in-combination or cumulative effects with the other projects considered.

**Criteria no. 3** states that:

*“Ensure a Sustainable Drainage System (SuDS) is applied to any development and that site-specific solutions to surface water drainage systems are developed, which meet the requirements of the Water Framework Directive and associated River Basin Management Plans;”*

As part of the proposed alterations to the Enva facility to facilitate the processing of HRW, excavation works for the reconfiguration of surface water drainage system on site will also be undertaken. The site comprises an artificial cover of paved surface (Made Ground) which has a low quality in terms of drainage properties and value on a local scale. Any drainage from site operations is made to sewer following wastewater treatment and with appropriate monitoring in accordance with the facility's EPA Licence. Groundwater is monitored on-site via three groundwater monitoring wells to comply with the conditions of its licence. The proposed drainage network will allow for surface water to filter through underlying soils and groundwater protecting groundwater quality and quantity.

**Criteria no. 4** states that:

*“The impact from a transport perspective should be assessed including road access, network, safety, and traffic patterns to and from the proposed facility in accordance with road design guidelines and / or relevant guidelines in relation to roads. Proposals will require a Traffic Impact Assessment (TIA);”*



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Chapter 7 of the accompanying EIAR relates to Traffic and Transport. The duration for the construction works for the proposed development will be approximately 18 weeks. The exact sequence of construction will be determined by the applicant and contractor prior to the commencement of development and will be detailed in a Contractor's Construction Management Plan. Overall, the temporary effect on the road network during the construction phase is classified as imperceptible in the enclosed EIAR.

Once construction is complete and the HRW facility is operational, it is considered that the effect on the road network is imperceptible. Junction capacity assessments were undertaken at the adjacent R120 Newcastle Roundabout junction as its directly impacted by the Proposed Development. The effects of the Proposed Development on the capacity of this junction are not significant based on the results reported in the enclosed EIAR.

**Criteria no. 5** states that:

*“Impact on residential and visual amenity of the area: - In general, no new waste disposal facility or Refuse Transfer Station shall be located within 200 metres of a residence”.*

Chapter 8 of the accompanying EIAR relates to Population. The assessment considers how people's enjoyment of their residential and local community may be impacted by the proposed development. The assessment of the site and its environs identifies limited local services and amenities in the immediate surroundings of the site. There are no residential properties locate within two hundred metres of the existing Enva facility. As noted above, the site of the proposed development is located within an existing Business Park, and the minor construction components will have an indiscernible impact on landscape.

## 7 WASTE MANAGEMENT POLICY CONTEXT AND ASSESSMENT OF COMPLIANCE

### 7.1 National Waste Management Plan for a Circular Economy 2024 – 2030

The Waste Management Act 1996 requires Local Authorities to make a waste management plan either individually or collectively for their functional areas. In 2015 local authorities established three Regional Waste Management Planning Offices to develop and implement three regional waste management plans on their behalf. Following evaluation, it was recommended that a single plan be prepared to replace the existing regional plans.

The Regional Waste Management Planning Offices, under the auspices of the County and City Management Association National Oversight Group, co-ordinated the preparation of the National Waste Management Plan for a Circular Economy 2024-2030 (March 2024) which is the first National Waste Management Plan for a Circular Economy.

This Plan sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030 and has been prepared to support and supplement the wider policy base and includes specific targets, policies and actions to enable the waste and resource sector to meet the circularity challenge and accelerate the transition to a circular economy.

The ambition of this Plan is 0% total waste growth per person over the life of the Plan with an emphasis on non-household wastes including waste from commercial activities and the construction and demolition sector. This ambition is underpinned with a comprehensive series of targets, policies, actions and a suite of key deliverables. Each of these provisions has been devised to support achievement of the Plan ambition, respond to current and future challenges, and support the transition to a more circular economy with reduced climate impact.

