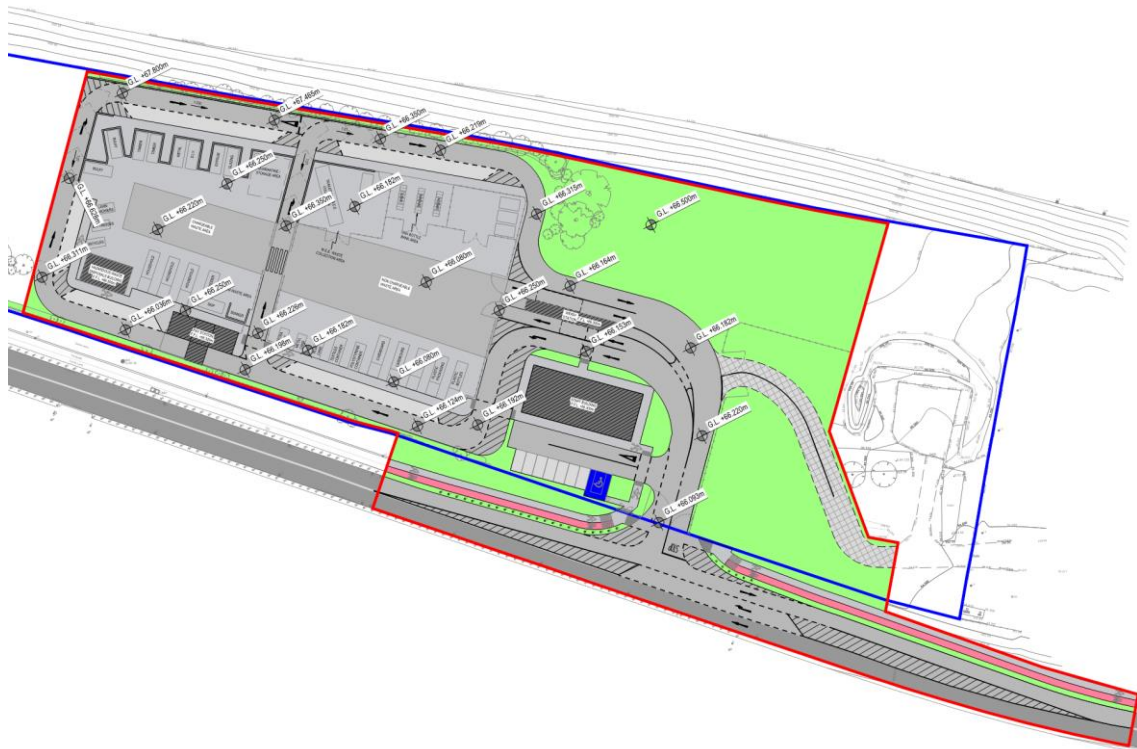


# PART 8 PLANNING REPORT

For the provision of a Civic Amenity & Waste Transfer Facility at Celbridge, Co. Kildare.



Prepared for

by

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# Table of Contents

<b>1.</b>	<b>INTRODUCTION.....</b>	<b>0</b>
1.1	DESCRIPTION OF PROPOSED DEVELOPMENT .....	0
1.2	STRATEGIC OVERVIEW .....	3
1.3	PART 8 PLANNING PROCESS.....	4
1.4	NEED FOR THE PROPOSED DEVELOPMENT .....	5
1.5	LIST OF DOCUMENTS ACCOMPANYING THE PART 8 PROCESS .....	5
<b>2.</b>	<b>SUBJECT SITE LOCATION AND CONTEXT .....</b>	<b>6</b>
2.1	SUBJECT SITE LOCATION .....	6
2.2	SITE OF THE PROPOSED DEVELOPMENT.....	6
<b>3.</b>	<b>SUBJECT SITE PLANNING HISTORY .....</b>	<b>8</b>
3.1	PLANNING HISTORY FOR THE SUBJECT SITE.....	8
3.2	PLANNING HISTORY FOR THE SURROUNDING AREA .....	8
<b>4.</b>	<b>SECTORAL GUIDANCE.....</b>	<b>10</b>
4.1	GOVERNMENT WASTE MANAGEMENT POLICIES AND GUIDANCE .....	10
4.2	SECTORIAL AGENCY ADVICE.....	14
4.3	REGIONAL WASTE MANAGEMENT POLICY .....	15
<b>5.</b>	<b>PLANNING AND DEVELOPMENT POLICY .....</b>	<b>17</b>
5.1	IRELAND 2040 – THE NATIONAL PLANNING FRAMEWORK.....	17
5.2	REGIONAL PLANNING GUIDELINES FOR THE GDA (2010-2022) .....	18
5.3	DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE EASTERN AND MIDLAND REGION.....	19
5.4	THE KILDARE COUNTY DEVELOPMENT PLAN (2017-2023).....	20
5.5	THE CELBRIDGE LOCAL AREA PLAN (2017-2023).....	29
5.6	OVERALL COMPLIANCE WITH PLANNING POLICY .....	30
<b>6.</b>	<b>ENVIRONMENTAL CONSIDERATIONS .....</b>	<b>31</b>
6.1	EIA SCREENING .....	31
6.2	AA SCREENING.....	31
<b>7.</b>	<b>OTHER CONSIDERATIONS.....</b>	<b>32</b>
7.1	TRAFFIC & TRANSPORT ASSESSMENT.....	32
7.2	ENGINEERING DESIGN REPORT .....	32
7.3	LANDSCAPE THEORY REPORT .....	32
<b>8.</b>	<b>PLANNING ASSESSMENT AND OVERALL CONCLUSION .....</b>	<b>33</b>

## List of Figures

Figure 2.1 Spatial Context of Subject Site .....	6
Figure 2.2 Site Layout .....	<b>Error! Bookmark not defined.</b>
Figure 4.1: European Union Waste Hierarchy .....	11
Figure 5.1 Table 17.8 of County Development Plan - Building Lines from Public Roads .....	25
Figure 5.2 Self- Compacting and Self-Contained Skips .....	28
Figure 5.3 Land Use Zoning of Subject Site.....	30

## List of Tables

Table 3.1 Nearby Relevant Planning Applications .....	8
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## List of Appendices

Appendix 1	Civic Amenity Design Rationale
Appendix 2	Drawing Schedule

# 1. INTRODUCTION

CAAS Ltd. have been commissioned by Kildare County Council to prepare this Part 8 Planning Report. This report is part of the planning documents for the development and operation of a Civic Amenity & Waste Transfer Facility to serve the north County Kildare area. In addition to supporting a number of objectives and policies in both the Kildare County Development Plan and the Celbridge Local Area Plan, the proposed Civic Amenity & Waste Transfer Facility is a direct response and realisation of the Kildare County Development Plan objective EN-3, and the Celbridge Local Area Plan objective INFO4.2. These objectives state:

*EN-3: Investigate the possibility of the provision of a recycling facility in the north of the county and to seek new markets for recycling in existing centres.*

*INFO4.2: To provide a civic amenity site (recycling centre) in Celbridge on lands located south of the M4 Motorway and north of the R449 Regional Route to the west of Exit 6.*

It is proposed that the facility will consist of both chargeable and non-chargeable waste areas to the east and west of the site respectively, and will be located adjacent to the R449 towards the north of Celbridge.

## 1.1 DESCRIPTION OF PROPOSED DEVELOPMENT

The development as described in the public notices is as follows, and a copy of the full Site Notice is included in the Part 8 Planning Application documentation.

A Proposed Civic Amenity and Waste Transfer Facility for mixed household municipal waste streams, with a maximum capacity of 7,500 tonnes per annum, and comprising the following buildings:

- i. A single storey (166.83m<sup>2</sup>) Administration/ Staff Building
- ii. A single storey (33m<sup>2</sup>) Pay Station Building
- iii. A single storey (11m<sup>2</sup>) Weighbridge Building
- iv. A single storey (57.64m<sup>2</sup>) Household Hazardous Waste Storage Building

Additional works required to support the facility include internal roads and set down areas; a site wastewater treatment plant; material handling areas; staff and visitor parking, moveable waste skips; cctv, public lighting and landscape works (including retaining walls), in addition to all necessary services and utility provision and associated site works.

The proposed development includes modifications to the R449 adjacent to the proposed site entrance including a right hand turning lane and associated road infrastructure signage, and modifications and widening to the existing site entrance, footpaths, cyclepaths and landscaping.

The proposed site shall contain two designated areas for waste disposal and collection which are defined as chargeable and non-chargeable waste areas. The perimeter of each area will be provided with the relevant moveable material containers/ skips which will be accessible by the public, and will be served by a dedicated set down area located off the internal access roads. All skips/ containers present on site will be covered to minimise dust emissions, and the operator shall put in place all

procedures to comply with the requirements of the EPA licence to ensure all dust, noise and air emissions are within the acceptable minimal limits.

The proposed facility will accept various forms of household municipal waste waste to a maximum capacity of 7,500 tonnes per annum. The primary focus will be to separate the mixed wastes to enable their effective recycling in order to increase the recovery of reusable materials, and minimising the volume of waste directed towards landfill. This will also allow recyclable materials to be repurposed and reused. No processing is intended to occur on site, and separated/ segregated waste streams will be collected and transferred elsewhere, by licensed operators, for appropriate recycling, reuse and disposal.

The waste streams identified as being able to be received at the proposed development includes the following:

Printer Cartridges	Paints, Inks, Adhesives - (Flammable/Toxic)
Cardboard Packaging	Paints, Inks, Adhesives - (Oils)
Plastic Bottles	Paints, Inks, Adhesives - (Paint Cans)
Plastic Packaging	Water Based Paint
Metallic Packaging Aluminium	Batteries Municipal Waste
Metallic Packaging Steel	Large Mixed WEEE
Tetra Pak	Small Mixed WEEE
Glass Packaging Brown	Filament Bulbs
Glass Packaging Clear	Wood
Glass Packaging Green	Polystyrene
Gas Cylinders	Fire Extinguishers
Lead Acid Batteries	Bicycles
Plasterboard	Lawnmowers
Paper	Metals
Glass Packaging (Sheet)	Garden Green Waste
Clothing / Textiles	Soil & Stones "Construction Waste"
Fluorescent Tubes	Mixed Municipal Waste "Baleable"
Cooking Oil	Bulky Municipal Waste "Bulky Non Baleable"
Motor Oil	Mattresses
Paints, Inks, Adhesives - (Aerosols)	

Of the above, the non-chargeable waste streams can be categorised as materials including, glass bottles, paper & cardboard, plastic bottles & plastic packaging, aluminium cans & metal cans, TetraPak, textiles, polystyrene, and WEE (White Goods, Electrical, Electronic).

Chargeable waste streams to be received on the site include garden green waste, bulky waste, DIY & plasterboard, household hazardous (paints, medicines, batteries, waste oils, fluorescent tubes etc), timber waste, flat glass, metal, and residual household waste.

The construction phase of the proposed development is expected to require some 16 – 18 months (approximately) to complete. As this stage of the proposed development is likely to be subject to a tender process, it is anticipated that the future contractor will submit a Construction Management Plan, which would be subject to the agreement and satisfaction of Kildare County Council, prior to any development works commencing on site.

