

1 INTRODUCTION

1.1 Proposed Development

Integrated Materials Solutions Limited Partnership (IMS) is the owner of the proposed development site, which is located at Hollywood Great, Nag's Head, Naul, Co. Dublin. The site is located approximately 3km west of the Junction 5 (Balbriggan South) of the M1 motorway and approximately 14km north of Dublin Airport. The site location is shown in **Figure 1.1** with the red line boundary showing the extent of the application (circa 54.4 hectares).

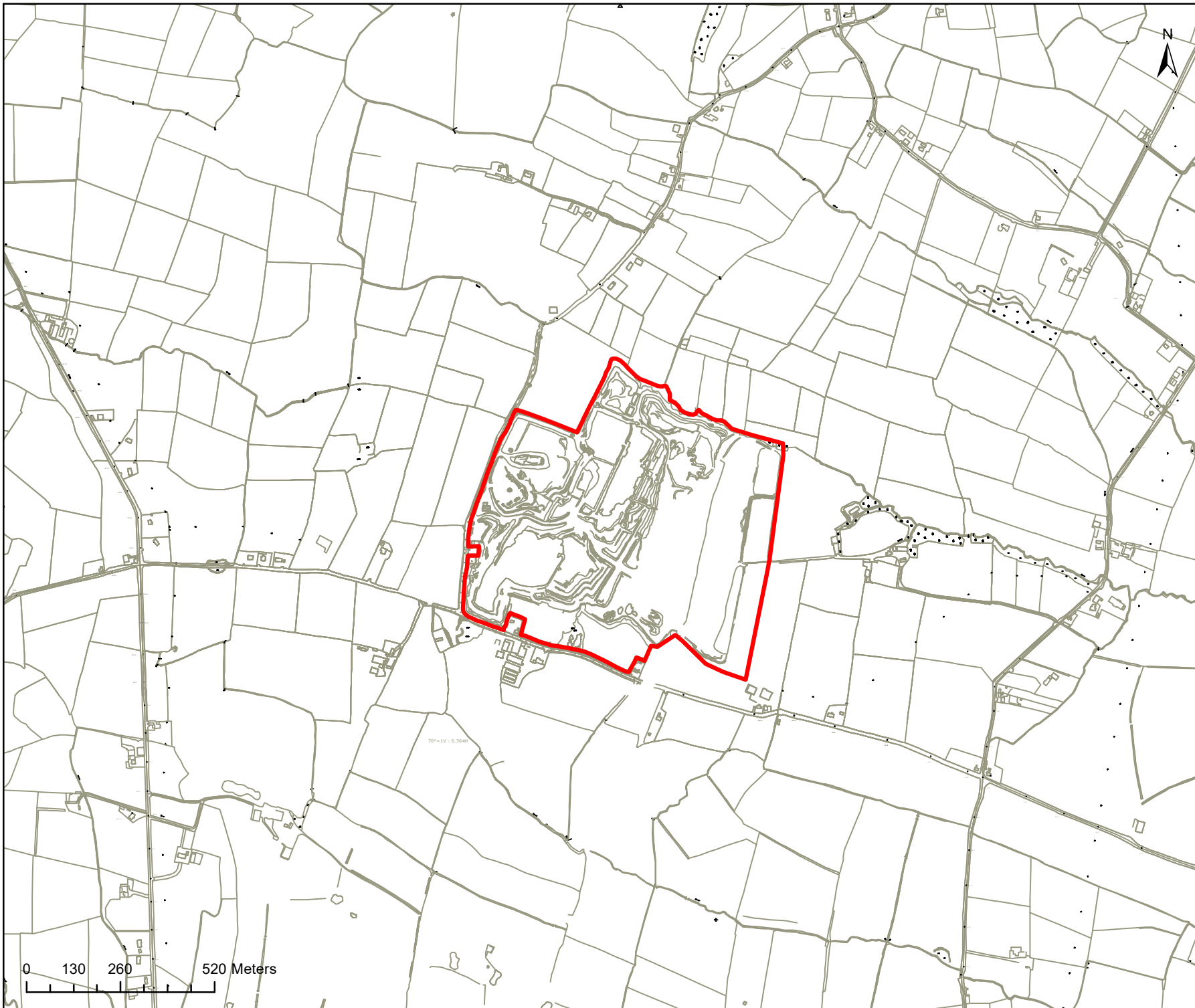
The site was a former shale and limestone quarry which operated until 2007 and is now licensed by the Environmental Protection Agency (EPA) as an engineered landfill for the purpose of infilling and restoration of the quarry to natural ground levels. Under the terms of the current planning permission (F19A/0077) and the Waste Licence (Ref. W0129-02), only waste which meets the criteria for inert landfill as set out in the Landfill Directive (Directive 1999/31/EC) may be landfilled at the site. The current cap on the waste volumes accepted at the site is 500,000 tonnes per annum both by the existing planning consent and the Waste Licence.

