



Fairgreen House
Fairgreen Road
Galway
H91 AXK8
Tel: + 353 (0)91 565211
Email: info@tobin.ie

Block 10-4,
Blanchardstown Corporate Park
Dublin
D15 X98N
Tel: + 353 (0)1 8030401
Email: info@tobin.ie

Market Square
Castlebar
Co Mayo
F23 Y427
Tel: +353 (0)94 9021401
Email: info@tobin.ie

Our Ref: **10243-L-02-004**

06 May 2020

Mr. Breen Higgins
Inspector – Environmental Licensing
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
Johnstown
Co. Wexford

Dear Mr. Higgins,

Re: Dublin City Council North City Operations Depot Waste Licence Application (Reg. No. W0302-01) – Further Information Request

In response to the Agency's Request for Further Information via EDEN on 26 March 2020, please see below our response.

Item A - Clarify the precise nature of the operational and infrastructural relationship between the facility Register Number W0302-01 and that of the facility Register Number W0303-01. This clarification shall include details of shared drainage networks and any other common structure.

For the purpose of clarity in this response, the following terms are used:

- Dublin City Council (DCC) Depot – refers to the overall council depot area outlined in blue in the Site Plan (included as Attachment A for reference) but excluding the Ballymun Recycling Centre area.
- North City Operations Depot (NCOD) Waste Facility (Reg. No. W0302-01) – refers to the defined waste management and handling area within the DCC Depot to which this waste licence application applies. This area is outlined in red in the Site Plan.
- Ballymun Recycling Centre (Reg. No. W0303-01) – refers to the public recycling centre to the west of the DCC Depot outlined in the Site Plan in orange.
- Development/Site – refers to the overall site and land parcel owned by DCC which is outlined in blue in the Site Plan and formed the boundary for the planning application to Fingal County Council (FCC).

In terms of waste management operations, the Operational Report submitted with this Waste Licence Application details the waste activities that will be carried out at the NCOD Waste Facility (W0302-01) and provides a summary of the waste activities that will be carried out at the Ballymun Recycling Centre (W0303-01).

As per the Site Plan attached, both the NCOD Waste Facility and the Ballymun Recycling Centre are located with the overall site boundary owned by DCC and granted planning permission by FCC (F17A/0686).

Directors: **M. Shelly** (Chairman) **C. McGovern** (Managing Director) **E. Connaughton** (Company Secretary)
B.J. Downes **D. Grehan** **M. McDonnell** **R.F. Tobin**
M.F. Garrick **J.P. Kelly**

Associate Directors **B. Carroll** **M. Casey** **P. Cloonan** **P. Cunningham** **B. Gallagher**
B. Heaney **C. Kelly** **A. Mulligan** **J. O'Flaherty** **S. Tinnelly**

The NCOD Waste Facility will operate as a waste transfer station for waste materials collected as part of DCC daily operations including waste from litter bins, waste from road sweeping and gully cleaning and waste from roads, housing and river maintenance. The NCOD Waste Facility will not be open to the public and will be for use by DCC staff only.

The Ballymun Recycling Centre will be open to the public for collection of household waste only and will operate in a similar manner to the existing Northstrand and Ringsend Recycling Centres which are currently managed and operated by Greenstar on behalf of DCC.

A Waste Licence Application for the Ballymun Recycling Centre has been made by DCC and is currently under review by the Agency. As set out in the application, it is intended, once the Waste Licence for the Ballymun Recycling Centre is granted, that the Licence will be transferred from DCC to a private contractor to run the facility on behalf of DCC. Following pre-application meetings with the Agency, it was determined that the private contractor should become the Licensee for the facility and assume the responsibilities for compliance with the Waste Licence in accordance with the *Waste Management Act 1996* as amended and the *Environmental Protection Agency Act 1992* as amended. DCC will run a tender competition for the procurement of services to operate the Ballymun Recycling Facility on their behalf. DCC will engage with the Agency in the processing of transferring the Waste Licence to the private operator. While the exact nature of the private contractor's appointment has not yet been determined, it is intended that the Facility Manager on behalf of the private contractor will report directly to a DCC Environmental Officer on ongoing operations.

