

Senior Executive Officer  
Forward Planning Section  
Land Use Planning and Transportation Department  
County Hall  
Tallaght  
Dublin 24

Tuesday, 26<sup>th</sup> April 2022  
[Via Consultation Portal]

Dear Sir/Madam,

**RE: SUBMISSION TO PROPOSED MATERIAL ALTERATIONS TO DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN WITH RESPECT TO MATERIAL AMENDMENT NO: 2.4**

## **1.0 INTRODUCTION**

Beuparc Utilities Holdings Ltd.<sup>1</sup> (Beuparc) has retained Tom Phillips + Associates<sup>2</sup> ("TPA") to make this submission in respect of the *Proposed Material Alterations to the Draft South Dublin County Development Plan (SDCDP)*, as published on the 29<sup>th</sup> March 2022 for a period up to the 26<sup>th</sup> April 2022.

## **1.1 BEAUPARC PROFILE**

Founded in Beuparc, Co Meath, in 1990, Beuparc has greatly expanded and diversified over the last 30 years and now employs over 2,300 employees. Beuparc Utilities Holdings Ltd's first primary business consisted of the Panda division. Over the intervening years, Panda expanded from a local recycling service into Ireland's leading commercial and domestic waste management company. Positioning itself as one of Ireland's leading suppliers of renewable energy, Panda Power provides homes and businesses with energy derived from 100% renewable resources. In 2016, Beuparc acquired Ireland's second large waste company, Greenstar. Greenstar now processes over 530,000 tonnes of waste every year.

In 2017, Beuparc further enhanced its position in the green energy industry with the acquisition of Bioverda. Operating at over twenty landfill sites across Ireland, Bioverda generates electricity through the extraction of methane gas through landfill.

Beuparc has active interest and investment in a number of land holdings within the South Dublin Council area, including lands within Ballymount Industrial Estate which is included

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within the City Edge Project and zoned 'Regeneration' as part of the Draft South Dublin Development Plan 2022-2028.

## 1.2 KEY ISSUES RAISED AND CONSIDERATIONS TO BE MADE

Beauparc (owner of Greenstar & Panda Waste) wish to raise the following key issues which should be considered in the proposed Material Alterations (MA) to the draft *South Dublin County Development Plan 2022-2022*, particularly MA 2.4.

1. Ballymount industrial estate, currently accommodates c.1 million tonnes of waste processing infrastructure is being flagged for redevelopment through the City Edge project (and subsequent REGEN zoning), with no clear plan as to where this essential waste processing infrastructure should go.
2. The undermining of existing waste operations through the zoning of Ballymount as "regen", with lack of direction for existing businesses within the area, threatens the ability of the state to service the waste management needs of Dublin city and the wider Eastern region.
3. There is currently a very significant shortfall in national waste processing capacity in Ireland.
4. National and European legislation and policy is demanding a growth in waste processing capacity to meet the needs of the circular economy and greenhouse gas targets.
5. The trend in residual municipal solid waste processing has been steadily increasing over the years 2018, 2019 and 2021, in line with growing population and economic activity. While some additional waste disposal capacity has been provided in planning in 2021, processing capacity constraints are now a significant issue.
6. Existing waste processing capacity is also being consumed through the export of waste. As more material is exported, more processing is required in order to meet the waste to energy acceptance criteria and ensure environmental compliance in Ireland and the destination country.

With regard to these key issues identified, we identify the below considerations that should be taken into account by the Council in the adopting the proposed material alterations.

1. The issue of relocation is greatly complicated by the carbon emissions associated with the transport of waste. Therefore, it is essential that waste processing capacity is located as close to population centres as possible. Ballymount, due to its proximity to the city and the M50 makes it an ideal location for waste infrastructure.
2. Existing land use must be urgently considered by SDCC in creating a vision for the Ballymount area. Currently, Ballymount is home to approximately 1,000,000 tonnes of waste processing infrastructure, all of which is essential to the provision of essential waste management services to Dublin city and its population.



3. A Relocation Strategy is required to be prepared to facilitate and assist existing land uses, including those crucial to the waste industry, in finding alternative zoned and serviced locations within and surrounding SDCC.

Some of the key site requirements in the examination of alternative sites for Waste Processing, which should be included in a future strategy, are:

- Appropriately zoned land close to population centres;
- Availability of up to 5MV of electrical supply;
- Connection to mains water supply with a supply of 1-2m<sup>3</sup>/hr;
- Sufficiently sized site to accommodate a sorting and processing plant; and
- Excellent logistical links, within Dublin City, which is the centre of origin for the majority of waste to be processed.

## **2.0 WASTE PROCESSING NEEDS AND POLICY REQUIREMENTS**

The following current waste processing needs, and policy requirements set out within this Section 2.0 are identified to provide the planning policy context to the proposed revisions to MA 2.4.

### **2.1 Current Waste Processing Requirements and Market Need**

There is currently a shortfall in national waste management capacity, to the extent that a Section 56 notice, under the Waste Management Act, had to be issued by Fingal County Council and the EPA to provide emergency waste capacity in late 2021. Many of the issues that led to the shortfall in 2021 remain relevant in 2022.

The trend in residual municipal solid waste processing has been steadily increasing over the years 2018, 2019 and 2021, in line with growing population and economic activity. While some additional waste disposal capacity has been provided in planning in 2021, processing capacity constraints are now a significant issue. This is primarily because the majority of municipal waste is processed prior to disposal. Prior to this it was disposed of without processing. This processing includes the bio-stabilisation of organic materials, composting, recyclate extraction, SRF production etc. All largely conducted to achieve higher recycling rates and recover more resources.