Normal operations of the facility would result in increased ambient noise levels. Slight increases would occur during delivery and collection. Proposed hours of operation are 8.00 a.m. – 7.00 p.m. (Monday to Friday) and 8:00 a.m. – 3:00p.m. (Saturdays). In terms of management, supervision and security arrangements, the site would be supervised by a full-time attendant who will ensure that materials are presented in a proper fashion and that the site is kept neat and tidy. In this regard, the successful tenderer/ operator shall provide sufficient resources to operate, monitor and secure the facility at all times. The operator's site staff will be present at each of the chargeable and non-chargeable waste areas in order to assist the public in placing the waste in the correct receptor. The operator shall also provide clear and concise signage in each location to assist with such an operation. All materials would be fully contained or covered so as to avoid nuisance such as rodents, litter and odour. The operator shall implement a Vermin Control procedure throughout the site. Heavy duty security gates and cctv will be provided at the entrance as a security measure. Opening hours would be approximately 8 a.m. – 7 p.m. Monday – Fridays (08:00 – 03:00p.m. Saturdays) with seasonal variations. The facility is aimed at private (household) use only, and no commercial/industrial waste will be accepted.

The actual development, the subject of this Part 8 application, is clearly distinguished on the Planning Drawings. Some existing public infrastructure services are located in close proximity to the site, on the opposite side of the road. The proposed development will easily and readily connect to existing public water supply services located along the existing R449 to the South of the proposed development (red line boundary of the proposal extends to include this connection). With regard to foul water infrastructure, there is no public system or infrastructure in the vicinity of the site, however, a site-specific foul water network and wastewater treatment system is proposed as part of the development. Telecoms and gas connections are available along the R449. The site includes provision for future expansion, however, any such proposal will be the subject of a future separate consent application/ Part 8 process, if/ when deemed necessary, by Kildare County Council.

With regard to waste licencing, Local Authorities activities are exempt from the requirement to hold a Waste Licence or Certificate of Registration (COR), as identified hereunder:

- WMA Section 39(7): Specified waste activities on an IPPC regulated site; deposit of litter in a bin; the disposal of specified animal by-products; **transfer of waste to an authorised person for recovery**<sup>1</sup>.

Notwithstanding the above, as the operation/ operator of the proposed facility is likely to be confirmed by means of a competitive tender, the facility will need to be operated in accordance with

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<sup>1</sup> EPA, Do I need a Waste Licence, Certificate of Registration, or a Registration Certificate? (2008)

the conditions set out in an operating licence, which will need to be applied for and granted by the EPA.

The proposed activity/ use of the Civic Amenity and Waste Transfer Facility will be the intake of a number of different and specified waste streams, which will be separated into different containers/ areas on-site, and eventually transferred to separate registered and licenced waste/ recycling or repurposing facilities off-site, by a licenced operator.

## 1.2 STRATEGIC OVERVIEW

The Waste Framework Directive (2008/98/EC) ("the WFD") sets the legal framework for waste management in the European Union. The WFD established a hierarchy of waste management, and was transposed into Irish Law (Section 21A of the Waste Management Act 1996 – as inserted by article 7 of the European Communities (Waste Directive) Regulations 2011 (S.I. No.126 of 2011)). It sets out the basic concepts and definitions relating to waste management, and was introduced in 2008. The WFD places a strong emphasis on optimising resource efficiency, prevention, reuse and the recovery of mixed residual wastes, whilst also introducing the "polluter pays principle" and the "extended producer responsibility".

The WFD imposes on Member States a number of obligations regarding waste management, including:

- The application of the waste hierarchy as a priority in waste prevention and waste management legislation and policy.
- To ensure that waste is recovered (including separate collection to facilitate recovery where technically, environmentally and economically practicable) or, where it is not recovered, to ensure that waste is disposed of without causing risks to human health and the environment.
- To establish an integrated and adequate network of waste disposal installations and of installations for the recovery of mixed municipal wastes – aiming for EU self-sufficiency and for member states individually to move towards self-sufficiency.

The principles of self-sufficiency and proximity are also highlighted within the WFD (Article 16), and require that:

1. *"Member States shall take appropriate measures, in cooperation with other Member States where this is necessary or advisable, to establish an integrated and adequate network of waste disposal installations and of installations for the recovery of mixed municipal waste collected from private households including where such collection also covers such waste from other producers, taking into account best available techniques.*
2. *The network shall be designed to enable the Community as a whole to become self-sufficient in waste disposal as well as in the recovery of waste referred to in paragraph 1, and to enable Member States to move towards that aim individually, taking into account geographical circumstances or the need for specialised installations for certain types of waste.*
3. *The network shall enable waste to be disposed of, or waste referred to in paragraph 1 to be recovered in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health".*

Recovery is defined in the Waste Framework Directive as any operation, the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been

used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.

It is within the above context that the development of Irish waste policy and facilities have been set and developed. Section 4 and 5 of this planning report outlines further how the principles and objectives have been incorporated into the various levels of policy (as relevant to the proposed development), and provides a brief indication of how the proposal meets, or seeks to implement, these provisions.

The Kildare County Development Plan (2017-2023) policies and objectives provide a clear spatial framework for land use planning within the general Celbridge and wider Kildare area. The county development plan acknowledges that there is a need to further develop environmental services throughout the county in order to maintain and improve the protection of the environment. The development plan also identifies that there is a need to ensure the provision of waste management facilities and collection, and to conform with EU, national and regional policy. This goal is supported in the Development Plan by a range of policy statements and objectives – as is noted above, these are further outlined in Section 5.4 of this planning report. As has also been identified in the Introduction to this Planning Report, the proposed facility is also a direct response and realisation of specific objectives in both the Kildare County Development Plan (EN-3) and the Celbridge Local Area Plan (INFO4.2).

The above planning framework sets a clear and unambiguous context for the support of development such as the subject proposal, to occur within the area in a co-ordinated, sustainable and planned manner.

### **1.3 PART 8 PLANNING PROCESS**

When Local Authorities propose to undertake certain types of works, such as the provision of infrastructure, they must publish their proposal, and invite the public to make submissions. This process is known as the Part 8 approvals process as it follows procedures set out in Part 8 of the Planning and Development Regulations 2001 (as amended).

The key stages of compliance with in relation to conducting the Part 8 process are as follows:

- Preparation of Drawings, maps and particulars
- Preparation of specialist report(s), as appropriate, relating to the proposed development
- Publication of a notice in an approved newspaper and the erection of a site notice
- Make project documentation available to the Planning Department for public inspection
- Registration of submissions made by the public and prescribed bodies
- Preparation of a Managers Report which takes account of submissions from the public and prescribed bodies
- Notification of the council's decision to members of the public who made submissions
- Notification of the council's decision to prescribed bodies which were circulated with the proposal

In accordance with the requirement of Part 8 of the Planning and Development Regulations, notice is hereby given that Kildare County Council proposes to carry out works to construct a Civic Amenity and Waste Transfer Facility to the north of Celbridge, as illustrated in Figure 2.1.



## 1.4 NEED FOR THE PROPOSED DEVELOPMENT

This Part 8 planning process is fully in compliance with the requirement to submit specific planning details of the development proposed.

Kildare County Council currently operates two similar such civic amenity sites. One is located at Athy, and another at Silliot Hill; however, it is deemed necessary to construct an additional civic amenity and waste transfer facility in Celbridge in order to accommodate the waste infrastructure needs of North Kildare.

This Part 8 development essentially provides for the provision of a civic amenity and waste transfer facility consisting of both chargeable and non-chargeable waste areas with a maximum capacity of 7,500 tonnes per annum, located to the north of Celbridge, Co. Kildare.

As is highlighted within Section 1 (Introduction) of this Planning Report, in addition to supporting a number of objectives and policies in both the Kildare County Development Plan and the Celbridge Local Area Plan, the proposed Civic Amenity & Waste Transfer Facility is a direct response and realisation of the Kildare County Development Plan objective EN-3, and the Celbridge Local Area Plan objective INFO4.2. These objectives provide that Kildare County Council will:

*EN-3: Investigate the possibility of the provision of a recycling facility in the north of the county and to seek new markets for recycling in existing centres.*

*INFO4.2: To provide a civic amenity site (recycling centre) in Celbridge on lands located south of the M4 Motorway and north of the R449 Regional Route to the west of Exit 6.*

## 1.5 LIST OF DOCUMENTS ACCOMPANYING THE PART 8 PROCESS

A number of supporting documents are part of the Part 8 planning process for the proposed development; these include:

- A Planning Report (this document) including Design Rationale (Appendix 1)
- An EIA Screening
- A Traffic and Transport Assessment
- An AA Screening Statement Report
- Landscape and Visual Assessment Report
- A Civil Infrastructure Design Report
- A Design Rationale
- Drawings and drawing list (Appendix to this Planning Report)
- Copy of the site notice
- Original newspaper notice

The above documents are made available for inspection at the local authority offices (in Naas) and Celbridge Library, and online on the council's website.

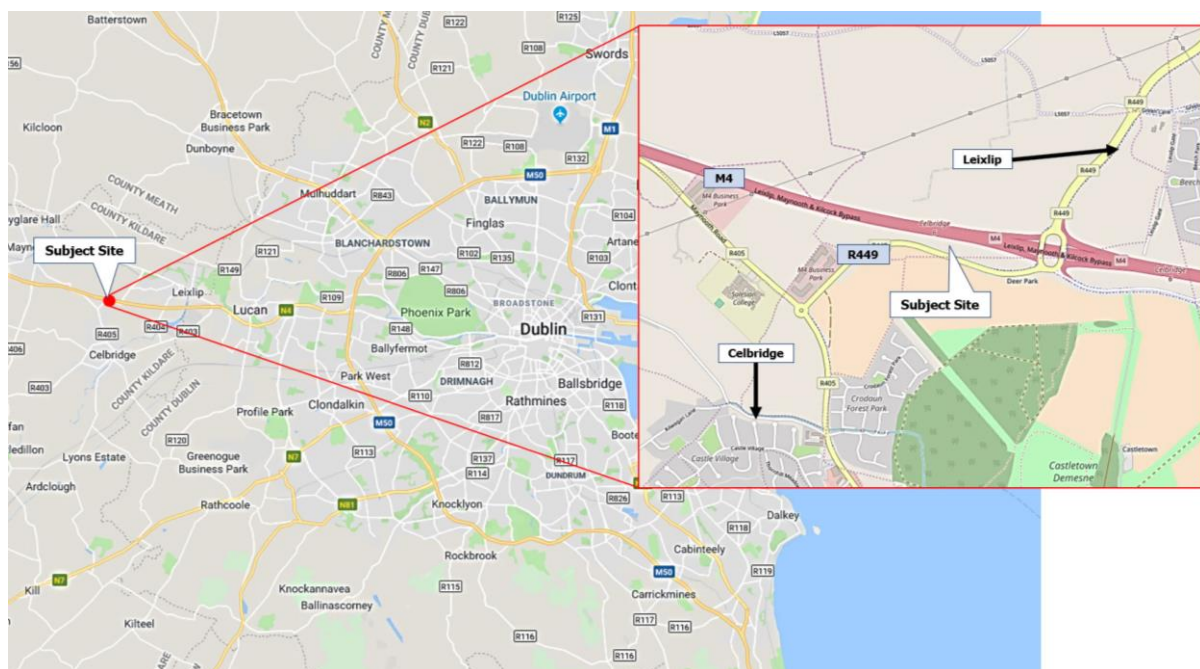
After a brief description of the site location and context of the development, this planning report outlines the relevant planning history for the subject site and in the vicinity, before demonstrating, with reference to the reports listed above, how the proposed development is in full compliance with all relevant planning and development guidance, policies and standards.

## 2. SUBJECT SITE LOCATION AND CONTEXT

### 2.1 SUBJECT SITE LOCATION

The subject site is situated approximately 2.4km to the north of Celbridge town centre, in the townlands of Castletown and Kilmacredock Upper. The site is also located in close proximity to a number of other settlements in the surrounding areas including Leixlip to the north-east and Maynooth to the north-west.