While the Ballymun Recycling Centre is located within the overall ownership boundary of DCC, the Ballymun Recycling Centre will be segregated from the rest of the site by means of a gated access at the south-east corner of the facility. Only the Ballymun Recycling Centre operational vehicles will use this gated access point, primarily for the removal of waste materials from the Ballymun Recycling Centre by heavy goods vehicles (HGVs). The planning permission for the development stipulates that operational vehicles are only permitted to access the site via St. Margaret's Road to the north, therefore the operational vehicles collecting waste containers from the Ballymun Recycling Centre are required to use this site entrance. HGVs will access the site through this secured entrance and proceed to the gated access into the Ballymun Recycling Centre where they will deposit and collect skips and waste containers as required. They will leave the Ballymun Recycling Centre via the same route.

Public access to the Ballymun Recycling Centre will be via a separate priority junction on Carton Way to the south-west. Members of the public will not be permitted through the gated access point from the Ballymun Recycling Centre to the DCC Depot.

In respect of the shared infrastructure between the two facilities, please see the Shared Infrastructure Layouts provided in Attachment B. This layout is used to provide clarity on the shared infrastructure for the purpose of this response and does not alter any of the infrastructure or utilities drawings already submitted as part of the Waste Licence Application.

Roads and Buildings:

Operational vehicle access to both waste facilities will be via the northern entrance from St. Margaret's Road to the DCC Depot. The security kiosk and security gates at this entrance will be shared by both facilities as shown highlighted in green in the attached Shared Infrastructure Layout. Once on the site, operational vehicles for the Ballymun Recycling Centre will continue west on the internal road network to the gated access point into the Ballymun Recycling Centre and operational vehicles for the NCOD Waste Facility will continue east into the waste management handling area.

The two facilities will not share any buildings or structures. Office and administration activities for the Ballymun Recycling Centre will be carried out from a dedicated facility office within the Ballymun Recycling Centre boundary. Administration for the NCOD Waste Facility will be carried out from the offices at the north-east corner of the DCC Depot.

Water Supply:

The water supply for both waste facilities will be provided from a new mains connection to the existing 300mm diameter watermain on the northern boundary of the site along St. Margaret's Road as shown on the Shared Infrastructure Layout. This single connection to the mains network will service the DCC Depot, Ballymun Recycling



Centre and NCOD Waste Facility. The section of this water supply network which will service both waste facilities is highlighted in magenta on the Shared Infrastructure Layout.

Surface Water Drainage:

The surface water drainage from the overall development will discharge into an existing 900mm diameter storm sewer which runs along St. Margaret's Road to the east of the site.

Surface water run-off from the hardstand areas within the Ballymun Recycling Centre boundary will divert to gullies and be collected in the surface water drainage network. The surface water network located within the Ballymun Recycling Centre boundary will contain surface water collected from the Recycling Centre only. The surface water network pipework will fall under gravity from the Ballymun Recycling Centre towards the east through the DCC Depot.

Surface water run-off within the DCC Depot will be collected in the same network.

Surface water gullies located within the NCOD Waste Facility will collect surface water run-off from clean areas (i.e. non waste storage areas) and divert to the surface water network. This collected surface water will discharge into the surface water network and combine with the surface water run-off from the Ballymun Recycling Centre and the rest of the DCC Depot. The surface water drainage network is shown on the attached Shared Infrastructure Layout in black and the section of this network which includes surface water combined from the Ballymun Recycling Centre and the NCOD Waste Facility is highlighted in yellow.

Foul Drainage:

The foul drainage from the overall development will discharge into an existing 750mm diameter sewer which runs along St. Margaret's Road to the east of the site.

There will be no trade effluent generated at the Ballymun Recycling Centre. Domestic effluent only will be generated in the facility office and discharged into the foul drainage network. The foul drainage network located within the Ballymun Recycling Centre boundary will contain wastewater generated at the Recycling Centre only. The foul drainage network pipework will fall under gravity from the Ballymun Recycling Centre towards the east through the DCC Depot.

Wastewater generated within the DCC Depot will be collected in the same network.

