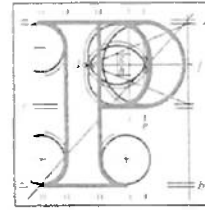


Our Case Number: ABP-314964-22



**An
Bord
Pleanála**

Louth Environmental Group
C/o John Conway
91 Saint Nicholas Avenue
Dundalk
Co. Louth

Date: 1st May 2024

Re: Proposed development of a Circular Economy Campus and an Integrated Waste Management Facility at the Hollywood Landfill
Hollywood Great, Nag's Head, Naul, Co. Dublin, A41 YE92

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

PP Eileen McGoldrick

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

PA09

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64 Marlborough Street
Dublin 1
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John Conway
Louth Environmental Group
91 St Nicholas Avenue
Dundalk
Co. Louth
Date: 25/04/24

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
25 APR 2024	
Fee: €	Type: _____
Time: 10:42	By: Hand

Re: Objection to Proposed Development of a Circular Economy Campus and Integrated Waste Management Facility at Hollywood Landfill, Hollywood Great, Nag's Head, Naul, Co. Dublin, A41 YE92

Dear Sir/Madam,

Subject: Objection to Planning Application Reference ABP-314964-22.

I am writing on behalf of the Louth Environmental Group to formally object to the proposed development of a Circular Economy Campus and an Integrated Waste Management Facility at the Hollywood Landfill as outlined in your notice dated 05/04/24.

Our objections are grounded in several concerns regarding the environmental impact, sustainability, and compliance with recent policies as highlighted in the Fingal Development Plan 2023-2029:

Environmental Impact Concerns: The proposed expansion of waste treatment activities and aggregate recovery operations raises significant concerns regarding potential negative impacts on local biodiversity and the surrounding ecosystem. The documentation in the planning application provided lacks comprehensive environmental impact assessments that consider the cumulative effects of increased

waste processing and aggregate recovery activities on local wildlife and habitats and the increase in the planning area compared to previous granted planning permission.

Traffic and Pollution: The anticipated increase in heavy goods traffic movements associated with the operation over its intended 25-year lifespan could significantly worsen air quality and increase noise pollution in the area, affecting the health and quality of life of local residents. There is an estimated 7800m³ per year of water leachate which will be ongoing forever because of the intended expansion. They are transferring the pollution problem on to the local water treatment facility in Fingal which is already stretched and would be better served to be utilised for other activities in the area such as housing. This leachate pollution is not in line with the Fingal development plan goals.

Non-Alignment with Sustainability Goals: The development's focus on expanded waste treatment and recovery operations appears to contravene the sustainability goals set forth in the Fingal Development Plan, which emphasizes reducing waste generation and promoting recycling and reuse within the framework of a circular economy.

Inadequate Public Consultation: There seems to be insufficient engagement with the local communities that would be most affected by the development. A project of this scale requires thorough public consultation to ensure that community concerns are adequately addressed and integrated into the planning process.

Procedural Concerns: The reliance on existing permissions for aggregate recovery that does not fully comply with current environmental legislation suggests a procedural oversight that needs rectification before further development is considered.

From Natura Impact Statement Report Section 2.8.1

"It should be noted that Figure 4.2 of the 1999 EIS was superseded in the 2007 planning application and EIS, however, the associated licence condition was not updated accordingly. This application proposes a revised set of restoration contours for the proposed development and these are shown in Figure 2-7. These revised contours are required to ensure that the final infilling restores the land to a smooth provide with the existing levels to the east and west of the site. It should be noted that while the contours vary, the final height remains at 149.0mAOD to mitigate any potential landscape impact."

This oversight has been admitted as an oversight by the proposers documents. This is non-compliance with environmental regulations and affects the integrity of the proposed landscape restoration and the bona fida of the process.

The proposed revised restoration contours aim to restore the land to a level that aligns smoothly with the existing topography to the east and west of the site. While it is noted that the final height of the restored land is maintained at 149.0 meters above Ordnance Datum (mAOD) to mitigate potential landscape impacts, the variance in contour levels raises questions about the thoroughness of the environmental impact assessment conducted. Such changes in land contouring could have unforeseen effects on local water drainage patterns, soil stability, and habitat suitability for native species, all of which are critical factors in maintaining ecological balance and complying with environmental protection standards.

The latest application seeks to extend the operational lifespan of the facility from 15 to 25 years while maintaining the annual tonnage limit of 500,000 tonnes. This adjustment results in a significant overall increase in the volume of material that will be processed and deposited over the extended period. To accommodate this increase, the application proposes changes to the contour lines across the site, which are essential for infilling the additional volume of material.