In addition to the landfilling operation, IMS undertakes a number of other consented circular economy activities on site to generate secondary aggregates for the construction sector. This includes an 'end of waste'¹ operation for the reuse of crushed concrete and an aggregate recovery operation to facilitate the reuse of aggregates in the construction sector.

IMS is now seeking consent to develop a Circular Economy (CE) Campus and an integrated waste management facility at the Hollywood site which will service national waste management requirements and assist in providing a self-sufficient waste management solution for the State. The proposal will enhance and expand the established waste and recovery operations at the Hollywood site in line with circular economy principals and the waste hierarchy. The proposal consists of permission for a 25-year lifetime of operation with waste intake capped at a rate of 500,000 tonnes per annum as per the existing operation. The proposed CE Campus includes a number of proposed changes as follows:

- Broader waste acceptance types to include non-biodegradable non-hazardous and inert wastes generated by a range of sectors (construction, commercial, industrial and waste processing);
- Expanded waste treatment activities including:
 - Development and re-profiling of the landfill void to accommodate specially engineered landfill cells for non-hazardous wastes in addition to the existing engineered inert cells;
 - Enhancement of the existing aggregate recovery processing on site which includes upgrading the aggregate recovery operations which produces low carbon, recovered sands and aggregates from various granular wastes by removing residues and other trace contaminants and separating the resulting aggregates into various size fractions;
 - Manufacture of secondary materials including enhanced soils and low-energy bound materials (e.g. concrete);
 - Additional waste recovery activities including soil/concrete batching and blending;
- Repurposing of an existing structure on site as a testing laboratory unit for the research, development and testing of recovered materials;
- A leachate management system including a leachate collection system and a storage tank prior to tankering off site for treatment at a suitably licensed WWTP with provision for a future on-site leachate treatment facility;
- Surface water management infrastructure for the landfill to capture, attenuate and treat storm water prior to discharge;

¹ Under Article 28 of the European Waste Framework Directive 2008/98/EC (Waste Framework Directive) and regulated by the EPA. Link: <https://www.epa.ie/publications/compliance--enforcement/waste/end-of-waste-criteria-recycled-aggregates.php>



Legend

Site Boundary

Client
Integrated Materials Solutions (IMS) Limited Partnership

IMS Hollywood 2022 Update

Title

**Figure 1-1:
Site Location**

RPS West Pier
 Business Campus, T +353 (0) 1 4882900
 Dun Laoghaire, E ireland@rpsgroup.com
 Co Dublin, Ireland. W rpsgroup.com/ireland

Issue Details

File Identifier: MDR1492A-RPS-00-XX-DR-Z-AG-0006		
Status: S0	Rev: P01	Model File Identifier:
Drawn: MV	Date: 15/09/2022	
Checked: SA	Scale: 1:14,000 @A4	
Approved: PC	Projection: ITM	

NOTE:

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- A mobile enclosure for the maturation of Incinerator Bottom Ash (IBA);
- An internal un-paved road network serving the deposition areas from the reception area which will be modified throughout the development phasing;
- Relocation of the existing artificial Peregrine Falcon nesting box to a proposed elevated pole-mounted location to the south west of the site; and
- Restoration of the site to natural ground levels.

This environmental impact assessment report (EIAR) identifies, describes and assesses the direct and indirect significant effects of this proposed development on the environmental factors listed in the EIA legislation.

1.2 Objective of the Proposed Development

The stated objective of the proposed development is to enhance and expand the established waste and recovery operations at the Hollywood site in line with circular economy principals and the waste hierarchy to allow for the full restoration of the lands over a 25-year timeframe.

It is within this context that the EIAR has been prepared and assessments have been undertaken. The objectives of this EIAR are to achieve the following:

- Identify the likely environmental impacts of the proposed development having regard to the characteristics of the local environment;
- Evaluate the magnitude and significance of the likely environmental impacts; and
- Propose appropriate measures to avoid or minimise adverse environmental impacts.

This document presents the above assessment and is supported by a suite of additional documents to support the applications for consent.

1.3 EIA Process

Broadly speaking the environmental impact assessment (EIA) process involves a number of steps which include the production of an EIAR, although this is not the end in itself, but rather an output to assist in a wider decision-making framework. This EIAR will be used by An Bord Pleanála (ABP) and the EPA (as the Competent Authorities) to make a decision to consent or refuse the applications or to seek further information if required. In line with current guidance, the EIA for the proposed development commenced at the project design stage. Subsequently, the scope of the study was determined with input from specialists in technical, planning and environmental disciplines and consultation feedback from expert groups and the public.

The EIAR will accompany an application to both ABP and the EPA, wherein it will be circulated to statutory stakeholders and made available to the public for consultation prior to any decision being made. It is acknowledged that the EIA process can extend beyond direct consent and into implementation of monitoring and mitigation programmes with the end focus being the protection of the environment in the long-term.

Figure 1.2 outlines the EIA process and the position of the EIAR in the overall procedure. Further details on the requirement for an EIAR and other related documentation is provided in **Chapter 3 Legislation and Policy**.

