# 2 BACKGROUND AND NEED FOR THE DEVELOPMENT

# 2.1 Overview

The need for the proposed development is derived from the urgent demand for capacity to treat construction, demolition and other wastes in the Greater Dublin Area (GDA). The abundant supply of available capacity for this range of wastes to be treated at the Hollywood site can help ease the capacity crisis. In addition, the development will further ease material supply chain issues through the delivery of a secondary raw material product for the construction sector as promoted by circular economy principles. The demand drivers for the development are threefold and include the following:

- The need for urgent additional capacity for construction wastes to meet the projected growth in the construction sector as set out in the Ireland 2040 - National Development Plan 2021–2030 and the National Planning Framework;
- The development of additional capacity to support the secondary raw materials market for the construction sector in line with circular economy policy; and
- The need for additional capacity to treat incinerator bottom ash (IBA) to meet the existing and projected demand for this waste fraction.

This chapter of the EIAR sets out the rationale for the drivers for the principle waste streams proposed coupled with an outline of the capacity of the site to accommodate these drivers.

#### 2.2 Demand for Treatment Capacity for Construction Wastes

In March 2020, the European Commission adopted the new Circular Economy Action Plan (CEAP) which focuses on a sustainable product policy framework and the identification of key value chains. The CEAP notes that construction and demolition (C&D) waste accounts for 35% of waste generated within the EU. In Ireland, construction waste accounted for circa 60% of all wastes generated within the State in 2019. This waste stream is exclusively generated by the construction sector which is experiencing significant growth in Ireland following the economic downturn. In 2019, Ireland generated 8.8 million tonnes of C&D waste continuing the significant growth in this waste stream observed since 2013, as shown in **Figure 2-1**. Soil and stone accounts for the largest fraction of this waste stream (typically 70-80% of the total stream) and increasing to 85% in 2019.



Figure 2-1 Construction and Demolition Waste generated in Ireland 2012-2019 (source: EPA)

The National Development Plan 2021-2030 (NDP) sets out the plan for meeting the State's infrastructure and investment needs over the next ten years, through a total investment estimated at €165 billion over the period through a range of development measures such as:

- Deliver an average of 6,000 affordable homes each year;
- Urban and Rural Regeneration and Development Funds;
- Completion of investments at Dublin Port, the Port of Cork and Shannon Foynes Port; and
- Delivery of 150 to 200 school building projects will be delivered annually over the period 2021 to 2025.

These measures will be achieved through the National Planning Framework (NPF) which includes commitments such as recycling rates for the reuse of brownfield land by requiring 40% of new housing to be built within infill and brownfield lands. This is specifically committed to through National Policy Objective 12:

NPO12 The Government will establish a National Regeneration and Development Agency to work with local authorities, other public bodies and capital spending departments and agencies to co-ordinate and secure the best use of public lands, investment required within the capital envelopes provided in the National Development Plan and to drive the renewal of strategic areas not being utilised to their full potential. The Government will consider how best to make State lands available to such a body to kickstart its development role and to legislate for enhanced compulsory purchase powers to ensure that the necessary transformation of the places most in need of regeneration can take place more swiftly and effectively.

Such investment will continue the recent strong growth in the construction activity and the waste streams associated with the construction industry (in particular from brownfield development). This recent growth has created a supply chain risk whereby there is a significant shortfall in the provision of treatment sites for construction and demolition wastes to enable the planned infrastructure to be developed at the required pace. With further projected growth in waste volumes, this shortfall in waste treatment capacity is likely to constrain the objectives of the NDP.

Under National Strategic Outcome 4 of the NDP on Sustainable Mobility, the State commits to a number of major infrastructural priorities within the GDA including the DART+ programme and MetroLink. If consented, these major projects will further increase the supply chain pressures to manage the waste arisings. A Railway Order application for MetroLink was lodged in September 2022 accompanied by an EIAR. Chapter 24 of this EIAR on Materials and Waste Management, specifically lists the operations at the Hollywood facility as both a source for circular secondary aggregates as well as a destination for construction wastes generated. The reliance of these major NDP infrastructure projects on the proposed development highlights the key role the site plays in managing these waste and resource streams.