Figure 2.1 below illustrates the site's proximity to the M4 motorway route and also shows that the area is readily accessible by road by means of the R449 route. Due to its location adjacent to national and regional routes, in addition to Celbridge itself, the site is high accessible from the surrounding settlements, such as Leixlip and Maynooth.



**Figure 2.1 Spatial Context of Subject Site<sup>2</sup>**

### 2.2 SITE OF THE PROPOSED DEVELOPMENT

The different elements of the subject proposal are located to the centre of the site as outlined in Figure 2.2 below. The site has a total size of 1.2Ha and is bound to the north by the M4 motorway and to the south by the R449. An existing Kildare County Council roads compound is directly adjacent to the east of the site and proposed development area. Undeveloped greenfield lands are situated to the west of the site.

<sup>2</sup> Source: Google Maps, 2018. OpenStreetMap, 2018.

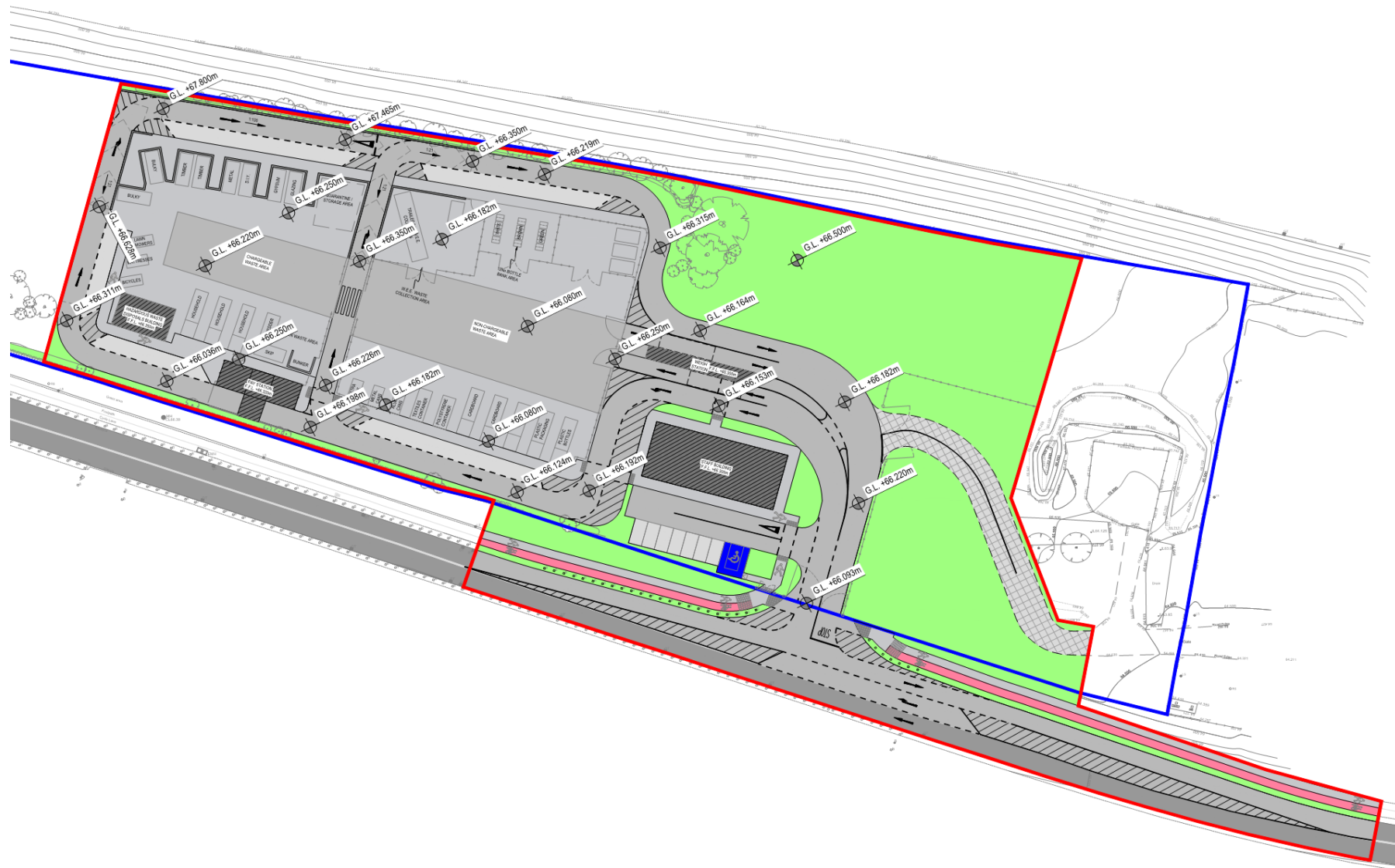


Figure 2.2 Site Layout

### 3. SUBJECT SITE PLANNING HISTORY

This section of the planning report provides a brief description of any relevant planning applications made both on the site itself and in the vicinity of the subject site. As part of the assessment of the proposed development, account has been taken of the planned developments in the area, as well as existing land uses.

#### 3.1 PLANNING HISTORY FOR THE SUBJECT SITE

There is no planning history associated with the subject site.

#### 3.2 PLANNING HISTORY FOR THE SURROUNDING AREA

A review of all relevant planning applications for development in the vicinity of the subject site was also conducted using Kildare County Council's online planning enquiry system. Outline details of relevant planning applications are set out in Table 3.1.

APPLICANT	BRIEF DESCRIPTION OF APPLICATION	REG. NO.	GRANT DATE
Longport Developments Ltd	The development will consist of the following: An industrial warehousing building comprising 9 individual units totalling a floor area of 1,340 sq m, associated carparking, siteworks, drainage and services, new vehicular access road R449, alteration to previously granted road layout – planning register reference: 08/72	10307	21/01/2011
Garard O'Leary	Construct 1 No. detached single storey temporary accommodation unit, containing 4 No. classrooms, 2 No. resource rooms, 2 No. changing rooms, 1 No. general purpose room and 1 No. accessible toilet with connection to the existing storm and foul drainage, building signage and all associated development works located to the east of the main school building in the townland of Moortown	18557	29/08/2018
Deirdre Brennan	The use of unit B2, Building B, as a Dance Studio. Unit B2 is 374m <sup>2</sup> in area, occupying part of the upper floor of Building B. Permission has been granted for the development works associated with unit B2. (ref :05/2210) Permission also exists for the current use as a Dance Studio (Ref: 09/63). This application is for permission to continue using and no changes to the character of the use are being proposed.	12387	06/08/2012
Giraffe Childcare Ltd	Change of use from office to creche of part ground floor (117 sq.m) as extension to existing creche	11914	09/12/2011
Petrogas Group Ltd.	Change of use from retail use to retail use with ancillary off licence use.	14296	10/07/2014

**Table 3.1 Nearby Relevant Planning Applications**

The proposed development site is suitably located towards the M4 motorway and is located a sufficient distance from other planning applications in the area. The proposed development is compliant with the current zoning of the site (Utilities/ Services) and does not conflict with

surrounding land uses/ zoning in the area (primarily industrial and green belt lands). In conclusion, it can be seen that the planning history of the surrounding area does not include any application which would preclude the granting of planning permission for the subject proposed development.

## 4. SECTORAL GUIDANCE

### 4.1 GOVERNMENT WASTE MANAGEMENT POLICIES AND GUIDANCE

There has been a significant evolution in National Waste Management Policies as issued by the Department of Environment, Community and Local Government (DoECLG) (previously the Department of Environment, Heritage and Local Government – DoEHLG) since the mid to late 1990s.

Government policy documents have moved from an initial focus on the development of modern, engineered landfill capacity and the promotion of recycling to fiscal measures to influence environmental performance as well as policies promoting and directing the emerging technologies in this sector, such as the development of commercial composting, both hazardous and non-hazardous waste facilities, and public recycling facilities.

In addition, Government waste management guidance has been based on a regional approach to waste management and planning, as embodied by the various regional waste management plans. Key waste management policy statements published by the now DoHPCLG since the late 1990s include:

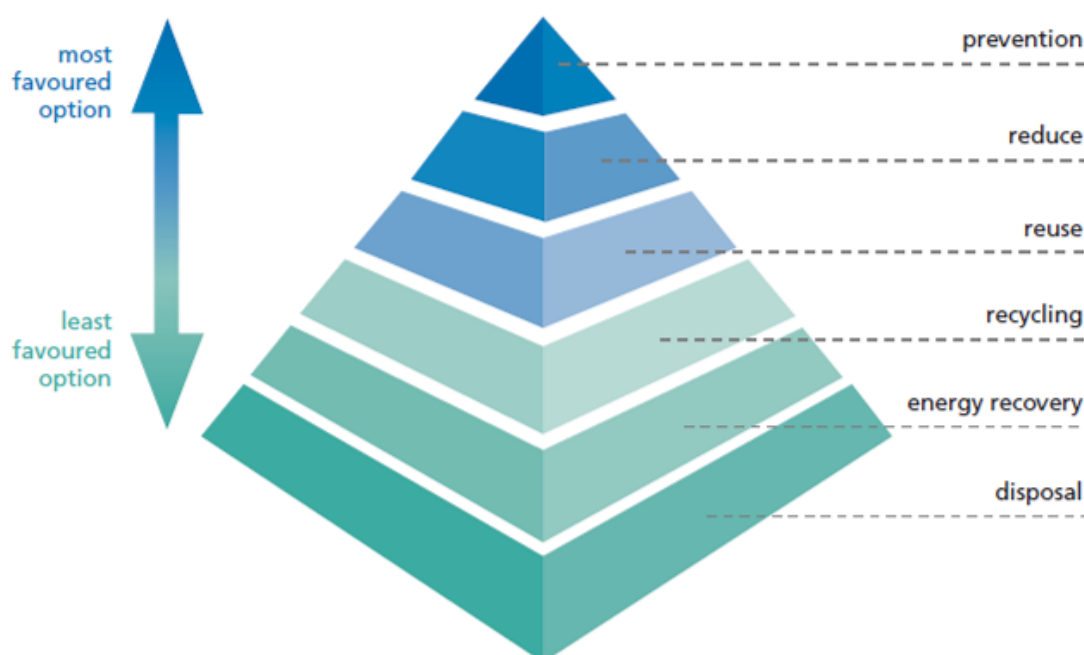
1. Waste Management: Changing Our Ways – DoEHLG (1998);
2. Preventing and Recycling Waste: Delivering Change (March 2002);
3. Waste Management: Taking Stock and Moving Forward (April 2004);
4. National Overview of Waste Management Plans (2004)
5. Policy Guidance Notes under Section 60 of the Waste Management Act, 1996 (May 2005);
6. National Strategy on Biodegradable Waste (April 2006);
7. International Review of Waste Management Policy (September 2009);
8. Towards a New National Waste Policy - Discussion Document (August 2011);
9. A Resource Opportunity – Waste Management Policy in Ireland (July 2012)

The following sections of this report will provide a brief overview of each of these policy documents to demonstrate that the proposal accords with the Government's overall approach to waste management in Ireland.

#### 1) "Waste Management: Changing Our Ways" - DoEHLG (1998)

The policy statement 'Waste Management: Changing Our Ways' was published by the Minister for the Environment and Local Government in October 1998. The policy approach adopted in 'Changing Our Ways' was one of integrated waste management based on the hierarchy of options, officially adopted by the European Union.

The illustration in Figure 4.1: European Union Waste Hierarchy) below indicates that this approach places greatest emphasis on waste prevention, followed by minimisation, re-use, recycling, energy recovery and, finally, the environmentally sustainable disposal of residual waste.