This EIAR has been prepared in accordance with the following legislative framework:

- Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment;
- The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018);
- The European Union (Waste Management) (Environmental Impact Assessment) Regulations 2020 (S.I. No. 130 of 2020);
- The Environmental Protection Agency (Integrated Pollution Control) (Licensing) (Amendment) Regulations 2020 (S.I. No. 189 of 2020);

- The Environmental Protection Agency (Industrial Emissions) (Licensing) (Amendment) Regulations 2020 (S.I. No. 190 of 2020); and
- The European Union (Environmental Impact Assessment) (Environmental Protection Agency Act 1992) (Amendment) Regulations 2020 (S.I. No. 191 of 2020).

In addition, the following guidance has been applied in preparing this EIAR:

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, (Department of Housing, Local Government and Heritage, August 2018);
- Circular PL 05/2018 -Transposition into Planning Law of Directive 2014/52/EU amending Directive 2011/92/EU on the effects of certain public and private projects on the environment (the EIA Directive);
- Environmental Impact Assessment of Projects–Guidance on Scoping (Directive 2011/92/EU as amended by 2014/52/EU) (European Commission, 2017);
- Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2022);
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2022);
- Draft Advice Notes for preparing Environmental Impact Statements (EPA, 2015);
- Advice Notes on current practice in the preparation of Environmental Impact Statements (EPA, 2003); and
- Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (European Commission, 1999).

A reference list detailing the legislation, policy, guidance and literature sources used to inform the descriptions and assessments for each of the technical assessments is listed in each of the EIAR chapters presented.

This EIAR has been compiled to comply with the requirements of Article 94 and Schedule 6 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) and the Environmental Protection Agency (Industrial Emissions) (Licensing) (Amendment) Regulations 2020 (S.I. No. 190 of 2020). The overall EIAR is arranged in four volumes, as follows:

- Volume I: Non-Technical Summary;
- Volume II: Main Text (i.e. this document);
- Volume III: Technical Appendices; and
- Volume IV: Hydrogeological Assessment.

This EIAR has been prepared by RPS, on behalf of IMS, with specialist inputs provided by a team of suitably competent experts as listed in **Table 1-1** which also provides an outline of the structure of Volume II of this EIAR.

