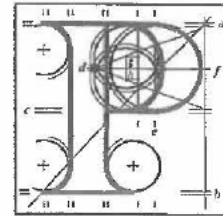


**Our Case Number:** ABP- 314964-22



**An  
Bord  
Pleanála**

Fidelma Geraghty & Family  
Belgee  
Naul  
Co. Dublin  
K32YW70

**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.

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

<b>64 Sráid Maoilbhríde</b>	<b>64 Marlborough Street</b>
<b>Baile Átha Cliath 1</b>	<b>Dublin 1</b>
<b>D01 V902</b>	<b>D01 V902</b>

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

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Fax  
Website  
Email

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[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

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D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

ABP – PAO6F.314964

Objection

to an application by

Integrated Materials Solutions Limited Partnership

for an integrated waste management facility

at Hollywood Great, Nag's Head, Co Dublin

From: Fidelma Geraghty & Family

Address: Belgee, Naul, Co Dublin, K32YW70

[REDACTED]

[REDACTED]

To Whom it May Concern,

I refer to the Bord's proposed determination on the above subject application from Integrated Material Solutions Limited Partnership registration number LP1457 CRO 583070 and I wish to object on the following grounds:

- There has been no public consultation by the applicant with the local community.
- In the EIAR IMS states that they are carrying out Recycling activities, I have checked their planning with Fingal Co Co and they informed me that they do not have permission for recycling and this is specifically stated in the conditions of their planning. How could we trust a company who is breaking the law to manage a hazardous waste facility in an ethical and legal manner, as we cannot trust the applicant, they should not be granted permission.
- The volume, size, and speed of trucks on the LP 1080 currently has made travel on this road treacherous and the road is not designed or suitable for this traffic. In addition, they have the road surface destroyed.
- I cannot see why the IBA is not processed at source, this is the responsibility of the producers and if it was such a valuable resource why are they passing it onto a landfill operator.
- The view of the coast along the north of the IMS site has been blocked by mounds of recycled concrete. They should be respecting the view and not exceeding the natural land height, if they are doing this today, what way will they leave the site?
- I have looked into the finances of the applicant and cannot see any strong capital structure and henceforth foresee a situation similar to that which arose in Kerdiffstown whereby the remediation cost the state/taxpayer €61.5million.

It is the responsibility of the BORD to ensure that the applicant puts in place the necessary bonds to ensure that sufficient funds are available until the site is fully remediated and is monitored for 25 years after closure.

We saw today in the case of Kerdiffstown, the operator simply went into liquidation and passed the poisoned chalice to the taxpayer. For strategic projects of this scale it is preferable that the local authorities provide and manage them as we continuously have landfills closing and the taxpayer being left carrying the can.

We also saw that the fire in Kerdiffstown which lasted for 7 months, caused major disruption on the N7 and forced residents to stay indoors, has possibly a higher probability as IBA exothermic reactions can reach temperatures of 90 degrees Celsius. This could destroy the proposed liner and see poisonous leachate entering our water system.

The most interesting observation of the Kerdiffstown catastrophe is that it appears that the EPA oversight of the license conditions was useless and significant breaches had taken place before closure.

The EPA was closing the stable door after the horse had bolted, so we are expected to trust the EPA to oversee IMS?

It is far safer to place the recycling centre on a site which is not overlying an aquifer.

- The Bog Of The Ring is a source of water and it is not prudent to site a hazardous landfill on the aquifer which is part of the bog of the ring water source.

#### **Hydrogeology:**

A water balance calculation would normally include a figure for annual rainfall. In round figure terms take a figure of 1000mm for the site, and a site area of 600x600 meters = 360,000 m<sup>2</sup>.

Total annual rainfall on site would be 360,000m<sup>3</sup> or **1000m<sup>3</sup> per day**, or 1000 tonnes of rainwater per day. Since there is no natural discharge point indicated for this rainwater, we must presume that it accumulates in the water pond on site and is regularly pumped out.

Where is the current receptor for this rainwater? Is it perhaps the adjacent Ballough Stream and if so, is this an acceptable practice and is the water quality monitored for EPA licencing purposes?

In the event of permission being granted this rainwater will presumably be used to dampen down the bottom ash and become leachate, perhaps supplemented by additional pumped water.

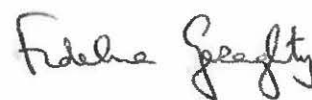
One could expect a **leachate generation of at minimum 1000tonnes per day**. Since the applicant proposes to remove the leachate from the site by road this is **50x20ton tankers per day** added to the traffic figure.

Of itself this appears an impractical and uneconomic exercise but there is an added difficulty. Because we are dealing with non-biodegradable bottom ash the requirement to remove leachate is expected to continue long after site closure. How long? The applicant fails to clarify this critical issue.

- Most of the land for miles around the site is farmland, producing many products sold for consumption in Ireland and beyond. This is not the location to site an integrated waste management facility.

I look forward to a positive outcome for the area and a refusal to the application.

Yours sincerely,



Fidelma Geraghty & Family