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Our Ref: 10243-L-02-009

21 June 2021

Mr Jim Johnson
Inspector
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
Johnstown
Co. Wexford

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

Dear Mr Johnson,

As per our previous letter on 26 April 2021, we are in the process of compiling the required information for submission to the Agency in response to the RFI received. We have engaged with the planning authority, Fingal County Council (FCC), and provided them with an updated description of the total quantity of waste to be accepted at the site (which, for the purposes of planning approval, incorporates both this facility as well as the adjacent Ballymun Recycling Centre (EPA Reg. No. W0303-01)).

This correspondence with FCC is attached (Attachment A) along with a supporting document entitled *Update on Environmental Considerations* which demonstrates that allowance for the revised waste tonnages (up to a maximum of 24,000 tonnes per annum (TPA) across the whole site) will have no greater environmental impacts than those considered and assessed in the original Planning Application (FCC Pl. Reg. F17A/0686).

Attachment B presents the response received from FCC on 16 June 2021 acknowledging the clarification on the total waste quantities and confirming that an Environmental Impact Assessment Report (EIAR) was not required for the development and that the maximum tonnage of 24,000 TPA, as set out in the correspondence from JNP Architects on 26 April 2021, remains below the threshold for mandatory EIA from a waste perspective. Accordingly, the letter from the planning authority confirms that the current planning permission (Pl. Reg. F17A/0686) is valid in respect of the maximum waste quantity for the development as set out.

Further to the attached, we will amend the Waste Licence application documents submitted to the Agency to reflect this updated maximum waste quantity. As per the RFI received from the Agency on 08 December 2020, we will update the non-technical summary, application form and relevant attachments wherein the revised maximum waste quantity impinges on these documents.

It is not anticipated that the revised maximum waste quantity will impact on any drawings already submitted. However, if it is the case that changes to drawings are required, we will prepare new drawings accordingly.

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Given that we have received the attached response from FCC only in the last few days, we are not in a position to provide these updated documents in this response as per the current deadline of **21 June 2021**.

In this regard, we are requesting a further extension of time of four weeks from today (i.e., **19 July 2021**) to submit our response, which will include the updated application documents as set out above.

We will endeavour to submit our response as soon as possible in advance of this date.

Yours sincerely



Robert Hunt

Senior Project Manager

For and on behalf of TOBIN Consulting Engineers

robert.hunt@tobin.ie

Encl: Attachment A – Letter from JNP Architects to Fingal County Council on 26 April 2021 (including *Updated Environmental Considerations Report* dated 26 April 2021)

Attachment B – Letter of response from Fingal County Council on 16 June 2021

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Attachment A – Letter from JNP Architects to Fingal County Council on 26 April 2021 (including *Updated Environmental Considerations Report* dated 26 April 2021)

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DOH/3426



26 April 2021

Mr. Colm McCoy
Planning and Strategic Infrastructure Department
Fingal County Council
County Hall
Swords
Fingal
Co. Dublin

Dear Colm,

Re: Planning Ref. F17A/0686 – New Operations Depot and Civic Amenity Site, St. Margaret’s Road, Ballymun, Dublin 11 for Dublin City Council

Condition 3: Environmental Protection Agency License (prior to commencement of Operations)

Thank you for facilitating the meeting held 1st April 2021 in relation to waste tonnages per annum to be transferred through the new Dublin City Council Depot and the separately operated Civic Amenity Site (CAS) to be constructed at the Councils site in Ballymun.

As explained, we are currently in the process of applying for a license from the Environmental Protection Agency (EPA).

The Council has recently conducted a further review of waste to be transferred through the Depot and CAS and as a result the figures contained in our letter regarding Planning Condition 3 (dated 29.12.20) have been amended as follows (expressed in tonnes per annum):

- Waste arising from Roads Maintenance: reduced from 7,500 to 6,000
- Waste arising from non-SLA Construction: reduced from 3,000 to 2,000
- Waste arriving at the CAS: reduced from 5,000 to 3,000
- Overall reduction = 4,500 tonnes per annum
- Overall projected waste tonnage per annum revised to 25,400

These amended figures take account of actual waste generated over the past 3 years (including 2020) as well as projections of demand over the coming years to *future proof* facilities to be provided for both the public and the Council.

With regard to the current Planning Permission granted for the new CAS and Depot the Planning Authority, during the processing of the planning application, deemed that an EIA was not required as, *inter alia*, the combined amount of waste transferring through both facilities was below the threshold for an EIA to be required (ie 25,000 tonnes per annum).



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Cognoscente of this EIA threshold, Dublin City Council can confirm commitment to maintaining the combined waste total to a maximum of 24,000 tonnes per annum through continual monitoring and use of other Council facilities, if necessary, for transfer of waste arising from Council operations.

We would further state that there is no other material change to the designs granted Planning permission under Ref PF/0194/18 (final grant order number for Reg Ref F17A/0686) and in those subsequent submissions made to the Planning Authority to comply with Planning Conditions.

Attached is a report *Update on Environmental Considerations* prepared by Tobin which demonstrates that allowance for the revised (and increased) waste tonnages noted above will have no greater environmental impacts than those considered and assessed in the original Planning Application Environmental Considerations Report and that the conclusions reached in the Environmental Considerations Report are still valid.