As a large waste business involved in collection, composting, recycling, recovery and disposal, Bauparc have been extremely active in the provision of additional capacity in processing, recovery, and disposal, as is evidenced by the fact that the company had several planning applications in the planning system in 2021. However, Bauparc has identified that the provision of adequate capacity, within the constraints of the existing planning and licensing regime, is extremely challenging and is becoming more difficult over time. Put simply, the regulatory systems do not allow an operator to adjust to meet the demands of a changing market, growing population, and growing economy. In this regard, it is important to note that the needs of the circular economy will require additional waste processing capacity, not less.

The Waste Management Planning Regional Co-ordinators in their Q4 2021 report documented that there were 1.8 million tonnes of residual municipal solid waste processed in 2021 and predict a waste management capacity deficit of up to 30,000 tonnes in 2022. Our client's



estimates are that this deficit will grow to well above 50,000 tonnes in 2022 due to enhanced economic activity and increased inward migration of refugees from the Ukraine.

### Market Need

Until a circular economy is fully embraced, there will continue to be a clear direct link between population growth/economic growth and waste arisings. According to a December 2021 OECD Economic Forecast, Ireland experienced a 15.2% growth in economic activity. In the same report the OECD predict that economic growth in 2022 will be 5.7%. This economic growth is occurring as Ireland's population continues to expand. CSO figures, published in 2021, show the population is currently at 5.01 million people and growing as a result of net migration and a stable birth rate. Even before the needs of the circular economy are factored in, it is clear that a growing population, in combination with growing economic activity needs additional waste capacity, for processing, recovery, recycling and disposal.

## 2.2 National Policy Support

The need to provide adequate resource recovery and processing facilities is accelerated by the recent publication of *A Waste Action Plan for a Circular Economy - Ireland's National Waste Policy 2020-2025*. This forward-looking document seeks to shift the focus from waste disposal and a linear economy to a circular economy where materials and products remain in productive use for longer. The document provides several key policy directions including: -

- Incorporating municipal waste recycling targets as conditions of waste collection permits (i.e. collectors will be required to achieve a 55% recycling rate of municipal waste by 2025, 60% by 2030 and 65% by 2035).
- The establishment of a national Deposit and Return Scheme (DRS) for plastic bottles and aluminium cans.
- The identification of 7 key product value chains including plastics and packaging.
- The banning of single use plastics in a range of applications.
- Making all packaging reusable or recyclable by 2030.

In summary, it is vital that each Local Authority area provide sufficient and serviced zoned land for the provision of waste processing facilities. The zoning of large areas of suitable land within Ballymount Industrial Estate for REGEN, and clearly directing the waste industry away from this well located, well service land without a clear relocation strategy has the potential to directly impact on the ability of the waste industry to achieve the key policy direction as set out above.

As such we request that SDCC include within its *Objective CS2*, as revised by MA2.4, a clear direction to undertake the necessary strategic work so that existing waste industry land uses within the boundary of the City Edge project are provided with sufficient options to relocate their businesses and vital services required to fulfil numerous policy objectives relating to the circular economy.



### 3.0 PROPOSED MATERIAL ALTERATIONS TO THE PUBLISHED MATERIAL AMENDMENTS

#### 3.1 Proposed Material Alteration 2.4

Our client welcomes the Material Alterations to the Draft SDCDP issued which amends Policy/Objective CS2 Objective 1 under Section 2.6.1 of the Land Capacity Study from:

*"CS2 Objective 1:*

*To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands at Naas Road/Ballymount to include the Local Centre zoning (LC) at Walkinstown. The LAP or equivalent will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework until such time as a Statutory Plan is in place."*

To read:

*"CS2 Objective 1:*

*To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road/Ballymount ~~to include the Local Centre zoning (LC) at Walkinstown as defined by the City Edge Project boundary.~~ The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the ~~Naas Road City Edge Strategic Framework~~ until such time as a Statutory Plan is in place.*

*Note: All references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework."*

#### Proposal:

Having set out the challenges facing the waste industry and the importance of ensuring that a sufficient quantum of well located, serviced, zoned land is provided in order to achieve the key policy objectives of *Ireland's National Waste Policy*, it is vital that South Dublin County Council recognise and actively engage with the Waste Industry on relocation options for waste processing facilities within the proposed Regeneration area. As such it is submitted that MA 2.4 be revised to include in its objective that the Council will actively pursue a relocation strategy with existing waste processing facilities located within the identified City Edge lands

#### **Proposed wording (See our suggested revision to MA 2.4 in purple):**

*'CS2 Objective 1:*

*To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road/Ballymount ~~to include the Local Centre zoning (LC) at Walkinstown as defined by the City Edge Project boundary.~~ The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable*



*transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the ~~Naas Road~~ City Edge Strategic Framework until such time as a Statutory Plan is in place. A relocation strategy is also to be prepared to facilitate and assist in identifying alternative zoned and serviced locations within and surrounding SDCC, particularly with respect to Waste Processing facilities.*

*Note: All references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework."*

#### 4.0 PROPOSED MATERIAL ALTERATIONS

It is respectfully requested that the above suggested revision to Material Alteration No. 2.4 and the key issues raised, as proposed by Beuparc Utilities Holdings Ltd., are duly considered by the Council in making the *South Dublin County Development Plan 2022-2028*.

Yours sincerely,

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**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**