The three Waste Management Regions carry out periodic inventories and projections of C&D waste in Ireland and the details of the most recent assessment carried out in 2022 is presented in **Table 2-1** and **Figure 2-2**. This data shows the measured and validated data for 2012 to 2019 from the EPA statistics coupled with projected data for the period 2020 to 2030. Growth factors from the 92<sup>nd</sup> Euroconstruct Report for Ireland (Winter 2021) have been applied and extrapolated to forecast data for the years 2019 to 2030. This forecast data includes development planned under the NDP (including housing).

The data illustrates that total C&D waste volumes generated within the State will increase to circa 12.65 million tonnes by 2030. Similarly, soil and stone (the largest fraction of C&D waste) will increase to circa 10.73 million tonnes by 2030 within the State. It is noted that while these are national figures, the bulk of the waste generation is within the GDA. This data highlights the projected increase in demand for national capacity to manage C&D wastes, and in particular soil and stone, within the State to service the growing construction sector and to ensure that there are no supply chain issues with managing these waste streams legally.

Year	Total C&D Waste (million tonnes)	Total Soil and Stone Waste (million tonnes)	Note
2012	3.14	2.27	Measured
2013	2.94	2.04	Measured
2014	3.84	2.89	Measured
2015	5.17	3.69	Measured
2016	5.35	4.30	Measured
2017	4.75	3.83	Measured
2018	6.19	4.70	Measured
2019	8.83	7.49	Based on Projected Growth
2020	7.68	6.51	Based on Projected Growth
2021	7.37	6.25	Based on Projected Growth
2022	7.99	6.78	Based on Projected Growth
2023	8.71	7.39	Based on Projected Growth
2024	9.26	7.86	Based on Projected Growth
2025	9.77	8.29	Based on Projected Growth
2026	10.30	8.74	Based on Projected Growth
2027	10.87	9.22	Based on Projected Growth
2028	11.47	9.73	Based on Projected Growth
2029	12.04	10.22	Based on Projected Growth
2030	12.65	10.73	Based on Projected Growth

#### Table 2-1 Measured and Projected growth in Construction and Demolition Waste in Ireland



Figure 2-2 Measured and Projected growth in Construction and Demolition Waste and Soil Waste in Ireland

This analysis has been further developed to assess the future levels of generation for the various fractions of soil wastes (inert, non-hazardous and hazardous waste). **Figure 2-3** shows the projected generation rates for these waste streams up to 2030. Typically inert soils constitute circa 84% of total soil waste with non-hazardous (circa 15%) and hazardous soils (circa 1%) making up the remainder. All streams are projected to grow in the short to medium term in line with the projected growth in construction. Non-hazardous soils are projected to increase to circa 1.6 million tonnes by 2030 but, as noted, the policy for greater brownfield development may further increase the volume of non-hazardous soils generated.



Figure 2-3 Projected growth in Construction and Demolition Waste Streams

While the demand for treatment capacity is high and growing, the supply of C&D treatment capacity within the State is more static with clear capacity risks mounting. To understand the treatment capacity dynamics, it is important to clarify the various types of treatment infrastructure available:

- Soil recovery facilities accept 'clean' soil waste for recovery primarily sourced from greenfield sites. These unlined facilities use the materials accepted for backfilling, replacing soil and stone removed during previous excavations often from quarry works;
- Inert landfill facilities accept wastes which comply with the waste acceptance criteria limits for inert landfills as described in the EU Landfill Directive. These facilities are lined and can therefore accept a more diverse mix of wastes, including brownfield wastes, without having any adverse impact on the environment – the current operations at Hollywood fall within this category; and
- Municipal waste landfills are landfills designed for disposal of municipal 'black bin' wastes and these are
  also engineered with a liner, cap and leachate and landfill gas collection systems. While these landfills
  primary purpose is to manage municipal wastes, other non-hazardous wastes (including C&D nonhazardous waste) can also be managed at these landfills, subject to the conditions of the relevant waste
  licence.