In light of the above proposal to reduce and limit the waste input to 24,000 tpa and attached report Update we would request confirmation from the Planning Authority that:

- i. An EIAR is not required and
- ii. That the revised waste tonnages do not affect the existing Planning Permission in that no changes to the Planning Conditions are necessary

Yours sincerely



Dermot O'Hagan
JNP ARCHITECTS

Enc

cc. Sharon Mc Mahon, Dublin City Council

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Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

North City Operations Depot

St. Margaret's Road, Ballymun, Dublin 11



ENVIRONMENTAL CONSIDERATIONS REPORT

Update Report – April 2021

Prepared by
TOBIN Consulting Engineers

REF	DATE	STATUS
NCOD-TOB-ZZ-XX-RP-EN-0001a	26 April 2021	S3

NORTH CITY OPERATIONS DEPOT

ENVIRONMENTAL CONSIDERATIONS REPORT – UPDATE REPORT

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A	Final	RH	26/04/21	DM	26/04/21	RH	26/04/21

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1.0 INTRODUCTION

TOBIN Consulting Engineers (TOBIN), as part of a design team led by JNP Architects (JNP), carried out an environmental assessment on the proposed development of a consolidated operations depot for Dublin City Council (DCC) at a site on St. Margaret's Road, Ballymun, Dublin 11. The proposed development is referred to as the North City Operations Depot (NCOD).

The NCOD will provide a centralised depot for the Council's north city operations including waste management, housing maintenance, public lighting and electrical services, traffic management, surface water and drainage (excluding foul drainage/Irish Water activities), signage and roads maintenance. The location of the NCOD is shown in Figure 1-1.

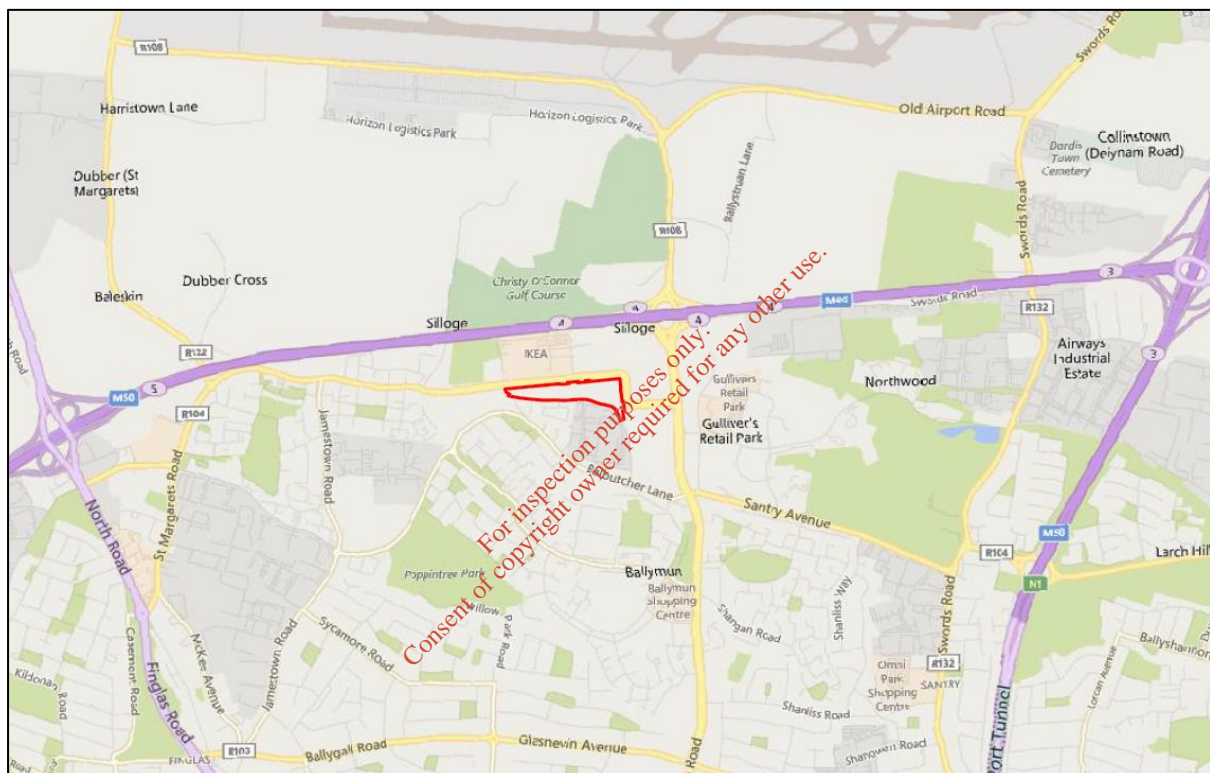


Figure 1-1 – NCOD Site Location

A planning application for the NCOD was submitted to Fingal County Council (FCC) in November 2017. The planning application was accompanied by an Environmental Considerations Report which was prepared to address the environmental assessments and consultations undertaken at, and in the vicinity of, the proposed development site, the identified potential impacts of the development and the proposed mitigation measures to ameliorate the identified impacts. All assessments were used to inform the overall project design and the planning application.

The NCOD was granted planning permission in February 2018 (Reg. No. F17A/0686) and is scheduled to commence construction in Q2 2021 subject to COVID-19 public health guidance on construction activity.

This Environmental Considerations Report – Update Report has been prepared to address the potential for any new or additional impacts to be created as a result of a revised maximum waste

quantity which is proposed to be handled and transferred through the NCOD facility. The revised maximum waste tonnage is set out in the following sections.

1.1 Environmental Licensing

Further to the Grant of Planning Permission for the NCOD and in accordance with Condition No. 3 of the Permission, TOBIN engaged with Environmental Protection Agency (EPA) in relation to the form of appropriate authorising environmental licence for the new facility. Condition No. 3 of the Permission states:

“Prior to commencement of operations on site, the Developer shall be in receipt of an appropriate authorising licence from the Environmental Protection Agency (EPA) and shall comply in full with all conditions associated with such licensing.”