While the planning documentation states that this increase and its associated environmental impacts have been fully accounted for in the

impact assessments, it is crucial to scrutinize the sufficiency and rigor of these assessments. The reported adjustments to the site's contouring and the extended operational timeline necessitate a thorough re-evaluation of potential long-term environmental impacts, including effects on local water tables, biodiversity, and the landscape's visual integrity.

Moreover, this proposal is introduced as a new planning consideration and does not rely on any pre-existing planning or authorization. This situation underlines the necessity for a comprehensive public consultation process and a detailed Environmental Impact Assessment (EIA) that explicitly addresses the extended time frame and increased material volumes. Such assessments should include robust data and predictive models to ensure that environmental protections are not only maintained but enhanced in response to the scaled-up operations.

15 years at 500,000 Tons per year is 7.5 million tons. Increasing over the new proposed operation of 25 years of operation gives 12,500,000 tonnes, this is a significant shift in the volumes of material being received at the site. And the public have not been properly informed of the significant increases. The proposed increases not only exceeded the original fill volume of the original quarry extracted, the volume of material proposed has increased by more than 40%. Accordingly to the proposal despite the quarry being closed for excavations in 2007. The proposer seeks to adapt the attitude of making it up as you go along. The proposal has increased the area being infilled but applied for the continuation of infilling of the quarry area, not an external or additional area.

The proposal is for an expansion of the areas already granted planning. Therefore, they do not have an existing proper planning for the proposed areas. At this stage had they applied for this expanded planning and had not previously requested these areas to be filled to a higher level. 2007 planning allowed for 39.8 ha filling to contours applicable at the time. The 2019 application was for the continuation

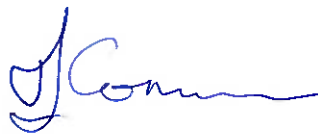
of this infill area, therefore the expansion to 54.4 ha was not properly considered.

Given these points, we urge An Bord Pleanála to reconsider the proposed development in light of its potential environmental impacts and the broader policy goals intended to protect and preserve our natural environment. We believe that a more thorough review and additional public consultation are essential to ensure that any development at the Hollywood Landfill aligns with both local and national environmental conservation objectives.

We are prepared to participate in discussions and provide further evidence or information as required to support our objections.

Thank you for considering our position. Please do not hesitate to contact me should you require further information or clarification on the points raised in this letter.

Yours faithfully,



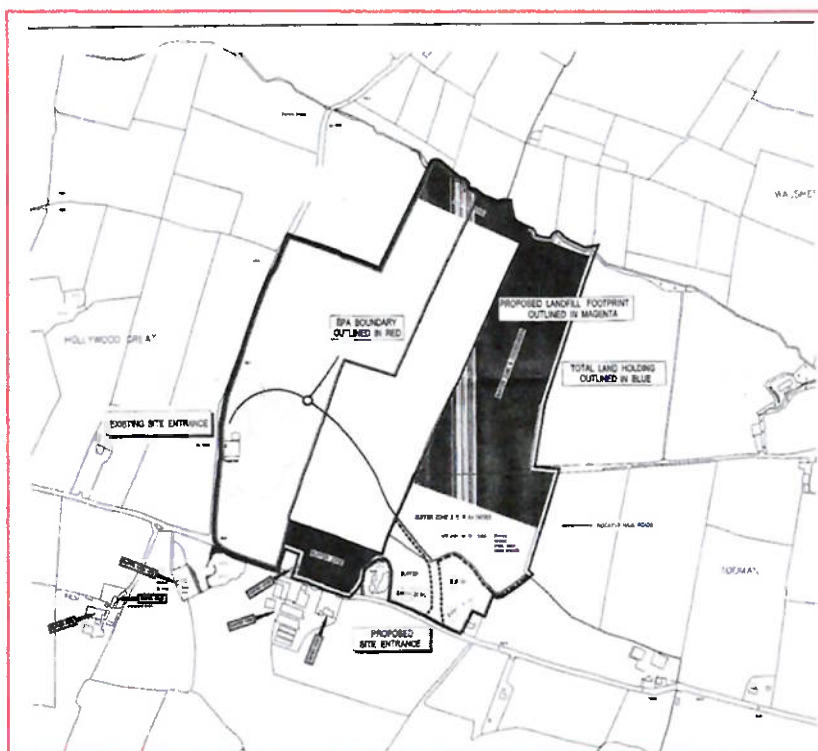
John Conway
Chair, Louth Environmental Group

Note 1:

Planning reference	F07A026
Application type	Permission
Proposal description	Permission to vary a previous permission (Reg. Ref. F04A0365) which permitted the infill and restoration of a quarry with inert construction and demolition waste at a rate of 340,000 tonnes per annum. This permission had a life of 15 years beginning on 7 October 2004. Permission is now sought to vary this permission to permit an extended area to be infilled and to permit the continued infill of the quarry at a rate of 500,000 tonnes per year so as to ensure that the quarry can be infilled and fully reclaimed before the 2004 permission expires i.e. by 6 October 2019. This revised application is accompanied by an Environmental Impact Statement. The facility currently operates under EPA Waste Licence W0129-01.
Location/Address/Eircode	Hollywood Great, Newry, Co Dublin
Applicants name	Murphy Environmental
Registration date	11 May 2007

Document: Site Layout Plan (2007)

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Planning reference F19A/T077

Application type Permission

Proposal description The proposed development will consist of:
 The continued infilling of a former quarry with construction and demolition waste material at a rate of 500,000 tonnes per annum permitted under Reg. Refs. F02AG262 and F04AG363 for a further 15 no. year period from the date of expiration of the existing permissions in order to enable the lands to be fully returned to the original ground level.
 The relocation of the primary entrance to the site to the southern site boundary, along the LPO1080.
 A new internal site access road.
 A new processing building.
 A new administration building.
 Add info received 14th August 2019.
 Car parking.
 Weighbridges.
 Associated infrastructure.
 Boundary treatments.
 And all associated site development works.
 An Environmental Impact Assessment Report will be submitted to the Planning authority with the application. The proposed development will continue to operate under the existing EPA Waste Licence (W12962).

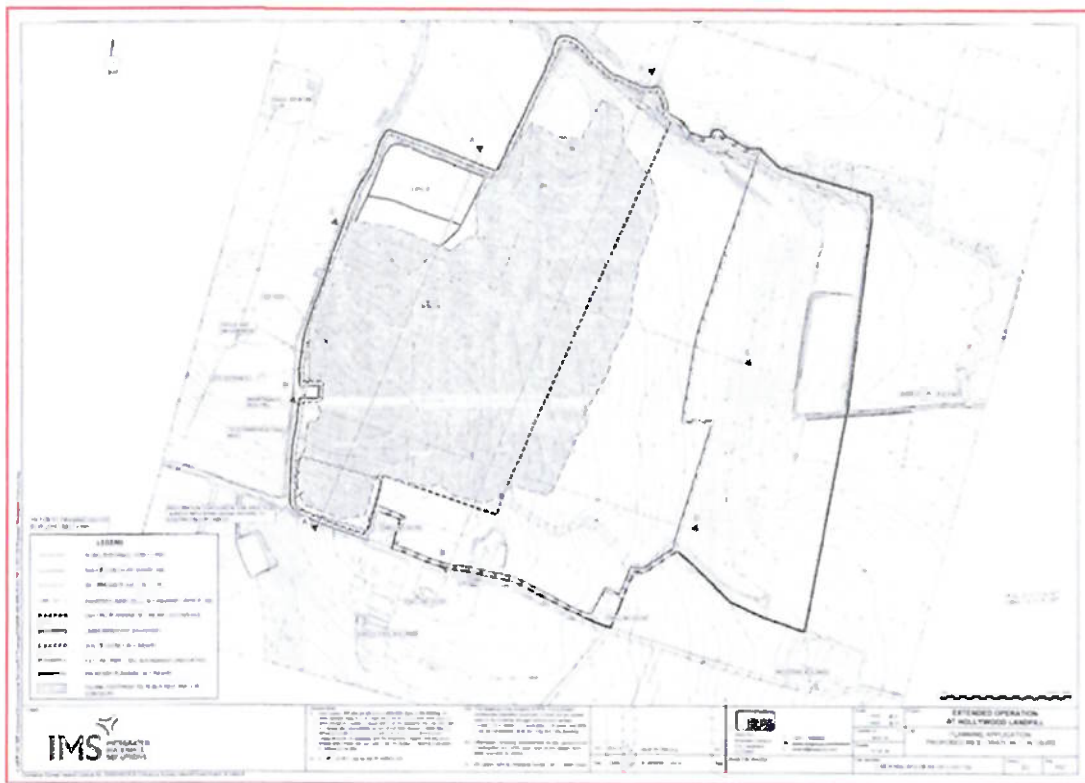
Location/Address/Eircode Hollywood Great, Naught's Head, Naas, County Dublin

Applicants name Integrated Materials Solutions Ltd Partnership

Registration date 14 Aug 2019

Document: Boundary Details (19 Feb 2019)

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Proposed Planning Boundary change in 2019 planning application compared with previous granted boundary in 2007.