In December 2020, the Regional Waste Management Offices published a report detailing the capacity of the waste sector in Ireland to manage the current volumes of C&D wastes along with projections on the amount of such waste likely to arise in the short to medium term. This report highlights existing and predicted generation levels of various C&D waste streams and the available capacities to treat these streams and the findings may be summarised as follows:

- Consented lifetime capacity for soil recovery facilities is substantial providing adequate short to medium term capacity supply for the market;
- There is an increasing demand for inert landfill capacity as construction and development at brownfield sites in urban centres increases;

- The data shows that current capacity for the acceptance of non-hazardous soil wastes for disposal is severely limited and disposal intake at active facilities has reduced; and
- Available void capacity at non-hazardous landfills is prioritised for other streams principally residual municipal waste and will cease to be an option for non-hazardous construction wastes.

In short, the report concluded that there remains a capacity gap for non-hazardous C&D streams, in particular soils, fines, rubble and concrete and it was recommended that additional disposal capacity is provided for this stream in the short to medium term to facilitate progress on key infrastructure under the NDP. More recent data published by the Regional Waste Management Offices and the EPA has been used to further update the findings of this capacity report and these are summarised in the following sections.

In relation to soil and stone, there has been a large increase in the amount of waste generated in recent years, increasing from 6.2 million tonnes in 2018 to 7.5 million tonnes in 2019. Sufficient capacity is needed in the market to manage such increases and prevent leakage out of the system through unauthorised activities. With increasing volumes of soil and stone forecast, a network of secure long-term soil recovery facilities is required to meet future market demands. **Table 2-2** provides a summary of available capacity within soil recovery facilities in Ireland showing that circa 5.8 million was reported as accepted in 2020 with a remaining 32 million tonnes available capacity remaining in the market between facilities regulated by the EPA (licensed) and those regulated by the local authorities (permitted and registered). This analysis indicates that there is significant existing national capacity available for the backfilling of 'clean' soil and stone into these facilities. However, as noted in **Figure 2-3**, levels of this waste stream may grow to in excess of 9 million tonnes by 2030 which may impact on the existing capacity in the medium term.

It is further noted that the EPA has signalled the intention to develop national Article 27 criteria for clean soil/stone and once implemented, this measure may significantly reduce the volumes of these materials captured and reported as waste. This may reduce the capacity demand for clean soil and stone if successfully implemented and adopted by the sector.

Consent	No. of Facilities	Market Capacity (tonnes)	Accepted 2020 (tonnes)	Remaining Capacity (tonnes)
Licensed	16	4,746,400 (annual)	2,773,687	25,272,206 (lifetime)
Permitted <sup>3</sup>	230	9,939,156 (lifetime)	2,436,586	6,686,156 (lifetime)
Registered	228	3,598,291 (lifetime)	578,470	906,948 (lifetime)
Total	474	-	5,788,746	32,865,310

#### Table 2-2 Available capacity at Soil Recovery Facilities in Ireland

Inert landfill facilities accept wastes which comply with the waste acceptance criteria limits for inert landfills as described in the EU Landfill Directive. As these facilities are fully engineered with a basal liner, the waste that may be excepted is broader than the clean soil and stone accepted at soil recovery facilities. This includes brownfield materials (non-hazardous soils) which can contain physical contaminants (e.g. brick and concrete) as well as chemical contaminants (e.g. hydrocarbons, PAHs, PCBs) at levels prescribed in the Landfill Directive and relevant Waste Licences as opposed to the unlined soil recovery sites which are not covered by the Landfill Directive and can only accept uncontaminated materials.