### 7.2 National Hazardous Waste Management Plan 2021 – 2027

The purpose of this plan is to protect the environment and human health in Ireland through best-practice management of hazardous wastes through the following objectives:

1. *Support and drive priority prevention actions by industry and the public to reduce the generation of hazardous waste.*
2. *Support the identification of adequate and appropriate collection infrastructure for all hazardous wastes with a view to mitigating environmental and health impacts.*
3. *Endorse the proximity principle such that hazardous wastes are treated as close to the point of production as possible – including within Ireland, taking into account the need for specialised installations for certain types of waste.*
4. *Support effective regulation of the movement and management of hazardous wastes in line with national policy priorities.*
5. *Promotion of safe reuse and recycling pathways in support of the circular economy.*

The *National Hazardous Waste Management Plan* (NHWMP) notes that the Covid-19 pandemic significantly increased the production of HRW by 24%. HRW production is on an upward trend globally and in Ireland.

The proposed modifications to the existing Enva facility to process HRW accords with the objectives as set out above to reduce the generation of hazardous waste. The proposed development has taken cognisance of any potential environmental and health impacts, and an EIAR has been prepared and is enclosed as part of this planning application pack. The proposed development will treat waste within proximity of a number of production points and will result in a reduced need to export HRW.

## 7.3 Waste Action Plan for a Circular Economy 2020-2025

The *Waste Action Plan for a Circular Economy* is Ireland's new roadmap for waste planning and management. This Plan shifts focus away from waste disposal and looks instead to how we can preserve resources by creating a circular economy.

The Waste Action Plan notes the global increase in plastic waste associated with domestic and medical waste from protective equipment arising from Covid-19.

Improving Irish waste management infrastructure is a clear policy ambition of the waste plan. The proposed Enva development will add a second supplier of HRW treatment services to the current single provider in Ireland. Adding an additional 24,000 capacity will alleviate the burden at these two facilities and will also reduce their reliance on export of HRW.

## 7.4 Eastern – Midlands Region Waste Management Plan 2015-2021

The regional level waste management plans in Ireland are statutory planning documents. Their objective is to set out a framework for the prevention and management of wastes for a defined regional area. The relevant regional waste management plan for South County Dublin is the *Eastern – Midlands Regional Waste Management Plan 2015-2021* (the WMP).

'Part 3 – Implementation' deals with waste projections and infrastructure planning for the region. Within Part 3, Chapter 16, Market Analysis, and Infrastructure, sets out the policies for the Plan period, which are for the most part designed to provide clear development signals to operators in the waste market.

Having regard to Chapter 16 of the Plan, the following policies are of relevance:

E9b: *"The waste plan supports the need for on-going disposal capacity to be developed for on-site generated non-hazardous / hazardous industrial waste over the plan period"*.

E19: *"The waste plan supports the development of indigenous reprocessing and recycling capacity for the treatment of non-hazardous and hazardous wastes where technically, economically, and environmentally practicable. The relevant protection criteria for planning and development of such activities need to be applied."*

Section 16.5 of the WMP sets out the overarching environmental protection criteria for waste-related activities requiring consent. The criteria are provided to assist project developers, operators, and competent authorities in considering the environment early in the planning process. The policy in this regard is G3 as set out below:

*"Ensure there is a consistent approach to the protection of the environment and communities through the authorisation of locations for the treatment of wastes"*

The proposed development is assessed against the general environmental criteria set out in Section 16.5 of the plan in **Table 7-1** below.

