

INTEGRATED WASTE MANAGEMENT FACILITY AT HOLLYWOOD CIRCULAR ECONOMY CAMPUS

Environmental Impact Assessment Report Volume III: Technical
Appendices



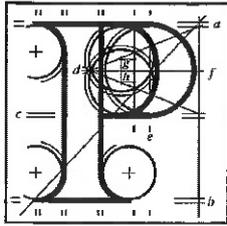
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Appendix A

Consultation with ABP



An
Bord
Pleanála

Record of 1st Meeting ABP-304428-19

Case Reference / Description	ABP-304428-19 Integrated waste management facility at Hollywood Great, Nag's Head, Naul, Co. Dublin.		
Case Type	Pre-application consultation		
1st / 2nd / 3rd Meeting	1 st		
Date	05/09/19	Time	11.30-12.50

Attendees
Representing An Bord Pleanála
Anne Marie O'Connor, Assistant Director of Planning (Chair)
Breda Gannon, Senior Planning Inspector
Josephine Hayes, Senior Executive Officer
Kieran Somers, Executive Officer
Representing the Prospective Applicant
Cian O'Hora, IMS
Des Johnson, Planning Consultant
Leah Kenny, RPS
Paul Chadwick, RPS

Introduction:

The Board referred to the letter received from the prospective applicant requesting pre-application consultations and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters it wished to receive advice on from the Board.

The Board mentioned general procedures in relation to the pre-application consultation process as follows:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or any legal proceedings.

Presentation by the prospective applicant:

The prospective applicant proposes develop fully-lined and engineered landfill cells for an integrated waste management facility for a mixture of hazardous, non-hazardous and inert wastes at a rate of 500,000 tonnes per annum over a 25 year period. The proposed development includes a new facility entrance (current site entrance to be closed), an administration office building, weighbridges, car parking, internal haul routes, a storage building, an ESB substation, leachate management infrastructure and surface water management infrastructure.

The subject site is located in North County Dublin and is in close proximity to the existing Poolbeg and Carranstown waste management facilities.

Planning permission was granted hazardous waste facility in June 2001 (PA0018) but was not implemented as an EPA Waste Licence was refused. This permission was extended by a five-year period to June 2021 by Fingal County Council and the ownership and licence for the facility was transferred to the prospective applicant in June 2017.

There is an existing waste licence for in-filling of inert construction waste on the site (since 2002) and some of the cells are already capped in this regard. A further permission in this regard was granted in 2007. The prospective applicant stated that the existing landfill is the only one remaining in county Dublin and there is a particular focus on construction and residual waste management as part of operations. Consequent to an end-of-waste decision by the EPA to recycle construction waste, the waste types it accepted at the site has expanded to deal with more problematic types of construction waste.

The prospective applicant said that the instant proposal largely includes infrastructural elements which were granted permission under case reference number 06F.PA0018 and also seeks to address the EPA's reasons for refusing the relevant waste licence in January 2016. In this latter regard, the prospective applicant noted the reduction and alteration with respect to the nature and quantity of the hazardous waste stream to be landfilled at the facility (solely asbestos waste in the current proposal which has very low leaching potential). The prospective applicant also noted that detailed hydrogeological analysis of the receiving

environment has been undertaken since the time of the waste licence refusal. A detailed quantitative risk assessment is also being undertaken to demonstrate the low risk to groundwater from the current proposal.

Seventh Schedule and section 37A(2) criteria:

With regard to the Seventh Schedule of the Planning and Development Act 2000, as amended, the prospective applicant pointed out that the proposed development is of a class of activity under the headings of landfill and an installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes. The prospective applicant offered its opinion that the proposed development would comprise strategic infrastructure having regard to the criteria set out under section 37A(2) of the Planning and Development Act 2000, as amended for the following reasons:

- Subsection (a) – the development proposes to accept asbestos waste (hazardous), incinerator bottom ash (non-hazardous) and construction waste (non-hazardous and inert). With respect to asbestos waste, the prospective applicant pointed out that there is currently no licensed landfill in the State to accept and landfill asbestos waste and that all such waste is currently exported. It referred to the fact that the EPA's National Hazardous Waste Management Plan 2014-2020 sets out a key strategic need to deal with the disposal of such waste with a capacity of up to 20,000 tonnes per annum. The prospective applicant said that it has had discussions with both the EPA and the Department on this particular matter.

With regard to incinerator bottom ash, the prospective applicant said that it is estimated that the Poolbeg and Carranstown facilities will generate in the order of 170,000 tonnes of IBA per annum at full capacity. Referring to the fact that the majority of IBA currently generated is exported, the prospective applicant said that there is a strategic economic need for the proposed facility in this regard and that prevailing policy supports this.

With respect to construction waste, the prospective applicant noted that activity in the construction sector is significant once again and expected to increase with regard to housing projections and major infrastructural projects applying for consent. Referring to the fact that over 250,000 tonnes of construction and

demolition waste was exported in 2018, the prospective applicant said that the overall objective is to future-proof the supply chain for the Greater Dublin Area.

- Subsection (b) – the prospective applicant referred to the National Planning Framework and emphasised that the proposed development is consistent with waste-related policies and will be significant in delivery of key national policy objectives. The Regional Spatial and Economic Strategy recognises the need to explore ways to deal with waste and contamination relating to brownfield regeneration. The Eastern-Midlands Region Waste Management Plan 2015-2021 and the National Hazardous Waste Management Plan 2014-2020 support the concepts of sustainable waste management treatment, a circular economy and self-sufficiency generally. The prospective applicant also remarked that the EPA's preference is for larger restoration sites, such as this one, ahead of smaller-scale sites.
- Subsection (c) – the prospective applicant stated its opinion that the proposed development would have a significant effect on the functional area of more than one planning authority given its central objective to serve the construction sector in the Greater Dublin Area and the general proximity of the subject site to other local authorities and the M1. The prospective applicant also emphasised the point that, in the event of planning consent being forthcoming, the proposed development would be the sole facility within the State for the disposal of asbestos waste and would also facilitate the State's objective to deal with national waste in a self-sufficient manner.

Noting these points, the Board's representatives referenced the current SID applications which are before it for Drehid (ABP-300506-17) and Knockharley (ABP-303211-18), both of which propose an element of IBA storage. The prospective applicant said that it is aware of these planning applications and has been liaising with Indaver Ireland in particular. The prospective applicant noted the current permission it has (under case reference number 06F.PA0018) and said that the overarching objective is to have a level of contingency in the State.

Current proposal v PA0018:

- The prospective applicant noted that elements such as the capacity per annum and lifespan of the permission being sought are the same as that under

06F.PA0018. With regard to ancillary infrastructural elements, it noted that these are largely the same with the exception of the solidification plant which is now being omitted in the current proposal. The number of proposed car parking spaces will be reduced from fifteen to ten.

- With respect to hazardous waste, the prospective applicant noted that a much smaller element is now being proposed which will comprise of mono-cells on site. The non-hazardous area will be larger under the current proposal (increase to circa 2,550,000 cubic metres in a series of seven cells) and inert waste will increase to circa 1,000,000 cubic metres in a series of three new cells.
- In relation to site restoration, the prospective applicant said that such works will be sympathetic to the surrounding land uses, current county development plan designation and protected views in the vicinity. The prospective applicant also noted that the proposed aftercare management plan will require approval by the EPA.
- In response to the Board's query on the matter, the prospective applicant confirmed that capped levels of cells will remain the same as per the permission granted under 06F.PA0018.

Discussion:

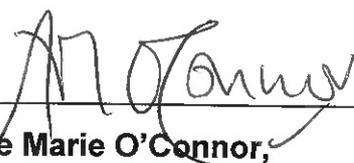
- With regard to the similarities between the current proposal and the elements granted permission under 06F.PA0018, the prospective applicant enquired as to whether a section 146B alteration request to the Board might be feasible as opposed to a SID application. The Board's representatives considered this and noted that the key element which is different relates to the nature of waste to be accepted at the facility. The altered nature of liner in the hazardous cells was also referenced in this regard. In the event of a section 146B alteration request being deemed appropriate, the Board said that this would likely be material in nature and would entail public notices and the invitation of submissions during the course of the process.
- The prospective applicant noted for the record that the highest-risk wastes are no longer part of the proposal and it also stated that there will be no proposed amendment to the wording of condition number 2 of 06F.PA0018.

- The Board enquired as to whether any consultations have taken place with the EPA to date. The prospective applicant replied that two pre-application consultation meetings with respect to the new waste licence application have taken place. With regard to the previous waste licence refusal of January 2016, the prospective applicant said that it is cognisant of the reasons for this and is confident these will be fully addressed in the new waste licence application.
- In response to the Board's query, the prospective applicant also confirmed that it has met with representatives from the Eastern and Midlands Regional Waste Management Office. The prospective applicant said that such meetings are occurring on a regular basis and the focus is on current regional needs.
- With regard to the matter of appropriate assessment, the prospective applicant noted that both EIA and AA screening will be required even in the scenario of a section 146B alteration request.

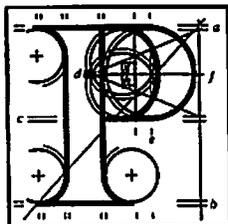
Conclusion:

The Board said that it would consider what the appropriate mechanism might be in terms of either a section 146B alteration request or a SID application under section 37. The Board's representatives may seek a meeting with the SID division of the Board in the meantime to elicit its opinion on this. In the event that the preliminary opinion of the Board is that the proposed development would be SID, a further meeting in the pre-application consultation process is likely. If a section 146B alteration request is deemed appropriate, then the prospective applicant will be required to withdraw from this process. A further meeting may also be required to clarify matters.

The record of the instant meeting will issue in the meantime and the prospective applicant may submit any comments it has on this in writing.



Anne Marie O'Connor,
Assistant Director of Planning



An
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**Record of 2nd Meeting
ABP-304428-19**



Case Reference / Description	ABP-304428-19 Integrated waste management facility at Hollywood Great, Nag's Head, Naul, Co. Dublin.		
Case Type	Pre-application consultation		
1st / 2nd / 3rd Meeting	2 nd		
Date	14/10/19	Time	2.30 – 3.10 p.m..

Attendees
Representing An Bord Pleanála
Anne Marie O'Connor, Assistant Director of Planning (Chair)
Breda Gannon, Senior Planning Inspector
Rob Mac Giollamáth, Executive Officer
Representing the Prospective Applicant
Cian O'Hora, IMS
Des Johnson, Planning Consultant
Paul Chadwick, RPS

Introduction:

The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.

The Boards representatives stated that the purpose of the meeting was to discuss the most appropriate mechanism for a new application e.g under section 146(B) of the Act, or, whether a new SID application is required in respect of the proposed development.

Background

Planning permission had previously been granted permission for a landfill facility by the Board in June 2011(06F.PA0018). Subsequently, the duration of the planning permission was extended by Fingal County Council for a further 5 years up until June, 2021.

Issue no. 1

The Board's representatives raised the question of the legal standing of the previous SID application which had no appropriate period specified, and which was extended by Fingal Co. Council under Section 42 Planning and Development Act. The prospective applicant might wish to seek a legal opinion as to the appropriateness of seeking an extension of the duration of the permission from Fingal County Council as opposed to seeking it from An Bord Pleanála. There might be an issue as to whether or not the existing permission was extant, and whether the section 146(B) process is open to the prospective applicants.

Issue no. 2

The Boards representatives also noted the expiry date of the extended permission and queried whether sufficient time remained to implement a permission. It noted that if the section 146(B) route was pursued, and a revised EIA required, the timelines for processing an application under section 146(C) would not be dissimilar from a SID application. If such a situation were to occur the prospective applicant might in

fact prefer to lodge a new application. In response to this issue the prospective applicant noted that in such a scenario it might be preferable, from their point of view, to stay within the confines of S.146(C) as the principle of development would be established

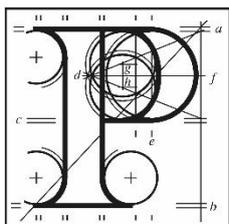
Conclusion:

The prospective applicant indicated that they would consider the issues raised and respond accordingly. The record of the instant meeting will issue in the meantime and the prospective applicant may submit any comments it has on this in writing.