Through consultation, the EPA advised that two Waste Licences would be required to appropriately authorise the proposed waste activities at the NCOD. The Waste Licences would be required independently for:

- North City Operations Depot – day to day operations of the facility including waste collection, street cleaning and typical Council operations; and
- Ballymun Recycling Centre – operation of the proposed Civic Amenity facility at the site.

As it is intended to appoint a suitably competent contractor to run the Ballymun Recycling Centre (BRC) on behalf DCC, the EPA advised that a separate Waste License would be required for this facility which will specify the appointed contractor as the legally responsible Licensee. It would not be possible to appoint a contractor to this role if there was only one Waste License in place for the entire development.

Subsequent to this, the Project Team commenced the preparation of two Waste Licence applications which were submitted to the EPA in June 2019.

1.2 Waste Quantities

As part of preparation of the planning application, an initial estimate of the waste quantities which would be handled and transferred through the depot on an annual basis were calculated and discussed with FCC. These initial estimates were approximately 8,000 tonnes/annum of waste associated with street cleaning operations and approximately 3,000 tonnes/annum of waste associated with the Civic Amenity facility and were set out in the pre-application consultation with FCC and the EPA (included as Appendix 1.1 to the Environmental Considerations Report). These estimates were determined from the ongoing operations at the existing DCC depots and the existing DCC Ringsend Civic Amenity Facility in 2016/2017.

Waste material generated from daily Council operations including roads maintenance, housing maintenance and river cleaning was also identified in the Environmental Considerations Report (Section 1.3.2.2) and an area for handling and temporary storage of the waste materials identified on the Site Plan (as discussed in Section 1.3 below). Waste materials from these daily Council activities were not quantified at the planning stage and, as such, the initial waste estimates set out in the pre-application consultation were not further refined at the planning application stage.

Subsequent to receiving planning permission for the development, the Project Team collated further detailed breakdowns of the waste types and quantities which will be required to be transferred through the NCOD and collected at the Civic Amenity facility. This analysis of the

waste quantities was built upon the initial estimates established at the pre-planning stage. The more recent waste records from the existing facilities in the period 2018-2020 identified that the incoming waste quantities were increasing and that the predicted quantities of waste passing through the new NCOD are likely to be higher than the initial estimates. A further review of future proof capacity was also carried out taking into consideration the highly accessible nature of the proposed Ballymun Recycling Centre and its likelihood to be used by residents within both DCC and FCC administrative areas.

As a result of the above reviews and calculation of the roads/housing/river maintenance waste material, the maximum waste quantity to be handled and transferred through the facility (i.e., both from Council activities at the depot and at the Ballymun Recycling Centre) is expected to be up to 24,000 tonnes per annum. This revised maximum waste quantity is further detailed in the following section.

1.3 Waste Types and Storage

Waste material transferring through the site will include waste generated and collected from the Council's daily activities across the north Dublin City region and brought back into the NCOD as well as waste materials brought into the Ballymun Recycling Centre by members of the public. In both cases, the waste material will be segregated on the site, stored for a short period of time and transferred off-site for reuse, recycling, recovery or disposal as appropriate.

Ballymun Recycling Centre

The Waste types which will be facilitated at the Ballymun Recycling Centre will include those waste types typically collected in a Civic Amenity facility. These are detailed in Section 1.3.2.1 of the Environmental Considerations Report and reconfirmed here as:

Table 1-1 - Waste types to be accepted at the Ballymun Recycling Centre

Item	Details
Clothes bank and waste batteries	Stand alone single storey lockable store
Waste containers	Freestanding containers for a variety of waste streams including general bulky waste; WEE; green waste; cardboard; dry recyclables; plastics; wood; steel; rubble; aerosols; paint; oils; glass; food.

The indicative locations of the storage containers for the above waste types were set out in the Site Plan (Part 1 of 2) (Drawing No. NCOD-JNP-00-XX-DR-AR-8002) submitted with the planning application.

It is noted that Condition No. 10 of the Grant of Planning Permission (Reg. No. F17A/0686) states that, "Materials accepted at the Civic Amenity facility shall be restricted to recyclables only." Adherence to this condition means that no residual (general) waste will be accepted at the Ballymun Recycling Centre.

North City Operations Depot

Waste materials transferring through the main Council depot facility will be generated from the daily Council activities. As described in Section 1.3.2.2 of the Environmental Considerations Report, the operations depot will include a waste management area for the following Council activities:

Table 1-2 – Waste handling to be carried out at the NCOD

Item	Details
Waste management area	Waste compactor area (for collection/transfer of street waste bins) comprising 2 no compactors/access ramp plus container yard; waste collection area for road sweepers/leaf collectors; waste collection area for gully cleaners; waste collection area for waste generated by operations (roads maintenance, housing maintenance, river cleaning).

Infrastructure required for the above waste management area and council activities generating waste are shown in the Site Plan (Part 2 of 2) (Drawing No. NCOD-JNP-00-XX-DR-AR-8003) submitted with the planning application.

The waste materials collected from street waste bins will be transferred into 2 no. compactors accessed from dedicated ramps along the southern boundary of the existing ESB substation. Waste from road sweepers, leaf collectors and gully cleaners will be handled in dedicated bays along the eastern boundary the existing substation.

An allocated area for waste storage in skips is also shown in the above referenced drawing along the northern boundary of the site between the existing substation and the proposed multi-storey carpark (waste containers coloured in blue, see Figure 1-2). This area is intended for handling of materials brought into the depot on a daily basis from roads maintenance, housing maintenance and river cleaning activity, which will include waste materials generated from those activities.