**Table 2-3** shows the currently licensed inert landfill facilities in the State (including the existing operation at Hollywood) and associated intake in 2019 and 2020. This data highlights that there are only three active inert facilities in the State with a combined annual capacity of 877,100 tonnes per annum which equates to circa 15% of the capacity available at the soil recovery facilities. As noted in **Figure 2-3**, this waste stream is projected to grow to at least 1.6 million tonnes by 2030 and the existing available capacity (0.88 million tonnes with Kyletalesha due to close in 2022 reducing the capacity to 0.83 million tonnes) only accounts for 55% of the projected growth. As such, there is a clear capacity crisis pending for non-hazardous C&D wastes as noted in the December 2020 report by the Regional Waste Management Offices.

<sup>&</sup>lt;sup>3</sup> Intake and remaining capacity figures for permitted and registered facilities are subject to under estimation due to incomplete rates of reporting

Facility	Location	Annual Licensed Capacity (tonnes)	Accepted 2019 (tonnes)	Accepted 2020 (tonnes)
Integrated Materials Solution (W0129-02)	Dublin	500,000	270,842	326,363
Walshestown Restoration Ltd. (W0254-01)	Kildare	330,000	229,650	283,986
Kyletalesha Landfill (W0026-03) – expected to cease waste acceptance in 2022	Laois	47,100	25,085	28,597
Total		877,100	525,577	638,946

#### Table 2-3 Operational Facilities accepting Inert Waste in Ireland

Non-hazardous soil and stone is material that does not meet the hazardous or inert waste acceptance criteria limits for as described in the EU Landfill Directive. Historically, this material was accepted at municipal solid waste landfills of which there are three active within the State (in Wicklow, Kildare and Meath). However, with the existing capacity crisis for the management of municipal waste, any stream that competes with municipal waste for landfill void space has been restricted at these sites. As such, there is very limited capacity to accept non-hazardous soil within the State with this waste steam growing.

In short, the more recent data sets conform the findings of the 2020 capacity report which may be summarised as follows:

- While clean soil and stone has adequate capacity in the short term, the capacity in the medium to long term is less certain against the projected growth of construction wastes. Additional infrastructure will be required in the market in the medium to long term to meet this capacity need in the event that the national Article 27 decision is unsuccessful in diverting this material from the waste regime.
- There remains a significant capacity gap for non-hazardous soils both at the existing inert landfills and with the absence of any alternate options for treatment. This capacity crisis is likely to be exacerbated in the short term with this waste stream projected to grow to circa 1.6 million tonnes by 2030. The absence of sufficient consented and environmentally sound treatment capacity for this waste stream will have significant supply chain implications for the growing construction sector.

Given the current and projected capacity issues identified, there is an immediate need for the continuation of existing available capacity but also the development of future capacity for these waste streams. This need has been signaled by the local authority sector for inclusion in the National Waste Management Plan for a Circular Economy which will be published for public consultation in early 2023. This Plan is expected to include a specific policy to ensure additional capacity is made available for the management of non-hazardous construction and demolition waste streams (in particular soils, fines, rubble and concrete).

The proposed development includes significant additional capacity for the market to manage non-hazardous waste streams and will respond to the requirements of this policy. In addition, the operation of the aggregate recovery unit and the end of waste process on the site currently aid in maximizing the circular potential of aggregates and concrete to facilitate the reuse of these materials. In this regard, the circular functions on the site will help to minimise the volume of waste that requires capacity within the landfill through maximising the reuse potential.

It is noted that the local authority sector are actively seeking to prohibit the landfilling of non-hazardous wastes in municipal waste landfills. As noted above, this action is a response to the municipal waste capacity crisis and will further reduce the treatment options for non-hazardous C&D waste placing greater pressure on the existing treatment options (such as the Hollywood site).

