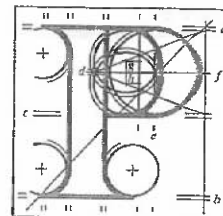


Our Case Number: ABP-314964-22



**An
Bord
Pleanála**

Hugh Coughlan
Eastern-Midlands Waste Region & Others
Dublin City Council
Block 1, Floor 6, Civic Offices
Dublin 8

Date: 22nd 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,

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 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.

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,

Doina Chiforescu
Executive Officer
Direct Line: 01-8737133

PA09

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
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64 Marlborough Street
Dublin 1
D01 V902

Shaun McGee

From: Una Fitzgerald <una.fitzgerald@dublincity.ie>
Sent: Thursday 15 December 2022 13:14
To: SIDS
Cc: Hugh Coughlan
Subject: Submission with respect to Case Reference Number ABP-314964-22
Attachments: IMS CE Campus_ABP-314964-22_RWMPO Submission.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon

Re: Case Reference Number ABP-314964-22

The Eastern-Midlands Regional Waste Management Planning Office, together with the Connaght-Ulster and Southern Regional Waste Management Planning Offices, wishes to lodge a submission to An Bord Pleanála with respect to the above case, for the proposed development of a Circular Economy Campus and an Integrated Waste Management Facility, at the Hollywood Landfill at Hollywood Great, Nag's Head, Naul, Co. Dublin, A41 YE92.

I refer also to Board Direction BD-005255-20, ABP-304428-19.

Please find our submission attached.

Regards
Úna

Úna Fitzgerald

Regional Technical Officer	Eastern-Midlands Regional Waste Management Planning Office	
c/o Dublin City Council	Environment & Transportation Department	Block B, Floor 2, Blackhall Walk, Queen Street, Dublin 7, Ireland
M +353 86 8389929	una.fitzgerald@dublincity.ie	www.emwr.ie



eastern-midlands
wasteregion

Smaoinigh ar an timpeallacht sula ndéanann tú an ríomhphost seo a phriontáil. Please consider the Environment before printing this mail.

Right to Disconnect:

My normal working hours are from 9am to 5pm. If I receive your email outside these times, I will respond when I am back at work. However, while it may suit me to send emails outside my normal working hours, I do not expect a response or action from you outside your own working hours.



**An Bord Pleanála,
64 Marlborough Street,
Dublin 1.**

15th December 2022

Re: Integrated Waste Management Facility at Hollywood Circular Economy Campus, Co. Dublin

Case Reference ABP-314964-22

Dear Sir / Madam

The Eastern Midlands, Connacht-Ulster and Southern Regional Waste Management Planning Offices (RWMPOs) wish to make a joint submission to An Bord Pleanála regarding the above referenced application.

1 Introduction

The subject site is located within the Eastern-Midlands Region. The Eastern-Midlands Region Waste Management Plan 2015 - 2021, is a statutory document guiding the development of regional as well as national waste treatment infrastructure. This regional plan is in the process of being replaced with a new plan, which for the first time is taking a national approach. Waste management planning is a statutory obligation on local authorities under Section 22 of the Waste Management Act. The three regional plans are being replaced with one national plan, which is being prepared by the RWMPOs on behalf of the 31 local authorities. The new National Waste Management Plan for a Circular Economy will be published in 2023 and will be in effect from 2023 to 2029. The existing regional plans are still in effect until such time as the publication of the national plan in 2023. This submission therefore makes reference to the existing Eastern-Midlands Region Waste Management Plan.

With respect to infrastructure planning in particular, Chapter 16 of the Eastern-Midlands Region Waste Management Plan sets out a number of policy recommendations which were developed following a detailed market analysis. The following infrastructural policy is relevant to the proposed development at the Hollywood facility.



E8: The waste plan supports the development of disposal capacity for the treatment of hazardous and non-hazardous waste at existing landfill facilities in the region subject to the appropriate statutory approvals being granted in line with the appropriate environmental protection criteria.

2 Commentary

Section 2 of this submission outlines the elements of the application that are relevant to the Eastern-Midlands Region Waste Management Plan, and provides commentary against same.

- **development and re-profiling of the landfill void to accommodate specially engineered landfill cells for the disposal of non-hazardous (non-biodegradable) waste, which would include incinerator bottom ash (IBA), for a period of 25 years.**

The proposed activity is consistent with plan policy E8 (see Section 1 above).