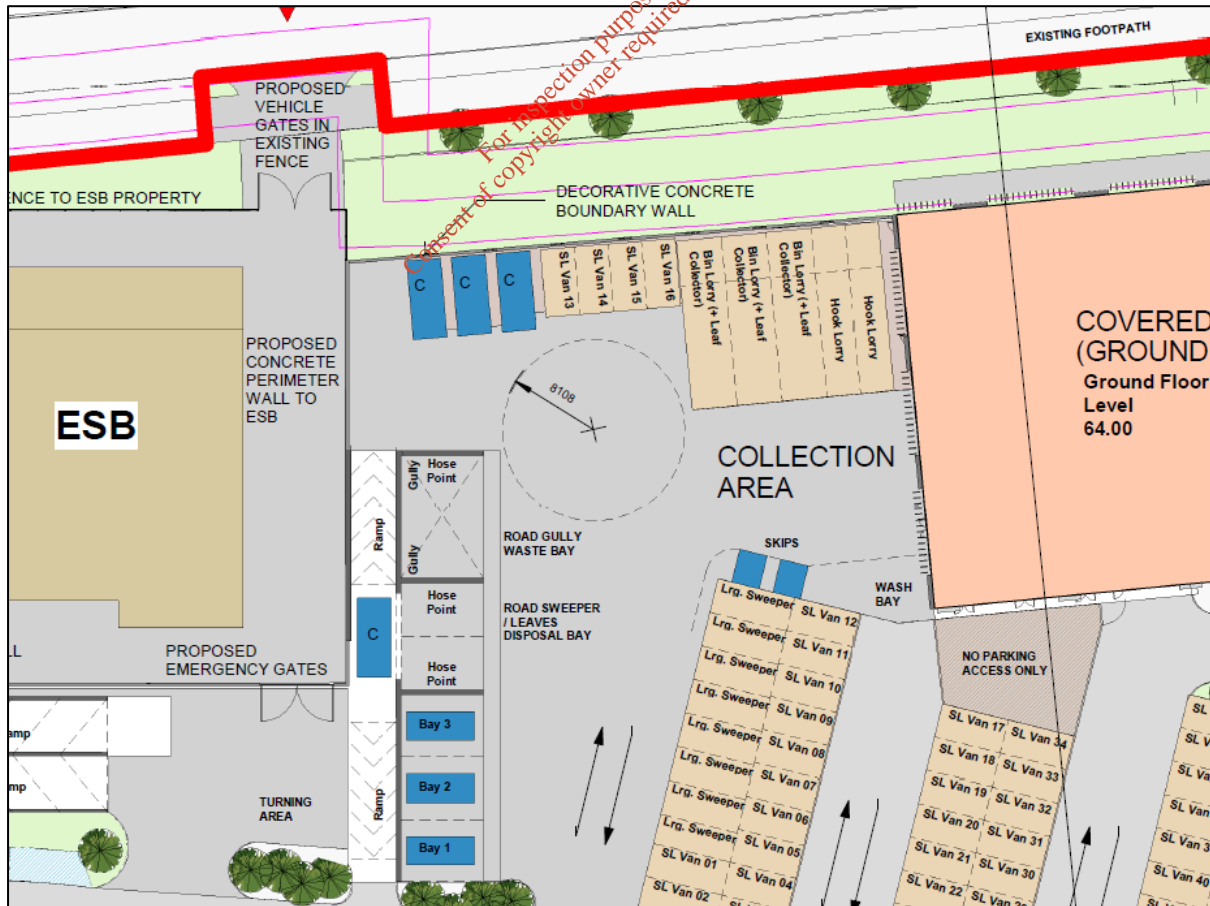


Figure 1-2 – Extract from Part Site Plan Part 2 of 2 (Drawing No. NCOD-JNP-00-XX-DR-AR-8003)

1.4 Purpose of this Update Report

The purpose of this Environmental Considerations Report – Update Report is to consider the potential for any new or additional impacts, above and beyond those previously considered in the Environmental Considerations Report, as a result of revising the maximum waste tonnage permitted for acceptance at the overall facility from approximately 11,000 tonnes per annum to a maximum of up to 24,000 tonnes per annum.

This report will consider if the change would materially alter the findings of the submitted report or be inconsistent with the findings of the environmental assessment completed by FCC, which deemed the provision of the development and associated activities at this location to be appropriate subject to the implementation of the mitigation measures set out in the Environmental Considerations Report.

Condition No. 1 of the Grant of Planning Permission (F17A/0686) stipulates that *“The development shall be carried out in its entirety in accordance with the plans, particulars and specifications lodged with the application, save as may be required by other conditions attached hereto”*. This condition will be fully complied with by DCC and the revision to the maximum waste tonnage does not alter the project team’s ability to comply in full with this requirement.

In consideration of the above, the findings presented within this Update Report demonstrate that the revised maximum waste tonnage will not give rise to any additional significant impacts on the environment, nor would its provision alter the conclusions presented in the Environmental Considerations Report or the ability of the permitted development to adhere to the terms of the conditions attached to the permission granted.

In addition, the Mitigation Plan submitted to and agreed with FCC in compliance with Condition No. 2 of the Grant of Planning Permission remains valid and will be implemented in full.

It is important to note that the revised maximum waste tonnage as set out previously does not require the addition of any further infrastructure at the site and there are no changes to the permitted site layout. The revised waste tonnage will not result in any changes in the construction activities which will be carried out and accordingly, there is no change to any of the construction phase assessments carried out in the Environmental Considerations Report submitted with the planning application.