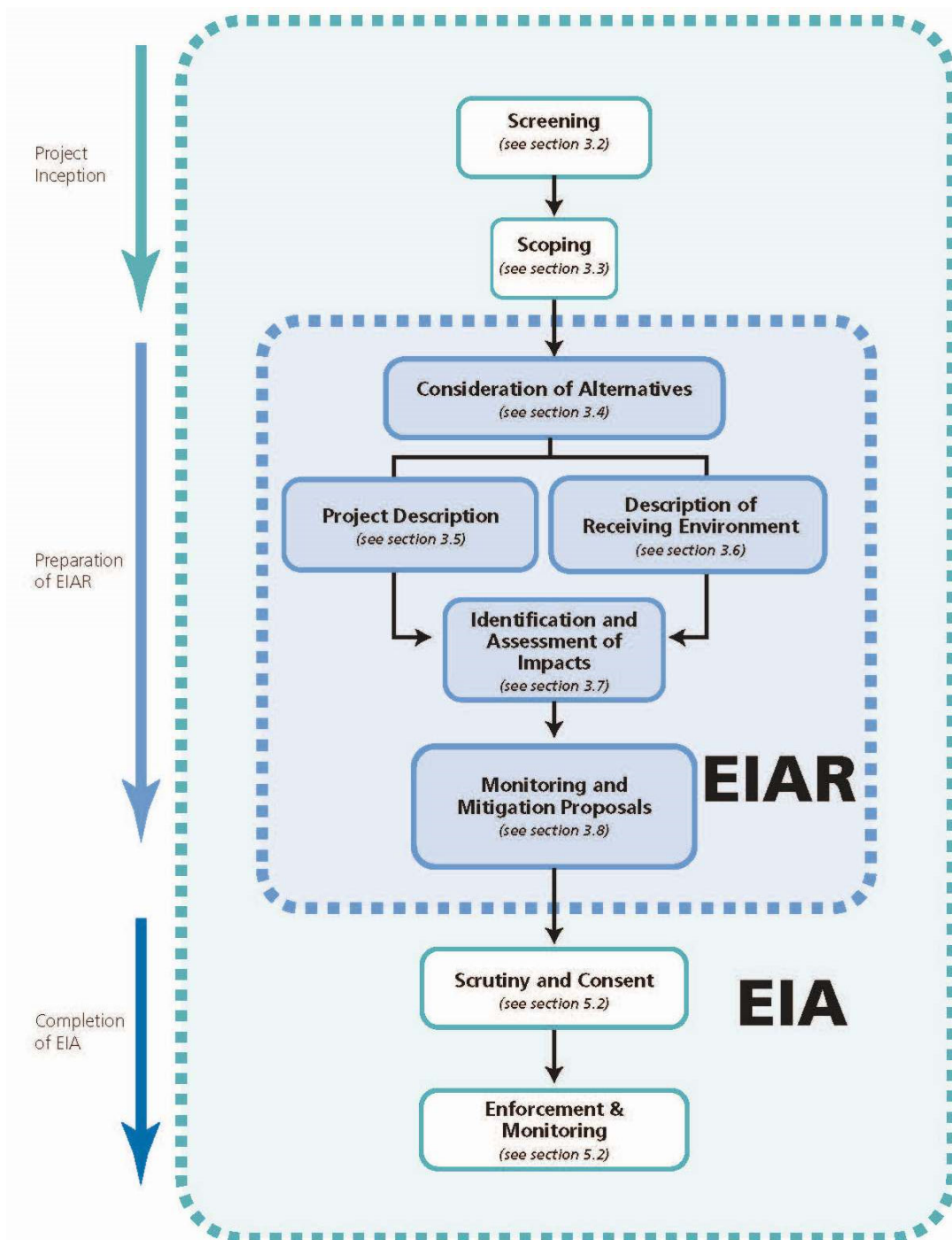


Figure 1-2 The Position of EIAR within the EIA Process²

² Source: EPA Guidelines on the Information to be Contained in an EIAR, May 2022

Table 1-1 EIAR Competent Experts

Discipline	Specialist	Qualifications and Experience
Chapter 1: Introduction Chapter 2: Background Chapter 3: Legislation and Policy Chapter 4 Alternatives Chapter 5: Project Description Chapter 17: Interactions	Paul Chadwick, RPS	BA (Mod) Chemistry M. Phil in Atmospheric Chemistry 23 years' experience in preparing EIA for waste, infrastructural, industrial and commercial development.
Chapter 6: Population	Valerie Brennan, RPS	BA International, MSc Town & Country Planning, Member of the Irish Planning Institute MIPI, Member of the Royal Town Planning Institute MRTPI 18 years professional planning experience advising on a wide range of waste, infrastructure, commercial and renewable energy projects.
Chapter 7: Human Health	Senuri Mahamithawa, RPS	BSc (Hons) Biology, MSc Environmental Technology; AIEMA - Associate Member of IEMA; 5 years' experience in Health Impact Assessment in Ireland and the UK.
Chapter 8: Biodiversity	Dr. Rob Rowlands RPS	Ph.D Ecology, BSc (Hons) Environmental Biology, Member of Chartered Institute of Ecology and Environmental Management (MCIEEM) 25 years' experience in preparing ecological assessment for a range of developments in Ireland and the UK.
Chapter 9: Soils Geology and Hydrogeology	Richard Graham, RPS	BSc (Hons) Geology, MSc in Geophysics, MSc in Hydrogeology 22 years professional experience of environmental consultancy as a Geophysicist and Hydrogeologist including landfill assessment.
Chapter 10: Water	Richard Graham, RPS	BSc (Hons) Geology, MSc in Geophysics, MSc in Hydrogeology 22 years professional experience of environmental consultancy as a Geophysicist and Hydrogeologist including landfill assessment.
Chapter 11: Air Quality and Climate	Paul Chadwick, RPS	BA (Mod) Chemistry M. Phil in Atmospheric Chemistry 23 years' experience in preparing EIA for waste, infrastructural, industrial and commercial development.
Chapter 12: Noise and Vibration	Caitriona Reilly, RPS	BSc (Hons) Environmental Science, PostGrad Diploma in Geographical Information Systems, Diploma in Acoustics & Noise Control, 15 years' experience in acoustics EIA for a wide range of infrastructure projects.
Chapter 13: Traffic and Transport	Ronan Grealy, RPS	B.E. (Hons) Civil and Environmental Engineering, M.Eng.Sc. (Civil): 'Traffic Impact Assessment of Developments' Chartered Member of the Institution of Engineers of Ireland

Discipline	Specialist	Qualifications and Experience
		20 years' experience in Transport Assessments for EIA, preparing Sustainable Transport Plans and preparing Urban Area Transportation Studies.
Chapter 14: Material Assets	Conrad Wilson, RPS	Honours Degree in Agriculture (Environmental) Advanced Farm Management Diploma, Farm Apprenticeship Board First Farm Management Diploma National Certificate in Agriculture 30 years' experience EIA for a wide range of waste and infrastructural projects.
Chapter 15: Cultural Heritage	Dr. Clare Crowley, Courtney Deery Heritage Consultancy	PhD in Archaeology, BA (Hons) in Ancient History, Archaeology & French, Certificate in Repair and Conservation of Historic Buildings, Certificate in Condition Surveys of Historic Buildings, 25 years' experience in evaluation of archaeological monuments, buildings, sites and landscapes for EIA.
Chapter 16: Landscape and Visual	Ray Holbeach, RPS	BSc (Hons) Environmental Science, Master of Landscape Architecture, Chartered Member of the Landscape Institute Member of the Irish Landscape Institute 31 years' experience in urban and rural design, and Landscape and Visual Impact assessment.