**Figure 4.1: European Union Waste Hierarchy**

**Source: Page 5, *Municipal Solid Waste: Pre Treatment and Residuals Management*, EPA, 2009**

'*Changing Our Ways*' also set out targets for particular waste streams (e.g. to recycle 85% of construction and demolition waste by 2013).

2) *Preventing and Recycling Waste: Delivering Change - DoEHLG (2002)*

'*Preventing and Recycling Waste: Delivering Change*' evolved from and was grounded in the '*Changing Our Ways*' document which established a national policy framework for the adoption and implementation of strategic waste management planning.

'*Delivering Change*' addressed the factors and practical considerations that are relevant to the achievement of Government policy objectives and for the prevention and, re-use and recycling of waste. This policy statement established a series of objectives in terms of the implementation of the waste hierarchy based on minimisation of waste generation and improving levels of recycling of generated waste.

3) *Waste Management: Taking Stock and Moving Forward - DoEHLG (2004)*

The overall policy approach set out in '*Taking Stock and Moving Forward*' remained grounded in the concept of integrated waste management, based on the EU waste hierarchy and designed to achieve the ambitious targets set out in '*Changing Our Ways*' by 2013.

While '*Taking Stock and Moving Forward*' acknowledged the considerable progress made in improving waste management, it made it clear that further work remained to be done to put the full range and scale of waste infrastructure in place.

4) *DoEHLG (2004) National Overview of Waste Management Plans*

The '*National Overview of Waste Management Plans*' which was published in tandem with '*Taking Stock and Moving Forward*' set out on a region by region basis the progress made (up to end-2003) in providing the principal pieces of waste infrastructure envisaged in local authority waste management plans.

5) *Policy Guidance Notes Under Section 60 of the Waste Management Act, 1996 - DoEHLG (2005)*

Policy Guidance Notes pursuant to Section 60 of the Waste Management Act, 1996 (as amended), (circular WIR 04-05) were issued by the Minister in May 2005 to address the issue of actions against illegal waste activity as well as the movement of waste between waste management plan areas.

With specific regard to the movement of waste, the '*Policy Guidance Notes*' addressed what it termed the "*unnecessarily restrictive*" approach to limiting waste management facilities to dealing only with wastes arising in the area to which the relevant Waste Management Plan applied.

6) *National Strategy on Biodegradable Waste - DoEHLG (2006)*

The '*National Strategy on Biodegradable Waste*' set out Government policy for the diversion of biodegradable municipal waste (BMW) from landfill, building upon the key objectives established in preceding policy documents. The primary focus of the policy therefore was tackling the challenge of meeting the limits set for the quantity of biodegradable municipal waste which is permitted to be sent to landfill under the EU Landfill Directive (1999/31/EC).

In order to meet the targets set out in the various Waste Management Plans, the '*National Strategy on Biodegradable Waste*' highlighted that a "*several-fold increase in recycling capacity and biological treatment capacity is required*" and that "*there is therefore an urgent need to procure the necessary alternative waste treatment capacity which will facilitate diversion of biodegradable municipal waste away from landfill*".

7) *International Review of Waste Management Policy (2009)*

An International Review of Waste Management Policy was commissioned by the DoEHLG in 2008 and published in 2009. Prepared by Eunomia Research and Consulting (and Partners) the objective of the study was to identify possible challenges to policy at a national level in order to assist Ireland to move towards a sustainable resource and waste policy; and examine the prevailing legal, institutional and organisational arrangements and analyse potential changes which could assist in achieving policy goals, as well as national and international obligations.

The report makes a number of significant recommendations and emphasises the importance of waste minimisation and prevention with only the smallest volumes of waste then requiring treatment and/or disposal. Ultimately it concludes that the impact of waste policies should increase recycling and composting / digestion at the expense of other forms of residual waste treatment.

8) *Towards a New National Waste Policy - DoECLG (2011)*

In August 2011, the current government published its own consultation document on waste management in Ireland entitled '*Toward a New National Waste Policy*'. This document is not intended to be prescriptive, but rather puts forward an outline of possible policy initiatives for consultation and takes on board submissions made to the previous Government's '*Draft Statement of Waste Policy*'.

'*Towards a New National Waste Policy*' was prepared in light of the transposition of the Waste Framework Directive (2008/98/EC) into Irish law in March 2011. The substantive changes in the Directive are aimed at encouraging the greater reuse and recycling of waste, whilst it also sets out

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<sup>3</sup> Section 2.2.7, Page 25, *National Strategy on Biodegradable Waste*, DoEHLG, 2006



to simplify the fragmented legal framework that has regulated the waste sector to date. The Directive also requires Member States to apply the waste hierarchy as a priority order in waste prevention and management legislation and policy.

According to *'Towards a New National Waste Policy'*, the development of a new waste policy is to be guided by a set of principles which, taken together with our obligations as an EU Member State, will inform how Ireland deals with its waste in the coming decade and beyond. One such principle is that *"the policy will be sufficiently flexible to respond to emerging developments in relation to technology, operational practice and wider thinking in the waste management policy realm"*. The document goes on to state that:

*Waste, just like many other sectors, has developed a range of technologies and practices in recent decades and will develop newer, more efficient and effective technologies and practices in the years ahead. The policy will allow for flexibility to take advantage of new thinking and advances once such approaches are proven<sup>4</sup>.*

9) *A Resource Opportunity – Waste Management Policy in Ireland (2012)*

The above-mentioned document was published by the Government (DECLG) in July 2012. In the context of the EU WFD this national policy document sets out the measures through which Ireland will make the further progress necessary to become a recycling society.

There are a number of guiding principles in this document (Section 1, Introduction), including that *"when waste is generated we must extract the maximum value from it by ensuring that it is reused, recycled or recovered, including by the appropriate treatment of mixed municipal waste or residual waste collected in our black bins"*.

The document notes that the waste projections set out in the EPA's National Waste Report 2010, which are based on the ESRI's sustainable development model for Ireland, *"anticipate that municipal waste arisings will increase by 825,000 tonnes (to 3.7m tonnes) within the next 15 years"*. The point is also made that:

*"While there may be sufficient management capacity in the immediate future, the predicted growth of municipal waste within the coming decade will necessitate investment in waste management infrastructure."*

This national policy document required the preparation of a regional waste management plan for each of the three waste regions. This was in recognition of the nature of the Irish waste market and the movement of waste across existing boundaries to avail of waste management infrastructure. This also reflects one of the key objectives of the waste management plans in respect of principles relating to proximity and self-sufficiency, and the need to ensure a sufficiency of waste management infrastructure within the State to manage municipal waste.

### **Summary of Government Waste Management Policy**

The brief review of Government waste management policy presented in the preceding section indicates a growing emphasis on the need to increase the re-use and recycling of waste streams and also divert waste away from landfill through the improving of Ireland's waste management system as a whole.

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<sup>4</sup> Section 3, Page 7, *Towards a New National Waste Policy*, DoECLG, 2011

This approach includes adopting a more flexible approach to the regional treatment of waste flows which must be seen in the national context of Ireland's commitments to meeting its waste management policy objectives. It also entails a growing emphasis on the need for greater sustainability as regards waste management, through the provision of better facilities in order to counteract unsustainable waste management practices, and to better facilitate recycling and repurposing endeavours.

The proposed development fully accords with the above-outlined government waste management policy approach, and would help enable the northern Kildare area to make a contribution towards helping Ireland meet its national waste policy management objectives. In this respect it would assist in Ireland becoming more aligned with the EU principles of self-sufficiency in waste management, and optimisation of proximity of waste management close to the source of generation. It would also comprise a needed contribution towards the requirement for recycling facilities, through the provision of segregated collection receptacles for easy separation and collection of the different waste streams.

## 4.2 SECTORIAL AGENCY ADVICE

The Environmental Protection Agency is responsible for the licensing and environmental enforcement of waste facilities in Ireland. In addition, it is also responsible for producing national statistics on waste generation and management in Ireland.

Forfás is Ireland's policy advisory board for enterprise, trade, science, technology and innovation, operating under the auspices of the Department of Enterprise, Trade and Employment. Since 2006, the organisation has prepared annual Waste Benchmarking Studies in order to assess Ireland's waste management performance.

Relevant documents, and a short synopsis of the provisions of these, from these organisations are outlined below:

### **National Waste Report 2012 - EPA (2014)**

The National Waste Report from the EPA has an objective to present the most up to date data available on waste generation and management (as reported to the EPA). The year 2012 is the most recent report available and addresses municipal solid wastes, waste streams subject to producer responsibility initiatives as well as construction & demolition and hazardous wastes.

Ireland met all of its EU obligations across a broad range of waste legislation in 2012. It was stated in the report that *'there was 2,692,537 tonnes of municipal waste generated in 2012 which is a 4.6% decrease than municipal waste generation in 2011. There was 2,478,337 tonnes of municipal waste managed in 2012 which is 2.7% lower than municipal waste managed in 2011. The treatment of hazardous waste in 2012 was similar to 2011 with 22% treated on-site at industry where it was generated, 30% sent off-site to a commercial hazardous waste facility for treatment and 48% exported for treatment'*.

### **Waste Management Benchmarking Updates - Forfás (2009 and 2010)**

In its role as Ireland's policy advisory board for enterprise and science, Forfás publishes regular reports on the state of the country's waste management infrastructure which is seen as having a key

role to play in the overall competitiveness of the national economy. Key findings set out in the previous two such reports state that:

- *Ireland continues to have a relatively high reliance on landfill for waste treatment and Irish companies continue to have a limited choice of waste treatment solutions compared to their competitors<sup>5</sup>*
- *Waste management infrastructure rollout in Ireland remains slow. A range of infrastructures necessary to meet Ireland's waste management requirements need to be accelerated including: thermal treatment capacity to recover energy from municipal and industrial waste; thermal treatment or landfill capacity for hazardous waste; biological treatment (composting, anaerobic digestion) and reprocessing capacity for recovered materials (e.g. paper, glass, plastic, metal recycled materials)<sup>6</sup>.*
- *Although still remaining high, Irish municipal waste generation per capita decreased in 2008 (most recent data available) in line with the slowdown in economic activity and increased waste prevention measures. Future volumes of municipal waste are expected to increase within the coming decade, necessitating investment in waste management infrastructure<sup>7</sup>.*

### 4.3 REGIONAL WASTE MANAGEMENT POLICY

The relevant regional waste plan associated with the proposed development is the Eastern - Midlands Region Waste Management Plan (EMRWM Plan). It provides a framework for the safe and sustainable management and prevention of waste. The Plan is a statutory document and was prepared by the local authorities of the region which included Louth, Offaly, Meath, Wicklow, Westmeath, South Dublin, Dublin City, Fingal, Dún Laoghaire, Kildare, Laois and Longford.

The preparation of the EMRWM Plan allowed for the local authorities to evaluate the existing waste management practices in the region. This process in turn allowed for the identification of measures which were succeeding and those which were not performing as well as anticipated. The outcome of the evaluation led to the formulation of new policies and measures for the improvement of waste prevention and management in the region.

