

INTEGRATED WASTE MANAGEMENT FACILITY AT HOLLYWOOD CIRCULAR ECONOMY CAMPUS

Planning Report



MDR1492ARp0004
F01
21st October 2022

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1 INTRODUCTION

Integrated Materials Solutions Limited Partnership (IMS) (the Applicant) has instructed RPS Group Ltd., West Pier Business Campus, Dún Laoghaire, County Dublin, to submit this Strategic Infrastructure Development (SID) Planning Application for a site at Hollywood Great, Nag's Head, Naul, Co. Dublin. The Applicant is the owner of the development site.

Applicants Registered Name: Integrated Materials Solutions Limited Partnership (IMS)

Registered Address: O'Connell Bridge House, 27/28 D'Olier Street, Dublin 2, D02 RR99

Limited Partnership No: 1457

This Section 37E application is being made directly to An Bord Pleanála (ABP / The Board) under the provisions of Section 37A (Strategic Infrastructure Development) of the *Planning and Development Act 2000*, as amended (The Act). As the development for which permission is being sought has been deemed to be SID, this planning application is accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).

The proposal consists of a 10 year permission for a 25-year lifetime of operation to develop engineered landfill cells on the site of the existing quarry to landfill a mixture of non-hazardous and inert wastes at a rate of 500,000 tonnes per annum. A full description of the proposed development can be found on the Statutory Notice and is detailed in **Section 5** of this Planning Report.

The lands which are the subject of this application are outlined in red on the enclosed Site Location Plan (DWG. No. DG1001). The locations of the 2 no. Site Notices are indicated on the Site Location Plan (DWG. No. DG2001) and have been placed in accordance with Article 19 of the *Planning and Development Regulations 2001*, as amended (The Regulations).

The appropriate planning fee under the Section 37E of The Act has been submitted to ABP by EFT. A copy of the remittance notice has been included with the planning application package for proof and reference.

A full schedule of reports and drawings submitted as part of this application is provided on the accompanying cover letter.

2 SITE LOCATION AND DESCRIPTION

2.1 Site Location

The subject site is located in Hollywood Great, Nag's Head, Naul, Co. Dublin (Irish Transverse Mercator Easting: 715736, Northing: 758036), circa 4km south-east of Naul and 3km west of the M1 (see **Figure 2-1**). For context, the subject site is also located circa 14km north of Dublin Airport.