1.4 Consultation with An Bord Pleanála

In May 2019, IMS commenced the pre-application SID consultation process with ABP under Section 37B of the Planning and Development Act 2000, as amended and Article 210 of the Planning and Development Regulations 2001, as amended. As 'Prospective Applicant' for this consultation, IMS sought advice from ABP regarding the proposed application, the procedures for making the application and the considerations relating to proper planning and sustainable development and the environment. The ABP case reference for this consultation is PL06F.304428.

The consultation process was informed by a report and presentation prepared by IMS to outline in detail the nature of the proposed development for ABP. The consultation request resulted in three consultation meetings between IMS and ABP on the following dates:

- 5th September 2019;
- 14th October 2019; and
- 5th December 2019.

On the 28th of February 2020, ABP served notice to IMS under Section 37B(4)(a) of the Planning and Development Act 2000, as amended, that it was the opinion of the Board that the proposed development falls within the scope of paragraphs 37A(2)(a) and (b) of the Act and that the proposed development falls within the meaning of Section 37A of the Act. This required that any application for permission for the proposed development must be made directly to ABP under Section 37E of the Act.

During the final consultation meeting on the 5th of December 2019, IMS also consulted with ABP on the scoping of the application (including the EIA) and the following matters were raised by ABP:

- **Policy & Need:** ABP requested that the policy context and need for the project should be clearly set out in the application. In a general sense, ABP reiterated the need for as much clarity as possible on matters such as the planning history of the site and previous waste licences. ABPs representatives also advised on the need to be clear with regard to the matter of asbestos (note, no longer included in this application) and where this requirement is listed in the National Hazardous Waste Management Plan 2014-2020. These matters are addressed in **Chapters 2 and 3** of this volume of the EIAR and the Planning Report included in the application.

- **Planning History:** Historical chronology for various planning applications and waste licences should be made clear. The planning and waste history are included in **Section 3.3** of this volume of the EIAR.
- **Duration of permission:** ABP stated that it is important to distinguish between the duration of the planning permission being sought (i.e. 5 to 10 years) and the lifetime of operations (i.e. 25 years). These matters are addressed in **Chapter 1** of this volume of the EIAR and the Planning Report included in the application. The proposal consists of a 10-year permission for a 25-year lifetime of operation.
- **EIA/AA:** ABP advised that the EIAR for the planning application and that for the EPA licence application should be the same. This is confirmed and this EIAR has been prepared for this dual purpose.
- **Hydrogeology:** Having regard to the history of the site, ABP considered that the potential impact on hydrogeology and protection of ground water resources will be a significant issue in the consideration of an application for development. The EPA reasons for refusing the previous waste licence application must be addressed. This is noted and these impacts are assessed in full in **Chapter 9** of this volume of the EIAR as well as detailed supporting information provided in **Volume IV** of the EIAR.
- **Biodiversity:** ABP underlined the importance of addressing fully the impacts on the Peregrine Falcon, supported by surveys and scientific information. Any potential relationship with the conservation objectives of the Rogerstown Estuary SPA should be explored in detail in order to support the omission of the species from the NIS. This is noted and these impacts are assessed in full in **Chapter 8** of this volume of the EIAR as well as in the accompanying Natura Impact Statement.
- **Traffic and transportation:** ABP noted that this planning matter was of particular concern to Fingal County Council during the planning history of the site. This matter is addressed in **Chapter 13** of this volume of the EIAR.
- **Cultural heritage:** ABP noted that the surrounding area is one rich in cultural heritage, but this does not affect the subject site. This element is presented in **Chapter 15** of this volume of the EIAR.
- **Landscape and visual impact:** ABP suggested that it might be useful to reflect the intermittent period when the quarry is being in-filled and cross-sections would be useful. This has been assessed in the **Chapter 16** of this volume of the EIAR with photomontages showing the current, interim operational years and restored site included in **Volume III** of the EIAR.

Notes from all three meetings with ABP, the Board Direction BD-005255-20 (ABP-304428-19) and the associated inspectors report are included in **Appendix A of Volume III** of this EIAR.

It should be noted that during consultation with ABP in 2019, it was proposed to also include for the acceptance and infilling of small volumes of hazardous waste. This hazardous waste was restricted to construction materials containing asbestos (EWC 17 06 05*) only. An estimated intake volume of circa 10,000 tonnes per annum was proposed. Asbestos waste meets the definition and criteria of a stable non-reactive hazardous waste and is therefore suitable for disposal in a non-hazardous landfill provided it is landfilled in accordance with the requirements of Section 2.3.3 of the Annex to the Council Decision, 2003/33/EC, on the criteria and procedures for the acceptance of waste at landfills.

Following ongoing engagement with the community in the area (refer **Section 1.8**) and concerns raised over the risk associated with asbestos, IMS has agreed to remove this waste stream from the proposal and this waste (or any hazardous waste) is no longer included in this application.