The EMRWM Plan sets out policies for infrastructural development in the region which take the findings of market analysis into consideration. The policies are largely relevant and targeted at the lead authorities, local authorities and operators in the waste market. In summary, policies of significance to the proposed development at Celbridge are as follows:

- **Policy A3** *Contribute to the improvement of management performance across all waste streams through the implantation of policy actions and monitor progress towards national targets.*
- **Policy B1** *Local Authorities in the region will ensure that the resources required to implement waste prevention activities are available through the lifetime of this plan.*
- **Policy C2** *Optimise the value of recycled and residual waste resources in the system to turn these materials into reliable sources of secondary raw materials for reprocessing and recovery.*
- **Policy E3a** *The local authorities in the region will maintain and develop their existing networks of bring infrastructure (e.g. civic amenity facilities, bring banks) subject to*

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<sup>5</sup> Press Release, Waste Management Benchmarking Update, Forfás, 2009

<sup>6</sup> Page 2, Press Release for the Waste Management Benchmarking Update, Forfás, 2009

<sup>7</sup> Page 4, Waste Management Benchmarking Update, Forfás, 2010

*appropriate statutory approvals and in line with appropriate environmental protection criteria.*

Many of the policies set out within the EMRWM Plan have a direct association with the proposed development at Celbridge. This can be clearly seen in policies which address waste management performance and the provision of additional civic amenity facilities and recycling capacity, all of which are elements of the proposed development. The EMRWM Plan clearly states and outlines a number of policies and objectives which present an overall consensus that there is a valid requirement to expand and develop waste facilities.

## 5. PLANNING AND DEVELOPMENT POLICY

The following section of this report demonstrates that the proposed development fully complies with the requirements of relevant statutory Regional, County and Local Plans and Policies. The relevant plans considered include:

- Ireland 2040 – The National Planning Framework
- Regional Planning Guidelines for the Greater Dublin Area
- The Kildare County Development Plan 2017 – 2023
- Celbridge Local Area Plan (LAP)

### 5.1 IRELAND 2040 – THE NATIONAL PLANNING FRAMEWORK

The National Planning Framework (NPF) is the government's strategic planning document aimed at catering for an approximate additional one million people living in Ireland in the future. It therefore sets out the likely future change scenario, and the spatial pattern required to best accommodate and support the envisaged change. It will also strongly inform future strategic national investment, including in infrastructure. It is intended that the NPF will be supported by robust tiered regional and local level plans. As such, the NPF establishes the overall framework for lower-order plans and strategies.

Within this context the NPF reiterates the fact that "*waste planning in Ireland is primarily informed by national waste management policies and regional waste management plans*", and further highlights the fact that planning for waste treatment requirements to 2040 will require (*inter alia*):

- *RSEs and the core strategies of MASPs and city and county plans will support national and regional waste policy and efficient use of resources*; In addition to the above, and as regards waste infrastructure, the NPF identifies the need to improve sustainability in relation to waste management. It also outlines a *Hierarchy of Settlements and Related Infrastructure* element which identifies *Waste-recycled* as an environmental infrastructure associated with large towns, such as that of Celbridge.

In terms of the effective management of waste (page 122), a national policy objective is provided as follows:

*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. (National Policy Objective 56)*

#### **Project Response**

The proposed development represents an efficient use of existing local authority owned land situated within a strategic location to service the wider local area, and will assist in providing the necessary and required appropriate waste transfer and management facilities to facilitate waste recovery and recycling. The proposed Part 8 development proposal is considered to be in accordance with the provisions, aims and objectives of the NPF.

## 5.2 REGIONAL PLANNING GUIDELINES FOR THE GDA (2010-2022)

The Regional Planning Guidelines (RPGs) for the Greater Dublin Area 2010-2022 aim to direct the future growth of the Greater Dublin Area over the medium to long term and work to implement the strategic planning framework set out in the National Spatial Strategy (NSS) published in 2002.

Whilst the RPGs are still in place, it is noted that these will be superseded by the Regional Spatial and Economic Strategies (RSES) which will be formulated and published after publication of the new National Planning Framework (Ireland 2040). The RSES's will be prepared by the three new Regional Assemblies which have replaced the Regional Authorities. The spatial areas of the new Regional Assemblies also reflect the Regional Waste Management Plan areas. Notwithstanding the fact that the RPGs will be reviewed in the near future, it is considered that any subsequent policies or provisions in respect of waste will complement and/ or reflect existing sectoral and government policies as have been outlined further within this report.

The Greater Dublin Area (GDA) incorporates the geographical area of Dublin City, Fingal, Dún Laoghaire-Rathdown, South Dublin, Kildare, Meath and Wicklow. The Regional Planning Guidelines (RPGs) for this area set out a strategy for development in two main areas, namely the Metropolitan Area, and the Hinterland.

Of particular relevance to the consideration of the proposed development is Chapter 6 of the RPGs. This sets out the key physical infrastructure needs for the GDA, listing key areas of priority investment under the different types of infrastructure such as transport, water supply, waste water and surface water treatment, energy and communications, and waste management.

Section 6.7 highlights the fact that "*waste management infrastructure provision is an important part of the physical infrastructure investment needed in the GDA for population and economic growth*". Key strategic policies and recommendations for waste management are set out in Section 6.7.1, and include the following Strategic Policy which emphasises the need to provide a range of options for the treatment and final disposal of waste:

***PIP5:*** *To ensure, from environmental, business and public health needs, that waste management remains a priority for local authorities and waste management regions in continuing to invest in promoting and facilitating reuse and recycling by residential and commercial sources and that high standard options for treatment and final disposal of waste are available within the GDA.*

The following strategic recommendations from the same section of the RPGs are also particularly relevant in the consideration of the proposed development:

***PIR36*** *The new waste management strategy across the regions of the GDA should seek to facilitate a balanced use of resources and greater adaptability and robustness of services. Integrated waste management should be considered from the perspective of the GDA as one singular functioning economic and spatial unit and to increase economies of scale.*

***PIR38*** *Ensure that developments include adequate space for domestic recyclable waste storage both within and outside dwellings; and ensure that larger development proposals, masterplans and local area plans incorporate bring banks and recycling facility requirements to facilitate sustainable development and optimal rates of recycling.*

**PIR40** *Waste management facilities should be appropriately managed and monitored according to best practice to maximise efficiencies and to protect human health and the natural environment.*

**PIR41** *Plans and projects associated with waste management that have the potential to negatively impact on Natura 2000 sites will be subject to a Habitats Directive Assessment (HDA) according to Article 6 of the habitats directive and in accordance with best practice and guidance.*

### **Project Response**

It is clear from the policies highlighted above that the proposed development will assist in achieving the objectives set out in the RPGs, by providing additional options for the safe collection and transfer of separated waste streams in the north Kildare and wider area. It will thus assist in ensuring increased capability and capacity for recycling and the handling of different wastes. The proposal will also assist in addressing an identified need within the north Kildare area and Greater Dublin Area (GDA), in terms of the delivery of an efficient and effective waste management service, thereby assisting to facilitate strategic waste management services for the region.

## **5.3 DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE EASTERN AND MIDLAND REGION**

The Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly, went on Public Display on the 5th November 2018. The strategy identifies a number of elements including pressures and opportunities, and regional assets, and sets out appropriate policy through Regional Policy Objectives. It also provides a framework for investment in order to better manage economic development and spatial planning in the region. As previously indicated, this new strategy will supersede the existing RPGs upon adoption.

The draft strategy identifies a number of Regional Strategic Outcomes in order to achieve the National Strategic Outcomes (NSOs) set out in the National Planning Framework, one of which is the '*Sustainable Management of Water, **Waste** and other Environmental Resources*'.

A Dublin Metropolitan Area Strategic Plan (MASP) forms part of the draft RSES, which also identifies a number of 'Guiding Principles' for the sustainable development of the area. Enabling Infrastructure is indicated as a guiding principle, stating the need to '*Identify infrastructure capacity issues and ensure water / waste water needs are met by national projects and improve sustainability in terms of energy, **waste management** and resource efficiency and water, to include district heating and water conservation*'. The Celbridge area, where the proposed development is located, is situated within the RSES MASP boundary.

The RSES also provides a specific section on the topic of waste management in which it outlines its support for a move to a more circular economy in order to *save resources, increase resource efficiency, and help to reduce carbon emissions*. Waste management will play a large role in helping achieve this through the minimisation of waste and an increase in re-use and recycling. In addition to this, the strategy also outlines the following regional policy objective regarding waste management which is regarded as being applicable to this proposed Part 8 development:

- RPO 10.20: Development Plans shall identify how waste will be reduced, in line with the principles of the circular economy and how remaining quantum's 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.

### **Project Response**

This Part 8 development proposal fully adheres to the waste management policy set out in the Draft RSES for the Eastern and Midland Region as it provides for a waste management facility which further enables the separation of different waste streams and therefore increases recycling and reduces residual waste. Arising from this, the proposal thus also represents sustainable development and will also increase sustainability of waste management practices in the north Kildare area.

## **5.4 THE KILDARE COUNTY DEVELOPMENT PLAN (2017-2023)**

The Kildare County Development Plan 2017-2023 (the Plan) sets out Kildare County Council's policies and objectives for the development of the County over the Plan period. The Plan seeks to secure the development and improvement, in a sustainable manner, of the economic, environmental, cultural and social assets of the County.

One of the main mandatory objectives of the Planning Acts relevant to the adoption and review of Development Plans, is "*the provision of infrastructure including transport, energy and communication facilities, water supplies, **waste recovery and disposal facilities**, waste water facilities, and ancillary facilities*". This primary objective sets a basis for policies in respect of waste management within the plan, which support the consideration and development of appropriate waste management facilities within Kildare, and also support the proposed development.

The KCDP highlights the fact (Section 7.6.1) that the "*Eastern-Midlands Region Waste Management Plan 2015-2021 provides the framework for waste management within the region and sets out a range of policies and actions to meet specified mandatory and performance-based targets*". The EMRWMP recognises that managing waste in a sustainable and self-sufficient manner will be one of the key challenges for the region.

Chapter 7 (Infrastructure) identifies that fact that Kildare County Council has a statutory role in regulating waste management and in pollution control. Within this Chapter, section 7.6 (Environmental Services) sets out the Council's aim in respect of conforming "*to European, National and Regional policies in relation to the provision of **waste management** and to protect and enhance water, air and noise quality*". In this respect the Plan highlights that the waste management policies and objectives contained within the KCDP "*are reflective of the overarching EU, National and Regional policy and legislation*". The KCDP also states that the Council "*seeks to ensure the provision of the highest standards of waste management facilities...*", and notes that as the Development Plan is required to include objectives for waste recovery and disposal facilities, "*the objectives of the relevant waste management plan are deemed to be included in the Development Plan*<sup>8</sup>."

