

Submission

Submitter:	Mrs Naoimh Hewitt
Submission Title:	Re: Roche response to RFI
Submission Reference No.:	S010058
Submission Received:	01 July 2021

Application

Applicant:	Roche Ireland Limited
Reg. No.:	P0012-06

See below for Submission details.

Attachments are displayed on the following page(s).

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We note the recent submission to the EPA, made on behalf of Roche Ireland in their licence review, which deals with the site demolition and remediation, dated 11/06/2021.

We note that their response to RFI 8 addresses the Staging area (as proposed in their planning application P20/420), and clearly states their understanding that the Staging Area has been omitted from the proposed demolition plan.

RFI 8 - It is noted that planning permission has been granted for planning reference number P20-420 subject to a number of conditions including Condition 2 which states that the proposed staging area shall be omitted from the development. Provide an update of the impact of this condition, if any, on the scope of the licence review application and provide updated maps as listed in Section 3.2 of the Application Form showing the correct IE licenced boundary [Regulation 9(2)(g)].

The Proposed Development incorporated a staging area at Knocknamana Clarecastle off the R458 to facilitate the use of EHGVs through Clarecastle Village in order to reduce emissions and noise levels, however in accordance with condition 2 of the consent conditions, the staging area has been omitted from the consented development. As a result, standard HGVs will be used to transport material to and from site via the identified haulage route, therefore the staging area for EHGVs is no longer required. The IEL boundary of the existing site will remain unchanged and all emission points associated with the staging area are no longer required as outlined in the our submission of additional information dated 16 April 2021.

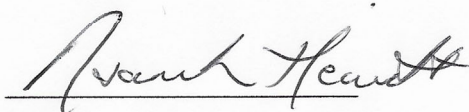
Please find attached an updated Non Technical Summary (NTS) which removes reference to the following emission points as these have been captured in the relevant attachments as minor emission points:

- Dust from within the enclosures emitted from the AHU exhausts
- VOCs from within the enclosures emitted from the AHU exhausts
- VOCs in the vapour space of vessels with vents

However, we also note that the Non Technical Summary document (revised and signed off on 31/05/2021) and submitted to the EPA with the response to further information request (11/06/2021) clearly refers to the Proposed Staging Area. Complete sections of this Non Technical Summary (Section 2.4.3 and Section 4.2.2) deal with the Proposed Staging Area, with references to the Proposed Staging Area in Sections 2.1, 2.2 and 4.4

For the avoidance of any doubt or any confusion with site contract work, we refer again to the permission P20/420, as granted, with the omission of this Staging Area.

Yours sincerely



Naoimh & Niall Hewitt

29th June 2021