

## ENVIRONMENTAL HEALTH - PLANNING MEMO

**Date:** 7<sup>th</sup> of April 2022

**Register Reference:** SD21A/0167

**Development:** Construction of a gas fired power plant with an electrical output of up to 125MW with associated balance of plant, equipment and buildings including; an Engine Hall building with a height of 18.9m, comprising 6 gas engines and ancillary infrastructure; an Electrical Annex Building with a height of 18.7m; a Workshop building with a height of 5.1m; a Tank Farm building with a height of 5.68m; a Security hut with a height of 3.27m; an Exhaust Stack with a height of 31.8m; a Gas AGI including a kiosk with height of 3.3m; Radiator Coolers with a height of 8.46m; 2 electrical transformers with a height of 4.98m; Tanks including 2 x Diesel Oil Storage Tanks (volume of 2500m<sup>3</sup> combined); SCR Urea Tank (26m<sup>3</sup>); Lube Oil Storage Tank (26m<sup>3</sup>); Lube Oil Maintenance Tank (26m<sup>3</sup>); Pilot Oil Tank (26m<sup>3</sup>); Fire Water Storage Tank (1000m<sup>3</sup>); Effluent Collecting Tank (26m<sup>3</sup>); Underground Surface Water Attenuation Tank (490m<sup>3</sup>); 2 new access onto the existing private road network with Profile Park; 12 parking spaces, footpaths, landscaping; fencing and all other associated site development plant and equipment and other works including surface water and foul wastewater drainage.

**Location:** Profile Park, Baldonnel, Dublin 22

**Applicant:** Shane Minehane, Greener Ideas Limited

**App. Type:** Permission

**Planning Officer:** SARAH WATSON

**EHO:** Kieran Groarke

### Comments

The Environmental Health Department reviewed the initial application and expressed concerns with regard to operational noise.

The initial acoustic assessment undertaken highlighted a proposed increase in the existing background noise across a total of 6 of the receivers with respect to the long-term operational noise.

The amended acoustic report is noted under Appendix 6 the further information submission document completed. The acoustic report completed by AWN, dated the 27<sup>th</sup> of November 2021 does not address the issues raised in the request for further information by Environmental health.

Table 12-7 of the report indicates there are still increases in background noise levels across 6 of the receivers. The increase at receiver R14 is predicted to be 3dB during the night time period. It should also be noted that receiver R14 represents a row of dormer bungalows along nangor road and as a result there is potential for disturbance to occur to multiple residents.

Whilst the increase of 3dB is referred to as “slight” within the report, an increase of 3dB is regarded as being a notable increase. These exceedances do not comply with Councils standard criteria which states that noise *shall not exceed the background level for evening and night time.*

Under section 8.0 of the submission by Tobin Consulting Engineers, revision D02, dated the 9<sup>th</sup> of December 2021 the report acknowledges these predicted increases to locations R01 and R14. The report continues to reference to EPA draft “guidelines on the information to be contained in Environmental Impact Assessment Reports”. Whilst it is noted the plant will be subject to an Industrial Emissions License it is the role of the Local Authority to ensure that a development will not give rise to long term noise impact on the existing receivers.

It is noted that profile park is the subject of other planning developments of similar nature. It is therefore important to ensure that incremental noise increases to the background noise level do not occur as this can lead to “background creep” occurring.

*The term “Background creep” refers to the process by which noise levels progressively become higher over time. This can occur in quite areas that have been developed for industrial use whereby there is a slow progression of development in the area which leads to an accumulation of noise sources.*

The Environmental Health Department have included an acoustic verification condition requiring the applicant to demonstrate that the development can meet the South Dublin County Council’s standard criteria. This will provide the applicant with a further opportunity to address Environmental Health concerns.

The proposal is **acceptable** to Environmental Health subject to the following conditions:

1. Noise due to the normal operation of the proposed development, expressed as Laeq over 15 minutes at the façade of a noise sensitive location, shall not exceed the daytime background level by more than 10 dB(A) and shall not exceed the background level for evening and night time. Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level.
2. During the construction / demolition phase of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances.

3. Prior to commencement of the development the applicant is required to submit an Acoustic Verification report to the Environmental Health Department of South Dublin County Council. The report must confirm whether the development is capable of complying with Council's standard operational noise criteria, set out below:

*Noise due to the normal operation of the proposed development, expressed as Laeq over 15 minutes at the façade of a noise sensitive location, shall not exceed the daytime background level by more than 10 dB(A) and shall not exceed the background level for evening and night time.*

- (a) This Acoustic Verification report should comprise of noise monitoring data at any noise sensitive locations. It should also include the cumulative noise level whereby the existing noise levels are included in the assessment of the developments overall impact.
- (b) The Acoustic Verification report should include performance specifications for any changes/modifications which have been incorporated in order to reduce operational noise levels during the night time period.

The report must include a statement certifying whether the development or proposed use is fully capable of complying with the requirements of the noise control conditions and criteria as set out within the planning consent.

4. No heavy construction equipment/machinery (to include pneumatic drills, construction vehicles, generators, etc) shall be operated on or adjacent to the construction site before 07:00 hours on weekdays and 09:00 on Saturdays nor after 19:00 hours on weekdays and 1300 hours on Saturdays, nor at any time on Sundays, Bank Holidays or Public Holidays.

Any work outside of these hours shall only be permitted following a written request to the Planning Authority and subsequent receipt of the written consent of the Planning Authority, having regard to the reasonable justification and circumstances and a commitment to minimise as far as practicable any unwanted noise outside the hours stated above.

5. The development shall be so operated that there will be no emissions of malodours, gas, dust, fumes or other deleterious materials, no noise vibration on site so as would give reasonable cause for annoyance to any person in any adjoining unit or public place in the vicinity.



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Kieran Groarke  
Environmental Health Officer  
7<sup>th</sup> of April 2022

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Tom Prendergast  
Principal Environmental Health Officer