2.0 BIODIVERSITY (FLORA AND FAUNA)

The original biodiversity assessment considered potential impacts during both the construction and operational phases.

In summary, construction phase impacts were associated with the loss of dry meadows and grassy verges during the installation of foundations, the potential for increased mobilisation of silt and suspended solids via a surface water drain connection, into a channel of the Santry River, the spread of invasive species (specifically Japanese knotweed around the ESB building) and disturbance to fauna due to the short-term increase in human presence.

A treeline length of c. 200m will be removed. However, this is comprised of immature tree species. No bat roosts were recorded on site and this treeline was not used as a bat foraging or commuting corridor. In relation to bird species, it was determined that the proposed development will not give rise to significant habitat loss, which may affect these species. The mature treeline to the southeast of the site is being retained.

With the implementation of mitigation measures as set out, the potential impacts on biodiversity during the construction phase were considered to be insignificant.

For the operational phase, it was determined that the presence of security fencing and exterior lighting would have imperceptible (not significant) impacts in the local context. There was limited bat activity detected on the site and no protected mammal dwellings were recorded within the site boundary.

There are no proposed changes to the physical extents of the proposed development or the waste management infrastructure requirements for the site, once it is operational. The handling of waste material at the site has already been identified on the Site Plans and will be carried out on hardstanding areas within the development. Any run-off from waste handling areas will be collected, treated and discharged in accordance with the permitted development infrastructure. On this basis, it is concluded that there would be no changes to the assessed impacts, relevant to the construction or operational phases. The allowance for the revised waste quantity will have no additional or greater impacts on biodiversity, than those considered and assessed in the Environmental Considerations Report.

The management of revised waste quantities has not altered the conclusions of the Environmental Considerations Report, in that any impacts associated with the construction and operational phase will be not significant.

3.0 ARCHAEOLOGY (CULTURAL HERITAGE)

The original cultural heritage assessment considered potential impacts during both the construction and operational phases.

The desktop review considered archaeological heritage constraints including World Heritage Sites, national monuments, archaeological monuments subject to Preservation Orders or in the ownership of a local authority, the Register of Historic Monuments and Archaeological Survey database. Additionally, in relation to architectural heritage, the review considered Architectural Conservation Areas, National Inventory of Architectural Heritage, demesne landscapes, historic gardens and protected structures. The review concluded that there were no constraints within or in the immediate vicinity of the proposed development.

There are no proposed changes to the physical extents of the NCOD or the waste management infrastructure requirements for the site, once it is operational. As such, there is no further ground disturbance required which could have a potential for encountering known or unknown heritage features. The handling and storage of waste within the facility has previously been identified in Site Plans and there is no alteration to this proposal.

On this basis, it is concluded that there would be no changes to the assessment of the construction and operational phases as considered in the Environmental Considerations Report and no changes to the conclusions reached.

4.0 NOISE

The original noise assessment considered potential impacts during both the construction and operational phases.

Baseline noise monitoring was undertaken at one location to the north of the site in 2017. The noise levels at this position were identified as being dominated by road traffic along St. Margaret's Road, the M50 and the R108. Since the survey was carried out a new sports store

(Decathlon) has been built along the R108, however it is still expected that the receiving environment is dominated by noise from the road traffic as previously identified.

In relation to the construction phase, reference was made to the *British Standard, BS 5228 (2009 +A1 2014) Code of Practice for Noise and Vibration Control on Construction and Open Sites Part 1*. These guidelines set out an approach for setting appropriate construction noise limits for residential dwellings. Taking into account the guidelines and with reference to the baseline noise environment, a construction noise limit of 70dB L_{Aeq} was proposed. As set out previously, the revised maximum waste quantity will not have any impact on the construction activities at the site, therefore there is no potential for new or additional impacts from construction related activities and the assessment as presented in the Environmental Considerations Report remains valid.

For the operational phase, appropriate noise limits were identified in relation to the nearest noise sensitive properties external to the site. These are described and set out in Section 4.4.1 of the Environmental Considerations Report. A review of the main operational noise sources occurring at the site was carried out and listed as:

- Waste Compactor;
- Waste Storage areas;
- Workshop activities;
- Civic Amenity Centre;
- On-site Mobile Plant; and
- Vehicle parking

To establish typical noise levels associated with the various sources, a combination of published source data and noise measurements at existing facilities were reviewed. As part of establishing source noise levels associated with waste activities at the facility, a noise survey was carried out at an existing DCC depot facility. The main activities carried out at this facility included “*waste and road maintenance vehicles, waste compactor, civic amenity area, a maintenance workshop and site offices*”. A noise model was produced to assess the impact of the noise sources. The modelled noise emissions included the following assumptions:

Daytime Noise Levels:

“Specific source noise emissions associated with the compactor area, maintenance sheds, vehicle wash areas, bottle banks were also modelled at the proposed location of these activities using the source data measured at the existing DCC depot or the assumed noise levels referred to above.”

Night-time Noise Levels:

“Source noise emissions associated with the compactor area was modelled over assuming 4 hours onsite at each compactor to calculate a worse-case scenario assuming this area will operate for periods during the night-time periods to facilitate waste collection vehicles.”

Figure 4.5 in the Environmental Considerations Report shows the night-time contour plot with the highest noise source areas correlating to the proposed locations of waste compactors at the site.

As stated in Section 4.6 of the Environmental Considerations Report, *“During the operational phase, the assessment outlined in the previous sections has shown that the predicted noise levels at the nearest sensitive locations are within the recommended operational noise criteria.”*

The handling of waste materials associated with roads, housing and river maintenance activities will occur along the northern boundary of the site at the location shown in Figure 1-2 in this report. This location is further away from the nearest noise sensitive receptors than the modelled waste compactors. Roads, housing and river maintenance works are only carried out in normal circumstances during the day-time, therefore incoming waste materials and waste handling will occur during the day-time hours and not at night. Roads maintenance crews associated with gritting/salting during winter will operate at night but do not generate waste.