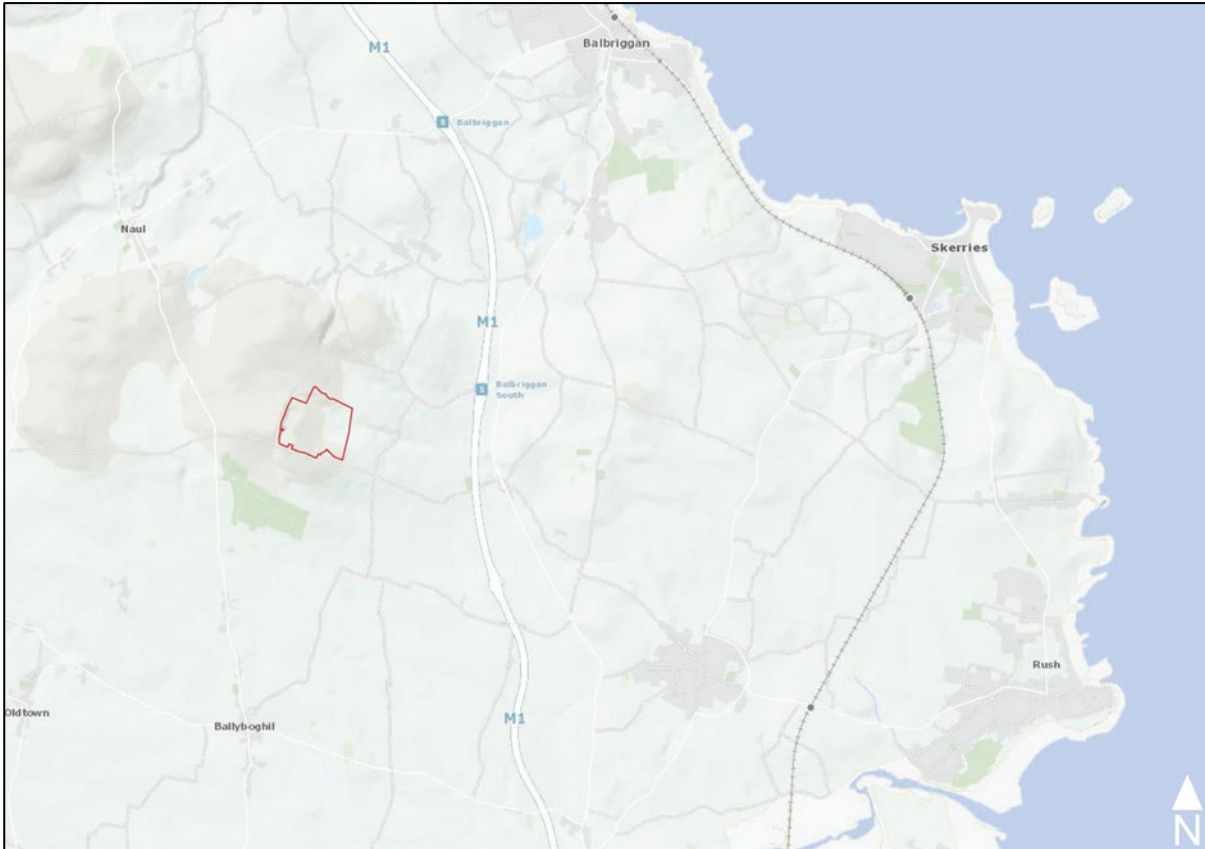


Figure 2-1 Site Location (indicative subject site outlined in red)

Source: Geohive (basemap)

The site is accessed via the LP-1090 local road which bounds the west of the site and the LP-1080 local road (also known as Sallowood View and the Nevitt Road) which bounds the south of the site and links the R108 with the R132.

The land use in the vicinity of the site is typically agricultural with the surrounding fields employed for a mixture of pasture and tillage uses. In total, there are 16 residential properties and three commercial properties (excluding farm buildings) located along the LP-1080 between the site and the M1 motorway to the east of the site. This LP-1080 local road is employed as the current haul route for the existing operation. There is also a primary school located circa 3km east of the site at the Five Roads but this is located circa 40m from the existing haul route employed. A second primary school is currently under construction in the area but not on the proposed haul route.

2.2 Site Description

The subject site was a former shale and limestone quarry which operated until 2007 and is now a licensed engineered landfill site. Since having received the necessary permissions and licences, the former quarry site has been used for the purpose of infilling such that it can ultimately be restored as well as waste recovery activities. The current site layout is shown in **Figure 2.2**.

The site entrance, buildings and other infrastructure are located on the western boundary of the site. Haul roads and ramps have been constructed within the site to allow vehicles access the active cell areas. Other features include stockpiles of topsoil and subsoil at the northern boundary.



Figure 2-2 Aerial View (indicative subject site outlined in red)

Source: Google Earth –(base image)

3 PLANNING HISTORY

From a review of Fingal County Council's (FCC) and ABP's online planning application search facilities, RPS sets out an overview of the valid planning applications regarding the subject site.

FCC Reg. Ref. 88A/32

On 27 July 1988, FCC issued a Final Grant for development consisting of the infill, restore and reinstate portion of the quarry which had been excavated.

FCC Reg. Ref. 88A/32/E1

On 12 August 2008, FCC granted permission to Seamus Murphy for an Extension of Duration of Permission for the proposed infill and land reclamation works at the existing quarry permitted in order to give the applicant time to complete an EIS in line with the requirements of the EPA licence.

FCC Reg. Ref. F04A/0363

On 07 October 2004, FCC issued a Final Grant to Murphy Environmental for development consisting infilling with inert material on existing quarry of 13.56 hectares as part of the restoration and reinstatement of that quarry. Permission was sought for a further period of fifteen years to continue to fill the quarry with inert material in accordance with the limits and conditions set out in the EPA Licence No. 129-1. An Environmental Impact Statement accompanied the application.

FCC Reg. Ref. F07A/0262

On 18 July 2007, FCC issued a Final Grant to Murphy Environmental for development consisting of variations to a previous permission (Reg. Ref. F04A/0363). The variations included an extension to the permitted area to be infilled and for an increase in the infill from 340,000 tonnes per year to 500,000 tonnes per year in order for the quarry to be infilled and fully restored before the 2004 permission expires i.e. by 6 October 2019. An Environmental Impact Statement accompanied the application.