Anne Marie O'Connor

Assistant Director of Planning



An
Bord
Pleanála

Record of 3rd Meeting ABP-304428-19

Case Reference / Description	ABP-304428-19 Integrated waste management facility at Hollywood Great, Nag's Head, Naul, Co. Dublin.		
Case Type	Pre-application consultation		
1st / 2nd / 3rd Meeting	3 rd		
Date	05/12/19	Time	11.30 - 13.00

Attendees
Representing An Bord Pleanála
Anne Marie O'Connor, Assistant Director of Planning
Breda Gannon, Senior Planning Inspector
Ellen Morrin, Senior Administrative Officer
Kieran Somers, Executive Officer
Representing the Prospective Applicant
Cian O'Hora, IMS
Leah Kenny, RPS
Paul Chadwick, RPS
Des Johnson, Planning Consultant

Introduction:

The Board referred to its previous meeting with the prospective applicant of the 14th October, 2019. In relation to the record of this meeting, the Board enquired as to whether the prospective applicant had any comments to make. The prospective applicant replied that it had no comments to make on this.

The prospective applicant undertook to address the main issues which were raised at the previous meeting. It said that it has received preliminary legal opinion which advised that Fingal County Council was the appropriate authority to grant an extension of time and that the said extension remains extant. The prospective applicant also said that the permission granted in June 2011 under case reference number PA0018 also remains extant according to its legal opinion; this latter permission the prospective applicant noted provides for landfilling up to the year 2036. Based on the said legal opinion, the prospective applicant expressed its intention to lodge a new application to the Board pursuant to section 37E of the Planning and Development Act 2000, as amended.

Presentation by the prospective applicant:

The prospective applicant recapped on the nature and extent of the proposed development. As regards site location, it said that the subject site is located in North County Dublin in close proximity to the M1. The subject site is a former quarry which ceased operations in the 2000s and is accessed via the M1 and the local road network. The prospective applicant said that the subject site is essentially rural in nature with some residential properties along the local road network. The site is located in a high amenity landscape and the prospective applicant noted that previous permissions have included conditions for the eventual reinstatement of the site.

The current site layout was set out by the prospective applicant. It noted that inert waste (soil and stone) has been accepted for landfilling to date and that some cells have been filled and capped and will be seeded and returned to agricultural use.

A planning application was made to Fingal County Council for a continuation of the in-filling of the former quarry for a further 15-year time period. At the present time,

this is the subject of a third-party appeal to the Board under case reference number ABP-305832-19.

It is stated that the extant EPA licence has not been exhausted as this provides for the intake of certain contaminated waste materials. The first EPA licence for the subject site was granted by the Agency in 2003 and quarrying activities ceased circa 2007/2008. A 2007 planning permission increased the per annum tonnage from 340,000 tonnes to 500,000 tonnes and the 2011 permission (PA0018) allowed for a diversification of waste types to be accepted at the facility. The prospective applicant also noted that, under the current proposal, a new waste licence will be required from the Agency.

With regard to the instant proposal, the prospective applicant said that the planning application will be for a 25-year permission to develop fully-lined and engineered landfill cells for a mixture of hazardous, non-hazardous and inert wastes at a rate of 500,000 tonnes per annum. The proposed development will also include the construction of a new facility entrance, an administration office building, a storage building for the temporary storage of IBA waste and an ESB substation. The prospective applicant provided an estimated volume of the three waste streams and referred in particular to the lower volume of hazardous waste now being proposed. Referring to the EPA's previous refusal for a waste licence in 2016 on the basis of effects on groundwater, the prospective applicant said that asbestos represented a stable non-reactive hazardous waste which poses no risk to groundwater. It noted for the record that it would be taking in all such material in the State (20,000 tonnes per annum) and that this requirement has been identified in the National Hazardous Waste Management Plan 2014-2020.

The prospective applicant set out the nature of the site post-construction and pre-operations. It said that the proposed storage building for the maturation of waste will be eventually dismantled and taken off the site once in-filling is completed. With regard to the proposed leachate tanks, the prospective applicant said that no on-site treatment of leachate will take place. The prospective applicant also provided a

layout of the site post-restoration. It said that the eventual plan would be to restore the entire site to a greenfield status.

Discussion:

The following matters were discussed:

- **Preliminary View:** The Board's representatives said that its preliminary view is that the proposed development would be SID. It also expressed its opinion that a new application appears to be a sensible approach.
- **Policy & Need:** The Board said that the policy context and need for the project should be clearly set out. In a general sense, the Board reiterated the need for as much clarity as possible on matters such as the planning history of the site and previous waste licences. The Board's representatives also advised of the need to be clear with regard to the matter of asbestos and where this requirement is listed in the National Hazardous Waste Management Plan 2014-2020.
- **Planning history:** Noting the complex history which pertains to the subject site, the Board's representatives emphasised the importance of setting out the historical chronology for various planning applications and waste licences as clearly as possible in any planning application.
- **Duration of permission:** In relation to any forthcoming planning application, the Board advised the prospective applicant that it would be important to distinguish between the duration of the planning permission being sought (i.e. 5 or 10 years) and the lifetime of operations (i.e. 25 years). The prospective applicant noted this latter point and said that this would be made clear in the subsequent planning application.
- **Environmental Impact Assessment/ Appropriate Assessment:** An EIAR and NIS will be prepared and submitted with the application. The Board advised that the EIAR for the planning application and that for the waste licence application should be the same.
- **Hydrogeology:** Having regard to the history on the site, the potential impact on hydrogeology and protection of ground water resources will be a significant issue in the consideration of an application for development. All issues raised

in the EPA's reasons for refusing the previous waste licence application must be fully addressed. The prospective applicant concurred with the need to fully address this issue and pointed to the nature of the proposed hazardous waste and the results of extensive site and hydro-geological investigations carried out in preparation for the application. It noted in this regard that Volume IV of the EIAR to accompany the planning application will be dedicated to hydrogeological assessment.

- **Biodiversity:** With respect to biodiversity, the prospective applicant said that the subject site has a relatively low ecological sensitivity. It noted that a Peregrine Falcon Management Plan is currently in place although the species is not a Qualifying Interest under the Rogerstown Estuary SPA. Notwithstanding this fact, the prospective applicant confirmed that an NIS will be submitted with the planning application. The prospective applicant confirmed that the NPWS is aware of the presence of the Peregrine Falcon and that it made an observation on this with regard to the current planning application which is on appeal to the Board. The Board 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 a European site should also be explored in detail in order to support the omission of the species from the NIS to be prepared.
- **Traffic and transportation:** The prospective applicant noted that this planning matter has been a particular concern for Fingal County Council. It said that it has calculated that the proposed development would add 152 additional HGV movements per day. There are approximately 10 – 20 residential dwellings located on the proposed haul route, many of which are agricultural dwellings. The prospective applicant also advised that Fingal County Council had requested a road safety audit to be carried out under a condition attached to the permission pertaining to register reference number F19A/0077.
- **Cultural heritage:** The prospective applicant said that this will be addressed in the EIAR. It noted that the surrounding area is one rich in cultural heritage, but this does not apply to the subject site.

- **Landscape and visual impact:** The prospective applicant said that it has assessed viewpoints and prepared photo montages of what the quarry looks like at present and how it will appear once reinstated. Noting this, the Board's representatives suggested that it might also be useful to reflect the intermittent period when the quarry is being in-filled. The Board's representatives also suggested that cross sections would be useful.
- **Consultations:** The prospective applicant provided the Board with an update on consultations which are on-going. It said its intention would be to revert back to relevant prescribed bodies once the Board has indicated its opinion on the appropriate mechanism for planning consent.

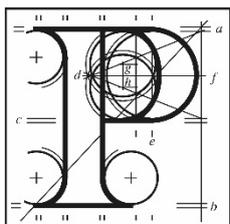
Conclusion:

The Board's representatives said that a further meeting would not be required and it confirmed to the prospective applicant that a formal SID determination is normally reached within four weeks of closure of the process. The closure of a pre-app consultation must be made in writing. The prospective applicant noted this and said that it would hold a further meeting with Fingal County Council prior to requesting closure to the process.

As regards the possibility of an oral hearing, the Board said that there is a presumption towards the holding of an oral hearing on this type of case, but it advised the prospective applicant that it should not absolutely rely on this. The holding of an oral hearing is ultimately at the discretion of the Board and can be predicated on the complexity of issues involved as well as the level of public participation.

The record of the meeting will issue in due course and this will include a copy of the relevant procedures for making a SID application to the Board.

Anne Marie O'Connor
Assistant Director of Planning



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Inspector's Report ABP 304428-19

Development	Integrated waste management facility.
Location	Hollywood Great, Nag's Head, Naul. Co Dublin.
Planning Authority	Fingal Co Council .
Applicant	Integrated Materials Solutions Limited.
Type of Application	Seventh Schedule
Date of Site Inspection	July 26 th , 2019.
Inspector	Breda Gannon

1.0 Introduction

- 1.1. On 10th May 2019, a request was received by the Board to enter into pre-application discussions with respect to the proposed development under section 37B of the Planning and Development Act 2000, as amended.
- 1.2. The Board's representatives met with the prospective applicant on September 5th, 2019, October 14th, 2019 and December 5th, 2019.
- 1.3. The prospective applicant formally requested closure of the pre-application consultation process by letter on January 13th, 2020.

2.0 Site Location and Description

- 2.1. The site is located at Hollywood Great, Nag's Head, Naul Co Dublin. It is located c 31km north of Dublin city centre, c 4km south of Naul village and c 3.5km west of the M1 motorway. The site is bounded by the LP-1080 to the south and the LP-1090 to the west. The area is one of undulating rural countryside and the predominant land use is agriculture. The pattern of development is dispersed with individual dwellings and clustered farm buildings scattered along the road network. Hollywood Reservoir is located adjacent to the east of the site entrance.
- 2.2. The site comprises a former quarry which subsequently operated as a landfill. It has an area of 39.8 ha and includes a series of large topographical hollows and infilled areas separated by internal haul roads. The site buildings which include a site office, weighbridge, shed, bunded tank and quarantine area are located on a concrete apron adjacent to the site entrance to the west of the site. Ground levels fall from west to east within the site.

3.0 Proposed Development

- 3.1. The proposal is to develop an integrated waste management facility at the site. It is proposed to develop engineered landfill cells and to landfill a mixture of hazardous, non-hazardous and inert wastes at a rate of 500,000 tonnes per annum. The current void space to be infilled is c 3.8 million cubic metres. Permission would be sought for a period of 25 years and an EPA licence would be required.

3.2. The waste streams would be landfilled in a series of cells and the cell layouts are outlined in the drawings submitted.

Hazardous waste - The proposal makes provision for the landfilling of one specific hazardous waste stream, construction materials containing asbestos. The asbestos waste would be landfilled at a single specialist mono-cell or a series of smaller mono-cells within the site. An estimated total intake volume of c.250,000 m³ would be accommodated over the 25-year timeframe. The intake volume is proposed to account for c.10,000 tonnes per annum generated nationally (as recorded by the EPA) over the 25-year timeframe. It is estimated that this volume would increase as Irish Water carry out remediation of the public drinking water network across the country replacing older, leaking and unsuitable (e.g. asbestos) pipes in the network. The location of the hazardous waste cells are shown in red on the submitted drawings.

Non-Hazardous waste – Non-hazardous waste streams listed in Table 3.2 (non-exhaustive) would be landfilled at the site at a series of engineered cells (Cells 11 to 16). The estimated tonnage is 5,100,000 tonnes over the 25-year timeframe. The location of the non-hazardous cells are shown in blue on submitted drawings.

Inert waste – The inert waste streams listed in Table 3.3 (non-exhaustive) are to be landfilled in a series of landfilled cells (Cells 6 to 8). The estimated volume of inert waste cells to be developed at the site is c 1,000,000 m³ which is equivalent to 2,000,000 tonnes. The location of the inert waste cells are shown in green on the submitted drawings. Some of these cells have already been filled (Cells 1-5) and are not included in the estimate of cell void space.