Wastewater generated within the NCOD Waste Facility boundary will comprise liquid run-off from the street cleaning and gully cleaning waste bays as well as collection drains around waste receptacles. This effluent will discharge into the foul drainage network and combine with the domestic effluent from the Ballymun Recycling Centre. The foul drainage network is shown on the attached Shared Infrastructure Layout in brown and the section of this network which includes wastewater combined from the Ballymun Recycling Centre and the NCOD Waste Facility is highlighted in magenta.

Electricity & Gas:

Electricity and gas supply to the overall development will be provided from connections into the existing mains networks and distributed across to the two facilities in accordance with the Site Services Plan, submitted with the Waste Licence Application. Lighting, telecommunications, and CCTV infrastructure will similarly be distributed to each waste facility. Controls for monitoring and isolation of supply to the Ballymun Recycling Centre will be defined as part of the process to transfer the Waste Licence for the Ballymun Recycling Centre to a private operator.

Item B - Clarify the tonnages of waste requested and granted for in the planning application for the facility.

The planning application and subsequent grant of permission for the development did not specify a maximum quantity of waste to be brought into or handled at the NCOD Waste Facility. Following a pre-planning meeting with FCC in May 2017, JNP Architects issued a letter to FCC in June 2017 (provided as Appendix 1.1 to the Environmental Considerations Report submitted with the planning application and included for reference in Attachment C to this letter) outlining the following:

"The estimated volume of waste associated with street cleaning operations and transferring through the new Depot [i.e. the NCOD Waste Facility] to its final destination is c. 8,000 tonnes."



This estimated quantity of waste refers to 'street cleaning operations' and is based on similar activities currently carried out at existing DCC Depots. This waste is generated from street sweeping activities and collection of rubbish from street bins.

As set out in the Planning Report submitted with the planning application, the DCC Depot will provide facilities for a range of Council activities including housing maintenance, roads maintenance and drainage. These daily Council activities will also collect and generate waste materials in addition to the estimated 8,000 tonnes referred to above. The estimated quantities of waste associated with these specific daily activities was not detailed in the planning application.

There is no maximum quantity of waste provided for in the Planning Conditions attached to the development (F17A/0686).

The above clarifications do not require any updates or amendments to the Non-Technical Summary, Application Form Environmental Considerations Report or Drawings submitted with the Waste Licence Application for the NCOD Waste Facility (W302-01).

I hope the above responses provide clarity to your queries. If you have any further queries, please do not hesitate to contact me on the email below.

Yours sincerely,



Robert Hunt

Senior Project Manager

For and on behalf of TOBIN Consulting Engineers

robert.hunt@tobin.ie

Encl.:

