



An tÚdarás Sláinte agus Sábháilteachta Health and  
Safety Authority

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Planning Department,  
Tipperary County Council,  
Civil Offices,  
Nenagh,  
Co. Tipperary.

16/01/2026

Our Ref: **CAS-18595-R5T1**

**Re: Planning Application [ref. 2560019] for development by Roadstone Limited for an Anaerobic Digestion Plant at Killough Quarry, Gaile Townland, Holycross, Co. Tipperary, E41 T622**

Dear Sir/Madam,

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015), gives technical advice to the planning authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

The Authority notes that the scope of the application has changed in terms of the dangerous substance storage conditions, and particularly the change from Compressed Biogas (CBG) to Liquefied Biogas (LBG). Based on the assessment of this new information and associated documentation, the Authority currently has insufficient information to provide technical advice on this application and therefore requests the Planning Authority to seek further information in accordance with regulation 24(10) from the applicant in relation to this application. Refer to Attachment 1 below for detail of the further information required. Note a copy of this request for further information has also been sent to the applicant.

The Authority will assess the submitted documentation, taking into account the Guidance on [Technical Land Use Planning](#), to ensure the requirements have been applied in full. The Authority will be in a position to provide advice to Tipperary County Council within 4 weeks of receipt of the requested information.

Tipperary County Council  
Planning Section by email  
Received 16/01/2026

Yours sincerely

*Dermot O'Callaghan.*

**Dermot O'Callaghan**  
**Inspector,**  
**COMAH, Chemical Production & Storage (CCPS)**

*cc: Shane McDermott- SLR Environmental Consulting (IRE) Ltd*

Tipperary Planning Authority - Inspection Purposes Only!

## Attachment 1

### Byrne & O'Cleirigh Land Use Planning Risk Assessment Report

Ref: 609-25X0241 6<sup>th</sup> Nov 2025

Following a review of the above report, which is contained within the further information planning pack, the following information is required.

#### **Section 1 Introduction**

1. There is no indication of how the site will be covered by the Control of Major Accident Hazards Regulation 2015 (COMAH) or how the COMAH Regulations apply. Following the change from CNG to LNG, the associated COMAH threshold calculation is to be provided, which shows that the site is subject to the Control of Major Accident Hazards Regulation 2015

#### **Section 3 Dangerous Substances**

2. The report should provide a description of the activities on the site to understand the nature and scale of the main LUP hazards and how they relate to the operation of the site. A site map showing the locations where the dangerous substances will be stored should also be included.

#### **Section 4 Major Accident Scenarios**

3. There is no wind rose (which is relevant for flash fire risks) or indication of the relative probability of D5/F2 conditions.

#### **Section 5 Consequence Modelling Results**

4. It is unclear what type of fireball model has been used in the EFFECTS software (static or dynamic), or the modelled Surface Emissive Power (SEP). Further details to be provided.
5. The report does not state the surface roughness length used in calculations; this is to be provided.
6. Section 5.1 considers a 10mm leak from the vessel (for 30 minutes). However, best practice in land use planning is to model the leak from the largest connection. Section 5.1 to be amended to use a leak from the largest connection rather than a 10mm leak.
7. Clarification is required on the jet fire results. It is unclear which jet fire results have been used in the risk assessment calculations. Confirmation is required as to whether a 50:50 split been assumed for vertical/horizontal jet fires.
8. Section 5.3 considers a variety of pipelines. The gas pipework layout plan Ref 1905-DG-0024-R1 should be included in this report for reference.
9. Section 5.4 states, "Finally, there will also be staging of tankers to the north of the site, estimated at a total of three trucks for up to 5 days each, over the Christmas period." It is not entirely clear what this means. Is the staging area used for filled ISO tanks at any other time of year, or are the predicted risks based simply on 3 ISO tanks present for 5 days per year? Further clarification is required.

#### **Section 6 Risk Assessment**

10. Further details to be provided on how the risks have been integrated to give the risk zones. Clarification on whether the risk contours relate to a residential population (90%/10% indoor/outdoor split, CIA Curve 3, etc), as required by TLUPG, or are outdoor LSIR (Location Specific Individual Risk) contours.
11. Similarly, it is unclear whether the individual risks quoted in Table 7.1 are LSIRs for an outdoor population. This outdoor risk might be an appropriate measure for the onsite loading bay personnel but would not be appropriate for the residences (which should be based on individual risk to a residential population, who will be indoor for 90% of the time). Further information required to clarify.
12. A plan showing the location of the populations should be provided.
13. Provide a map which shows the risk contours superimposed, showing the key elements of the site.

#### **Section 7 Conclusion**

14. The report concluded with regard to major accidents to the environment that "The major accident risk to the environment is broadly acceptable;" however, the report has not provided an appropriate assessment to confirm that this statement in the report is justified.

## General Commentary

The report does not provide the outputs from its modelling software for the scenarios modelled.

### Further information letter issued 17.02.2025.

In terms of the response submitted by the applicant following the Health and Safety Authority letter dated 17/02/2025, the following items have not been sufficiently addressed:

1. *Section 2.1.2 states that 'Environmental matters are addressed in the EIA for the project.' The EIA simply states in Table 15-7 Risk ID 1 that for an industrial accident, Localised contamination possible'. This needs to be considered in more detail and a determination should be made on whether a MATTE (Major Accident to the Environment) is credible. Refer to section 1.8 of the Guidance on Technical Land Use Advice.*

Item 1 above has not been sufficiently addressed in the Byrne O' Cleirigh LUP report as suggested in the applicant's response to the further information request.

2. *.Clarification should be provided on the inventory of biogas inside (i) the Bioconversion Building and (ii) the Pretreatment, Equalisation and Gas Upgrading Building, and if there is potential for a significant leak/explosion in these buildings. If so, further details should be provided on inventories, pressures, building compartment volumes etc.*

It has not been confirmed whether there is potential for a significant leak and subsequent explosion in the buildings mentioned above. An appropriate assessment is required if there is a risk of explosion.

3. *EIA Table 15-4. Lightning is mentioned as a potential hazard in Table 15-4 of the EIA but there is no mention of lightning or lightning protection elsewhere or in the plant description. A description of what is proposed in terms of lightning protection should be provided.*

It has not been confirmed that the tanks storing dangerous substances as defined by the COMAH Regulations will have appropriate lightning protection installed.

4. *There is no assessment of current or future operations at the quarry that could impact the proposed development. It should be clarified if risks such as blasting, projectiles, vibration, etc., have been considered, and if so, the measures in place to control such risks should be described.*

It has not been confirmed satisfactorily in the further information that the risks from blasting or from projectiles (fly rock) impacting tanks and equipment storing dangerous substances is as low as is reasonably practicable.