While the inclusion of this hazardous waste fraction was a factor in the assessment by ABP, the inspectors report notes that the wider proposed development would also address significant capacity issues for other waste streams, including IBA and C&D and would be of strategic economic to the State and the region (Section 37A(2)(a)). As such, the omission of hazardous waste from the proposed development does not materially alter the findings of ABP that the proposed development falls within the scope of Section 37A(2)(a) and (b) of the Planning and Development Act, 2000, as amended, and constitutes strategic infrastructure.

1.5 Consultation with the Planning Authority

On the 8th of January 2020, IMS held a consultation meeting with the planning authority at the Fingal County Council offices in Swords, Co. Dublin. As part of the consultation, IMS provided a presentation to the planning authority on the proposed development and the status of the ongoing consultation with ABP (refer **Section 1.4**). The planning authority agreed with the initial views of ABP on the application scoping and also proposed the following elements:

- Traffic - The planning authority recommended that an updated baseline traffic survey is undertaken to reflect the current traffic volumes relative to the previous survey in May 2018. This survey has been commissioned in May 2022 and the results of same have been employed in the impact assessment prepared in **Chapter 13** of this volume of the EIAR.
- Community Fund – The planning authority suggested that IMS provides a consideration of a community fund as part of the application. The purpose of such a fund is to provide financial assistance to community organisations in the area to fund environmental, recreational and community projects as part of a wider mitigation regime. This element is presented in **Section 5.10** of this volume of the EIAR.

1.6 Consultation with the EPA

A pre-application consultation meeting was held with the EPA Waste Licensing Team on the 11th April 2019 at the EPA offices in Wexford. In advance of the meeting, IMS prepared a series of consultation responses for the EPA to inform the meeting. During the meeting the scope and nature of the Industrial Emissions Licence application were discussed and the EPA advised of additional specific requirements such as the EIAR and NIS.

1.7 Consultation with Other Bodies

The purpose of this section is to document the extent and nature of third-party consultation that has taken place in relation to the proposed development. It also outlines the key issues raised during the consultation process and how these issues have been addressed by the project team and considered in the impact assessments as described in **Chapters 6 - 17**.

The consultation process consisted of communicating with both statutory and non-statutory organisations and other competent parties as listed in **Table 1-2**. The primary objective of involving these organisations and parties at an early stage in the EIA process is to aid in the scoping of and the content of the EIAR.

All parties listed were consulted by email through three separate consultation events in May 2019, January 2020 and August 2022. Each event included a brief project description coupled with a series of site layout maps. The consultation process invited any comments, queries or observations from the contacted parties on the nature of the proposed development, the potential environmental impacts and the content of the EIAR.

Table 1-2 presents the summary of the consultation responses received and a copy of the more detailed responses received is included in **Appendix B of Volume III** of this EIAR. All comments and recommendations from each of the Statutory Authorities and Consultees have been taken into consideration in this EIAR.

Table 1-2 Statutory and Non-Statutory Organisations and other Competent Parties Consulted

Consultee	Responses
Department of the Environment, Climate and Communications – Geological Survey of Ireland	<p>The following points were raised by GSI in consultation:</p> <ul style="list-style-type: none"> • The proposed site is a County Geological Site (CGS). • In December 2019, Geological Survey Ireland carried out fieldwork within Nag’s Head Quarry to record and document the geology prior to infilling. • With the current plan, there are no further envisaged impacts on the integrity of current CGSs by the proposed development. • The Groundwater Data Viewer indicates an aquifer classed as a ‘Locally Important Aquifer - Bedrock which is Generally Moderately Productive’ underlies the proposed development. • The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. Recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and ‘Rock at or near surface’ in the assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas. • Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible.

Consultee	Responses
Department of Housing, Local Government and Heritage - Development Application Unit (DAU)	<p>The following points were raised by the DAU in consultation:</p> <ul style="list-style-type: none"> • Reference to the application of Directive 2014/52/EU into Irish planning law and the associated guidelines to be applied in EIA. • The development site is a known peregrine site. The EIA should assess impacts and include mitigation to avoid impacting on the breeding site of the falcons. • Guidance provided on the scope of the biodiversity impact assessment including baseline surveys and the National Biodiversity Data Centre. • Reference should be made to the National Biodiversity Action Plan 2017-2021 and any relevant County Biodiversity Plan, as well as the All Ireland Pollinator Plan 2015-2020. • The EIAR should also address the issue of invasive alien plant and animal species. • Need to consider cumulative impacts. • The need for a project specific Construction Environmental Management Plan (CEMP).
Transport Infrastructure Ireland	<p>TII have noted the following in the consultation response:</p> <ul style="list-style-type: none"> • The EIAR should identify the methods/techniques for any works traversing/in proximity to the national road network. • Consultations should be had with the relevant local authority/national roads design office with regard to locations of existing and future road schemes. • Clearly identify the proposed haul routes and capacity of these routes to accommodate the traffic. • Carry out a traffic impact assessment in line with the relevant TII guidelines relevant to the proposed thresholds. • Use TII standards for any Road Safety Audit or Road Safety Impact Assessment. • Use TII guidelines for any road design or construction proposed. • Have regard to TII Guidelines on Air and Noise within the EIAR. • The EIA should have due consideration for previous EIA undertaken in the area.
Irish Aviation Authority	Acknowledgement of consultation letter but no response issued.
Fáilte Ireland	No response issued.
Inland Fisheries Ireland	<p>IFI noted the following in consultation:</p> <ul style="list-style-type: none"> • Development is located in the catchment of the Ballough/ Corduff system. The Corduff River system is salmonid and supports a significant local population of both resident Brown trout and migratory Sea trout (both <i>Salmo trutta</i>). • EIAR should address the potentially highly polluting nature of the wastewaters generated at this facility and highlight the need for implementation of comprehensive leachate and surface water management measures in order to safeguard the ecological integrity of local surface and ground waters. • The accumulative effects from the development along with other planned development in the catchment should also be examined and discussed in the EIAR. • An Invasive Species and Biosecurity Plan should be included to treat and manage identified invasive species onsite.
Health Service Executive	<p>The following points were raised by the HSE in consultation:</p> <ul style="list-style-type: none"> • Reference to the following documents to be considered when preparing the EIAR: Guidelines on the information to be contained in EIA (2002); Advice Notes on Current Practice in the preparation of EIS (2003); Guidelines for Planning Authorities and An Bord Pleanála on carrying out EIA.; EU publication Environmental Impact Assessment of Project Guidance on the preparation of the Environmental Impact Assessment