Attachment A: North City Operations Depot Waste Facility (W0302-01) – Site Plan

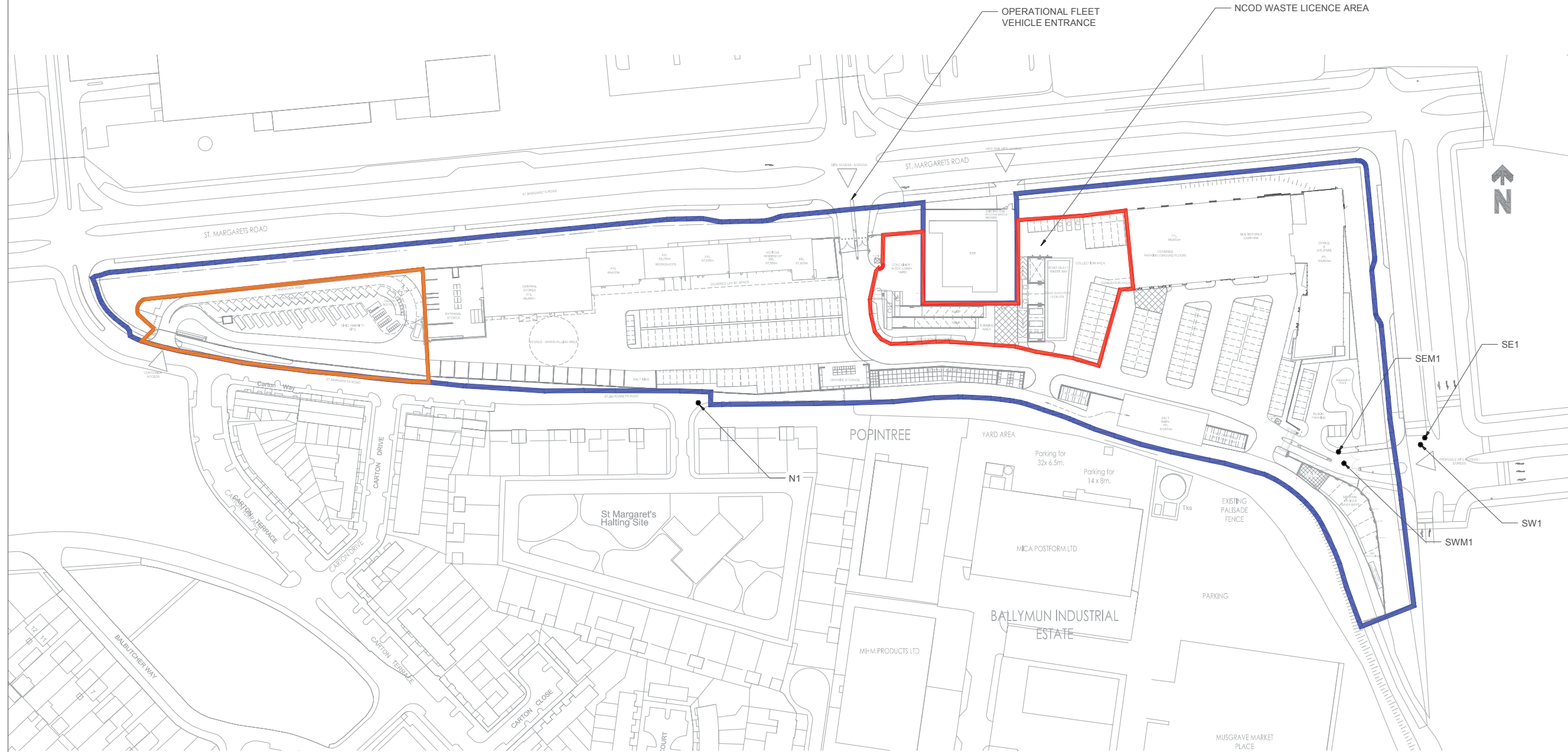
Attachment B: Shared Infrastructure Layouts

Attachment C: Copy of Correspondence from JNP Architects to Fingal County Council (dated 09 June 2017)



LEGEND

- OWNERSHIP BOUNDARY
- NCOD WASTE LICENCE BOUNDARY
- BALLYMUN RECYCLING CENTRE WASTE LICENCE BOUNDARY



Waste Licence Site Plan Layout
(Scale 1:1000)

Rev	Date	Description	By	Chkd.
A	FEB-2019	ISSUED FOR LICENCING	PK	RH

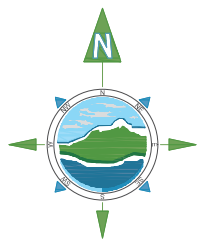
Client: Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Project:
**NORTH CITY OPERATIONS DEPOT
BALLYMUN
FOR DUBLIN CITY COUNCIL**

Title:
SITE PLAN

Scale @ A1: **1:1000**
Prepared by: PK Checked: RH FEB 2019
Project Director: Michael McDonnell
Suitability Status: FOR LICENCING















TOBIN
Patrick J. Tobin & Co. Ltd.
TOBIN Consulting Engineers,
Block 10-4, Blanchardstown Corporate Park,
Dublin 15, Ireland.
tel: +353-(0)1-8030406
fax: +353-(0)1-8030409
e-mail: dublin@tobin.ie
www.tobin.ie

