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To Whom It May Concern:

The below letter sets out our assessment of the reasons why the Ballymount site is not suitable for the installation of a green roof and is directly in response to South Dublin County Council GI5 Objective 7:

“To require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council’s ongoing SuDS strategy development.”

Please see a review of same by Carl Dixon, Ecologist, of Dixon Brosnan Environmental Consultants (Attachment A)

Site description

The site is located in Ballymount Industrial Estate, adjacent to the M50 and close to the M50/NM7 Junction. The site is approximately 2 acres in size and consists of an all-concrete yard with a small industrial building to rear and a medium sized office block to front. The site was developed initially in the late 1980’s. The site is surrounded by a mix of industrial, large retail and commercial activities.

There are some semi mature trees on the eastern and western boundaries and the boundary to the front consists primarily of laurel hedging. The site currently functions to conduct basic waste separation of skip waste for the SDCC area. A secondary function is to provide parking for a portion of Panda’s fleet of refuse collection vehicles.

Application

SEHL, T/A Panda, are proceeding with a SID application to increase the waste acceptance capacity from 150,000 tonnes per annum to 350,000 tonnes per annum and in increase waste processing activities on site in line with the requirements of the circular economy. Permission is being sought to allow SEHL transfer waste processing activities from another nearby site, which is located

approximately 1.5kms away to this site. Relocation is required as other site has been re-zoned as Regen and is ear marked for housing and other mixed by the local authority.

It is proposed that waste processing activities will be conducted on municipal solid waste (MSW) at the site for two purposes. Firstly, processing will extract resources from MSW prior to disposal/recovery in the Dublin Waste to Energy (WtE) Facility. These resources will be recovered for further processing offsite and will be returned to the circular economy. The second reason for processing is to reduce the fossil derived component of MSW destined for energy recovery. It is proposed to install processing and machinery to extract plastics from MSW prior to combustion of MSW in the WtE plant.

Processing Description

All processing will be conducted within a large, dedicated processing building for the purposes of preventing odour, dust and noise nuisance.

The processing will consist of the following: -

- Trommelling to remove organic materials.
- Shredding to reduce overall particle size. Size reduction improves the removal efficiency of plastics and metals.
- Use of air curtains/air knives to separate and remove plastics and light fraction material.
- Use of eddy current separators to remove non-ferrous metals.
- Use of magnets to remove ferrous metals.
- Use of rare earth metals to remove stainless steel.

The facility will operate under a negative air system, which will vent building air through an odour abatement plant.

The development will include the demolition of the offices and existing industrial building and the replacement with a modern large waste processing shed.

Rationale for screening out of a green roof in favour of a solar generating roof.

South Dublin County Council has published a biodiversity action plan which runs from 2020 to 2026. This document identifies opportunities for stepping stones for nature and recognises that business operators and private householders can play a role in providing corridors for nature. SEHL as an environmental services provider is acutely aware of the need for protection and encouragement of biodiversity. SEHL's parent company is current in the process of developing its own biodiversity action plan and has already banned the use of pesticides throughout all its sites. Even though our business places emphasis on biodiversity, we have concluded that the Ballymount site is not suitable for the development of a green roof for the following reasons.

Directors: Brian McCabe, Gordon Parsons (British), Hani Zogheib (Lebanese), Paul Mitchener (British/American) Jo Cooper (British)