Consultee	Responses
	<p>Report, EU, 2017; Reference to the application of Directive 2014/52/EU into Irish planning law and the associated guidelines to be applied in EIA.</p> <ul style="list-style-type: none"> The HSE will consider the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact. <p>Consultation</p> <ul style="list-style-type: none"> The need for public consultation. Accurate information should be obtained regarding the location of sensitive receptors. EIAR should contain proposals for keeping stakeholders informed and any measures to be employed during the construction and operation phase for dealing with enquiries and/or complaints from members of the public. <p>Protection of Surface and Ground Water</p> <ul style="list-style-type: none"> HSE raised concerns regarding the protection of the underlying aquifer. Baseline water quality of aquifer and a proposed monitoring programme to verify no direct emissions. Reference should be made to GSI's Groundwater Protection Scheme and to the location of any private drinking water sources within a 1km distance. All surface and groundwater mitigation measures should be clearly identified. Details of fuel and chemical storage and proposed bunding measures with provision of inspection and monitoring of bunding structures. Surface water to be used for activities such as wheel-washing and dust suppression. <p>Emissions to air, including noise and vibration:</p> <ul style="list-style-type: none"> Establish baseline air quality at nearest sensitive receptors by means of background air quality monitoring. CEMP to include dust minimisation and suppression measures. <p>Noise and Vibration</p> <ul style="list-style-type: none"> Assessment of existing noise environment and predicted noise and vibration levels from construction and operations. Noise assessment should include an evaluation of the likely significant impacts at sensitive receptors against a recognised standard for health protection – the HSE consider the predicted change in the noise environment to be the most relevant aspect and not an evaluation against an absolute noise exposure level. <p>Staff Welfare Facilities</p> <ul style="list-style-type: none"> Reference to the requirements of S.I. No. 278/2007 EC (Drinking Water) Regulations. Non-public supply must be verified through sampling programme. Foul wastewater including Population Equivalent calculations to be included.
Environmental Protection Agency	Acknowledgement of consultation letter but no response issued.
Heritage Council	No response issued.
Arts Council	No response issued.
Dublin Chamber of Commerce	No response issued.
Office of Public Works	<p>OPW noted the following:</p> <ul style="list-style-type: none"> The proposed facility is not adjacent to any OPW Arterial Drainage Scheme channels or LA Drainage District channels. OPW not aware of any flood history in the area or plans for a flood relief scheme at the location.

Consultee	Responses
Eastern and Midland Regional Assembly	No response issued.
Eastern-Midlands Regional Waste Office	No response issued.
IBEC	No response issued.
BirdWatch Ireland	Acknowledgement of consultation letter but no response issued.
Regional Fisheries Board	No response issued.
An Taisce	No response issued.
Irish Archaeological Guide	No response issued.
Irish Environmental Network	No response issued.
World Wildlife Fund	Acknowledgement of consultation letter but no response issued.
Bat Conservation Ireland	Follow bat survey guidelines in relation to bat surveys required.
National Biodiversity Data Centre	No response issued.
Irish Landscape Institute	Acknowledgement of consultation letter but no further comment at project level.
ESB Networks	Network connection should be considered as part of the planning application to determine the appropriate connection method prior to post application consent.
Institute of Public Health in Ireland	No response issued.
Archaeological Survey of Ireland	No response issued.
DAA (Dublin Airport Authority)	No response issued.
CEWEP	CEWEP Ireland is supportive of the proposed development and recognises that it is in alignment with the requirements of national and regional waste policy including those underlined in the National Hazardous Waste Management Plan 2014-2020 and the Eastern-Midlands Region Waste Management Plan.