3.3. To facilitate the landfill operation a number of infrastructural works are required including the following;

- A new facility entrance on the local road (LP-1080) to the south to replace the existing entrance at the western boundary.
- Administration office building.
- Weighbridge located on the internal access road.
- Car parking.
- Internal haul routes.

- A dry mechanical processing building (1285m²).
- Leachate management infrastructure.
- Surface water management infrastructure.

4.0 Planning History

Reg Ref 88A/32 – Planning permission granted in June 1988 to infill, restore and reinstate the portion of the quarry that was excavated to that date. A 15-year permission was granted (expiring 2003). This operation was subject to a Waste Licence from the EPA (W0129-01).

Reg Ref F04A/0363 – Permission was granted in 2004 to extend the existing operation to infill the quarry void with inert materials within engineered cells at a rate of 340,000 tonnes per annum as part of the restoration and reinstatement of the quarry. Permission was granted for a period of 15 years (expiring October 2019).

Reg Ref F07A/0262 – Permission was granted in 2007 to amend the 2004 permission to permit an extended area to be infilled and to permit the continued infill of the quarry at a rate of 500,000 tonnes per annum of inert construction and demolition waste. For the increased tonnage a revised Waste Licence was required and granted by the EPA in 2007 (W0129-02).

Reg Ref F07A/1241 – Permission was refused to relocate the primary entrance from the local road along the western boundary of the site (LP01090) to the road which runs along the southern boundary of the site (LP01080) as well as the construction of a new weighbridge, wheelwash, office building and proprietary treatment plant together with car parking etc. There were four reasons for refusal which related to (i) zoning objectives and material contravention of the development plan, (ii) adverse impacts on the landscape character of the area, (iii) impacts on residential amenities and (iv) unacceptable proposals for the treatment of foul sewage associated with the proposed development.

Reg Ref F08A/0749 – Permission sought for essentially the same development as that sought under F07A/1241. An Bord Pleanála upheld the decision of the planning authority and refused permission for the development (PL06F.230763). There were

two reasons for refusal relating to (i) zoning and (ii) the failure of the applicant to demonstrate the need for the proposed new access and impacts on traffic safety.

Reg Ref 06F. PA0018 - Permission was granted for an integrated waste management facility on a site of 39.8 ha at the site. The permission permitted the acceptance of up to 500,000 tonnes per annum of non-biodegradable inert non-hazardous and hazardous wastes over a period of 25 years. The permission was granted in June 2011 and was subject to 22 no. conditions.

The permission was not implemented as a waste licence for the development was refused by the EPA (W0129-03).

In July 2016 an extension to the duration of the permission was granted by Fingal County Council (Ref SID/03/10E1) up to June 2021.

Reg Ref F19A/0077 – On October 8th 2019, Fingal Co Council issued a decision to grant permission to IMS for the continued infilling of the quarry with inert construction and demolition waste material at a rate of 500,000 tonnes per annum permitted under Reg Ref's F07A/0262 and F04A/0363 for a further 15 no. year period from the date of expiration (6th October 2019) to a revised expiration date of 6th October 2034. The decision is currently under appeal (ABP 305832-19). If permission is granted this would allow for the continuation of the existing operation under EPA Waste Licence Reference W0129-02.

5.0 Policy and Context

5.1. National Planning Framework – Project Ireland 2020

The National Planning Framework (NPF) which was published in 2018 is a strategic plan to guide development and investment out to 2040. It is envisaged that the population of the country will increase by up to 1 million by that date and the strategy seeks to plan for the demands that growth will place on the environment and the social and economic fabric of the country. The Plan sets out 10 goals, referred to as National Strategic Outcomes.

Under National Strategic Outcome 9 – the emphasis is on the sustainable management of water, waste and other environmental resources. It expressly provides in relation to waste that it will require:

‘Development of necessary and appropriate hazardous waste management facilities to avoid the need for treatment elsewhere’.

‘Adequate capacity and systems to manage waste, including municipal and construction and demolition waste in an environmentally safe and sustainable manner’.

The NDF supports circular economy principles that minimise waste going to landfill and maximise waste as a resource.

National Policy Objective 56 states:

‘Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, re-use, recycling and recovery to support a healthy environment, economy and society’.

The **National Hazardous Waste Management Plan 2014-2020** sets out a number of objectives including:

- To maximise the collection of hazardous waste with a view to reducing the environmental and health impacts of any unregulated waste.
- To strive for increased self-sufficiency in the management of hazardous waste and to minimise hazardous waste export.

Section 6.2 states that consideration should be given to co-location of hazardous waste treatment at existing waste facilities or brownfield sites for the purposes of sustainability and land use planning.

With regard to landfill of hazardous waste the Plan notes that there is currently no dedicated hazardous waste landfill disposal facility in the country. It further notes that Asbestos is the single largest hazardous waste stream that requires landfill disposal (Section 6.5).

The EPA published a Progress Report on the implementation of the National Hazardous Waste Plan in 2018. It underlines the key objective of increasing Ireland's level of self-sufficiency regarding hazardous waste management. It finds that while Ireland has moved towards greater self-sufficiency regarding hazardous waste management since the publication of the Plan, the often more favourable cost option of treatment and disposal abroad has meant that export continues to be a significant treatment route for Ireland's hazardous waste.

The **Eastern-Midlands Region Waste Management Plan 2015-2021** provides the framework for the prevention and management of waste in the region. The strategic vision of the regional waste plan is to rethink our approach to managing waste, by viewing waste as a valuable resource, leading to a healthier environment and sustainable commercial opportunities for our economy. The policy aim is for the region and the State to become more self-sufficient, in terms of treating the wastes we generate and currently export. The circular economy is central to the strategy of the regional waste plan.

Strategic Objective E: The region will promote sustainable waste management treatment in keeping with the waste hierarchy and the move towards a circular economy and greater self-sufficiency.

With regard to landfilling the plan states at **Policy E8;**

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

At Section 16.4.4 the plan states notes that backfilling activities make up a significant treatment capacity in the region at both local authority authorised sites and EPA licensed sites. Relevant policies include

Policy E 13: Future authorisations by local authorities, the EPA and An Bord Pleanála must take account of the scale and availability of existing backfilling capacity.

Policy E14: The local authorities will co-ordinate the future authorisations of backfilling sites in the region to ensure balanced regional development serves local and regional needs with a preference for large scale restoration sites ahead of smaller scale sites with shorter life spans. All proposed sites for backfilling activities must comply with environmental protection criteria set out in the plan.

- 5.2. The **Eastern and Midland Regional and Spatial Economic Strategy**, which came into effect on June 28th, 2019, builds on the foundations of Government policy in Project Ireland 2040. It seeks to determine at a regional scale how best to achieve the shared goals set out in the National Strategic Outcomes of the NPF and sets out 16 Regional Strategic Outcomes (RSO's) which set the framework for city and county development plans. It supports the circular economy to make better use of resources and become more resource efficient.

Regional Strategic Outcome 7 -Sustainable Management of Water, Waste and other Environmental Resources states

'Conserve and enhance our water resources to ensure clean water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy'.

5.3. **Development Plan**

The operative development plan is the **Fingal County Development Plan 2017-2023**. Section 7.5 (Waste Management) contains various policies and objectives regarding compliance with national/regional policy, compliance with waste hierarchy and the transition to a circular economy. An extract from the plan is appended to the back of the report.

6.0 Strategic Infrastructure-Legal Provisions

Strategic Infrastructure is defined in the **Seventh Schedule** of the 2006 Act and under Environmental Infrastructure as:

-A waste installation for –

- (a) The incineration, or*
- (b) The chemical treatment (within the meaning of Annex IIA to Council Directive 75/422/EEC under heading D9), or*
- (c) The landfill,*

of hazardous waste to which Council Directive 91/689/EEC applies (other than an industrial waste disposal installation integrated into a larger industrial facility).

-A waste disposal installation for-

- (a) the incineration*
- (b) the chemical treatment (within the meaning of Annex IIA to Council Directive 75/442/EEC under heading D9),*

of non-hazardous waste with a capacity for an annual intake greater than 100,000 tonnes.

-An installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes.

Section 37A of the Planning and Development Act, 2000, as amended by the Planning and Development (Strategic Infrastructure) Act sets out the conditions under which Seventh Schedule development is considered to constitute strategic infrastructure for the purposes of the Act,

- (a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,*
- (b) the development would contribute substantially to the fulfilment of any of the objectives of the National Spatial Strategy or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate.*

(c) the development would have a significant effect on the area of more than one planning authority.

7.0 Prospective Applicant's Submission to the Board.

The proposed development comprises of development for the purpose of *'the landfill, of hazardous waste to which Council Directive 91/689/EEC applies (other than an industrial waste disposal installation integrated into a larger industrial facility' and 'an installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes'*.

- 7.1. The proposed development therefore falls within the Seventh Schedule by means of the proposal to landfill hazardous wastes (i.e. asbestos waste) and the disposal of waste with a capacity for annual intake greater than 100,000 tonnes at the site.
- 7.2. The applicant provides an analysis of each of the conditions contained within Section 37A(2), which is required to determine if the proposed development is strategic infrastructure.

(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,

The relevance of the proposed development to strategic and economic importance to the State and GDA relates to the provision of additional much needed waste management capacity within the Region and compliance with the principles of self-sufficiency within the State. The submission looks at three waste streams which are to be landfilled at the proposed development (hazardous asbestos waste, incinerator bottom ash waste and general construction waste) to illustrate the strategic and economic importance of the proposed development.

Hazardous asbestos waste - There is currently no licensed landfill in the State to accept and landfill asbestos waste. The EPA's National Hazardous Waste Management Plan 2014-2020 (NHWMP) recognises that if additional hazardous waste is to be treated in Ireland and export avoided that an overarching strategic need is the *'development of landfill capacity to manage non-recoverable and non-combustible hazardous waste and residues containing asbestos'*. It recommends that at least one other non-hazardous landfill facility be authorised to accept

construction materials containing asbestos. *‘Such a facility would be expected to provide a regional service to supplement a region or regions that are more distant from a national facility’*. It is proposed to accept asbestos at the facility in line with the strategic needs of the NHWMP.

The increase in construction work and the planned remediation of the public drinking water mains network will generate a sizable and constant flow of additional asbestos waste over the next decade. It is estimated that this waste volume from the pipeline remediation alone could be c 100,000 tonnes if all waste piping is removed for disposal or an additional 10,000 tonnes per annum on top of the 5,000-10,000 tonnes baseline estimate for general construction works.

With this planned additional generation rate, there is a known strategic need for c 15,000 tonnes per annum capacity facility for the disposal of asbestos waste to comply with the *‘development of landfill capacity to manage non-recoverable and non-combustible hazardous waste and residues containing asbestos’* and the self sufficiency policies in the national and regional waste management planning and to ensure that the waste stream is fully managed to protect the environment.

Incinerator bottom ash waste – Poolbeg and Carranstown Waste to Energy are the two authorised municipal waste incinerators that generate IBA. The Poolbeg plant currently exports IBA to the Netherlands for metal recovery. IBA from Carranstown is sent for recovery at landfill. The proposed incinerator at Ringaskiddy would generate c 52,700 tonnes per annum (EIS).

The Eastern-Midlands Region Waste Management Plan 2015-2021 supports the development of up to 300,000 tonnes of additional thermal recovery capacity for the treatment of non-hazardous waste nationally. This additional incinerator capacity would generate an additional c 60,000-70,000 tonnes of IBA for treatment within the State. This would result in up to 250,000 tonnes of IBA generated per annum including all installed and proposed incinerators.

There are a limited number of landfills than can accept IBA and the 2018 reported tonnages indicate that while the three facilities at Knockharley, Drehid and Ballynagran can cater for the current demands from Carranstown, there is limited current capacity to manage the IBA from Poolbeg. In the event that the future 300,000 tonnes of additional thermal recovery capacity is developed, there is a considerable

shortfall in the State's capacity to be self-sufficient in the treatment of IBA. Therefore, 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 the projected waste stream.