The following policies contained within Chapter 7 of the KCDP, support the need for the proposed waste transfer and civic amenity facility:

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<sup>8</sup> Section 7.6.1 of the KCDP



**WM 1** *Implement European Union, National and Regional waste related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.*

**WM 3** *Support the implementation of the Eastern-Midlands Region Waste Management Plan 2015-2021 by adhering to overarching performance targets, policies and policy action.*

**WM 4** *Support waste prevention through behavioural change activities that disassociate economic growth with resource use.*

**WM 5** *Provide, promote and facilitate high quality sustainable waste recovery and disposal infrastructure and technology in keeping with the EU waste hierarchy and to adequately cater for a growing residential population and business sector.*

**WM 7** *Secure appropriate provision for the sustainable management of waste within developments, including the provision of facilities for the storage, separation and collection of such waste.*

**WM 8** *Require the submission of either a certificate of exemption or a valid planning permission for a Waste Facility Permit or a Certificate of Registration application, in accordance with the Waste Management (Facility Permit and Registration) Regulations 2007 (as amended).*

**WM 9** *Provide each town, village or settlement, subject to the availability of finance with appropriate recycling facilities in the form of a kerbside collection, civic site and bring bank recycling facilities.*

**WM 10** *Encourage waste prevention, minimisation, reuse, recycling and recovery as methods of managing waste. Where waste management is not being carried out properly, the Waste Management Act 1996 (as amended), will be used as a means of ensuring specific national policies and regulations are adhered to.*

**WM 11** *Promote and facilitate communities to become involved in environmental awareness activities and community-based recycling initiatives or environmental management initiatives, which will lead to local sustainable waste management practices.*

**WM 12** *Ensure the provision of waste management facilities in County Kildare (either directly by the Council or in co-operation or partnership with other local authorities and the private sector) is subject to the specific requirements of the Eastern-Midlands Region Waste Management Plan 2015-2021.*

**WM 15** *Support and facilitate the separation of waste at source into organic and non organic streams or other waste management systems that divert waste from landfill and maximise the potential for each waste type to be reused and recycled or composted and divert organic waste from landfill, in accordance with the 'National Strategy on Biodegradable Waste 2006 and the Eastern – Midlands Region Waste Management Plan 2015-2021.*

**WM 17** *Facilitate the development of waste management infrastructure that is of an appropriate scale and is related to the needs of the county and the Eastern and Midlands Waste Region, subject to the protection of the environment, landscape character, road network and the amenities of the area.*

The Environmental Services Objective associated with the above policies is stated at:

**EN 2** *Facilitate the implementation of the Eastern Midlands Region Waste Management Plan 2015-2021.*

**EN 3** *Investigate the possibility of the provision of a recycling facility in the north of the county and to seek new markets for recycling in existing centres.*

**EN 10** *Promote and increase the amount of waste reused and recycled consistent with the Eastern Midlands Region Waste Management Plan and Waste Hierarchy and facilitate recycling of waste through adequate provision of facilities and good design in new developments.*

In accordance with guidance in respect of implementation of Directive 2014/52/EU, this Part 8 development proposal has also considered aspects relating to climate change. Chapter 8 of the Kildare County Development Plan highlights specific policies relating to 'Energy from Waste' and 'Energy Efficiency in Buildings'. Those policies considered appropriate to the subject development proposal are:

**EB1:** *Ensure that new development is designed to take account of the impacts of climate change, and that energy efficiency and renewable energy measures are incorporated in accordance with national building regulations, policy and guidance.*

#### **Project Response:**

The proposed development fully accords with the KCDP policies and objectives in that it would represent a significant step in ensuring that the County (and in fact the wider region) has adequate and highly accessible waste management infrastructure to facilitate future growth in the North Kildare and wider area. The proposed development is in accordance with EU, National, Regional and Local policies as it represents an increase in the sustainable management of waste through the separation of different waste streams which will allow for greater levels of recycling and also minimise residual waste. In terms of organic waste, the proposed Civic Amenity Centre includes the provision of a separate green waste area on the site which will enable waste of this nature to be transferred to an appropriate green waste facility off-site and appropriately diverted away from landfill.

With regard to climate change and energy efficiency, the site has been designed in accordance with SuDs through the inclusion of an underground stormwater attenuation tank system. The proposed SuDs system replicates the site Greenfield run-off rates ( $Q_{bar}$ ) and attenuates flows greater than  $Q_{bar}$ . This minimises the impact of this development on the drainage regime. The SUDS requirements allows for the provision of the following:

- Green roofs will be to the proposed Staff and Weigh Buildings and will typically comprise of a Bauder (or other equal) XF301 sedum blanket incorporating a Bauder SDF drainage mat below.
- The dedicated staff and visitor car parking areas to the front of the Staff Building will incorporate porous asphalt underlain with a coarse graded sub base with 30% voids and will be drained by slotted solid pipes. These areas will be drained to ground and the benefit of the existing ground infiltration will be achieved on the site with any overflow draining to the attenuated drainage system at a level approximately 50mm above porous base material thereby providing interception storage. The benefit of this infiltration has not been taken into account in the attenuation design and therefore the attenuation design is considered a robust design

Sustainability has been at the forefront of this project (see also Appendix 1: Design Rationale) at the planning design stage, and will continue through its construction and implementation. Sustainability objectives will be achieved through the implementation of the following:-

- Recycled Content - The specification of materials to be used in the construction of the project has included the use of recycled material such as the tyre retaining walls in the proposed Staff Building and the specification of Recycled Concrete Aggregate (RCA) in the Chargeable and Non-Chargeable external concrete yard slabs. The total content of recycled materials for use on the project is 20% of the proposed total material cost.
- Regional Materials - A minimum of 20% of the materials proposed for use on the project shall be extracted, harvested, recovered and manufactured within 500 miles of the proposed site. This will include materials such as steel reinforcement, cement, aggregate, timber, planting, etc.
- Certified Wood - A minimum of 95% of the timber proposed for use as a material on the project shall be certified in accordance with the Forest Stewardship Council's (FSC) principles and criteria for wood building components.
- Construction Waste Management Plan - The Contractor will implement a Construction Waste Management Plan that sees a minimum of 75% of the non-hazardous construction and demolition waste to be recycled or salvaged. This will be managed by the preparation of a site waste management plan which is to put in place to identify the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled.
- Construction Activity Pollution Prevention - The Contractor shall implement an Erosion and Sedimentation Control Plan for all construction activities on site which shall adhere to the 2003 EPA Construction General Permit which will prevent loss of soil during construction by storm water run-off/ wind erosion, including protecting topsoil by stockpiling for re-use, prevention of sedimentation of receiving storm water sewers, prevention of polluting the air with dust and particulate matter.

Landscaping features also form part of the site layout with further native species planting proposed in addition to existing site vegetation. In addition to the above, Each of the proposed buildings has been designed to comply with the requirements of Part L and its associated Technical Guidance, and include a combination of following in order to achieve the requisite 60% (less energy) improvement:-

- Building insulation (under floor, external walls and roof spaces)
- Glazing ratios and u-value of glazing/ facade
- Airtightness
- Solar shading
- Inclusion of renewables such as solar panels, photovoltaic panels and air to water heat pumps
- Energy efficient mechanical and electrical services

To illustrate the above in practical application terms, the proposed staff building on the site, for example, will be constructed using sustainable building methods including such features as green roofs, glass bottle wall features and retaining walls made from used tyres.

The proposed Part 8 development incorporates a variety of sustainable features into its design in addition to its proposed use. Taking account of this element of the proposal, certain green infrastructure policies outlined in the Kildare county development plan are considered to be relevant to the proposal, and are highlighted below:

- **GI 1** *Ensure the protection, enhancement and maintenance of Green Infrastructure and recognise the health benefits as well as the economic, social, environmental and physical value of green spaces through the integration of Green Infrastructure (GI) planning and development in the planning process.*

- **GI 9:** *Ensure proper provision is made for the consideration, protection and management of existing networks of woodlands, trees and hedgerows when undertaking, approving or authorising development.*
- **GI 10:** *Ensure a Tree Management Plan is provided to ensure that trees are adequately protected during development and incorporated into the design of new developments.*
- **GI 11:** *Ensure that hedgerow removal, to facilitate development, is kept to an absolute minimum and, where unavoidable, a requirement for mitigation planting will be required comprising a hedge of similar length and species composition to the original, established as close as is practicable to the original and where possible linking in to existing adjacent hedges. Native plants of a local provenance should be used for any such planting.*
- **GI 16:** *Encourage the planting of woodlands, trees and hedgerows as part of new developments using native plants of local provenance.*
- **GI 26:** *Ensure that the Green Infrastructure Strategy and Network is used to inform the development management process to ensure that new residential areas, business/ industrial development and other relevant projects contribute towards the protection, management and enhancement of the existing Green Infrastructure of the local area in terms of the design, layout and landscaping.*
- **GI 27:** *Require all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, green roofs, etc.) and provide links to the wider Green Infrastructure network as an essential part of the design process.*
- **GI 28:** *Restrict development that would fragment or prejudice the Green Infrastructure network.*
- **GI 29:** *Strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network.*
- **GI 30:** *Require multifunctional open space provision within all new developments; this includes provision for ecology and sustainable water management.*

**Project Response:**

The proposal has taken account of the existing vegetation/ green infrastructure on the site through the preparation of a landscape report and plan. The overall landscaping of the site will be enhanced through additional planting in order to strengthen the green infrastructure and screening aspects of the site. Vegetation that is needed to be removed will be replaced by native plant species. The landscape plan incorporates a variety of planting, in addition to existing vegetation on the site; including boundary hedging, open space shrubs, a woodland shrub mix, open space specimen trees and woodland trees. This will therefore strengthen the green infrastructure network in the area.

In addition to the above, and as stated in the previous 'Project Response', sustainability has been to the fore of the design proposal for the proposed development, and additional details on this are provided in Appendix 1 – Design Rationale. The staff building element of the proposed development is also designed in an environmentally sustainable manner through the use of green roofs, and the

reuse of materials including a proposed retaining wall made from used tyres and a proposed glass bottle feature wall.

Given the location of the proposed Part 8 development site adjacent to Regional (R449) and National (M4) roads, consideration is given to policy and development management standards regarding roads. With regard to building lines of proposed development – the County Development Plan outlines particular standards regarding development located along public roads, and states the following:

- (Section 17.7.2) - *Building Lines* - It is the policy of the Council where developments are permitted in rural areas along National, Regional and County Roads that they must conform to the minimum setbacks listed in Table 17.8. All measurements are taken from the nearest edge of road surface. Other building lines may be specified in recognition of local conditions. In situations where there is an established building line, new houses, where appropriate, shall conform to the established building line.
- *Building lines in developed areas will be determined having regard to the historic urban grain of the area and the need to provide pedestrian friendly streets with a sense of enclosure.*

Building Lines from Public Roads

Motorways	91m
National Primary	91m
National Secondary	91m
Regional Road	31m
Urban / County Road	18.5m
Distributor	18.5m

Figure 5.1 Table 17.8 of County Development Plan - Building Lines from Public Roads

**Project Response:**

The proposed Part 8 site is situated in a peri-urban although primarily rural part of the Celbridge area, and therefore the figures outlined in Table 17.8 of the County Development may be deemed applicable to that of the proposed Civic Amenity Centre. Notwithstanding this, the site of the proposed development is located within the Celbridge LAP boundary and is also zoned for 'Utilities/ Services'. The site is zoned to specifically accommodate the development of services, such as that of waste management which is a critical service in supporting the functioning of urban areas in the North Kildare area.

In addition to the location and zoning of the proposed development site, a Traffic and Transport Assessment (TTA) has also been carried out for the proposed development, which illustrates that the traffic network will operate within capacity when the proposed development becomes operational and that the impact of the proposed development is acceptable. The TTA also outlines a number of traffic management measures for both the construction and operational phases of the development (e.g. encouragement of employees and visitors of the proposed development to use other modes of travel other than private car).

In consideration of the points outlined above, the relatively small-scale of the proposed buildings on the site, and the accessible location of the site, it is considered that the proposed Civic Amenity and

waste transfer facility is suitably located and compliant with road safety policy highlighted with the Kildare County Development Plan.

Other development management standards set out in chapter 17 of the County Development Plan are also relevant to the proposed Part 8 development, including development standards which specifically relate to waste disposal, recovery and recycling facilities.