In summary, the current and projected increase in construction waste streams (including brownfield soils comprising non-hazardous soils and inert soils is driving the need for development of greater capacity and diversity for treatment of these streams to meet the demands of the NDP, NPF and the expected policy position for the draft National Waste Management Plan for a Circular Economy. The Hollywood site is ideally placed with a significant capacity to allow for maximising the circular potential of a greater diversity of waste streams and to facilitate sustainable recovery at this site. The proposed development seeks to maximise this capacity and diversify the waste streams accepted at the site to meet this projected demand.

# 2.3 Supply of Landfill Capacity for Construction Wastes

An Annual Environmental Report (AER) is reported by IMS to the EPA each year providing key operational statistics and monitoring data. The AER waste intake and void capacity for the site in the period 2003 to 2020 is summarised in **Table 2-4** and graphically in **Figure 2-4**. The actual intake for disposal has varied significantly between 2003 – 2020 with the largest intake volumes occurred between 2004 – 2008 with a peak actual intake of 433,602 tonnes for disposal. This period coincided with the construction boom and the annual generation rates nationally generated the demand for capacity at the site.

Post 2008, the actual intake is significantly lower as a result of the economic downturn and only in three years has the intake rate surpassed 150,000 tonnes (2016, 2018, 2019 and 2020) reflecting the growth in waste generate rates in recent years. Note that the 2017 tonnage is comparatively low as the site transferred ownership in this year which impacted on waste operations and a lower throughput was accepted.

The remaining void space on the site is also recorded in the AER and is presented in **Table 2-4**. As expected, the remaining licensed capacity is decreasing on a yearly basis inconsistently based on the infill rates. Note that in 2016 the remaining capacity increased due to a void survey carried out in 2016 resulting in an adjustment on the 2015 remaining void.

**Figure 2-4** displays the trend of the void space available from 2008 (after the quarrying operations had ceased) up to the most recently reported year (2020). The void space decreases at an inconsistent rate with an increase in 2016 due to a survey being carried out that provided an adjustment on the 2015 void.

Table 2-4 The annual intake for dis	posal at Hollywood an	nd remaining licensed ca	pacity (2003 - 2020)
	posal at nonywood an	ia remaining neensea ea	pucity (2000 - 2020)

Year	Authorised / Licenced Annual Intake for Disposal (tpa)	Actual Intake for Disposal in Reporting Year (tpa)	Remaining Licensed Capacity at the End of Reporting Year (m³)
2003	340,000	20,750	-
2004	340,000	173,037	-
2005	340,000	330,973	-
2006	340,000	339,753	-
2007	340,000 / 500,000	433,602	-
2008	500,000	225,996	4,107,002
2009	500,000	42,206	4,069,651
2010	500,000	30,626	4,054,338
2011	500,000	27,378	4,040,649
2012	500,000	41,565	4,019,867
2013	500,000	25,028	4,007,353
2014	500,000	30,344	3,992,181
2015	500,000	66,433	3,958,964
2016	500,000	160,041	3,995,116
2017	500,000	54,747	3,967,742
2018	500,000	226,946	3,655,015
2019	500,000	270,842	3,500,000
2020	500,000	326,363	-





In short, the Hollywood site offers significant capacity for the landfilling of construction and other wastes at the site with an estimated 3.5 million cubic metres of void space available. The scale of the capacity available at the Hollywood site makes the site one of the largest waste facilities in the country. It is expected that the draft National Waste Management Plan for a Circular Economy will include criteria and a policy relating to existing and future nationally important waste infrastructure. Nationally important infrastructure is of the type and scale deemed essential to maintain a functioning waste market within the State to maintain current supply chains for the growing construction market. Specifically the construction waste criteria of relevance to the proposed development expected to include landfills for non-hazardous/non-inert soil and stone and inert landfills with a capacity greater than 100,000 tonnes per annum. The proposed development would therefore be categorised as nationally important infrastructure under the plan criteria.

In summary, the scale of the capacity at the proposed development is considerable and would make a significant contribution to resolving the capacity issues noted in **Section 2.2**. Furthermore, the scale of the facility will likely designate the proposed development as 'nationally important infrastructure' under the draft National Waste Management Plan for a Circular Economy making the site essential to maintain a functioning waste market within the State.