Construction Waste (Non Hazardous and Inert) – The recent growth in construction activity has created a current supply chain whereby there is a significant shortfall in the provision of treatment sites for C&D waste to enable the planned infrastructure to be developed at the required pace. With further projected growth this shortfall in waste treatment capacity is likely to constrain the objectives of the National Development Plan. It is projected that total construction and demolition waste will increase to c 9 million tonnes by 2023 in the GDA alone.

There is, therefore, an immediate need for the development of additional capacity for these waste streams. This is acknowledged in the Eastern-Midlands Region Waste Management Plan 2015-2021 which states that *'future planning and authorisation of backfilling sites must take account of the location of existing capacities and the scale of available capacity across the region to ensure that there is adequate, appropriate and balanced supply'*.

The Hollywood site is ideally placed within the GDA with good transport routes and with a significant existing void space to allow for a greater diversity of waste streams to be sustainably landfilled 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.

(b) the development would contribute substantially to the fulfilment of any of the objectives of the National Spatial Strategy or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate.

National Planning Policy – The National Spatial Strategy noted that waste management was a particular priority noting that *'Efficient, effective and cost effective waste management facilities are essential if industrial and enterprise activity is to thrive and develop in a balanced way across Ireland'*. This priority still exists and is echoed in the successor to the NSS, the National Planning Framework - Project Ireland 2040 (NPF). It recognises that a key future enabler for Dublin

includes improving sustainability in terms of waste and waste management. It promoted the circular and bio economy and the management of waste by having adequate capacity and systems to manage waste in an environmentally safe and sustainable manner such that waste is significantly reduced or eliminated.

The subject waste recovery facility is wholly consistent with the waste related policies of the NPF and notably National Policy Objective 56 which is to:

‘Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery to support a healthy environment, economy and society’.

The NPF also targets a significant proportion of future urban development on infill/brownfield development sites (National Policy Objective 12). The proposed development is unique as it would be the only engineered landfill in Co. Dublin capable of accepting brownfield materials at levels prescribed in the Landfill Directive and Waste Licence. All other unlined recovery sites are not covered by the Landfill Directive and can only accept uncontaminated materials. The policy to further develop brownfield sites requires the appropriate infrastructure to manage the associated wastes and the proposed development will be central to the delivery of this policy in the GDA.

Regional Planning Policy – The Regional Spatial and Economic Strategy is still in draft form. Regional policy objectives (RPO) concerning regeneration and waste management contained in the Draft RSES are particularly relevant to the proposed development. RPO 9.13 states the following compelling the relevant authorities to consider effective waste management projects for brownfield regeneration;

‘To support at a National level, efforts to explore ways to deal effectively with waste and contamination relating to brownfield regeneration’.

The proposed development is one such way for dealing with effectively with waste and contamination relating to brownfield regeneration.

The **National Hazardous Waste Management Plan 2014-2020** has a number of key objectives one of which includes to strive for increased self sufficiency in the management of hazardous waste and to minimise hazardous waste export. Ireland has no self-sufficiency in the management of hazardous waste which is all currently exported. It is recognised in the plan that asbestos is the single largest hazardous

waste stream that requires landfill disposal and states that there is a projected need for 20,000 tonnes of capacity per annum for a dedicated asbestos landfill cell in the future. The recommendation is that, in the absence of such a landfill capacity for asbestos and considering the prohibitive export costs from this stream, additional capacity be provided at specialist cells in a limited number of existing non-hazardous landfills to prevent the illegal disposal of asbestos.

The **Eastern-Midlands Region Waste Management Plan** is the key policy driver for waste management in the GDA. One of the strategic objectives relates to self-sufficiency (Specific Objective E). It also refers to the NHWMP and the need for national capacity for an asbestos landfill. It also supports (Policy E8) the development of disposal capacity for hazardous and non-hazardous waste at existing landfill facilities. Under the provisions of Policy E14, it is stated that the local authorities will co-ordinate the future authorisations of backfilling sites in the region with a preference for larger restoration sites ahead of smaller scale sites with shorted life spans. Policy E14 is specifically designed to ensure the continued operation of larger facilities such as the proposed development to meet the growing demand for capacity for this waste stream in the GDA.

(c) the development would have a significant effect on the area of more than one planning authority.

The proposed development will serve the construction sector in the GDA comprising the administrative jurisdictions of Fingal, Dublin City, South Dublin, Dun Laoghaire Rathdown as well as Louth, Meath, Kildare and Wicklow. This is based on the proximity of the site to these other local authorities and ease of access using the M1 motorway. If granted, the proposed development will become the sole facility for the disposal of hazardous asbestos waste within the State. It will allow the State to comply with the self sufficiency objectives of national waste policy and cease the current practice of exporting all asbestos waste.

8.0 Assessment

The proposal is to develop engineered landfill cells on the site to landfill a mixture of hazardous, non-hazardous and inert wastes to infill the existing void space. The

proposed development with a proposed input of 500,000 tonnes per annum comprises Seventh Schedule development as it exceeds the threshold being:

Development comprising or for the purposes of the following;

-An installation for-the landfill of hazardous waste to which Council Directive 91/689/EEC applies (other than an industrial waste disposal installation integrated into a larger industrial facility), and

-An installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes.

8.1. **SID Qualifications under Section 37A (2)**

Section 37 of the Act, as amended requires that development falling under the Seventh Schedule of the Act, as amended, in order to constitute strategic infrastructure should comply with one or more of the three conditions set out in section 37A(2)(a)(b)(c).

Section 37A(2)(a) – Development would be of strategic economic or social importance to the State or the region in which it would be situate.

The three waste streams proposed to be landfilled are considered below.

Hazardous waste – The data available from the EPA suggests that in the region of 10,000 tonnes of Asbestos waste is reported each year. There is potential for this waste stream to increase as a result of proposed new infrastructural development, regeneration and housing projects proposed in the NPF and through the proposed remediation of public water mains by Irish Water. Due to the lack of disposal facilities in the State, all of this waste is currently exported which does not accord with the principles of self-sufficiency.

The NHWMP recommends that capacity of up to 20,000 tonnes per annum be provided. The proposed development accords with the NHWMP's recommendations, which states that in the absence of a dedicated national facility, additional capacity should be provided in dedicated cells in a limited number of existing non-hazardous waste landfills. Providing a suitable treatment option for asbestos waste will help to maximise the collection of this waste stream and reduce the environmental consequences and health impacts of unregulated waste. It will also improve the

State's move towards self-sufficiency in line with the objectives of the National Hazardous Waste Management Plan 2014-2020.

The need to address the treatment of hazardous wastes that cannot be recycled or recovered is also identified in the Eastern-Midlands Region Waste Management Plan 2015-2021. It also supports the development of disposal capacity for the treatment of hazardous waste at existing landfills in the region (Policy E8) and self-sufficiency.

Incinerator bottom ash (Non-hazardous) – There is also an identified deficiency in the State for the treatment of IBA from the existing waste to energy facilities at Poolbeg and Carranstown. At present IBA from Poolbeg is exported and the waste arising from Carranstown is landfilled. These two facilities generate c140,000 tonnes of IBA per annum. In addition to the capacity provided by these facilities, national policy as outlined in the regional waste plans supports the provisions of a further 300,000 tonnes per annum of national thermal treatment capacity for residual MSW management, which will generate additional quantities of IBA for treatment. As noted in prospective applicant's submission there is limited capacity for the treatment of existing volumes of IBA and no capacity to cater for projected increases to allow the State to be self-sufficient in the treatment of IBA.

Construction Waste (Non-Hazardous and inert) – At the time of publication of the regional waste plans the national waste capacity market for the treatment of C&D soil waste exceeded supply due to depressed activity in the construction sector. The *Construction and Demolition Waste: Soil and Stone Recovery/Disposal Capacity* report published on behalf of the regional waste authorities in December 2016 indicated that the capacity reported at the time of the regional waste plans had been eroded. It stated that capacity to recover soil and stone is an issue in each region, that there is a lack of licensed capacity nationally and in particular the GDA. This has resulted in C&D waste being managed outside the State. The report highlights the significant planned expenditure on public infrastructure and social housing within the State under the NPF, which would generate significant volumes of C&D waste. The lack of adequate recovery capacity waste could prejudice the development of these projects.

While the waste plans do not identify specific sites suitable development for soil recovery activities, they do support the development of new capacity with a

preference for larger restoration sites. This is a large site with the capacity to address some of the capacity issues for the treatment of C&D within the State and particularly the GDA where supply is particularly acute. It also aligns with the principles of self-sufficiency by providing an alternative to export for this waste stream.

Having regard to relevant policy considerations and the prospective applicants submission to the Board, I consider that the proposed development which would address significant capacity issues for particular waste streams, including asbestos, IBA and C&D, would be of strategic economic to the State and the region in which it is situate. I conclude, therefore, that the development is of strategic importance by reference to the requirements of condition (a) of Section 37A (2).

Section 37A(2)(b) – The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect to the area or areas in which it would be situate.

The proposed development accords with National Strategic Outcome 9 of the NPF as it will provide capacity and systems to manage different waste streams where national capacity issues have been identified. Most significantly, it will provide necessary landfill capacity for the treatment of hazardous waste and will become the only licensed facility in the State for that purpose. It would reduce dependence on export for this waste streams contributing towards the self-sufficiency objectives of the NHWMP. By providing landfill capacity for C&D waste it will facilitate the National Policy Objectives of the NPF which proposes significant infrastructural, regeneration and housing proposals to cater for increased population growth within the State.

I consider that the development would contribute substantially to the fulfilment of objectives in the National Planning Framework in respect to waste management and I conclude, therefore, that the development is of strategic importance by reference to the requirements of condition (b) of Section 37A (2).

Section 37A(2)(c) – the development will have a significant effect on the area of more than one planning authority.

The proposed facility would be located proximate to Dublin, where the highest level of construction activity is currently taking place. It is highly accessible being with

easy reach of the M1 motorway and would therefore be conveniently located to cater for construction activity in the wider GDA including the administrative areas of Fingal, Dublin city, South Dublin, Dun Laoghaire Rathdown, and Louth, Meath, Kildare and Wicklow. It would be conveniently located to accept IBA from the two existing waste-to-energy plants in Co Meath and Dublin city and would be accessible by motorway from the proposed facility at Ringaskiddy, should it proceed. The proposed development, if permitted, would be the sole facility for treatment of asbestos waste within the State and would accept waste from all parts of the country.

Whilst the proposed development would generate traffic movements associated with the movement of waste, I do not consider that it would result in significant effects on the area of more than one planning authority. I do not therefore consider that the development is of strategic importance by reference to section 37A(2)(c).

9.0 Planning & Environmental Issues

The following matters were discussed during the pre-application meeting:

- Reasons for EPA Waste Licence refusal in 2016 including hydrology and protection of ground water resources (Bog of Ring).
- Biodiversity – Peregrine Falcon present on the site.
- AA – Connectivity between the stream to the north of the site and the Rogerstown SAC and Rogerstown SPA
- Landscape and visual impacts – Site located in a high amenity landscape.
- Traffic and Transportation.

10.0 Conclusion

- The proposed development with an intake of 500,000 tonnes per annum would exceed the threshold of 100,000 set out in the Seventh Schedule of the Strategic Infrastructural Act, 2006, as amended.
- It is my opinion that the proposed development falls within the parameters of section 37A(2)(a) and (b) of the Planning and Development Act 2000, as amended and constitutes strategic infrastructure.

11.0 Recommendation

I recommend that Integrated Materials Solutions be informed that it is the Board's opinion that the proposed development consisting of an integrated waste management facility at Hollywood Great, Nags Head, Naul. Co. Dublin as set out in the plans and particulars received by An Bord Pleanála on the 10th of May 2019 falls within the scope of section 37A(2)(a) and (b) of the Planning and Development Act, 2000, as amended, and constitutes strategic infrastructure necessitating an application directly to the Board.