Section 17.10 of the development plan outlines criteria for Waste Recovery/Disposal Facilities development which are as follows:

- *Planning applications for waste related facilities will be assessed with regard to:*
  - *The sensitivity of the site: Facilities impacting upon Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), areas protected for landscape character, visual amenity, geology, heritage or cultural value, or areas at risk of flooding, will not be permitted.*
  - *Nature of Operation and Materials: The Council will consider the type, source and volume of waste material to be processed and its method of processing, including hours of operation and duration of permission sought.*
  - *Traffic and Transport: A Traffic and Transportation Assessment will be required to be submitted in most cases. All proposals shall indicate details of road access, sightlines / visibility, vehicle turning manoeuvres, parking areas, pull-in areas, the number and types of vehicles which will frequent the site, the carrying loads of vehicles, and haul routes.*
  - *Surface Water Drainage: A Sustainable Drainage system will be applied to proposed developments, and proposals shall have regard to the requirements of the EU Water Framework Directive and associated River Basin Management Plans.*
  - *Emissions: Details of potential noise, fumes, odours, dust, grit, vibration and lighting, along with controls and monitoring of same, will be required.*
  - *Landscaping and Restoration Proposals: Boundary treatments, screening proposals and remediation measures, including a timeframe for implementation, shall be required.*
  - *Impact on Residential Amenity: The Council will consider the proximity to residences and the impact on same (including through the considerations of traffic, emissions etc. outlined above).*
  - *Environmental Impact Assessment: Proposals shall be screened for the requirements of mandatory and sub-threshold Environmental Impact Assessment. An Environmental Impact Statement shall be submitted as required.*
  - *Appropriate Assessment: All developments will be screened for the need to undertake Appropriate Assessment. Development will not be permitted in the absence of screening, or a Stage 2 Appropriate Assessment if required.*

In addition to the above, Section 17.10.3 of the plan outlines standards relating to Bring Banks and Recycling Facilities, some of which are relevant to the proposed development, as follows:

- *Bring bank facilities should include receptacles for glass, cans and textiles and, where practicable, receptacles for paper, cardboard, plastics, batteries, light bulbs and certain waste oils.*

- *All applications for bring bank facilities will be assessed on a case by case basis having regard to the following:*
  - *Proximity to residential areas;*
  - *The provision of an area of at least 10m by 4m;*
  - *Truck access and clearance heights;*
  - *A hard-standing area and safe pedestrian walkway;*
  - *A vehicle set down area only with no permanent parking provision;*
  - *Suitable lighting and CCTV monitoring; and*
  - *Noise mitigation, screening and/or landscaping as considered necessary by the Council*

**Project Response:**

The AA screening demonstrates that there will be no likely significant adverse effects on the qualifying interests, special conservation interest or the Conservation Objectives of any designated European site. An EIA screening and AA screening have both been carried out for the proposed development, please refer to section 6.1 and 6.2 respectfully of this planning report for further detail.

The proposed development incorporates the separation of waste streams taken in on the site in the form of separate containers and designated areas across the 1.2Ha site. The different waste streams accommodated by the proposed development (further details of which are outlined in section 1.1) will be transferred off-site by a licenced waste operator to an appropriate licenced/ registered waste or recycling/ repurposing facility.

A Traffic and Transport Assessment (TTA) has been carried out for the proposed development and accompanies this Part 8 proposal. The TTA concludes that the traffic impact of the development is acceptable. The site will be accessed via a priority junction on the R449 (the R449 will be widened at the site access). Realignment will also occur to the pedestrian and cycle lanes on the north of the R449 in order to allow site access for pedestrians. There will be a number of vehicle set down areas adjacent to the waste storage areas. Parking on the site has also been provided which includes the provision of car parking spaces for staff and visitor purposes (e.g. education).

Sustainable Drainage systems have been incorporated into the design of the proposed development through means of a stormwater attenuation tank system. The surface water drainage network on the site will connect into the existing surface water infrastructure adjacent to the site. The design and management of the surface water drainage network will comply with the Greater Dublin Strategic Drainage Study (GSDSDS) and SuDS principles.

In terms of emissions, the operator of the facility will assess all sources of potential nuisance odours on-site and develop an odour management plan which shall detail measures to reduce the risk of nuisance odours from the proposed facility to fully comply with the requirements of the EPA Licence. Measures that are proposed as part of the development proposal in order to assist in reducing any emissions from skips, include self-compacting, self-contained enclosed sealed skips (see Figure 5.2 below) – with skips to the north-west of the site being covered by tarpaulins, whilst the others would be covered by integrated steel doors/ lids.

A landscaping plan and report has been prepared for the proposed development which outlines the landscape measures to be incorporated. There is existing screening to the north and south of the

site boundary. The landscape plan aims to introduce specimen tree/hedgerow planting in addition to existing tree & hedgerow screening along boundary lines in order to ensure long term screening of the proposed facility. The proposed development will not impact on residential amenity as the site is located a sufficient distance from residential areas (c. 0.5km), and is also screened by existing landscape features in the surrounding environs of the site (e.g. tree lines and hedgerows).

A Lighting Design and Assessment Report, and associated Lighting Levels and Lighting Spill Contour drawings (the calculations illustrate worst case scenarios based on a level calculation plane with no obstructions), has also been specifically undertaken and produced for the proposed development. One of the key criteria in relation to the lighting design proposal was to ensure a minimal effect to the M4 motorway, limiting light pollution as much as possible, and ensuring as little energy use as possible. As such the lighting design philosophy relates to the use of flat zero cut-off LED lanterns and a restriction on lighting column heights – i.e. 5m on the perimeters, and 8m on internal waste and truck access roadways. This strategy will ensure a more distributed low-level scheme with a high degree of uniformity and reduced shadows between set down spaces and loading points.

For security and safety purposes, heavy duty security gates and cctv will be provided at the entrance as a security measure. The scheme also provides ample scope for security lighting including the use of programmable part-night dimming function on all lanterns, although the security lighting arrangement has not been set out in the proposed design. A full-time attendant will also supervise the site.



**Figure 5.2 Example of the type of proposed Self- Compacting and Self-Contained Skips**

As demonstrated through the relevant extracts above, the proposed development is fully compliant with the provisions, objectives and policies of the Kildare County Development Plan (2017-2023). The framework policy, as highlighted above within the KCDP, and within which this subject proposal is made, is thus supportive of the proposed development. The principle of the proposed development is therefore acceptable.



## 5.5 THE CELBRIDGE LOCAL AREA PLAN (2017-2023)

In addition to the County Development Plan, the policies and objectives outlined in the Celbridge Local Area Plan (LAP) are also applicable to the proposed development, as the subject site lies within the LAP boundary.

Section 9.5 of the plan outlines the topic of Solid Waste and provides policies and objectives for the sustainable management of waste in the area. The plan identifies that Kildare County Council currently operates two civic amenity sites (recycling centres) located at Athy and Silliot Hill.

The subject site is currently identified for the provision of a recycling centre to serve North Kildare within the Celbridge LAP due to its central location within the settlement cluster of Celbridge, Leixlip, Maynooth and Kilcock.

The LAP also highlights that the Kildare Local Economic and Community Plan 2016 – 2021 identifies that county Kildare has *the fourth lowest number of civic amenity centres/bring banks in the country, therefore there is a need for continued investment in solid waste collection facilities.*

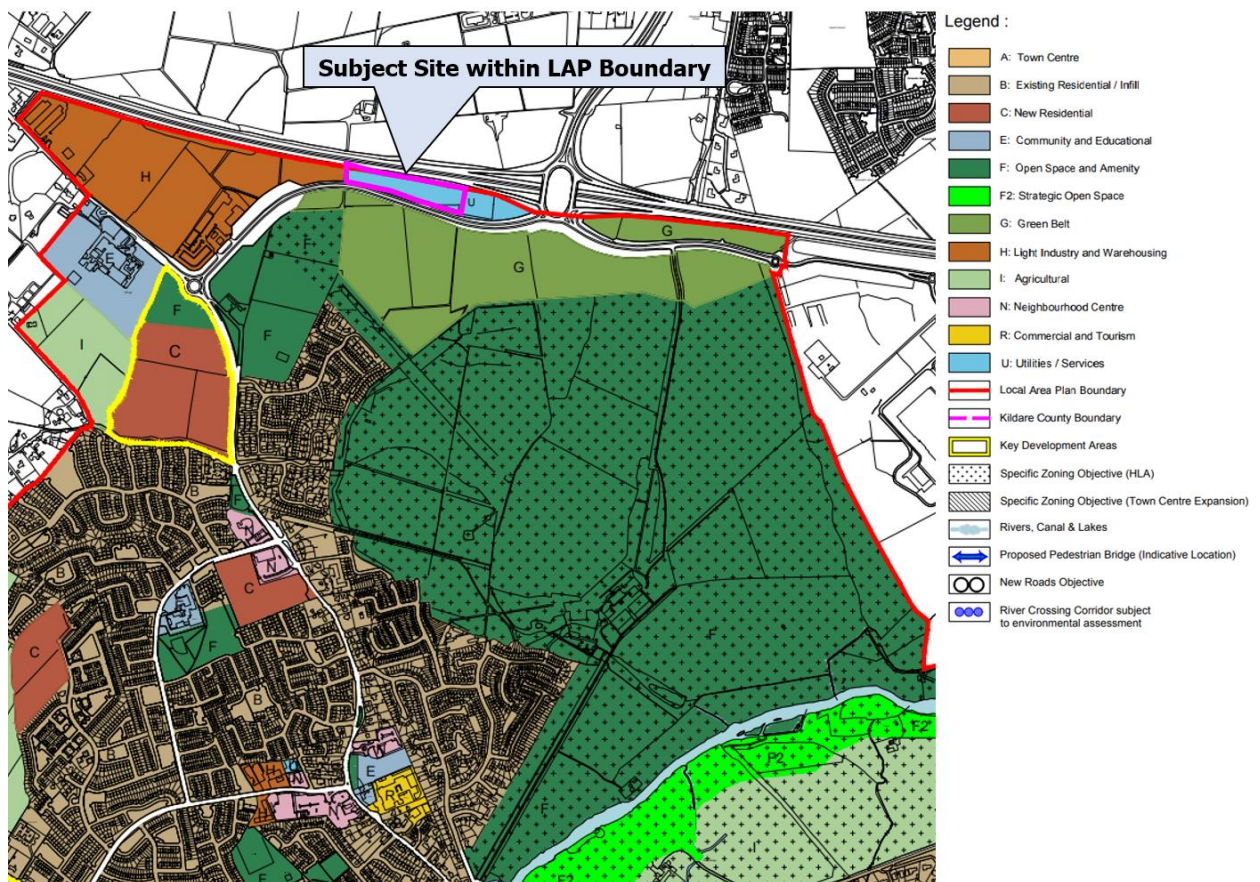
Policies and objects which are relevant to the proposed development are also set out in section 9.5, these include:

- **INFO4.1** *To adequately maintain recycling facilities and to secure the provision of additional facilities, as required, including in conjunction with new development.*
- **INFO4.2** *To provide a civic amenity site (recycling centre) in Celbridge on lands located south of the M4 Motorway and north of the R449 Regional Route to the west of Exit 6.*

### **Project Response:**

The proposed Part 8 Development will provide an additional recycling facility in Celbridge to serve the north Kildare area, and will contribute towards providing the necessary services capacity to accommodate the continued sustainable growth of settlements in north Kildare.

With regards to zoning, the subject site is zoned for 'Utilities and Services' (as illustrated below in Figure 5.2), which has a land-use zoning objective '*To provide for and improve public utilities*'.



**Figure 5.3 Land Use Zoning of Subject Site**

(Source: Celbridge LAP 2017-2023)

According to the zoning matrix within the LAP, 'Utility Structures' are permitted in principle on lands zoned for Utilities and Services. The proposed development is regarded as comprising such utility structure/ services provision in the form of a waste transfer and civic amenity facility. In addition to the zoning, the location of the site is also suitable from an adjacent land uses perspective, as the proposed development does not conflict with the surrounding land uses within the vicinity of the site (i.e. 'Light Industry and Warehousing' and 'Green Belt').