- The process is heavily dependent on the use of electrical equipment such as shredders, conveyors, air handling units etc. The facility will consume approximately 3MW of electricity. Therefore, more environmental benefit will accrue in the installation and operation of 1MW of solar panels on the roof than will accrue in the installation of a green roof on the building.
- SEHL's parent company Beuparc has assessed its Scope 1 and Scope 2 emissions and has developed a Net Zero Plan (NZP). A key element of our NZP is the gradual decarbonisation of our processing operations through the use of self-generated renewable electricity.
- Grid electricity in Ireland is significantly more carbon intensive in Ireland than in other jurisdictions such as France and the UK. Therefore, it makes more sense to reduce reliance on grid electricity.
- We have had several conversations with Enrich, who provide soils for green roofs and their advice is that they are challenging to get correctly established and that we would be better off offering compensatory habitat on an equivalent area elsewhere.
- Our industry has a high staff turnover rate. We currently struggle to maintain gutters and car parks at present due to staff shortages. Therefore, the likelihood is that we would struggle to maintain the green roof and the roof would fail to meet its biodiversity goals.
- The additional weight associated with the installation of soil on the roof will require additional roof supports. Our waste processing operation will require large roof spans without central supports to facilitate safe vehicle movements through the building.
- We have significant net zero commitments to our lenders. Our lender commitments include a requirement to provide 25% of our own electricity through roof mounted solar to achieve our net zero goal by 2040 across our business.
- The site is an existing industrial development, first constructed in the 1980's. The installation of a green roof on an industrial building within an industrial area will bring minimal biodiversity benefit.
- As an alternative we are willing to contribute to biodiversity measures elsewhere in SDCC. For example, just drive along the N81 through vast acres of useless mowed green spaces adjacent to Springfield, Citywest and Jobstown.
- We currently have 5 no. electric refuse collection vehicles, which are used for night-time city collections. Charging these vehicles from a solar roof will aid in the decarbonisation of our business.
- Yard space is at a premium for HGV requirements and therefore no opportunity exists to build solar panels into yard spaces.

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Company Registration No. 611241

Company Registered Office: Panda Waste Management Solutions, Ballymount Road Upper, Ballymount, Dublin, D24 E097

As an environmental services company we are motivated to achieve best in class performance on a range of environmental indicators including biodiversity. However, having carefully considered the site, its location, our net zero plan and our high electrical demands, we have concluded that a roof incorporating solar generation is a clearer environmental win for a high energy intensity operation on an existing industrial site and best serves national and our company environmental needs.

Yours sincerely,



David Tobin

Sustainability Director

For and on behalf of SEHL, a subsidiary of Beuparc.

See, below, Opinion of Carl Dixon, Ecologist.

date	our ref	your ref	cc
27/11/2023	-	-	

O'Callaghan Moran & Associates
Environmental & Hydrogeological Consultants
15 Melbourne Business Park,
Model Farm Road,
Cork
T12 WR89.

Re: Ballymount – Proposed Green Roof

The site is located in Ballymount Industrial Estates adjacent to the M50. The site is approximately 2 acres in size, all concrete yard with a small industrial building to rear and a medium sized office block to front. The site was developed initially in the late 1980's. The site is surrounded by a mix of industrial, large retail and commercial activities. There are some semi mature trees on the boundaries and the boundary to the front consists of laurel hedging.

In general small patches of isolated habitat in an urban/industrial context, that lack connectivity in the context of the wider landscape, are of limited ecological value. It is noted that whilst the green roof may provide a degree of visual interest or other environmental benefits in relation to noise etc this does not make it of particular value from an ecological viewpoint. As it will be elevated, isolated and exposed it will of limited value for invertebrates and thus is not expected to be of value for species at higher trophic levels such as birds and bats. It is highly unlikely that it will be colonised by uncommon plant species due to its position and isolation and is likely to be colonised by common and more aggressive herbaceous species or suffer for drying out/destabilisation if not carefully maintained.

Rooftop conditions are challenging for plant survival and growth. Moisture stress and severe drought, extreme (usually elevated) temperatures, high light intensities, and high wind speeds increase the risk of desiccation and physical damage to vegetation and substrate. In this context the provision of a green roof does not provide any meaningful ecological benefit whilst significantly increasing costs.

There are a number of ecological measures that can be implemented, either within the site or offsite, that would be preferable and have greater potential to increase ecological value.

Yours sincerely,

A handwritten signature in grey ink, appearing to be 'Carl Dixon', written in a cursive style.

Director: Carl Dixon BSc (Ecology), MSc. (Ecological Monitoring)