As such, it is considered that the modelled noise sources, in particular modelling of the waste compactors during night-time periods, as described in the Environmental Considerations Report represent a worst-case scenario. Noise generated from handling of waste from roads, housing and river maintenance activities during the day would not be considered to have potential for a more significant impact on the sensitive receptors identified.

As set out in Section 9 below, the vehicle movements associated with the collection of waste from roads, housing and river maintenance activity is not considered to be significant and accordingly would not be likely to have significant impacts on noise. These traffic movements will occur during the day and will be typical of the noise sources already modelled and assessed in the Environmental Considerations Report.

Mitigation measures proposed for the operational phase of the development are set out in Section 4.5.2 of the Environmental Considerations Report and these will be complied with in full at the NCOD.

It is concluded therefore, that the revised maximum waste quantity to be accepted at the NCOD will not result in a significant new or additional noise impact which would be above or beyond the noise sources already considered and assessed in the Environmental Considerations Report.

5.0 AIR QUALITY AND CLIMATE

The original air quality and climate assessment considered potential impacts from the development during both the construction and operational phases.

The NCOD facility is located within an air quality zone Zone A (i.e., Dublin). Available background data from other representative locations was collated and incorporated into the air dispersion model.

During the construction phase, the assessment concluded that with the implementation of dust minimisation measures, any impacts on air quality would be not significant. As noted previously, the revised waste quantity received at the facility will not have any impact on construction activities, therefore the conclusions reached on air quality and climate impacts during the construction phase are still valid.

During the operational phase, the air dispersion model considered key air quality parameters (NO₂, PM₁₀ and PM_{2.5}), associated with emissions from road traffic, that would be generated by the proposed development. The output from the dispersion model indicated that the proposed development will not have a significant impact on air quality. As set out in Section 9.0 below, the traffic movements associated with the daily activities at the depot were included as part of the assessment at the planning stage. These vehicle movements include the Council trucks which would return waste materials from roads, housing and river maintenance activities to the depot. Accordingly, the potential vehicle emissions associated with these waste movements have been previously assessed.

As set out in Section 9, the vehicle movements associated with the collection of waste from roads, housing and river maintenance activities is not considered to be significant and accordingly would not be likely to have significant impacts on air quality and climate.

Dust generation from handling of the additional waste quantities is not considered to be a significant impact. Roads maintenance waste has potential for dust generation, however the material handling at the site will be minimal and carried out on hard-standing surfaces therefore it is not anticipated that significant dust generation will occur. Proactive housekeeping measures and general maintenance to clean access roads and parking areas within the depot will ensure that dust generation is minimal. Handling of waste will occur at the furthest distances from sensitive residential receptors and waste materials will not be kept on site for a prolonged period of time.

The waste materials generated from housing and river maintenance activities will mainly comprise inert bulky waste materials including furniture, timber, shopping trolleys etc. and some quantities of general litter. Litter waste will be transferred into the enclosed compactor skips where appropriate. Waste materials from roads maintenance will comprise mainly concrete, stone, soil and bituminous materials. As such, the vast majority of wastes generated from these activities are inert and do not generate any odours. As above, the handling and temporary storage of the waste is far removed from the sensitive residential receptors located to the south-west of the depot and it is considered that there will be no additional odour impact from the waste materials. As set out in the Environmental Considerations Report, best practice waste handling procedures and stringent facility management will reduce the likelihood of odour emissions.

There are no proposed changes to the physical extents or layout of the proposed development or the waste management infrastructure requirements for the site, once it is operational.

As such, there are no alterations to the conclusions of the Environmental Considerations Report in that any impacts associated with the construction and operational phase of the NCOD will be not significant.

6.0 SOILS AND GEOLOGY

The original soils and geology assessment considered potential impacts during both the construction and operational phases.

For the construction phase, the assessment detailed that soils will be removed from part of the site to create a level platform for the construction of the various buildings and other site components with some material import also required.

It was detailed that, during the operational phase, the potential for spillages of fuel or lubricants from plant and machinery will be mitigated by supporting infrastructure such as spill kits, hardstanding and an oil interceptor on the site. This design mitigation infrastructure will also protect the underlying soils and geology environment in the case of the revised waste quantity set out in Section 1.

There are no proposed changes to the physical extents or layout of the proposed development or the waste management infrastructure requirements for the site, once it is operational. Therefore, it is considered that there is no potential for any new or additional impacts as a result of the revised maximum waste quantity.

There are no alterations to the conclusions of the Environmental Considerations Report in that any impacts associated with the construction and operational phase will be not significant.

7.0 WATER (SURFACE WATER AND GROUNDWATER)

The original surface water and groundwater assessment considered potential impacts during both the construction and operational phases.

At the site, overland surface flow discharges to land drains which convey water to the south of the south and into the Santry River. There are no in-stream works proposed as part of the development works. There are proposals to connect into an existing surface water drain which outfalls into a channel of the Santry River. The potential for increased mobilization of silt and suspended solids via the surface water drain connection will be managed by the implementation of a Construction Management Plan.

It was detailed that during the operational phase, on-site attenuation will be provided to control the discharge to the Santry River in accordance with the Greater Dublin Drainage Strategic Study. The site will incorporate bunded areas for the storage of any potentially polluting materials and all discharges from the site will be via an oil interceptor discharging to an attenuation tank. In addition to the attenuation tank, other SuDS principals that will be provided on-site include permeable block paving in the car park bays, sedum green roof on the office building and the provision of rainwater harvesting from a designated section of the site.