**Table 7-1: Assessment of Proposed Development Against Environmental Protection Criteria of Eastern - Midlands Waste Management Plan**

Environmental Protection Criteria (Ref. Section 16.5 of WMP)	Assessment
Avoid, as far as possible, siting waste infrastructure or related infrastructure in areas protected for landscape and visual amenity, geological heritage and/or cultural heritage value. Where it is unavoidable, an impact assessment should be conducted by a suitably qualified practitioner and appropriate mitigation and/or alternatives must be provided.	The subject site is an existing site which meets this site criteria.
Avoid siting waste infrastructure or related infrastructure in proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves,	The site of the Proposed Development is not located within or adjacent to any nationally or

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Environmental Protection Criteria (Ref. Section 16.5 of WMP)	Assessment
Refuges for Fauna and Annex I Habitats occurring outside European designated sites;	internationally designated sites for nature conservation.
To prevent the spread of Invasive Alien Species (IAS), where waste material is transported from one location to another, a suitably qualified person will conduct an IAS survey of source and receptor sites. If IAS are found, preventative measures will be implemented to prevent the onward spread of the plant/animal material including: employment of good site hygiene practices for the movement of materials into, out of and around the site; ensuring that imported soil is free of seeds and rhizomes of key invasive plant species; adherence to any national codes of practice relating to prevention of the spread of IAS (including both Ireland and Northern Ireland Codes of Practice)	Survey undertaken at site. No evidence of IAS identified within the subject site.
In order to protect habitats which, by virtue of their linear and continuous structure (e.g. rivers and their banks) or their contribution as stepping stones (e.g. ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species, these features will be protected as far as possible from loss or disruption through good site layout and design;	<p>The enclosed Appropriate Assessment Screening Report undertaken indicates the proposed development is not predicted to result in any Likely Significant Effects on any European site(s) within the Zol of the facility.</p> <p>The enclosed EIAR finds no residual impact on biodiversity.</p>
To protect river habitats and water quality, ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15m measured from each bank of any river, stream, or watercourse;	The site of the proposed development is located adjacent to the Griffeen River, a tributary of the River Liffey. No works are proposed within 15m of the Griffeen River.
Ensure that a Sustainable Drainage System (SuDS) is applied to any development and that site-specific solutions to surface water drainage systems are developed, which meet the requirements of the Water Framework Directive and associated River Basin Management Plans;	The proposed development is located within an existing facility and does not impact on existing surface water drainage arrangements.
Avoid development of waste management infrastructure in flood risk areas. Reference should be made to the Planning System and Flood Risk Management for Planning Authorities (DECLG/OPW, 2009), the National Flood Hazard Mapping (OPW) and the relevant Flood Risk Management Plan (FRMP);	The Enva facility is not within an area that is subject to flooding or that has any historically recorded flood event, and does not intersect any area associated with low, medium, or high flood probability.
Ensure that riparian buffer zones (minimum of 15 m) are created between all watercourses and any development to mitigate against flood risk. The extent of these buffer zones shall be determined in consultation with a qualified ecologist and following a Flood Risk Assessment. Any	The site of the proposed development is located adjacent to the Griffeen River, a tributary of the River Liffey. No works are proposed within 15m of the Griffeen River.

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Environmental Protection Criteria (Ref. Section 16.5 of WMP)	Assessment
hard landscaping proposals shall be located outside of these buffer zones;	
Avoid geologically unsuitable areas including karst where practicable, and areas susceptible to subsidence or landslides. Consideration should be given to the primary water source of the area and the degree of surface water/groundwater interaction;	No karst features have been mapped within 2km of the Proposed Development. Based on review of the GSI's Landslide Susceptibility mapping, the site is rated as having 'Low' landslide susceptibility.
If there is an airport within 13 km of the proposed waste facility, the airport shall be consulted at an early stage of planning.	Casement Aerodrome is located approx. 1.3km the west of the development site.
Impact from a transport perspective will be assessed including road access, network, safety, and traffic patterns to and from the proposed facility in accordance with road design guidelines and/or relevant LA guidelines in relation to roads; and	Traffic and Transport impacts have been assessed and found to be demonstrates negligible in the enclosed EIAR.
There are existing, closed or uncommenced landfills which could be used for alternative waste activities as they are considered brownfield sites; also, suitably zoned, other brownfield sites could be used for alternative waste activities. Sites that offer opportunities to integrate differing aspects of waste processing will be preferred choices. This will ensure maximum efficiency of waste processing.	There are no existing, closed or uncommenced landfills which could be used for the proposed facilities.