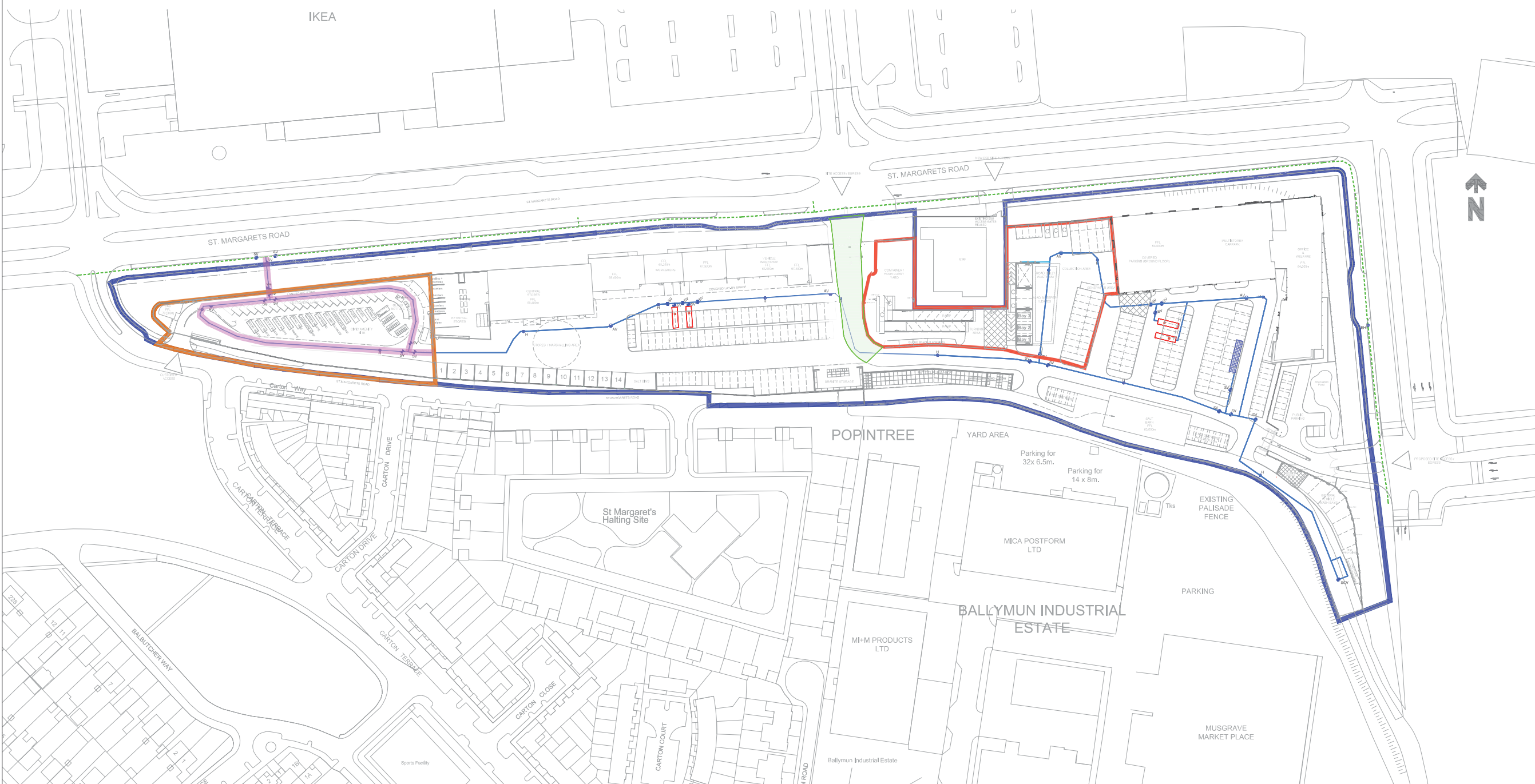


Drawing No.: NCD-TOB-ZZ-XX-DR-CE-6250A **A**
Revision:


THE INFORMATION ON THIS DRAWING IS TO THE ORDNANCE SURVEY IRELAND ITM COORDINATE SYSTEM

LEGEND

-  OWNERSHIP BOUNDARY
-  BALLYMUN RECYCLING CENTRE WASTE LICENCE BOUNDARY
-  NCOD WASTE LICENCE BOUNDARY
-  EXISTING MOPVC 300mm WATERMAIN FROM FCC RECORDS
-  PROPOSED 250mm HDPE POTABLE WATERMAIN
-  PROPOSED SHARED 250mm HDPE POTABLE WATERMAIN
-  FIRE HYDRANT
-  EXISTING HYDRANT
-  SLUCE VALVE
-  SCOUR VALVE
-  BULK WATER METER
-  AIR VALVE
-  RAINWATER HARVESTING TANK
-  SHARED ROAD INFRASTRUCTURE