The above design mitigation measures will also protect the nearby surface water and underlying groundwater environment in the case of the revised waste quantity set out in Section 1. Foul water run-off from handling of street cleansing waste such as street sweepers and gully sucking operations will be as per the design submitted in planning and will not be impacted by the waste quantities associated with the roads, housing and river maintenance activities.

There are no proposed changes to the physical extents or layout of the proposed development or the waste management infrastructure requirements for the site, once it is operational. Therefore, it is considered that there is no potential for any new or additional impacts as a result of the revised maximum waste quantity.

There are no alterations to the conclusions of the Environmental Considerations Report, in that any impacts associated with the construction and operational phase will be not significant.

8.0 FLOOD RISK ASSESSMENT

The Flood Risk Assessment considered the potential pluvial (ponding of surface water) and fluvial flooding from the Santry River to the proposed development.

As there is no proposed changes to any of the infrastructure at the site, there is no potential for any new or additional flood risk at the site and the conclusions as set out in the Environmental Considerations Report remain applicable.

9.0 TRAFFIC MANAGEMENT

An assessment of the potential traffic impact of the NCOD development was carried out and presented in the Environmental Considerations Report.

The estimated construction phase traffic movements were presented in the report and an Outline Construction Traffic Management Plan prepared. As noted previously, the revised

waste quantity will not result in any changes to construction activities and there will be no potential for additional or new construction phase impacts.

The Environmental Considerations Report also includes information on other traffic assessment reports including a Workplace Travel Plan and Road Safety Audit. Neither of these assessments are impacted by the revised waste quantity.

A Traffic and Transportation Assessment (TTA) was also undertaken and included with the planning application. In summary, the TTA Report assessed the following:

- Existing Site Conditions;
- Details of the Proposed Development;
- Trip Generation and Distribution;
- Junction Analysis;
- Mitigation Measures; and
- Construction Phase.

Section 3.2 of the TTA identified the approximate number of employees both based at the depot and working off-site from the depot and this off-site allowance includes the DCC employees that will carry out the roads, housing and river maintenance works. Therefore, the TTA has already accounted for traffic movements associated with the employees carrying out these works.

Section 4.2 of the TTA outlines the development trip generation rates and details the traffic movements associated with fleet traffic which will include the vehicles used to carry out routine Council activities including the roads, housing and river maintenance works. These fleet vehicles include pick-up trucks and vans which have capacity to carry tools, equipment and waste generated from the daily Council activities. A comprehensive assessment of traffic movements from existing DCC operations depots across the Dublin City area was carried out and the numbers of vehicles, types of vehicles and timing of traffic movements recorded.

The waste materials associated with the roads, housing and river maintenance works will be transported to the depot by the returning fleet vehicles throughout the day. The TTA, and subsequently the traffic assessment in the Environmental Considerations Report, has already accounted for these vehicle movements and have been factored in, where relevant, and added to the baseflow traffic peaks on the road network (i.e., AM peak (08:00 to 09:00) and PM peak (17:00 to 18:00)).

Traffic movements associated with the removal of these additional waste quantities (from roads, housing and river maintenance) are not specifically detailed in the TTA, however these waste collections will be scheduled events with the appointed waste contractor and will not be likely to occur during peak AM and PM times.

The DCC operations management will schedule these collections to take place during off-peak hours (on the road network) when incoming and outgoing fleet and staff movements, as well as non-development related traffic on the surrounding roads are reduced. As a result, the associated waste collections are not required to be added to peak hour traffic movements as assessed in the TTA and will not result in any additional traffic volumes beyond those already assessed in the worst-case scenario.

As set out in the conclusion of the TTA, the TTA was based on the provision of 200 no. employee car spaces and 336 no. fleet vehicle spaces and concluded that *“the proposed development has minimal impact on the junctions assessed, however due to the general traffic growth in the area, some of the larger junctions operate close to or at capacity without the development traffic”*. As

such, it is considered that the additional waste collection vehicles will not have any significant impact on traffic movements and will not alter the conclusions reached in the traffic assessment of the Environmental Considerations Report.

All traffic movements associated with the incoming and outgoing waste from roads, housing and river maintenance activities will use the fleet entrance from St. Margaret's Road along the northern boundary of the site (Junction 2) which is located away from sensitive residential receptors and will be scheduled to occur outside of the peak traffic hours on the surrounding road networks.

For the reasons outlined above, it is concluded that the assessment of traffic impacts as set out in the Environmental Considerations Report and the TTA remain valid and are not considered to have a significant impact on the environment.

10.0 LANDSCAPE AND VISUAL IMPACT

An assessment of the potential landscape and visual impact of the NCOD development was carried out and presented in the Environmental Considerations Report.

The context of the site location was set out identifying the IKEA warehouse building to the north, the M50 further north, grasslands and the R108 to the east, industrial buildings, a school and residential developments to the south and Ballymun United Football Club to the north-west.

The site is described as forming part of a larger patchwork of disused grassed brownfield sites and public green spaces set within the built urban framework of the local area. The only significant structure on the site is the existing ESB substation and associated fences and yard, which will be retained.

It was noted that views are possible into the site from the adjacent roadways to the north, east and southwest and also that the relatively raised elevation of the M50 at this location means that views are possible southwards across the site from the M50. However, long distance views into the site were not considered to be significant due to the relatively low-lying topography of the site relative to the M50 and IKEA as well as the height and massing of buildings to the south, east and west.