The WMP also contains policy content with respect to the need to protect European Sites.

Policy G5:

*“Ensure that the implementation of the regional waste management plan does not prevent achievement of the conservation objectives of sites afforded protection under the EU Habitats and Birds Directive.”*

Criteria to be considered include *inter alia* the avoidance of siting new waste infrastructure or related infrastructure in European Sites, the undertaking of Appropriate Assessment Screening for all waste-related activities requiring development consent, the avoidance of damage to linear features of the landscape functioning as steppingstones for the migration, dispersal, or genetic exchange of wild species. In this case, a screening exercise has been conducted and no adverse effects are anticipated.

Section 19.6 of the Plan relates to Infrastructure Planning. In this regard, Strategic Objective E states

*“The region will promote sustainable waste management treatment in keeping with the waste hierarchy and the move towards a circular economy and greater self-sufficiency.”*

Improving Irish waste management infrastructure is a clear policy ambition of the waste plan. The policy aim is for the region and the State to become more self-sufficient, in terms of treating the wastes generated and which it is currently exporting. The proposed development accords with the objectives and policies as set out in the Plan.

## 8 ENVIRONMENTAL ASSESSMENTS

### 8.1 Environmental Impact Assessment Report

An EIAR in respect of the Project has been prepared by RPS with input from a multidisciplinary team of competent experts and is submitted along with this application.

The EIAR presents the environmental information which has been gathered to assess the likely significant environmental effects of the Proposed Development.

The EIAR specifically:

- Provides statutory and non-statutory consultees with technical information to enable an understanding of the Proposed Development.
- Provides a description of the reasonable alternatives considered for the Proposed Development and an indication of the main reasons for the options selected.
- Presents the existing environmental baseline information established from desktop studies, site-specific surveys and/or consultation.
- Indicates any limitations encountered during the compilation of the environmental information, including the acknowledgement of any data gaps or deficiencies and confidence in the information gathered.
- Describes the methodology used within the Environmental Impact Assessment process.
- Presents the potential environmental impacts arising from the Proposed Development. This will be based on the baseline information coupled with the analysis and impact assessments completed.

Proposes mitigation measures to avoid, prevent and reduce any identified significant adverse effects on the environment. Where mitigation measures have been identified, the residual significance of effects has also been identified.

### 8.2 Appropriate Assessment

A Screening for Appropriate Assessment has been prepared by RPS and is included in the application documentation. This assessment was completed in compliance with EU and Irish law and relevant European Commission and national guidelines to determine whether or not Likely Significant Effects on any European site could be excluded because of the subject application.

It has found that the proposed development is not directly connected with or necessary to the management of any European site.

From the findings of the assessment presented it has been found that the proposed development alone is not predicted to result in any Likely Significant Effects on any European site(s) within the ZoI of the facility.

Furthermore, the proposed development will not give rise to potential in-combination or cumulative effects with the other projects considered.

## 9 CONCLUSION

The site is located within an existing industrial estate, approximately 500m east of Newcastle village. The principle of the proposed development is in keeping with national, regional, and local planning policy with regard to improving waste management infrastructure. The subject site benefits from existing permissions which have allowed waste treatment to be efficiently managed onsite for a number of years.

The proposed development accords with the land use zoning. There are no zoning objectives restricting the use of the site for waste management activities and there are no sensitive uses immediately adjacent the site such as would be impacted by the development and associated activities proposed.

The proposed development will alleviate the burden at the two existing HRW management facilities in Ireland and will also reduce reliance on exporting HRW for disinfection.

The potential for impact on the environment has been carefully considered with respect to any surrounding sensitive receptors. There are no significant adverse ecological impacts on the site or nearby Natura 2000 sites.

In conclusion, the proposed development will have significant positive impacts at national, regional, and local level, and can be readily accommodated at the subject site in accordance with the principles of proper planning and sustainable development.