Rev	Date	Description	By	Chkd.
A	MAY-2020	ISSUED FOR LICENCING	PK	RH

Client:  Comhairle Cathrach Bhaile Átha Cliath
Dublin City Council

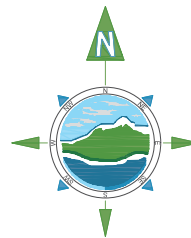
Project: NORTH CITY OPERATIONS DEPOT BALLYMUN FOR DUBLIN CITY COUNCIL

Title: SHARED INFRASTRUCTURAL LAYOUT WATERMANS AND ROADS

Scale @ A1: 1:1000

Prepared by:	Checked:	
PK	RH	MAY-20
Project Director:	Brian Carroll	
Suitability Status:	A	

 **TOBIN**
Patrick J. Tobin & Co. Ltd.
TOBIN Consulting Engineers,
Block 10-4, Blanchardstown Corporate Park,
Dublin 15, Ireland.
tel: +353-(0)1-8030406
fax: +353-(0)1-8030409
e-mail: dublin@tobin.ie
www.tobin.ie
















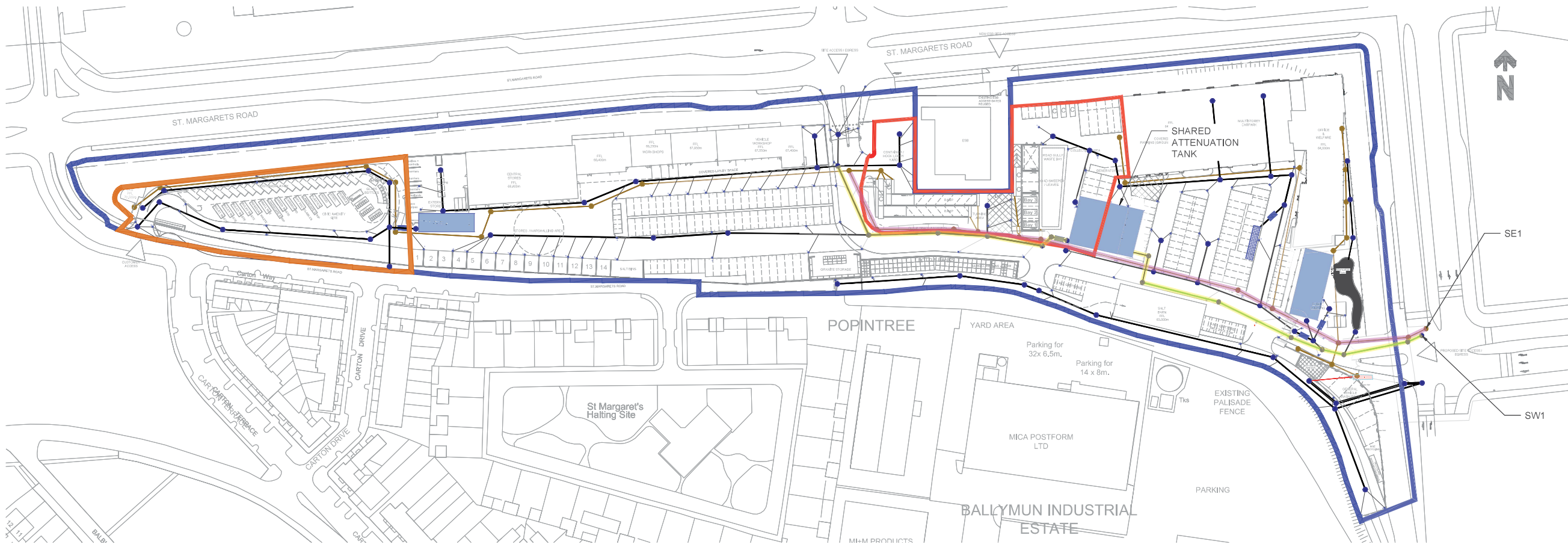
Site Watermain and Roads Plan
(Scale 1:1000)

- NOTES:**
- FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
 - ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE.
 - ENGINEER/EMPLOYERS REPRESENTATIVE, AS APPROPRIATE, TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES.
 - THE CONTRACTOR SHALL UNDERTAKE A THOROUGH CHECK FOR THE ACTUAL LOCATION OF ALL SERVICES/UTILITIES, ABOVE AND BELOW GROUND, BEFORE ANY WORK COMMENCES.
 - ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD.
 - REFER TO DRAWINGS NCOD-TOB-07-XX-DR-CE-2090-2094 FOR DETAILS.