Breda Gannon
Senior Planning Inspector

20th January 2020

Appendix 1

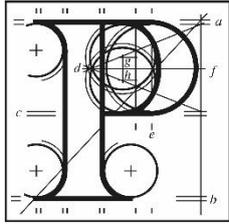
The following is a schedule of prescribed bodies considered relevant in this instance for the purposes of Section 37E(3)(c) of the Act.

1. Minister of Culture, Heritage and the Gaeltacht.
2. Minister for Communications, Marine and Natural resources
3. Eastern and Midland Regional Assembly
4. Fingal Co Council
5. Dublin City Council
6. Dublin County Council
7. Meath County Council
8. South Dublin County Council
9. Inland Fisheries Ireland
10. EPA
11. Failte Ireland
12. An Taisce
13. Health Service Executive
14. Transport Infrastructure Ireland

15. Irish Water

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

1. Eastern-Midlands Waste Regional Authority
2. Geological Survey of Ireland



An
Bord
Pleanála

Board Direction
BD-005255-20
ABP-304428-19

The submissions on this file and the Inspector's report were considered at a Board meeting held on 25/02/2020.

The Board noted that the intake for the proposed integrated waste management facility at Hollywood Great, Nag's Head, Naul, County Dublin, includes the receipt of hazardous waste as well as the receipt of non-hazardous and inert wastes at a rate which would exceed the relevant threshold set out in the Seventh Schedule of the Strategic Infrastructural Act, 2006, as amended.

The Board decided in accordance with the Inspector's recommendation that the development in question falls within the scope of Section 37A(2)(a) and (b) of the Planning and Development Act, 2000, as amended, and constitutes strategic infrastructure necessitating an application directly to the Board.

Appendix 1.

The following is a schedule of prescribed bodies considered relevant for the purposes of Section 37E(3)(c) of the Planning and Development Act 2000, as amended.

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
13. Irish Water

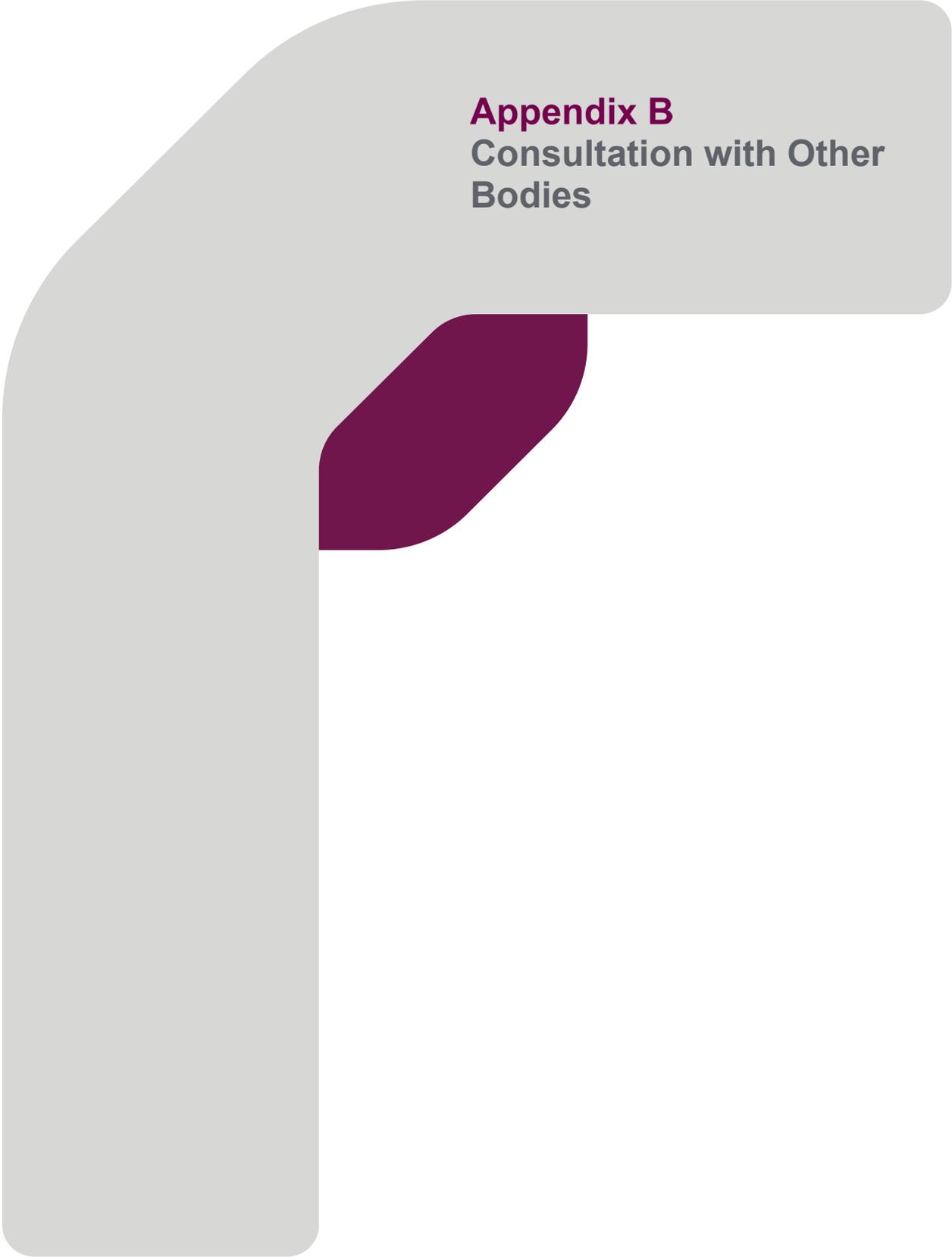
The following are not Prescribed Bodies for the purposes of Section 37E(3)(c) but are bodies which applicant should notify:

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

Board Member

Date: 26/02/2020

Chris McGarry



Appendix B Consultation with Other Bodies



RPS | Consulting UK & Ireland
West Pier Business Campus
Dun Laoghaire
Co. Dublin
A96 N6T7

01 September 2022

Re: EIA and AA Consultation for development of a Circular Economy Campus and an Integrated Waste Management Facility at Hollywood Great, Nag's Head, Naul, Co. Dublin

Your Ref: MDR1492ALt0001

Our Ref: 22/347

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 12 August 2022, concerning the EIA and AA Consultation for development of a Circular Economy Campus and an Integrated Waste Management Facility at Hollywood Great, Nag's Head, Naul, Co. Dublin, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The County Geological Heritage Audit for Fingal was completed out in 2007. The full report details can be found [here](#).

Our records show that there is a CGS within the proposed material waste recovery facility.

Nags Head Quarry, Fingal (GR 315681, 258044), under IGH theme: IGH 8 Lower Carboniferous. This large working quarry 5km south of Naul exposes Lower Carboniferous rocks of the Loughshinny Formation - a mixture of thin to medium bedded limestone and shale. The structural deformation seen here, for example as chevron folds, reflects the geology also visible 12km away on the coast at Loughshinny. Link to Site Report: [DF016](#).

In December 2019, Geological Survey Ireland carried out fieldwork within Nag's Head Quarry to record and document the geology prior to infilling and we are grateful to Integrated Materials Solutions (IMS) for allowing us to do this.



With the current plan, there are no further envisaged impacts on the integrity of current CGSs by the proposed development. However, if the proposed development plan is altered, please contact Clare Glanville (Clare.Glanville@gsi.ie) for further information and possible mitigation measures if applicable.

Should any further significant bedrock cuttings be created and/or exposed, Geological Survey Ireland would request that the operator might assist our geological heritage goals with the following (and ideally this would be written into the restoration / closure plan) and be included as a condition of planning as deemed appropriate by the planning authority:

1. Allowing access to quarry faces by appropriate scientists (upon request and with due regards to Health and Safety requirements) during quarrying to check for interesting new stratigraphies / relationships as they might become exposed and to establish if the quarry site is worthy of recognition post extraction and through aftercare/restoration planning.
2. If deemed appropriate in (1) above, leaving a representative section of the quarry face at the end of the quarry life or inclusion of information panels to promote the geology to the public or develop tourism or educational resources if appropriate depending on the future use of the site. Natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface.

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie)). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

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. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here: <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>**



Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Our 3D models can help stakeholders visualize, understand and characterise geology, for deposit and resource mapping, for flooding and for urban geology applications including basement impact assessment, Sustainable Drainage Systems (SuDS), and subsurface management. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation.

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the [Data & Maps](#) section of our website.

Further information on the bedrock and Quaternary 3D models of Dublin is available [here](#) and [here](#).

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. This page also hosts urban geochemistry mapping (Dublin SURGE project), Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and litho-geochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)
- Department of Environment, Heritage and Local Government, 2004. Quarries and Ancillary Activities, Guidelines for Planning Authorities.
- Environmental Protection Agency, 2006. Environmental Management in the Extractive Industry: Non-Scheduled Minerals.
- Geological Survey of Ireland - Irish Concrete Federation, 2008. Geological Heritage Guidelines for the Extractive Industry.

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.



I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a21718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcaa.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/lough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916d0c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?zesting=7&northing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

- Notes:
1. The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
2. Please read all disclaimers carefully when using Geological Survey Ireland data
3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.



RPS
West Pier Business Campus
Dun Laoghaire
County Dublin

16 January 2020

Re: Proposed development of an Integrated Waste Management facility at Hollywood Landfill – EIA consultation

Your Ref: MDR1492Lt0005
Our Ref: 20/09

Paul, a chara,

With reference to your email received on 08 January 2020, concerning the development of an Integrated Waste Management facility at Hollywood Landfill, Geological Survey Ireland (a division of Department of Communications, Climate Action and Environment) would like to make the following comments:

Geological Survey Ireland is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our [website](#) for data availability and we recommend using these various data sets, when undergoing the EIAR, planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland.

Geoheritage

Geological Survey Ireland (GSI) is in partnership with the National Parks and Wildlife Service (NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Irish Geoheritage Programme (IGH) of GSI, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGS), as adopted under the National Heritage Plan are now included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). The audit for Co. Fingal was published in 2007 and full report details can be found [here](#). **Our records show that the proposed landfill site itself is a CGS:**

Nags Head, Co. Fingal (GR 315500 257910), under IGH theme 8: Lower Carboniferous

This large working quarry 5km south of Naul exposes Lower Carboniferous rocks of the Loughshinny Formation - a mixture of thin to medium bedded limestone and shale. The structural deformation seen here, for example as chevron folds, reflects the geology also visible 12km away on the coast at Loughshinny. The Nags Head structures are bigger and are much better preserved than those on the coast as they have been sheltered from the erosion of the sea. In the northern part of the quarry, one of the very few exposures of Upper Carboniferous sandstones in North County Dublin, was reported to be exposed. The audit revealed that this Upper Carboniferous section has been backfilled, but it is possible that the sandstones may be uncovered in the future in another part of the quarry. (Site Report from County Audit attached).

As part of the end-of-life plan of the quarry, Geological Survey Ireland should be contacted to enable a discussion to identify and to recommend ways to promote the geology to the public or develop tourism or



educational resources if appropriate. Geological Survey Ireland would like to offer help with interpretative signs where interesting geological features have been exposed, if appropriate.

Groundwater

Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected. Through our [Groundwater Programme](#), Geological Survey Ireland provides advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI's National Aquifer and Recharge maps on our [Map viewer](#) to this end.

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent of these hazards. Geological Survey Ireland has information available on past landslides for viewing as a layer on our [Map Viewer](#). Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and GWflood Groundwater Flooding, and in international projects, such as the Tsunami Warning System, coordinated by the Intergovernmental Oceanographic Commission of UNESCO. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Geothermal Energy

Geothermal energy harnesses the heat beneath the surface of the Earth for heating applications and electricity generation, and has proven to be secure, environmentally sustainable and cost effective over long time periods. Geothermal applications can range in depth from a few metres below the surface to several kilometres. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online through Geological Survey Ireland's Geothermal Suitability maps for both domestic and commercial use. We recommend use of our [Geothermal Suitability maps](#) to determine the most suitable type of ground source heat collector for use with heat pump technologies. Ireland also has recognised potential for deep geothermal resources. Geological Survey Ireland currently supports and funds research into this national energy resource.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me, or my colleague Clare Glanville (Clare.Glanville@dcca.ie).