### 2.4 Secondary Raw Materials

Traditionally the construction sector in Ireland operated on a linear consumption model whereby virgin aggregates were quarried (such as at the former operation at the Hollywood site) for use in the construction sector. Waste from the construction sector was than backfilled into these quarries to restore the sites to natural ground levels. However, this traditional linear consumption model is no longer sustainable requiring continual development of quarries and sand/gravel pits to meet the construction sector need for virgin material with wider implications for the environment in the development of these quarries.

European and Irish policy is currently making the transition to a more sustainable circular model across all aspects of the economy. In relation to construction waste, the primary focus is on the growth of the secondary materials market to offset the need for virgin or primary materials. Secondary raw materials are recycled materials that can be used in manufacturing processes instead of, or alongside, virgin raw materials. The use of secondary raw materials presents a number of advantages including increased security of supply, reduced material and energy use and reduced impacts on the climate and the environment.

The policy landscape has changed significantly in the past two years with a significant shift in focus to the circular economy and the use of secondary raw materials across all sectors. Some of the key policy mechanisms with relevance to this project are outlined in the following paragraphs.

The 2nd Circular Economy Action Plan was published by the EU in 2020 as a building block of the European Green Deal and recognising the need to accelerate the circularity transition to the mainstream economy. This Plan identifies seven key product value chains including construction waste as having a high circular potential and states the object to drive the secondary raw materials market through minimum recycled content in materials. Specifically for construction waste, one of the key objectives of European policy is:

Addressing the sustainability performance of construction products in the context of the revision of the Construction Product Regulation, including the possible introduction of recycled content requirements for certain construction products, taking into account their safety and functionality.

The Waste Action Plan for a Circular Economy was published in 2020 by the Department of the Environment, Climate and Communications (DECC) and sets out the Government policy commitment to meeting targets and provides a roadmap for the circular economy in Ireland. One of the principle objectives of the Waste Action Plan is ensuring materials and products remain in use longer by rewarding circularity and discouraging waste. Specifically in relation to construction waste, the Waste Action Plan commits to the following:

We will put in place incentives to encourage the use of recycled materials including examining a possible levy on the use of virgin aggregates in construction projects to incentivise the use of recycled C&D materials, or build thresholds into Green Public Procurement.

The Whole of Government Circular Economy Strategy 2022-2023 was published by DECC in 2021 as a strategic document intended to explain what the circular economy is, why Ireland needs to achieve a circular economy and how national policy will develop to support that goal. This strategy notes that:

Within the Construction and Demolition sector, greater resource efficiency and resource re-use could avoid the need for millions of tonnes of virgin raw materials per annum, as well as reducing the carbon intensity of our built environment. The development of the next iteration of this Strategy should support and enhance existing circular initiatives on the part of the sector, for example through the work of the EPA's reorganised Circular Economy Programme. Reducing the volume, and associated costs, of Construction and Demolition waste could also contribute to greater affordability, particularly in relation to the high-density residential sector.

In short, the recent significant changes in the policy base for waste has highlighted the circular potential of the construction sector as a priority area. This policy base signalled the need for the sector to move away from the use of virgin aggregates and other materials towards a more circular secondary raw materials market. A range of policy documents and specific policies have been presented in this section to highlight this specific need. The proposed development seeks to accept wastes but to maximise the circular potential of these materials and to generate secondary raw materials (through enhanced aggregate recovery, concrete end of waste and other circular mechanisms) for reuse in the sector. The proposed development will be the first such circular economy campus developed within the State to respond to the policy direction for construction waste.