Since the Environmental Considerations Report was prepared in November 2017, a new Decathlon store has been built immediately north of the NCOD site which reduces visibility of the site from the M50.

The landscape design proposed within and surrounding the site was described along with a description of maintenance requirements and confirmation of agreeing a maintenance contract with a landscape contractor for the initial 24-month period. It was concluded that once the landscape scheme has established at the site, that there is potential for significant positive visual amenity value to the existing landscape of the area.

The allowance for the revised waste quantities to be accepted and handled at the site, as set out in Section 1.2, will not alter the conclusions reached in the assessment of landscape and visual impact. The proposed landscape design will be as per the permitted development and the areas for handling and temporary storage of the waste materials within the site will be entirely within the site boundary and not visible outside of the site. The locations for handling waste will be as shown in the Site Plan submitted with the planning application.

11.0 CONCLUSION

This Environmental Considerations Report – Update Report has been prepared to address the potential for any new or additional impacts to be created as a result of a revised maximum waste quantity which is proposed to be handled and transferred through the NCOD facility. The quantity of waste passing through the depot as described in pre-application consultation with FCC and the EPA was approximately 11,000 tonnes per annum. On further detailed review of the waste to be transferred through the facility (both the Council depot and the Civic Amenity facility), this maximum waste tonnage anticipated has been revised to 24,000 tonnes per annum.

There are no proposed changes to the physical extents or layout of the proposed development or any of the waste management infrastructure requirements for the site.

The details presented in this Update Report demonstrate that the revised maximum waste quantities to be accepted at the site will not give rise to any additional significant impacts on the environment or alter the conclusions presented in the Environmental Considerations Report submitted with the planning application. In addition, the mitigation measures set out previously remain appropriate and will be implemented during the construction and operation phases of the proposed development.

The revised annual waste intake will in no way compromise the planning conditions attached to the development and these planning conditions, as well as the planning compliance documents submitted and agreed to date, remain appropriate and valid. The Mitigation Plan submitted to and agreed with FCC in compliance with Condition No. 2 of the Grant of Planning Permission remains valid and will be implemented in full.

In accordance with Condition No. 3 of the Grant of Planning Permission, and as is currently in progress, appropriate licensing from the EPA will be in place prior to commencement of operations at the site.

This assessment is presented to show that the revised annual waste quantity will not give rise to any additional or new significant impacts on the environment during the construction or operational phases over and above those considered acceptable in granting permission previously for the NCOD.

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Attachment B – Letter of response from Fingal County Council on 16 June 2021

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Mr. Dermot O'Hagan,
JNP Architects,
30 Northwood Court,
Northwood,
Dublin D09 F799.

16th June 2021

Re: Planning Ref. F17A/0686 – New Operations Depot and Civic Amenity Site, St. Margaret's Road, Ballymun, Dublin 11 for Dublin City Council

Dear Dermot,

I refer to your correspondence of 26th April 2021 in respect of Condition No. 3 to F17A/0686 which relates to the requirement to be in receipt of the appropriate authorising licence from the EPA and the proposed tonnages of waste to be accepted at the facility.

Permission was granted under F17A/0686 for construction of a new Operations Depot and Civic amenity Site to include:

- (i) 4 storey office building with staff welfare and canteen facilities, bin store, plant areas and 1st floor external terrace (4,963 sq.m.);
- (ii) Central Stores Warehouse building and workshops, part single storey and part 2 storey (Warehouse stores: 1,712 sq.m.; Welding Workshop: 355 sq.m; Painting Workshop: 77.5 sq.m; Electrical Workshop: 91 sq.m; Carpentry Workshop: 124 sq.m; signage Workshop: 314 sq.m; Vehicle Workshop: 507 sq.m; welfare facilities: 22 sq.m; circulation: 62.5 sq.m; total: 3,265 sq.m);
- (iii) Multi-Storey carpark, 4 storey, 132 spaces for fleet vehicles and 200 spaces for staff private vehicles plus 220 bicycle spaces (11,200 sq.m);
- (iv) Covered parking for 15 no. fleet vehicles (721 sq.m.);
- (v) Salt barn, singles storey (457 sq.m);
- (vi) Civic Amenity Site office, single storey (43 sq.m.); (vii) Store for recycled batteries and clothes, single storey (12 sq.m); substations and LV switch room, single storey (64 sq.m); Plant room, 2 storey (76 sq.m).

The development also included a 3m high boundary wall (part 5m at Civic Amenity Office) with portals and gates at 3 no. vehicular & pedestrian access points along with 3m high weldmesh fencing; open area for fleet vehicle parking of 189 vehicles of various types; internal site fencing and walls to provide external material and equipment storage areas; waste compaction area with associated ramps; waste collection areas with associated ramp; waste container area within the Civic Amenity Site with associated customer parking/set down spaces (24 no.) and access road/pedestrian walkways; fleet vehicle wash bays; 10 no. visitor parking spaces; attenuation pond; internal roads and pedestrian walkways; 2 no. security kiosks (1.2 sq.m each); foul and surface water drainage; underground services and associated works.

Based on the details contained in your letter of 26th April, the overall projected waste tonnage for the site per annum is 25,400. However, Dublin City Council will maintain the combined waste total to a maximum of 24,000 tonnes per annum.

An Environmental Impact Assessment Report was not required for application Ref. F17A/0686. It is noted that the maximum tonnage of 24,000 set out in the correspondence of 26th April remains below the threshold for mandatory Environmental Impact Assessment from a waste perspective.

I trust this is of assistance.

Yours sincerely,



Philip Long
Senior Executive Officer
Planning & Infrastructure Department

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