Le meas,

Amrine Dubois Gafar
Geoheritage Programme

FINGAL - COUNTY GEOLOGICAL SITE REPORT

NAME OF SITE	Nags Head Quarry		
Other names used for site			
IGH THEME:	IGH 8 (Lower Carboniferous)		
TOWNLAND(S)	Nags Head		
NEAREST TOWN	Naul		
SIX INCH MAP NUMBER	4		
NATIONAL GRID REFERENCE	315500 257910 = O 155 579		
1:50,000 O.S. SHEET NUMBER	43	1/2 inch Sheet No.	13

Outline Site Description

Large working quarry.

Geological System/Age and Primary Rock Type

Lower Carboniferous (Viséan) limestone, shale and sandstone.

Main Geological or Geomorphological Interest

This large working quarry 5km south of Naul exposes Lower Carboniferous rocks of the Loughshinny Formation - a mixture of thin to medium bedded limestone and shale. The structural deformation seen here, for example as chevron folds, reflects the geology also visible 12km away on the coast at Loughshinny. The Nags Head structures are bigger and are much better preserved than those on the coast as they have been sheltered from the erosion of the sea. In the northern part of the quarry, one of the very few exposures of Upper Carboniferous sandstones in North County Dublin, was reported to be exposed. The audit revealed that this Upper Carboniferous section has been backfilled, but it is possible that the sandstones may be uncovered in the future in another part of the quarry.

Site Importance

This site shows impressive large scale structural features within the bedrock, that can only otherwise be observed along the coastal section at Loughshinny. This quarry would make an excellent teaching locality, while the walls are still exposed and it is recommended for County Geological Site status.

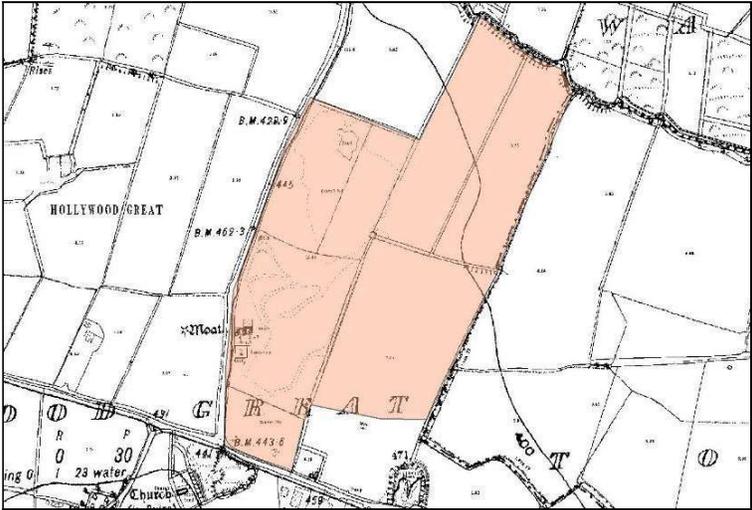
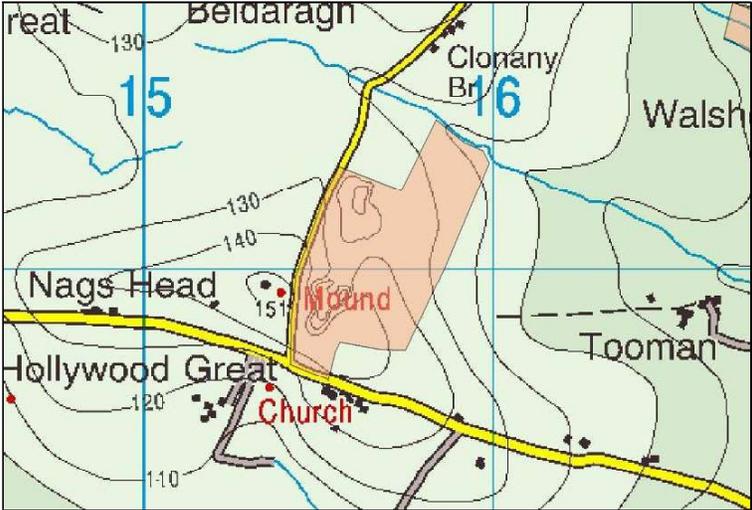
Management/promotion issues

As a large scale working quarry, operated by Murphy Environmental, this is a potentially hazardous environment and is not suitable for general promotion without first contacting the owners. The quarry management may allow supervised educational groups inside the quarry, on request.



Above: Large scale chevron folds within the shale and limestone of the Loughshinny Formation at Nags Head Quarry.

Nags Head Quarry



Transport Infrastructure Ireland (TII) acknowledges receipt of the above EIAR and NIS consultation documentation by email in respect of the above proposed project.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid application referred.

The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidance as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Regard should also be had to other relevant guidance available at www.TII.ie.

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the national road network. The developer should have regard, *inter alia*, to the following:

1. As set down in the Spatial Planning and National Roads Guidelines (2012), it is in the public interest that in so far as is reasonably practicable, that the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
2. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
3. Clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.
4. Where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.
5. TII Standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
6. Assessments and design and construction and maintenance standards and guidance are available at [TII Publications](#) that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).
7. The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular:
 - a. TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006),
 - b. The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant

competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1st Rev., National Roads Authority, 2004)).

8. The Environmental Assessment should have regard to previous Environmental Assessment Statements/Reports and conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.



Mr. Paul Chadwick
RPS | Consulting UK & Ireland
West Pier Business Campus
Dun Laoghaire
Co. Dublin
A96 N6T7

Dáta | Date
6 February 2020

Ár dTag | Our Ref.
TII20-108501

Bhur dTag | Your Ref.
MDR1492Lt0005

Re: Pre-Planning EIA consultation for an Integrated Waste Management Facility at Hollywood Landfill, Hollywood Great, Naul, Co. Dublin on behalf of Integrated Materials Solutions Ltd.

Dear Mr. Chadwick,

Transport Infrastructure Ireland (TII) acknowledges receipt of the above EIAR and NIS consultation documentation (cover letter, site location and layout plans) by email 6 January 2020 in respect of the above proposed project.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid application referred.

The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidance as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The proposed development will seek to diversify the waste accepted at the site from construction and demolition waste to hazardous, non-hazardous and inert wastes at a rate of 500,000 tonnes per annum for 25 years. The site is approximately 2km west of the M1.

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the national road network. The developer should have regard, *inter alia*, to the following;

1. As set out in the Spatial Planning and National Roads Guidelines (2012), it is in the public interest that, in so far as is reasonably practicable, that the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
2. Consultations should be had with the relevant local authority/National Roads Design Office with regard to locations of existing and future national road schemes.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.

3. Clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.
4. Where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's TTA Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.
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7. The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular;
 - a. TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006),
 - b. The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1st Rev., National Roads Authority, 2004)).
8. The Environmental Assessment should have regard to previous Environmental Assessment Statements/Reports and conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

Yours sincerely,



Natasha Crudden
Regulatory & Administration Unit



An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2

HSE EIA Scoping

Environmental Health Service Submission Report

Any clarification on the content of this submission should be directed to:

Eve Smith, EHO at eve.smith@hse.ie

Date: 31st August 2022

Our reference: EHIS 2603

Report to: RPS Group

Type of Consultation: EIA Scoping

Proposed development: Development of a Circular Economy Campus and an Integrated Waste Management Facility at Hollywood, Co. Dublin The proposal will expand the established waste and recovery operations at the Hollywood site.

Applicant: Integrated Materials Solutions Limited Partnership (IMS),

Proposed Development

The proposal consists of permission for a 25-year lifetime of operation at a rate of 500,000 tonnes per annum as per the existing operation. The proposal will expand the established waste and recovery operations at the Hollywood site.

The proposed development includes a number of proposed changes as follows:

- Broader waste acceptance types including hazardous (as stable non-reactive waste), 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 (including stable non-reactive hazardous waste) in addition to the existing engineered inert cells;
 - Enhancement of the existing aggregate recovery processing on site which includes upgrading the aggregate recovery operations to produce 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 wastewater treatment plant (WWTP) with passive provision for a future on-site leachate treatment facility;
- Surface water management infrastructure for the landfill to capture, attenuate and treat storm water;
- 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; and
- Full restoration of the site to natural ground levels.

General Introduction

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

<http://www.epa.ie/pubs/consultation/reviewofdrafteisguidelinesadvicenotes>

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

- a) Description of the receiving environment
- b) The nature and scale of the impact
- c) An assessment of the significance of the impact
- d) Proposed mitigation measures
- e) Residual impacts

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is the experience of the Environmental Health Service (EHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The HSE will consider the final EIAR accompanying the planning application and will make comments to the planning authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 17 June 2022

The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR

- Public Consultation
- Location of the proposed facility
- Assessment of Consideration of Alternatives
- Noise & Vibration
- Odour and Air Quality

- Potential impacts on Surface and Groundwater Quality
- Cumulative impacts

Public Consultation

Although a waste recycling facility has operated at this site for a number of years, it is strongly recommended that early and meaningful public consultation with the local community is carried out to ensure all potentially significant impacts have been adequately addressed.

All parties affected by the proposed development must be fully informed of what the proposal entails especially with regard to potential impacts on surrounding areas. Members of the public should be given sufficient opportunities to express their views on the proposed development.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed development in the future.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA.

The EIAR should state the period of planning permission sought and the length of time construction is estimated to take

Location of the proposed facility

The EIAR should include a map and a description of the proposed waste recycling facility, which should identify the nearest sensitive receptors and the location of the nearest watercourse.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives.

Noise & Vibration

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration.

A baseline noise monitoring survey should be undertaken to establish the existing background noise levels.

In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed development must be undertaken which details the change in the noise environment resulting from the proposed development.

Odour and Air Quality

Due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors. A Construction Environmental Management Plan

(CEMP) should be included in the EIAR which details dust control and mitigation measures. Measures should include:

- Sweeping of hard road surfaces
- Provision of a water bowser on site, regular spraying of haul roads
- Wheel washing facilities at site exit
- Provide covers to all delivery trucks to minimise dust generation
- Inspect and clean public roads in the vicinity if necessary
- Dust monitoring at the site boundary
- Truck inspection and maintenance plan

Potential impacts on surface and ground water quality

The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources that might be impacted must be identified. Public Water Scheme sources and supplies that might be impacted should be identified. Measures to ensure that all sources and supplies are protected should be described.

Any potential significant impacts to drinking water sources should be assessed and proposed mitigation measures described in the EIAR.

Cumulative Impacts

All existing or proposed industrial and commercial developments in the vicinity should be clearly identified in the EIAR.

The impact on sensitive receptors of the proposed development combined with any other industrial and commercial developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed waste recycling development

Existing Facility

The EIAR should include the results of any mitigation measures employed in respect of the existing waste management facility, including the results of any monitoring undertaken and corrective actions.



Eve Smith
Environmental Health Officer



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health
Unit 4 & 5, Nexus Building,
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Dublin 15

Tel +353 (0)1 8976140
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Proposed development of an Integrated Waste Management facility at Hollywood Landfill – EIA Consultation

Environmental Health Submission

11th February 2020

Ref: MDR1492Lt0005

HSE Ref: ID 1091

FAO Mr Paul Chadwick

The following HSE stakeholders were made aware of this scoping request on the 17th January 2020

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Mellany McLoone

Proposed Development

The proposed development consists of a 25-year permission to develop engineered landfill cells on the site to landfill a mixture of stable non-reactive hazardous (i.e. asbestos construction waste), non-hazardous and inert wastes at a rate of 500,000 tonnes per annum. To facilitate the landfill operation a number of ancillary infrastructural works are required including the following:

- Specially engineered landfill cells for inert and non-hazardous wastes (including stable non-reactive hazardous waste);
- The construction of a new facility entrance on the LP-1080 local road which bounds the south of the site. This will replace the existing facility entrance at the western boundary of the site which will revert to, and be maintained as, a secondary and emergency access. This new entrance will provide provision of safe access and reduce the road traffic risk associated with haulage to and from the site;

- A new eight metre wide internal access road from the entrance to the main site reception area which comprises weighbridges, car parking, etc.;
- A new administration building is to be located in the south-eastern portion of the site adjacent to the new access road. This building comprises of a single-storey flat roof structure with a gross floor area of circa 149m²;
- Two weighbridges are to be located on either side of the administration building;
- Car parking for 10 vehicles will be provided adjacent to the administration building;
- An internal un-paved road network serving the landfill area from the reception area;
- A new portal frame steel building for bottom ash maturation/waste processing with a building height of 12m and a gross floor area of 3,600m². Associated hard standing and yard space will also be provided as ancillary structure to this building to allow for the temporary storage of materials;
- A packaged treatment plant to treat sanitary effluent from the administration building;
- A leachate management system including a leachate collection system and a storage tank to temporarily store leachate prior to tankering off site for treatment at a suitably licensed WWTP under agreement with Irish Water;
- A storm water management system for the landfill, bottom ash maturation/waste processing building and the new access road; and
- All ancillary site works.