FCC Reg. Ref. F07A/1241

On 27 November 2007, FCC issued a Refused Permission to Murphy Environmental for development consisting of the relocation of the primary entrance to the site. It was proposed that a new entrance be created from the County Road LP01080 Walshestown Road. The development was sought to provide: new boundary treatment; new internal site access road; with new weighbridge; wheel wash; and a single storey office building and its associated services. The existing entrance was to be used as an emergency access only. The application was refused for four reasons; FCC determined that the proposed development:

1. Would be visually obtrusive and would be injurious to the rural amenity of the area.
2. Was not necessary or desirable or that it would not have significant adverse impacts on the landscape and boundary character of the area.
3. Would be seriously injurious to the residential amenity of the adjacent dwellings through negative impacts of noise, dust and traffic.
4. Submitted unacceptable proposals for the treatment of foul sewer and insufficient information in relation to the proposed surface water arrangement.

FCC Reg. Ref. F08A/0749 (ABP Reg. Ref. PL06F.230763)

On 07 August 2008, FCC Refused Permission to Murphy Environmental for development consisting of the relocation of the primary entrance to the site. As per FCC Reg. Ref. F07A/1241, this application sought to create a new entrance from the County Road LP01080 Walshestown Road. The development was sought to provide: new boundary treatment; new internal site access road; with new weighbridge; wheel wash; and a single storey office building and its associated services. The existing entrance was to be used as an emergency access only.

A First-Party Appeal was lodged on 02 September 2008 and was Refused Permission by the Board on 18 March 2009 based on two reasons:

1. The Board considered that the proposed new access and associated infrastructure would be visually obtrusive and out of character within the high amenity location and would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The Board were not satisfied that the applicant demonstrated that there is a need for the proposed new access or that the proposed entrance would not interfere with the safety and free flow of traffic on the public road.

ABP Reg. Ref. PL06F.PA0018 (FCC Reg. Ref. SID/03/10)

On 16 June 2011, the Board issued a Grant Order to Murphy Environmental Hollywood Ltd. for development consisting of an integrated waste management facility for the acceptance and landfilling of nonbiodegradable inert, non-hazardous and hazardous waste at the existing quarry.

FFC Reg. Ref. SID/03/10/E1

On 06 July 2016, FCC issued a Notification of Decision to Grant Extension of Duration Permission to Murphy Environmental Hollywood Ltd. for the integrated waste management facility granted under ABP Reg. Ref. PL06F.PA0018 (FCC Reg. Ref. SID/03/10).

FCC Reg. Ref. F19A/0077 (ABP Reg. Ref. PL06F.305832)

On 08 October 2019, FCC Granted Permission to Integrated Materials Solutions Ltd. for development consisting of the continued infilling of the former quarry with construction and demolition waste material at a rate of 500,000 tonnes per annum permitted under FCC Reg. Refs. F07A/0262 and F04A/0363 for a further 15 no. year period from the date of expiration of the existing permissions in order to enable the lands to be fully restored to the original ground level. The development also consists of: the relocation of the primary entrance to the site to the southern site boundary along the LP01080; a new internal site access road; a new processing building; and a new administration building its associated services. An Environmental Impact Assessment Report was submitted with the application.

This permission was the subject of a third party appeal on the 4th November 2019 (ABP Reg. Ref. PL06F.305832) which was subsequently withdrawn on the 16th November 2020.

4 CONSULTATION

4.1 Consultation with An Bord Pleanála

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

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

- 05 September 2019;
- 14 October 2019; and
- 05 December 2019.

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

During the final consultation meeting on 05 December 2019, IMS also consulted with ABP on the scoping of the application (including the EIA). The matters raised by ABP are listed in **Table 4.1**.

4.2 Consultation with the Planning Authority

On 08 January 2020, IMS held a consultation meeting with the planning authority at the Fingal County Council offices in Swords, Co. Dublin. As part of the consultation IMS provided a presentation to the planning authority on the proposed development and the status of the ongoing consultation with ABP. The planning authority agreed with the initial views of ABP on the application scoping and also proposed a number of elements (refer **Table 4.1**).