## 5.6 OVERALL COMPLIANCE WITH PLANNING POLICY

A review of the spatial and policy context highlights the fact that the proposed development further contributes to the environmental protection of Kildare. The proposal is also seen to comply with policies set out in the county development plan, which are supportive of such waste infrastructure development and provision.

In conclusion, it can be seen that the proposed development, which essentially provides for a waste transfer and civic amenity and associated works, fully accords with the overall development principles set out in the relevant planning policy documents.

## **6. ENVIRONMENTAL CONSIDERATIONS**

### **6.1 EIA SCREENING**

An Environmental Impact Assessment (EIA) screening report has been prepared for the proposed development, and accompanies the Part 8 application documentation.

The screening report finds that the proposed development is well below the relevant thresholds outlined within Schedule 5 of the Planning and Development Regulations, 2001 (as amended), and is unlikely to cause significant environmental effects with reference to Schedule 7 (Planning and Development Regulations 2001, as amended). It is concluded that there is no requirement for an Environmental Impact Assessment to be carried out for the proposed civic amenity centre, and there is thus no requirement for an Environmental Impact Assessment Report to be prepared.

### **6.2 AA SCREENING**

A Stage 1 Screening for AA of the proposed development has also been carried out. The AA Screening Statement accompanies the Part 8 development proposal.

The AA screening process has considered potential effects which may arise during the construction and operational phases as a result of the implementation of the project. Through an assessment of the pathways for effects and an evaluation of the project characteristics, taking account of the processes involved and the distance of separation from European sites, it has been evaluated that there are no likely significant adverse effects on the qualifying interests, special conservation interest or the Conservation Objectives of any designated European site; alone or in combination with any other project.

## **7. OTHER CONSIDERATIONS**

A number of other short reports accompany the Part 8 development proposal application. In addition to those already mentioned (AA and EIA Screening), these include reports relating to Traffic, Landscaping, Architectural Design, and an Engineering Design Report which outlines the infrastructural aspects of proposed development works.

### **7.1 TRAFFIC & TRANSPORT ASSESSMENT**

The Traffic and Transport Assessment (TTA) which comprises part of this Part 8 supporting documentation, examines the traffic and transport impact of the proposed development and also the access to the local area road network. The TTA calculates the net change in traffic on the network due to the additional traffic and investigates its influence on the local road network.

Through its modelling and assessments, the TTA demonstrates that the proposed development is compliant with relevant national, county and local transport policies.

From a review of the existing network conditions in the vicinity of the proposed development, along with the site access provisions provided as part of the proposed development, the TTA concludes that the impact of the development on traffic is acceptable. The TTA also confirms that there is sufficient capacity in surrounding junctions to accommodate the proposed Part 8 development.

The TTA also outlines mobility management measures for the proposed development when operational; and traffic management measures are identified for the construction phase of the project.

### **7.2 ENGINEERING DESIGN REPORT**

This report details the proposed development works in respect of the following:-

- Surface Water Drainage,
- Foul Water Drainage,
- Water Supply, and
- Roads Infrastructure

The report also details considerations relating to flood risk and the subject proposal site, and concludes that there is no risk from Fluvial Flooding based on the available OPW & CFRAMS data, nor is there any risk from Pluvial Flooding.

### **7.3 LANDSCAPE THEORY REPORT**

This report provides a proposed landscape detail which will ensure adequate screening of the proposed facility and will also introduce an aspect of 'greenness' to the proposed development. This will be achieved through additional boundary planting consisting of boundary hedging (i.e. laurel) and open space specimen trees. Woodland trees and a woodland shrub mix will also be planted adjacent to the boundary of the site.

The interior landscape of the facility will also be softened through the addition of open lawns, open space shrubs and partition hedging. The report is also accompanied by a landscape plan which details existing and proposed landscape features, and planting schedule.

## 8. PLANNING ASSESSMENT AND OVERALL CONCLUSION

An EIA screening has been carried out in relation to the proposed Part 8 Development which concludes that an EIAR will not be required for the proposed development.

A Traffic and Transport Assessment (TTA) has also been undertaken and concludes that the proposed development is not predicted to have a detrimental impact on the road network.

A Landscape Report (and Plan) has also been prepared for the proposed development. This demonstrates that existing landscape features on the site, together with the proposed landscaping scheme, will be successful in establishing a landscape screening to counteract any potential visual impacts of the development, whilst providing valuable resources which benefit biodiversity.

In conclusion, it can be seen that the proposed development is in accordance with strategic planning and policy considerations, and the waste management principles set out in the relevant plans, strategy and guidance documents, in that it will:

- Address the current deficit in waste management facilities. The proposed development is therefore of strategic environmental and social importance to the north Kildare area and the region in which it is situate;
- Support the waste treatment scenario adopted in the Eastern – Midlands Region Waste Management Plan which seeks to increase the capacity capabilities of waste management facilities in order for the sustainable recovery of various;
- Help to achieve the objectives set out in the RPGs by providing additional options for the treatment of waste in the region;
- Play an important role in addressing infrastructural requirements highlighted in the NPF by ensuring the provision of more efficient, effective and cost-effective waste management infrastructure in the Kildare and Greater Dublin Area;
- Support EU, national and regional waste policy objectives through its contribution to recycling;
- Contribute to the national effort to meet targets set out in Government Waste Management Policy aimed at increasing sustainability within the waste disposal/ management sector in Ireland;
- Provide a key physical infrastructure to support continued population and economic growth whilst managing waste arising in the state in a sustainable and self-sufficient way, as favoured by sectoral policy; and,
- Provide an appropriately sized waste management facility at a suitable location which is positioned to take advantage of the inter-regional economies of scale required to ensure the most efficient treatment and disposal of waste.

Finally, it can be seen that the proposed development has been designed and sited in a highly accessible area adjacent to the R449 and between the existing towns of Celbridge, Maynooth and Leixlip.

# APPENDIX 1      CIVIC AMENITY DESIGN RATIONALE

## **Celbridge Civic Amenity Centre- Design Rationale**

The design proposal creates three buildings to serve the site. Each relates to each other in form while each had a separate function. An influencing factor in the design was the fact that the site will be a recycling facility and the buildings should have the highest green credentials and energy efficiency.

A green/grass roof was chosen as the best way to integrate a distinct form and meet the need for energy efficient buildings. Green roofs have several advantages over traditional roofs. Shading the outer surface of the building envelope has been shown to be more effective than internal insulation.

- In summer, the green roof protects the building from direct solar heat.
- In winter, the green roof minimizes heat loss through added insulation on the roof.
- Energy conservation translates into fewer greenhouse gas emissions.

A further advantage is that traditional buildings do not promote habitats. With the green roof proposal each building's roof is its own habitat.

### **Proposed staff building & educational facility**

The main building on the site and will also have a role in education. As such, the building needs to demonstrate to visitors that design can utilise green philosophies. The work spaces are orientated to the south to maximise sunlight and solar gain, while shading devices prevent overheating in the summer and prevents glare. The green roof provides high levels of insulation. Recycled tyres rammed with earth will provide additional insulation under the sloped section of the green roof. A feature glass bottle wall is proposed for the entrance lobby. Rainwater can be collected in an attic storage tank and used as a grey water supply for the staff toilets. The choice of external materials will be renewable and recyclable, examples include timber cladding and rubble stone walls. Careful landscaping design will integrate the building into the site.

### **Proposed pay station**

The pay station is subservient to the main administrative but relates to it in form. It controls public access to the recycling facility. As it acts as a gateway the design intent was to emphasise this gateway with a covered canopy. As with the staff and educational building, the same criteria for green design was applied.

### **Proposed weigh station**

The weigh station is located to the rear of the staff building and controls access and egress for trucks. Staff can easily access it from the main staff building.

## APPENDIX 2 DRAWING SCHEDULE

<b>DONNACHADH O'BRIEN &amp; ASSOCIATES CONSULTING ENGINEERS CIVIL INFRASTRUCTURE DRAWINGS</b>				
CIVAMY	DOB	C	0001	SITE LOCATION PLAN
CIVAMY	DOB	C	0010	SITE PLAN - EXISTING
CIVAMY	DOB	C	0015	SITE PLAN - PROPOSED WORKS
CIVAMY	POA	A	0016	PROPOSED STAFF BUILDING
CIVAMY	POA	A	0017	PROPOSED PAY STATION BUILDING
CIVAMY	DOB	C	0018	PROPOSED HOUSEHOLD HAZARDOUS WASTE BUILDING
CIVAMY	POA	A	0019	PROPOSED WEIGHBRIDGE BUILDING
CIVAMY	DOB	C	0020	PROPOSED SURFACE WATER DRAINAGE LAYOUT
CIVAMY	DOB	C	0030	PROPOSED FOUL DRAINAGE LAYOUT
CIVAMY	DOB	C	0040	PROPOSED WATERMAIN LAYOUT
CIVAMY	DOB	C	0050	PROPOSED SITE LAYOUT SHEET 1 OF 2
CIVAMY	DOB	C	0051	PROPOSED SITE LAYOUT SHEET 2 OF 2
CIVAMY	DOB	C	0060	PROPOSED ROAD MARKINGS SHEET 1 OF 2
CIVAMY	DOB	C	0061	PROPOSED ROAD MARKINGS SHEET 2 OF 2
CIVAMY	DOB	C	0070	PROPOSED AUTOTRACK ACCESS - SHEET 1
CIVAMY	DOB	C	0071	PROPOSED AUTOTRACK ACCESS - SHEET 2
CIVAMY	DOB	C	0080	PROPOSED EXIT SIGHTLINES
CIVAMY	DOB	C	0090	PROPOSED TREATMENT PLANT LAYOUT & DETAILS
CIVAMY	DOB	C	0100	PROPOSED TYPICAL DRAINAGE AND MANHOLE DETAILS
CIVAMY	DOB	C	0110	PROPOSED ATTENUATION TANK DETAILS
CIVAMY	DOB	C	0120	PROPOSED TYPICAL SITEWORKS DETAILS
CIVAMY	DOB	C	0121	PROPOSED SITE BOUNDARY & ENTRANCE GATE DETAILS
CIVAMY	DOB	C	0130	TYPICAL WATERMAIN DETAILS (1-OF-3)
CIVAMY	DOB	C	0131	TYPICAL WATERMAIN DETAILS (2-OF-3)
CIVAMY	DOB	C	0132	TYPICAL WATERMAIN DETAILS (3-OF-3)
CIVAMY	DOB	C	0140	PROPOSED ROAD LONG SECTIONS WITH SW & FW DRAINAGE (1-OF-2)
CIVAMY	DOB	C	0141	PROPOSED ROAD LONG SECTIONS WITH SW & FW DRAINAGE (2-OF-2)
CIVAMY	DOB	C	0150	PROPOSED SITE SECTIONS
<b>PAUL OSBORNE ARCHITECTS DRAWINGS</b>				
CIVAMY	POA	A	0016	PROPOSED STAFF BUILDING
CIVAMY	POA	A	0017	PROPOSED PAY STATION BUILDING
CIVAMY	POA	A	0019	PROPOSED WEIGHBRIDGE BUILDING
<b>ANTHONY JOHNS LANDSCAPE ARCHITECTURE DRAWINGS</b>				
CIVAMY	AJL	X	0019	PROPOSED LANDSCAPE MASTERPLAN
<b>LUMEX LIGHTING TECHNOLOGY PUBLIC LIGHTING DRAWINGS</b>				
GIVAMY	LMX	X	4A00695	PROPOSED LIGHTING LAYOUT – LIGHTING LEVELS & SPILL CONTOURS
GIVAMY	LMX	X	4A00697	PROPOSED LIGHTING LAYOUT – LIGHTING LEVELS & SPILL CONTOURS INCLUDING CONFLICT AREA