THE INFORMATION ON THIS DRAWING IS TO THE ORDNANCE SURVEY IRELAND ITM COORDINATE SYSTEM

LEGEND

-  OWNERSHIP BOUNDARY
-  BALLYMUN RECYCLING CENTRE WASTE LICENCE BOUNDARY
-  NCOD WASTE LICENCE BOUNDARY
-  STORM WATER PIPE (CONCRETE PIPE)
-  SHARED STORM WATER PIPE (CONCRETE PIPE)
-  FOUL WATER PIPE THERMOPLASTIC STRUCTURAL WALL PIPE
-  SHARED FOUL WATER PIPE THERMOPLASTIC STRUCTURAL WALL PIPE
-  SHARED TRUNK STORM WATER PIPE (CONCRETE PIPE)
-  GEO-CELLULAR ATTENUATION TANK
-  ATTENUATION POND
-  STORM / SURFACE MANHOLE
-  FOUL MANHOLE
-  GULLY



Site Drainage Layout
(Scale 1:1000)

Rev	Date	Description	By	Chkd.
A	MAY-2020	ISSUED FOR LICENCING	PK	RH

Client:  Comhairle Cathrach Bhaile Átha Cliath
Dublin City Council

Project:
**NORTH CITY OPERATIONS DEPOT
BALLYMUN
FOR DUBLIN CITY COUNCIL**

Title:
**SHARED
INFRASTRUCTURAL LAYOUT
SURFACE WATER AND
FOUL WATER**

Scale @ A1: **1:1000**
Prepared by: PK Checked: RH MAY 2020
Project Director: Brian Carroll
Suitability Status: **FOR LICENCING**

 **TOBIN**
Patrick J. Tobin & Co. Ltd.
TOBIN Consulting Engineers,
Block 10-4, Blanchardstown Corporate Park,
Dublin 15, Ireland.
tel: +353-(0)1-8030406
fax: +353-(0)1-8030409
e-mail: dublin@tobin.ie
www.tobin.ie

Drawing No.: NCOD-TOB-ZZ-XX-DR-CE-6251B **A** Revision:

DOH/3426

9th June 2017

Mr. Peter Byrne
Senior Planner
Planning Department
Fingal County Council
County Hall
Main Street
Swords
Co. Dublin K67 X8Y2



Dear Sir,

Re: Proposed Operations Depot (North City) and Civic Amenity Site for Dublin City Council, St. Margaret's Road, Ballymun, Dublin 11

Further to our pre-Planning Meeting held 15th May 2017 we write to confirm details of the above proposed development. We would be grateful if you would confirm whether an Environmental Impact Assessment Report will be required to accompany the forthcoming Planning Application for this facility.

SITE AREA AND LOCATION

The location of the proposed new Depot and Civic Amenity Site is on the new St. Margaret's Road, Ballymun, Dublin 11 with an area of 5.04 Hectares. The site is bounded to the south by a mix of Residential dwellings, Poppintree Halting site and Commercial/Industrial premises (Ballymun Industrial Estate) whilst to the north is located a large, retail warehouse for bulky goods (IKEA). See Figure 1.



Fig. 1 Site Location

FUNCTION AND PROPOSED FACILITIES –

Operations Depot

The Operations Depot development will provide a centralised facility for Dublin City Council to cover the north of Dublin City and will accommodate the following Operations Departments:

- Housing Maintenance
- Roads Maintenance (to include winter salting)
- Traffic management
- Waste management (street cleaning)
- Rivers and Surface Water Management; and
- Public Lighting and Electrical Services Management and Maintenance

To provide for all of the above Departments/Operations the following facilities are to be included:

- Central Stores building for receipt and dispatch of materials and equipment necessary for the various operational departments (building materials, Personal Protection Equipment, janitorial supplies, spares etc)
- Workshops (blacksmith/metal working, carpentry, small equipment repairs, painting, signage)
- Vehicle Workshop (facility for routine repairs/replacement of minor equipment)
- Street Waste compaction and receptors
- Vehicle garage (for vehicles containing water)
- Multi-Storey carpark (for small fleet vehicles and private staff owned vehicles associated with Depot); and
- Main Administration Building including Offices, Catering, Welfare and Training facilities

The estimated volume of waste associated with street cleaning operations and transferring through the new Depot to its final destination is c.8,000 tonnes.