General

The following documents should be considered when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment
https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanala_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

<http://www.epa.ie/pubs/consultation/reviewofdrafteisguidelinesadvicenotes/>

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

- a) Description of the receiving environment;
- b) The nature and scale of the impact;
- c) An assessment of the significance of the impact;
- d) Proposed mitigation measures;

e) Residual impacts.

The HSE will consider the final EIAR accompanying the planning application and will in particular make comments to the Planning Authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

Public Consultation

The EHS emphasises the need for early and meaningful public consultation in the proposed development process.

Accurate information should be obtained regarding the location of sensitive receptors referred to above.

The EIAR should detail proposals for keeping stakeholders informed and any measures to be employed during the construction and operational phase for dealing with enquiries and/or complaints from members of the public.

Protection of Surface and Ground Water

In previous development of the site the Environmental Health Service has been made aware of concerns regarding the protection of the underlying aquifer from pollution and in particular the fact that it is a connected water source for market gardening and food production in the surrounding area. The EIAR should include the baseline water quality of the aquifer and a proposed monitoring programme to verify that there are no direct emissions to the water courses from the development. Reference should be made in the EIA to the Geological Survey of Ireland's (GSI) Groundwater Protection Scheme and to the location of any private drinking water sources within the vicinity of the development. The Environmental Health Service considers a 1 km distance from the site to be a reasonable catchment for the identification of private water extraction.

All mitigation measures to prevent direct emissions to surface and ground water during construction and operation should be clearly identified.

Details of any fuels and chemicals which may be used and stored on site during construction works and the method proposed for the bunding of fuel and chemical storage tanks should be provided in the EIAR. Provision should be made for the inspection and monitoring of bunding structures.

In order to minimise the use of water, surface water should be used for activities such as wheel washing and dust suppression.

Emissions to air, including noise, vibration and dust

The EIA should establish baseline air quality at the nearest sensitive receptors by means of background air quality monitoring.

The Construction Environmental Management Plan should include dust minimisation and suppressions measures to be employed to minimise the impact of dust emissions from the construction activities. Methods can include, but are not limited to:

- Wheel washing of construction vehicles
- Covering every load on vehicles delivering loose construction material to the site

- If sand, gravel or similar materials are stockpiled on site, they should be covered to prevent wind-blown dust
- The regular spraying and washing of roads used to haul construction materials
- Undertaking of regular vehicle maintenance to minimise potential significant impacts from noise from construction vehicles

Noise and Vibration

The EIA should include an assessment of the existing noise environment and predicted noise and vibration levels from construction and operation of the proposal.

The noise assessment should include an evaluation of the likely significant impacts at sensitive receptors against a recognised standard for health protection. The Environmental Health Service considers the predicted change in the noise environment to be the most relevant aspect of the assessment and not an evaluation against an absolute noise exposure level.

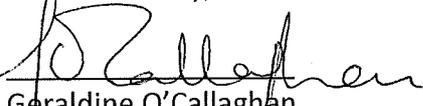
Staff Welfare Facilities

Any water used for drinking or preparation of food must meet the requirements of the S.I. No. 278/2007 - European Communities (Drinking Water) (No. 2) Regulations 2007. If a drinking water source is from a non-public supply it must be verified as meeting the above requirement through a sampling programme.

There should be no direct emissions of foul waste water to ground water during the construction or operational phase of the proposed development. The proposed treatment of foul waste water should be included in the EIAR along with the specific Population Equivalent calculations.

Any queries regarding this submission should, in the first instance, be made to the Principal Environmental Health Officer at the above address.

Yours Sincerely,


Geraldine O'Callaghan
Principal Environmental Health Officer



Your Ref: MDR1492Lt0004
Our Ref: G Pre00158/2019
(Please quote in all related correspondence)

19 July, 2019

Mr. Paul Chadwick
RPS Consulting UK & Ireland
West Pier Business Campus
Dún Laoghaire
Co. Dublin
A96 N6T7
Via email: paul.chadwick@rpsgroup.com

Re: Notification to the Minister for Culture, Heritage and the Gaeltacht under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

Re: Preparation of an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) to support application for planning consent and EPA licensing for the proposed development of an Integrated Waste Management facility at the existing engineered landfill at Hollywood Landfill, Hollywood Great, Nag's Head, Naul, Co. Dublin

A Chara,

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading.

Nature Conservation

The Department refers to the pre-application request for the Department to submit comments, or information, relevant to this development, which the Department would like to see addressed as part of the project delivery process and in the project environmental assessment.

Due to the recent transposition of the requirements of Directive 2014/52/EU into Irish planning law with effect from 1st September 2018, the following documents and guidelines should be consulted during preparation of any Environmental Impact Assessment Report (EIAR) or EIAR screening document:

- Circular Letter: PL 05/2018 Transposition into Planning Law of Directive 2014/52/EU.
- Department of Housing, Planning and Local Government (2018), Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.



Other important guidance documents that should be consulted include the following:

- Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports, Environmental Protection Agency, 2017.
- European Commission guidance document on the implementation of the EIA Directive (Directive 2011/92/EU as amended by 2014/52/EU): Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impacts Assessment Report, European Commission, 2017.

You should also consult the requirements of this Department in relation to pre-planning at <https://www.npws.ie/development%20consultations> in particular, the section entitled pre-application consultation/engagement which has recently been updated.

Assessment of Project Effects

Article 3 of Directive 2014/52/EU defines the Environmental Impact Assessment (EIA) process to include the process of identifying, describing and assessing in an appropriate manner, the direct and indirect significant effects of a project on biodiversity, with particular attention to species and habitats protected under the Habitats and Birds Directives. Assessment must also be made of significant effects of the project on the interaction between the environmental factors listed in Article 3 of the Directive. Assessment of effect shall also include the expected effects deriving from the vulnerability of the project to risks of major accidents and/or disasters relevant to the project.

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.

Assessment of the direct and indirect significant effects of the project on biodiversity should be made, where applicable, with regard to:

- Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas (SPA) designated under the EC Birds Directive (Directive 2009/147 EC)
- Habitats and species protected under Habitats Directive – Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur), Bird species protected under the Birds Directive – Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur)
- Other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora, designated under the Wildlife Acts 1976 to 2012
- Species protected under the Wildlife Acts including protected flora
- Important bird areas such as those identified by Birdwatch Ireland
- Features of the landscape, which are of major importance for wild flora and fauna, such as those with a “stepping stone” and ecological corridors function, as referenced in Article 10 of the Habitats Directive
- Other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans)
- Red data book species



- Biodiversity in general.

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.

It should be noted that the National Biodiversity Action Plan sets out Government policy on nature conservation and includes as Objective 1 to “mainstream biodiversity into decision making”, including for all public authorities to move towards no net loss of biodiversity. It also requires Local Authorities to develop policies and objectives for the protection and restoration of biodiversity.

In order to assess impacts, it may be necessary to obtain hydrological and/or geological data. In particular any impact on water table levels or groundwater flows may impact on wetland sites some distance away. As EU Member States have to report every 6 years on the National resource of habitats and species listed under the Habitats Directive it is important that any impact on such habitats and species both inside and outside of Natura 2000 sites is recorded.

Ecological Survey

With regard to scoping for an EIAR for a proposed development, in order to assess impacts on biodiversity, ecological surveys should be carried out of the site of the proposed project including the route of any access roads, pipelines or cables etc. to survey the habitats and species present. Any improvement or reinforcement works required for access and transport anywhere along any proposed haul route(s) should be included in the EIAR and subjected to ecological impact assessment with the inclusion of mitigation measures, as appropriate. Where ex-situ impacts are possible survey work may be required outside of the development sites.

Surveys should be carried out by suitably qualified persons at an appropriate time of the year depending on the species being surveyed for. The EIAR should include the results of the surveys, and detail the survey methodology and timing of such surveys. It is expected by this Department, that in any survey methodology used, best practice will be adhered to and if necessary non-Irish methodology adapted for the Irish situation. The EIAR should cover the whole project, including construction, operation and, if applicable, restoration or decommissioning phases. Alternatives examined should also be included in the EIAR. Inland Fisheries Ireland (IFI) should be consulted with regard to fish species if applicable.

Baseline Data

With regard to the scope of baseline data, details of designated sites can be found at www.npws.ie. For flora and fauna the data of the National Parks and Wildlife Service (NPWS) should be consulted at www.npws.ie Where further detail is required on any information on the website, a data request form should be submitted. This can be found at <https://www.npws.ie/maps-and-data/open-data-policy> Further information may be found at <http://dahg.maps.arcgis.com/home/index.html> Other sources of information relating to habitats and species include that of the National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie), BirdWatch Ireland (www.birdwatchireland.ie) and Bat Conservation Ireland



(www.batconservationireland.org). Data may also exist at a County level within the Planning Authority.

Cumulative Effects

Effects of the project must be considered cumulatively. Cumulative effects may arise from:

- The interaction between the various impacts within a single project.
- The interaction between all of the different existing and/or approved plans and projects in the same area as the proposed project.

Mitigation and Construction Environment Management Plans (CEMPs)

The EIAR should refer to features and/or measures to address significant effects on biodiversity. Any losses of biodiverse habitat associated with this proposed development (including access roads and cabling) such as woodland, scrub, hedgerows and other habitats should be mitigated for.

For complex projects such as this, where environmental management may entail multiple aspects, a project specific Construction Environmental Management Plan (CEMP) may be developed. This will form a framework for all environmental management processes, mitigation measures and monitoring and will include other environmental requirements such as invasive species management measures, if applicable. A designated environmental officer and project ecologist should be appointed, as appropriate for the project. Complete project details, including outline CEMPs need to be provided in the EIAR in order to allow an adequate assessment to be undertaken. Applicants need to be able to demonstrate that CEMPs and other such plans are adequate and effective mitigation, supported by scientific information and analysis, and that they are feasible within the physical constraints of the site.

No significant details of the project or its construction may be deferred to the post-consent stage as this may suggest that the impacts are not fully known at consent stage. The positions, locations and sizes of construction infrastructure and mitigation, such as settlement ponds, disposal sites and construction compounds, may significantly affect European sites, other designated sites, habitats, and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment, all potential effects of the development on the site are not being considered. If applicants are not in a position to decide the exact location and details of these at time of application, then they need to consider the range of options that may be used in their assessment so that all issues are covered.

Monitoring

This Department recognises the importance of pre- and post-construction monitoring. The applicant should not use any proposed post-construction monitoring as mitigation to supplement inadequate information in the assessment.

The EIAR process should identify any pre- and post-construction monitoring which should be carried out. Monitoring results should be made available to the Planning Authority and copied to this Department. A plan of action needs to be agreed at planning stage with the



Planning Authority should future results show a significant mortality of birds and/or bat species or impacts to habitats.

Alien Invasive Species

The EIAR should also address the issue of invasive alien plant and animal species, such as Himalayan balsam (*Impatiens glandulifera*), Rhododendron ponticum, Japanese knotweed (*Fallopia japonica*). Detail of methods required to ensure they are not accidentally introduced or spread during construction must be included in the EIAR. Information on alien invasive species in Ireland can be found at <http://www.biodiversityireland.ie/projects/invasive-species/> and at <http://invasivespeciesireland.com/>.

