

Gillian and Roger Blackburn  
Abbey Hill  
Damastown  
Naul  
Co. Dublin  
K32 A624

Date: 20th December 2022

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 recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the 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 Fingal County Council 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](http://www.pleanala.ie).

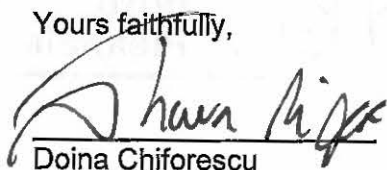
If you have any queries in the meantime, please contact the undersigned officer of the Board.

Tell	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Doina Chiforescu  
Executive Officer  
Direct Line: 01-8737133

PA04

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To: An Bord Pleanála  
64 Marlborough St  
Rotunda  
Dublin 1  
D01 V902

**Re: case ref ABP 314964 : IMS planning application for permission for a Proposed Circular Economy Campus and Integrated Waste Management Facility at Hollywood, Co Dublin**

We object because this proposal has serious consequences for our environment, health and safety.

IMS (operators of former Murphy Quarry- Hollywood) has applied for planning permission to change the use of the quarry from “infilling” to seeking consent to develop a Circular Economy Campus and an “Integrated Waste Management Facility” at the Hollywood site (Nags Head).

IMS state that their proposal “will enhance and expand the established waste and recovery operations at the Hollywood site in line with circular economy principles and the waste hierarchy”.

Whilst this sounds “very green”, however, the actual proposal is principally to :

- landfill 5 Million Tons of Toxic and Hazardous Incinerator Bottom Ash over the next 10 years
- IMS is seeking permission for a total of 25 years.

In the independent research report linked :

<https://zerowasteeurope.eu/library/toxic-fallout-waste-incinerator-bottom-ash-in-a-circular-economy/>

the waste incinerator industry fails to mention the hazards associated with bottom ash in its “fact sheets” nor in the permit/planning applications process: The EU best available techniques for bottom ash processing are outdated and do not represent current scientific knowledge.

Having reviewed the current planning permission/planning history on Fingal Co. Co. records, IMS appears currently to be only authorised to infill the Quarry with inert materials and restoration:

- Fingal Co. Co. Planning Reference F19/0077, condition No. 7, states the following “this permission does not authorise recycling activities”
- However, per EPA records, IMS is currently recycling approximately 250,000 tonnes per year!
- Incinerator bottom ash, is a source of leachate which is toxic to the underlying water resource and waterways, and is deeply concerning to residents, farmers and local businesses.

The above were some of the many reasons why the Environmental Protection Agency refused a licence for landfilling on this site on 6/01/2016 EPA licence ref W0129-03

The site was also found to be unsuitable by the EPA for the following key technical reasons (further reasons can be found on [EPA.ie](http://EPA.ie) website, licence application W0129-03 - see under ‘EPA Documents’ - ‘Inspectors Report’ dated 12/06/2014

- The most important and extensive groundwater aquifer in Leinster lies under the site.
- Landfills must be sited on deep clay in order to provide natural filtration of any escaping leachate. However Hollywood Quarry is situated on bare fractured rock with no natural clay protection. This is, therefore, a completely unsuitable site.
- Landfill siting conditions are legal requirements laid down by the Irish/ EC environmental authorities and are designed to protect our water resources now and into the future.

Not only will water resources be at risk, it will lead to a higher risk of toxic dust exposure and airborne toxin dissemination which puts our health at risk.

As a predominantly agricultural area, contaminated water puts local produce & reputation at risk. This area is predominantly agricultural.

There are a large number of private wells in the area which are at great risk of contamination.

This is in addition to emissions from the trucks carrying hazardous waste to and from the site.

There is great concern about and danger from trucks (and the inevitably increased volume of trucks ) travelling on rural roads at 80k per hour. These now directly pass the entrance and exit to the new Hedgestown National school, will increase the danger to children, parents and staff.

We want to protect our children's future, our homes, environment, health and livelihood.

Yours faithfully

Gillian Blackburn  
Roger Blackburn