Waste generated by the new Depot will include materials from the various workshops (which cannot be recycled or reused) as well as normal typical waste from the kitchen and office use. The quantities and types of this waste will be similar to that generated by the existing operational depots that this facility will replace.



Figure 2 – Proposed site layout (Operations Depot and Civic Amenity Site)

FUNCTION AND PROPOSED FACILITIES –

Civic Amenity Site

Adjacent to the Operations Depot there will also be a new Civic Amenity Site as part of this development serving the needs of the local community. This site area for this facility will be 0.64 hectares and it will be run on a contract basis by a private operator. The Civic Amenity Site will have an associated office/welfare facility. The site will receive segregated waste for onward transfer and disposal – there will be no waste processing operations on site.

This new facility will replace an existing facility at Aldborough Parade and a Bring Centre in Collins Avenue.

The model proposed for development is based on a similar type of facility currently in operation at Ringsend. The volume and type of waste collected in the Ringsend facility during 2015 and 2016 is detailed below:

ITEM TYPE	TONNES	
	2015	2016
Bulky	854.82	795.81
Steel	59.8	67.76
Wood	253.58	272.24
Rubble	369.06	482.92
Cardboard	62.32	62.34
Glass	109.32	112.33
Plastic	60.28	50.48
Recyclables	162.49	205.96
Flat Glass	10.18	15.38
WEEE	204.41	195.965
Paint	142.6	135.4
Aerosols	2.16	2.52
Gas Cylinders	1.29	0.97
Green Waste	100.94	127.28
Batteries	0.7	0.6
Municipal Waste	144.86	161.9
Light tubes	0.765	0.768
Textiles	17.74	18.53
TOTAL	2,557.315	2,709.153

In addition to the above there will also be approximately 2,300 litres of waste oil per annum.

It is anticipated that the proposed new Civic Amenity Site will handle around 3,000 tonnes of waste for transfer to its final destination.

TRAFFIC GENERATION

The vehicular movements generated by the development will comprise staff owned vehicles arriving and leaving at the start and end of shifts as well as operational vehicle movements to include road sweepers, waste collection vehicles (for onward transfer to final destinations), deliveries of materials, road salting during winter months and customers using the Civic Amenity Site. A full Traffic Impact Assessment (including traffic counts on the surrounding road network) is currently being prepared to accompany the Planning Application. Also a Work Place Travel Plan is currently being prepared to accompany the Planning Application.

The amount of private vehicles (staff owned) currently driving to existing Depots is estimated at around 360 no. whilst the fleet vehicle numbers is around 311 no.

Parking provision for private vehicles (staff owned) for the proposed new Operations Depot will be in accordance with Fingal County Councils Development Plan standards which on the basis of current floor area estimates will be in the region of 210 spaces (% reduction in regard to proximity of development to the future planned Metro North stop to be discussed further with Fingal County Council).

ENVIRONMENTAL MATTERS

A preliminary assessment of the site has concluded that there are no significant environmental features or constraints at the proposed new Depot location.

There are no Natura 2000 sites within the boundary of the proposed development or within close proximity to the site.

From an archaeological perspective, the site does not contain any recorded monuments or structures and has been sterilised, with the original levels stripped and infilled by previous activities at this location.

However, all potential impacts from the construction and operational phases of the proposed development will be assessed e.g. traffic, noise, dust etc. and mitigation measures proposed where relevant - details of which will be included in the Planning Application.

We would be grateful if, following a review of the above information, you would advise if an Environmental Impact Assessment Report will be required to accompany the forthcoming Planning Application.

Yours Faithfully,



Dermot O'Hagan
JNP ARCHITECTS

cc. Patricia Cadogan, Fingal County Council