Green Infrastructure

From a biodiversity point of view, it is important to take note of the EU Green Infrastructure Strategy. Further information on this can be found at http://ec.europa.eu/environment/nature/ecosystems/docs/green_infrastructure_broc.pdf. Care should be taken to ensure that green infrastructure involves greening existing infrastructure rather than adding built infrastructure to existing biodiversity corridors.

Hedgerows, and Protected Species

Hedgerows form important wildlife corridors and provide areas for birds to nest in. In addition badger setts may be present. If suitable trees are present bats may roost there and they use hedgerows as flight routes. Hedgerows also provide a habitat for woodland flora. Where a hedgerow forms a townland or other historical boundary it is usually an old hedgerow. Such hedgerows will contain more biodiversity than a younger hedgerow. Hedgerows should be maintained where possible. The EIAR should provide an estimate of the length of hedgerow that will be lost, if any. Where trees or hedgerows have to be removed there should be suitable planting of native species in mitigation. Where possible hedgerows and trees should not be removed during the nesting season (i.e. March 1st to August 31st). Birds' nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 to 2012.

Appropriate Assessment (AA) Guidance

Guidance on AA is available in the Departmental guidance document on Appropriate Assessment, which is available on the NPWS website at www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf and in the EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC", which can be downloaded from http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf. However CJEU and Irish case law has clarified some issues and should also be consulted.

Description of the Project

In describing the project, it will be necessary to identify all those elements of the project or plan, alone or in combination with other projects or plans that have the potential to have significant effects on Natura 2000 sites. Therefore, full project details must be given, including any planned access routes and scour protection.



As outlined above, when determining likely significant effects, Article 6(3) of the Habitats Directive requires that in-combination effects with other plans or projects are considered.

Conservation Objectives

Once the effects of the project or plan have been identified and predicted, it is necessary to assess whether there will be adverse effects on the integrity of the site as defined by the conservation objectives and status of the site. Details of designated sites status and conservation objectives can be found on www.npws.ie. Site-specific, as opposed to generic, conservation objectives are now available for many sites. Each conservation objective for a qualifying interest (QI) is defined by a list of attributes and targets and is often supported by further documentation. Where these are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its integrity are analysed and assessed.

Impact Assessment

Appropriate Assessment carried out under Article 6(3) of the Habitats Directive cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned. Therefore, any conclusions of the proposed development having no impact on the qualifying interests and the integrity of the SAC must be supported by scientific data or survey work.

Should this survey work take place well before construction commences, the Department recommends that an ecological survey of the site should take place immediately prior to construction to ensure no significant change in the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and where a licence has expired, there will be a need for new licence applications for protected species.

Mitigation Measures

Mitigation measures need to be assessed against the adverse effects the project or plan is likely to cause (alone or in combination with other projects or plans). To assess mitigation measures, the following tasks must be completed:

- List each of the measures to be introduced (e.g. noise bunds, tree planting);
- Explain how the measures will avoid the adverse impacts on the site;
- Explain how the measures will reduce the adverse impacts on the site.

Then, for each of the listed mitigation measures:

- Provide evidence of how they will be secured and implemented and by whom;
- Provide evidence of the degree of confidence in their likely success;
- Provide a timescale, relative to the project or plan, when they will be implemented;

Where residual impacts remain, further mitigation measures may be required such as lining of the bypass channel and installation of silt curtains.



Monitoring

Evidence should be provided of how the mitigation measures will be monitored, and, should mitigation failure be identified, how that failure will be rectified.

Monitoring should take place immediately downstream of the construction site.

The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate information in the assessment.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in her role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@chg.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit (DAU)
Department of Culture, Heritage and the Gaeltacht
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

Sinéad O' Brien
Development Applications Unit

12th February 2020

RPS

West Pier Business Campus

Dun Laoghaire

Co. Dublin.

By email: paul.chadwick@rpsgroup.com

Re: Proposed development of an Integrated Waste Management facility at Hollywood Landfill
– Environmental Impact Assessment (EIA) Consultation

Dear Mr. Chadwick.

I wish to acknowledge receipt of the correspondence received on the 6th February.

In this regard, CEWEP Ireland (Confederation of European Waste-to-Energy Plants) is pleased to be afforded the opportunity to comment on the proposed development of an Integrated Waste Management facility at Hollywood Landfill in Naul, County Dublin.

We are supportive of the proposed development and recognise that the proposal 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 (EMRWMP) 2015-2021.

With regard to any potential environmental consequences which may result from the construction and/or operation of the proposed development, CEWEP Ireland is of the view that An Bord Pleanála and the Environmental Protection Agency (EPA) as appropriate are best placed to determine such matters, taking into account any likely effects or impacts of the proposed development through the application of best available techniques and appropriate measures.

We hope the foregoing comments are helpful and should any further detail on the above mentioned matters be required, we would be happy to provide the same.

Yours Sincerely,

Jackie Keaney

Jackie Keaney

President, CEWEP Ireland



Appendix C Prescribed Bodies Notified

List of Prescribed Bodies notified as per Board Direction BD-005255-20

Board Direction BD-005255-20 Prescribed Bodies	Prescribed Bodies Notified
Minister for Culture, Heritage and the Gaeltacht	Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media Leinster House, Kildare Street, Dublin 2 D02 TD30
Minister for Communications, Climate Action and Environment	Minister for the Environment, Climate and Communications 29-31 Adelaide Road, Dublin 2, D02 X285
Eastern and Midland Regional Assembly	Eastern & Midland Regional Assembly 3rd Floor North, Ballymun Civic Centre, Main Street, Ballymun, Dublin 9, D09 C8P5
Fingal County Council	Chief Executive Officer Fingal County Council County Hall, Main Street, Swords County Dublin K67 X8Y2
Dublin City Council	Dublin City Council Customer Services Block 3, Floor 0 Civic Offices Wood Quay Dublin 8 D08 RF3F
Meath County Council	Meath County Council Buvinda House Dublin Road Navan County Meath C15 Y291
Inland Fisheries Ireland	Inland Fisheries Ireland 3044 Lake Drive Citywest Business Campus Dublin D24 CK66
EPA	EPA PO Box 3000 Johnstown Castle Estate County Wexford Y35 W821

Board Direction BD-005255-20 Prescribed Bodies**Prescribed Bodies Notified**

Failte Ireland

Fáilte Ireland
88 - 95 Amiens Street
Dublin 1
D01 WR86

An Taisce

An Taisce
Tailors' Hall,
Back Lane,
Dublin,
D08 X2A3

Health Services Executive

Health Services Executive
Dr Steevens Hospital,
Steevens Lane,
Dublin 8
D08 W2A8.

Transport Infrastructure Ireland

Transport Infrastructure Ireland
Parkgate Business Centre,
Parkgate Street,
Dublin 8,
D08 DK10,

Irish Water

Irish Water
Colvill House,
24-26 Talbot Street
Dublin 1
D01 NP86

Health and Safety Authority

Health and Safety Authority
The Metropolitan Building
James Joyce Street
Dublin 1
D01 K0Y8

Eastern Midlands Waste Regional Authority

Eastern-Midlands Regional Waste Office
c/o Dublin City Council
Motor Tax Office
Floor 2,
Blackhall Place,
Queens Street,
Smithfield,
Dublin 7
D07 ENC4

Geological Survey of Ireland

Geological Survey Ireland
Block 1
Booterstown Hall
Booterstown
Blackrock
Co Dublin
A94 N2R6

Appendix D Public Consultation

1st September 2022

**Proposed Circular Economy Campus and
Integrated Waste Management Facility at Hollywood, Co. Dublin**

Dear Sir/Madam,

Integrated Materials Solutions Limited Partnership (IMS) operate the existing Hollywood Waste Facility at Hollywood Great, Nag's Head, Naul, Co. Dublin. Shortly we will be making an application for planning consent to An Bord Pleanála and a licence review application to the Environmental Protection Agency for the development of a circular economy campus and an integrated waste management facility at the existing waste facility at Hollywood.

This letter provides summary details of the proposed development for your information, and we welcome any queries that you may have in relation to the proposal.

Background Information

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 Permissions and the Waste Licence, only waste which meets the criteria for inert landfill as set out in the Landfill Directive 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 consents and the Waste Licence.

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

IMS strive to maintain open and transparent communications with the local community and stakeholders on the site's activities and our environmental performance. We follow best practice in all areas of our operations and since assuming operations of the Hollywood site from Murphy Environmental Hollywood Ltd in 2017, IMS have implemented several initiatives which demonstrate our commitment to continual improvement and sustainability. Initiatives include:

- Achieving and maintaining accreditation for our Environmental Management System (ISO14001).
- Implementing a Haulier Charter to promote neighbourly and safe conduct for all vehicles using our site.
- Investing in site upgrades including a wheel wash, road sweeper and improvements to the access road.
- Biodiversity enhancement measures on site.

- Supporting local community initiatives and educators working in sustainable development

During 2019 and 2020 IMS held a number of pre-application consultation meetings with An Bord Pleanála (ABP) regarding the appropriate route under which a planning application for a circular economy campus could be made. Subsequently, further meetings were held with local community groups and stakeholders to answer queries on the resulting ABP Inspector's report and on IMS operations in general. These meetings informed the final proposed development as laid out in the following sections.

Proposed Development

The proposed development is designed to 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 recovery operations at the Hollywood site in line with circular economy principals. The proposal consists of permission for a 25-year lifetime of operation, at a rate of 500,000 tonnes per annum – unchanged from existing operation.

The proposed development includes a number of proposed changes as follows:

- Broader material acceptance types including non-biodegradable non-hazardous (in addition to the existing inert wastes) generated by a range of sectors (construction, commercial, industrial and waste processing)
- Expanded treatment activities including:
 - Development and re-profiling of the landfill void to accommodate specially engineered landfill cells for non-hazardous waste, 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 produce low carbon, recovered sands and aggregates from various granular wastes
 - Manufacture of secondary materials including enhanced soils and low-energy bound materials (e.g. concrete)
 - Additional 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
- Surface water management infrastructure for the landfill to capture, attenuate and treat storm water
- An internal un-paved road network serving the deposition areas from the reception area
- Full restoration of the site to natural ground levels.

Changes that the Community will experience

Noted above, the proposed changes to the development are limited to the acceptance of some additional non-hazardous non-biodegradable materials, and to the recovery of more material for re-use by the Construction Industry.

- **Traffic** – There will be no increase in traffic volumes as the same number of trucks will enter and leave the site. Recovered material will be transported off site in what – under current operations – would be an empty vehicle. The proposed development is capped at the same incoming tonnage limit as the existing operation
- **Noise** – There will be no increase to the noise experienced by residents in the community due to site operations. Broadly the same activities will be undertaken (with some enhancements to reduce the quantities going to landfill) and the same restrictions on noise levels experienced at the boundaries of the site will remain the same
- **Working Hours** – The proposed development has the same working hours as are currently permitted for the existing operation

- **Dust** – We will continue to utilise best practice and industry leading dust reduction and road cleanliness, with no change to the quantity of material, and the number of vehicles. As with noise above, we will still meet the Local Authority & EPA requirements for dust management
- **Odours** – As any new material proposed to be accepted is non-hazardous and non-biodegradable, there will be no odours generated by the management of these materials
- **Water** – In line with the current operation, all water exiting the site will continue to be treated & monitored to ensure that Local Authority, Irish Water & EPA standards are met
- **Asbestos** - As you are probably aware, during a previous round of consultations, we indicated the aspiration to accept Asbestos Containing Materials (ACMs), as there are very limited receivers for this type of waste. We understand the Community concerns around this type of material, so have decided not to pursue acceptance of ACMs.

We would welcome any queries you may have in respect of the proposal, which can be sent in writing to the site address or by email to greencampus22@imsirl.ie.

Yours sincerely,

Regards,



Darren O'Reilly

On behalf of Integrated Materials Solutions Limited Partnership