Under Section 37E(3)(c) of the Planning and Development Act 2000, as amended, before IMS may apply to ABP for permission, copies of the application (including this EIAR) must be issued to a set of prescribed authorities. This must include a notice stating that submissions or observations may be made in writing to the Board in relation to—

- (i) the implications of the proposed development for proper planning and sustainable development, and*
- (ii) the likely effects on the environment of the proposed development, if carried out.*

Board Direction BD-005255-20 issued to IMS from ABP following the 2019/2020 consultation on whether the proposed development falls within the scope of Section 37A(2)(a) and (b) of the Planning and Development Act, 2000, as amended, direct IMS to issue a notice and a copy of the application to the following prescribed bodies:

1. Minister of Culture, Heritage and the Gaeltacht;
2. Minister for Communications, Climate Action and Environment;
3. Eastern and Midland Regional Assembly;
4. Fingal Co Council;
5. Dublin City Council;

6. Meath County Council;
7. Inland Fisheries Ireland;
8. EPA;
9. Failte Ireland;
10. An Taisce;
11. Health Service Executive;
12. Transport Infrastructure Ireland; and
13. Irish Water.

The following are not Prescribed Bodies for the purposes of Section 37E(3)(c) but are bodies which ABP recommended that the applicant should notify:

1. Health and Safety Authority;
2. Eastern-Midlands Waste Regional Authority; and
3. Geological Survey of Ireland.

As directed, a copy of the application and associated notice has been provided to each of the above prescribed bodies in advance of lodgement with ABP. The contact details for the prescribed bodies are listed in **Appendix C of Volume III** of this EIAR.

Note that the consultation to the EPA is in relation to planning matters only. A separate application will be lodged in due course in relation to the IE Licence Application.

1.8 Public Consultation

IMS undertakes ongoing engagement with community groups and individuals in the area to inform residents of operations on site and to resolve any issues that residents may experience as a result of operations. To support this application, a series of meetings and engagements were undertaken following initial consultation with ABP to consult with these groups on the scope of the proposed development and to elicit feedback on the proposals.

The primary concern raised by residents related to the potential to accept and landfill asbestos wastes at the site. Health risks associated with the transport and handling of this waste stream were the main focus of concern for residents.

As such, IMS has agreed to remove this waste stream from the proposed development. No asbestos (or any other hazardous material) is proposed for acceptance at the facility in this application. This omission reduces potential risks to air quality and human health as well as the wider environment from the proposed development.

Most recently, on the 1st September 2022 IMS issued a consultation letter to all residents located along the existing haul route advising residents of the scope of the proposed development and the potential for change in operations, traffic, noise, air and water. The commitment to remove asbestos from the proposal was also formally communicated.

A copy of this consultation letter is included in **Appendix D of Volume III** of this EIAR.

1.9 Difficulties Encountered Compiling the EIAR

Assumptions specific to certain environmental aspects are discussed in the relevant chapters of the EIAR. General Assumptions that have been made during preparation of the EIAR are set out below:

- Relevant information has obtained from publicly available sources and mapping databases such as the EPA, NPWS, GSI, OPW, etc. It has been assumed that the information is correct and while reasonable care and skill has been applied in review of this data no responsibility can be accepted for inaccuracies in the data supplied.
- The Covid-19 pandemic and the associated Government restrictions on passenger car and public transport journeys has had impacts on travel patterns and traffic flows. As a result, some assumptions

and projections were necessary for certain areas of this assessment, particularly the traffic assessments. Survey work has been undertaken in 2022 to compliment data from official sources to provide reliable and up-to-date base line information on which to undertake the environmental assessments.

- Any topic specific difficulties encountered beyond those presented above have been noted within the specialist chapters 6-17 of this EIAR.

1.10 References

1. Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.
2. The European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).
3. The European Union (Waste Management) (Environmental Impact Assessment) Regulations 2020 (S.I. No. 130 of 2020).
4. The Environmental Protection Agency (Integrated Pollution Control) (Licensing) (Amendment) Regulations 2020 (S.I. No. 189 of 2020).
5. The Environmental Protection Agency (Industrial Emissions) (Licensing) (Amendment) Regulations 2020 (S.I. No. 190 of 2020).
6. The European Union (Environmental Impact Assessment) (Environmental Protection Agency Act 199 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, (Department of Housing, Local Government and Heritage, August 2018).
7. Circular PL 05/2018 -Transposition into Planning Law of Directive 2014/52/EU amending Directive 2011/92/EU on the effects of certain public and private projects on the environment (the EIA Directive).
8. Environmental Impact Assessment of Projects–Guidance on Scoping (Directive 2011/92/EU as amended by 2014/52/EU) (European Commission, 2017).
9. Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2022).
10. Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR) (EPA, 2022).
11. Draft Advice Notes for preparing Environmental Impact Statements (EPA, 2015).
12. Advice Notes on current practice in the preparation of Environmental Impact Statements (EPA, 2003).
13. Guidelines on the information to be contained in Environmental Impact Statements (Environmental Protection Agency (EPA, 2002).
14. Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (European Commission, 1999).