



### Submission

Submitter:	Mr Thomas Boland
Organisation Name:	Health Service Executive
Submission Title:	HSE comment
Submission Reference No.:	S005623
Submission Received:	25 July 2019

### Application

Applicant:	Dublin City Council
Reg. No.:	W0303-01

See below for Submission details.

Attachments are displayed on the following page(s).

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**Our ref:** 0964  
**Licence Type:** Waste Management Licence  
**Name and address of applicant:** Dublin City Council, Civic Offices, Wood Quay, Dublin 8  
**Reference No:** W0303-01  
**Location of facility:** St. Margaret's Road, Ballymun, Dublin 11

**Class and Nature of Activity:**

D13	No	Blending or mixing prior to submission to any of the operations numbered D 1 to D 12 (if there is not other D code appropriate, this can include preliminary operations prior to disposal including pre-processing such as, amongst others, sorting, crushing, compacting, pelletising, drying, shredding, conditioning or separating prior to submission to any of the operations numbered D1 to D12)
D14	No	D14 – Repackaging prior to submission to any of the operations numbered D 1 to D 13 Repackaging prior to submission to any of the operations numbered D 1 to D 13
D15	Yes	Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).
R03 –		Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) Preparing for reuse of organic substances
R04	No	Recycling/reclamation of metals and metal compounds Preparing for reuse of metal and metal compounds 17 tonnes/day 5,000
R05	No	Recycling/reclamation of other inorganic materials Preparing for reuse of inorganic materials
R12	No	Exchange of waste for submission to any of the operations numbered R 1 to R 11 (if there is no other R code appropriate, this can include preliminary operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11)
R13	No	Storage of waste pending any of the operations numbered R 1 to R 12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced)".

As a statutory consultee, this office has reviewed the information contained in the licence application and the associated documents from a public health perspective and has the following comment to make:

**Description:**

The site is located within a well-populated area located in Fingal County Council area but within an existing Dublin City Council (DCC)-owned property and will comprise of a civic amenity area, workshops, a vehicle garage, a multi-storey car park, an office block and a salt barn. The licence application seeks approval for 24,900 tonnes p.a., 500 tonnes of which will be hazardous waste.

All foul water will be discharged under licence to the existing 750mm sewer along with 'dirty' surface water run-off from the operations area. 'Clean' surface water will discharge to the surface water drainage system.

Noise will be generated mainly from delivering trucks and vehicles and from on-site compactors and machinery.

Air emissions may be generated in the form of dust and odour.

**Receiving environment:**

This is a greenfield site which borders St. Margaret's residential area to the south with the remaining surrounding areas predominantly open spaces – roads/industrial areas.

The main areas of concern from a public health perspective which would be associated with a facility such as this are:

**Air emissions including odours**

**Noise emissions**

**Pest Control**

The Applicants have submitted an Environmental Report in support of this application compiled by Tobin Consultants Ltd.

The report details mitigation measures which will be put in place during the construction and operational phases.

**Air emissions including odours**

The report predicts the construction phase as more likely to have an impact on air quality and has detailed mitigation measures accordingly. The impact on air quality from the operational phase is predicted to be insignificant, provided the intake of waste materials is strictly limited.

**Noise emissions**

Noise impact is again predicted to arise mainly during the construction phase. While reference is made in this report to screening of noise sources, it is not clear from the plans whether physical barrier screens will be put in place for the duration of the construction phase.

It is proposed that the measures such as machinery selection, enclosed working areas and a 3 metre high perimeter wall will mitigate any noise sources during the operational phase.

**Pest Control:**

As this is currently a vacant site, a survey of the site should be carried out prior to construction commencement/disturbance works as any rodent nests are likely disperse into nearby properties.

During the operational phase a comprehensive pest control management plan must form part of the Overall Management Plan. Pest control must be carried out by a competent person and in such a manner as not to cause injury to human or animal health, domestic pets or birds.

The application has also been referred a number of departments within the HSE for consideration. The following comment has been made by Dr. Ruth McDermott SPHM, Department of Public Health, HSE East:

A demographic profile of the local area based on CSO census data of the nearest Small Areas was produced using Health Atlas. Overall this is a disadvantaged area; this is a young population with higher proportion than nationally in all age groups from 0 to 44 years. When compared with national figures the area has a higher proportion of travellers (17% compared with 0.7%); a higher proportion of unemployed persons (13% vs 5.6%); and a higher proportion of persons in disadvantaged categories (applying the HP index1).

In terms of vulnerable populations there is a halting site very close to the site. There is a primary school approximately 500m from the facility. There is a pre-school close to the facility on St Margaret's Road.

From a public health perspective, potential health impacts on the population living and attending school and pre-school near this facility include:

- Noise from the facility particularly given the potential effects of noise on children's cognitive skills
- Increased traffic of vehicles into the site with consequent air quality and road safety issues
- Odour nuisance
- Risk of fire

### **Conclusion**

We request that consideration is given to mitigation of the above issues with particular focus on strict monitoring and adherence to noise limits.

Signed:



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**Environmental Health Officer**  
**HSE Environment Operational Unit**

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