The RWMPOs recognise and support the need for continued, albeit limited, landfill capacity, for inert, non-hazardous and hazardous waste. EU and national policy is underpinned by the waste hierarchy, which places landfill at the lowest tier, however for certain waste streams which are not suitable for recycling, recovery or combustion, landfill remains a viable and necessary option. This is articulated in the Eastern-Midlands Region Waste Management Plan, and very much remains the case in 2022.

The generation of C&D waste has been steadily increasing since 2013 (notwithstanding a dip in 2020 owing to Covid restrictions) and this presents a growing challenge with respect to the management of this waste stream. A perpetual role of the RWMPOs is to monitor waste treatment capacity, both within Ireland and through export options, for a number of waste streams including municipal and C&D in particular. Of particular concern at present with respect to C&D waste, is the non-hazardous fractions such as residual fines and brownfield soil & stone, both of which compete with residual Municipal Solid Waste (MSW) in particular but they also compete with biostabilised fines, for domestic disposal options. The aforementioned non-hazardous C&D wastes therefore have limited treatment options since they don't qualify for inert landfill.

The significant decline in the number of operational non-hazardous landfills (there are currently three), has meant that priority for their void space is typically afforded to residual MSW, as well as biostabilised fines. As a result, domestic disposal capacity for the acceptance of non-hazardous C&D wastes has shrunk to virtually zero. An increase in the domestic disposal capacity for non-hazardous waste, to include the non-hazardous waste types listed in the application, which it is noted also includes biostabilised fines, is of critical importance at present.



It is noted that the application does not seek to increase the annual tonnage limit for acceptance of waste for disposal, which is currently 500,000 tonnes per annum, for a range of waste types, as set out in Waste Licence W0029-02 i.e. wastes that meet the criteria for acceptance at inert landfill under the Landfill Directive (1999/31/EC). The tonnages that would be accepted for disposal of the non-hazardous wastes listed in the application, (which would be placed in a dedicated engineered cell meeting the specifications for non-hazardous waste under the Landfill Directive) would count towards the 500,000 tonne annual limit. This would mean that the applicant would be afforded the flexibility to respond to the prevailing market conditions with respect to demand for inert versus non-hazardous disposal capacity. This flexibility is viewed favourably by the RWMPOs.

The proposed development would:

- ease the existing capacity constraints with respect to non-hazardous C&D wastes that are not suitable for recycling or recovery, within Ireland's existing waste treatment network
- reducing our reliance on export for non-hazardous C&D wastes
- improve Ireland's self-sufficiency in managing our own waste in line with the proximity and self-sufficiency provisions of the Waste Framework Directive

Incinerator Bottom Ash (IBA)

The Regions support the development of domestic disposal outlets for incinerator bottom ash in the short to medium term. At present, much of the IBA outputs generated nationally are being exported.

IBA has excellent potential for use as a secondary raw material in civil engineering applications e.g. aggregate. Under the Waste Framework Directive, the beneficial use of this material outside of recovery applications in authorised waste facilities (e.g. haul roads within the void at our limited number of non-hazardous landfills), would require end-of-waste status. In the absence of end-of-waste status for IBA, if the tonnages arising at present in Ireland are to be managed domestically, this would require disposal in the short to medium term.

However, the RWMPOs do not support the granting of permission for the disposal of this material for a period of 25 years. Doing so may prolong the management of this waste stream by means of disposal, at the expense of recycling. Alternatively, it is recommended that a shorter timeline of 5 years be imposed on the acceptance of this waste stream for disposal, with the option of this being extended, for a further period, depending on the status of IBA with respect to end-of waste, as well as market conditions for demand for replacement IBA aggregate.



Furthermore, the RWMPOs recommend that a condition of permission should be imposed, to ensure that the IBA is landfilled separately to the other non-hazardous waste streams accepted, to facilitate the extraction of this material, for recycling and beneficial use, at a point in the future should favourable conditions prevail for doing so.

The following summarises the two proposed conditions with respect to acceptance of IBA for disposal:

Condition 1: a condition should be formulated to impose a restricted timeline of 5 years, (as opposed to the 25 years applied for) on the acceptance of residual IBA for disposal, with the flexibility of this being extended, subject to the establishment of End-of-Waste for this material in Ireland.

Condition 2: a condition should be formulated to oblige the applicant to deposit the IBA in such a manner that facilitates its extraction for reuse, subject to the establishment of End-of-Waste for this material in Ireland.

Yours faithfully,

Hugh Coughlan

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