# 2.5 Need for Additional IBA Capacity

Bottom ash is generated when the non-combustible fraction of municipal solid waste charged to the furnace in waste to energy plants forms a residue (ash). This material is generally referred to as incinerator bottom ash (IBA). IBA is generated at a rate of approximately 200-250kg/t of waste. Currently, there are two consented (with planning and license) municipal waste thermal treatment plants that generate IBA as follows and the total IBA generated is also listed:

- Poolbeg Waste to Energy 104,061 tonnes (in 2018 135,000 tonnes at capacity).
- Carranstown Waste to Energy 36,786 tonnes (in 2018, at capacity).

The Poolbeg plant current exports IBA to the Netherlands for metal recovery while the Carranstown facility sends the IBA for recovery at landfill within Ireland. Both facilities are located within 30km of the Hollywood site which is ideally placed to provide a local and self-sufficient location for recovery of this waste stream generated within the region.

In 2020, approval was granted by the EPA for the classification of IBA as non-hazardous waste opening up wider treatment options for this waste stream. Subsequently in 2021, ABP granted planning consent for the acceptance of up to 150,000 tonnes per annum of IBA at Knockharley landfill in Meath (Case reference: PA17.303211). A licence review to permit this process is currently with the EPA. If fully consented, this

facility would largely cater for the current volumes of IBA generated by the two thermal treatment plants listed.

However, additional IBA treatment capacity would be required if any additional thermal treatment capacity is realised. It is noted that the Poolbeg Waste to Energy plant has sought an additional 90,000 tonnes capacity which has been granted approval by ABP in 2021 (Case reference: YA29S.309812) and is currently awaiting a licence review with the EPA (W0232-02). In addition, the 2015 Regional Waste Management Plans signaled the need for further dedicated thermal treatment capacity within the State through the development of up to 300,000 tonnes of dedicated additional thermal recovery capacity for the treatment of non-hazardous residual wastes nationally.

A thermal treatment facility of this scale would generate an estimated 60,000-75,000 tonnes of IBA per annum which would require additional treatment capacity over that already consented at Knockharley.

In the event that the future 300,000 tonnes of additional thermal recovery capacity are developed, there is a considerable shortfall in the State's capacity to be self-sufficient in the treatment of IBA. Hence, the proposed development at Hollywood is of strategic importance for self-sufficiency and economic development within the State and would be able to significantly contribute to treatment capacity for this projected waste stream.

### 2.6 Summary

This chapter presents the details of the increasing trend and projected growth in the generation of construction and demolition wastes nationally based on projected construction trends. These recorded and projected growths illustrate that total construction and demolition wastes will increase nationally to circa 12.65 million tonnes by 2030. These increased generation rates will increase the demand for intake capacity in the region and hence there is a strong demand for suitably licensed C&D waste facilities in the medium term.

The current and projected increase in construction waste streams (including brownfield soils comprising nonhazardous soils and inert soils) is driving the need for development of greater capacity and diversity for treatment of these streams to meet the demands of the NDP, NPF and national waste and circular economy policy. The Hollywood site is ideally placed with a significant capacity to allow for maximising the circular potential of a greater diversity of waste streams and to facilitate more sustainable treatment at this site. The proposed development seeks to maximise this capacity and diversify the waste streams accepted at the site to meet this projected demand.

The scale of the capacity at the proposed development site is considerable and would make a significant contribution to resolving the capacity issues identified above. Furthermore, the scale of the facility likely designates the proposed development as 'nationally important infrastructure' under the expected policy in the draft National Waste Management Plan for a Circular Economy and would categorise the site as essential to maintain a functioning waste market within the State.

The proposed development seeks to accept wastes but to maximise the circular potential of these materials and to generate secondary raw materials (through measures including aggregate recovery and concrete end of waste) for reuse in the sector. The proposed development will be the first such circular economy campus developed within the State to respond to the policy direction for construction waste.

The proposed development will provide essential capacity for non-hazardous incinerator bottom ash to cater for the planned growth in thermal treatment within the State.

In short, the continuation and diversification of the current operations at the site is essential to provide suitably licenced capacity for wastes from the projected construction increases proposed in the short term.

# 2.7 References

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