Table 4-1 Consultation with ABP and the Planning Authority

Consultee	Responses
An Bord Pleanála	<ul style="list-style-type: none"> • Policy & Need – ABP requested that the policy context and need for the project should be clearly set out in the application. In a general sense, 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 on 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. These matters are addressed in Section 3 of the EIAR whereby asbestos has been removed from the scope of this application. • Planning History – Historical chronology for various planning applications and waste licences should be made clear. The planning and waste history is included in Section 3.3 of the EIAR. • Duration of Permission – It is important to distinguish between the duration of the planning permission being sought (i.e. 5 to 10 years) and the lifetime of operations (i.e. 25 years). These matters are addressed in Section 1 of the EIAR and the Planning Report included in the application. The proposal consists of a 10-year permission for a 25-year lifetime of operation. • EIA / AA – The Board advised that the EIAR for the planning application and that for the EPA licence application should be the same. This is confirmed and this EIAR has been prepared for this dual purpose. • Hydrogeology – Having regard to the history of the site, ABP considers that the potential impact on hydrogeology and protection of ground water resources will be a significant issue in the consideration of an application for development. The EPA's

reasons for refusing the previous waste licence application must be addressed. This is noted and these impacts are assessed in full in Chapter 9 of the EIAR as well as supporting information provided in Volume IV of the EIAR.

- Biodiversity – The board underlines the importance of addressing fully the impacts on the Peregrine Falcon, supported by surveys and scientific information. Any potential relationship with the conservation objectives of the Rogerstown Estuary SPA should be explored in detail in order to support the omission of the species from the NIS. This is noted and these impacts are assessed in full in Chapter 8 of the EIAR as well as in the accompanying Natura Impact Statement.
- Traffic and Transportation – It was noted that this planning matter was of particular concern to FCC during the planning history of the site. This matter is addressed in Chapter 13 of the EIAR.
- Cultural Heritage – It was noted that the surrounding area is one rich in cultural heritage but this does not affect the subject site. This element is presented in Chapter 15 of the EIAR.
- Landscape and Visual Impact – ABP suggested that it might be useful to reflect the intermittent period when the quarry is being in-filled and cross-sections would be useful. This has been assessed in the Chapter 16 of the EIAR with photomontages showing the current, interim and restored site included in Volume IV of the EIAR.

Fingal County Council

- Traffic - The planning authority recommended that an updated baseline traffic survey is undertaken to reflect the current traffic volumes relative to the previous survey in May 2018. This survey was commissioned in January/February 2020 and the results of same have been employed in the impact assessment prepared in Chapter 13 of the EIAR.
 - Community Fund – The planning authority suggested that IMS provides a consideration of a community fund as part of the application. The purpose of such a fund is to provide financial assistance to community organisations in the area to fund environmental, recreational and community projects as part of a wider mitigation regime. This element is presented in Section 5.10 of the EIAR.
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4.3 Consultation with Other Bodies

The consultation process consisted of communicating with both statutory and non-statutory organisations and other competent parties. All comments and recommendations from each of the Statutory Authorities and Consultees have been addressed by the project team and considered in the impact assessments as described in Chapters 6 – 17 of the accompanying EIAR.

4.4 Public Consultation

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

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

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

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

5 PROPOSED DEVELOPMENT

5.1 Rationale for the Proposed Development

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

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

Chapter 2 of the accompanying EIAR sets out the rationale for the drivers for the principle waste streams proposed coupled with an outline of the capacity of the site to accommodate these drivers.

5.2 The Proposed Development

IMS is seeking consent to develop a Circular Economy (CE) Campus and an integrated waste management facility at the Hollywood site which will service national waste management requirements and assist in providing a self-sufficient waste management solution for the State. The proposal will enhance and expand the established waste and recovery operations at the Hollywood site in line with circular economy principals and the waste hierarchy. The proposal consists of a 10 year permission for a 25-year lifetime of operation at a rate of 500,000 tonnes per annum as per the existing operation.

The proposed CE Campus includes a number of proposed changes as follows:

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

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

The proposed development will operate subject to the requirements of an Industrial Emission (IE) Licence, if granted by the EPA, to replace the existing Waste Licence, which governs all associated enforcement and regulation from when operations commence.

6 PLANNING POLICY & ASSESSMENT

This section of the Planning Report considers the proposed development with regards to the relevant national, regional and local planning policy.



Figure 6-1 Planning Policy Hierarchy

6.1 National Planning Policy

Project Ireland 2040 - National Planning Framework (NPF) was adopted and published in May 2018. It is the primary articulation of spatial, planning and land use policy within Ireland. The National Strategic Outcomes of the NPF includes the ‘sustainable management of water, waste and other environmental resources’. More specifically, in this context, it states that:

‘Ireland has abundant natural and environmental resources such as our water sources that are critical to our environmental and economic wellbeing into the future. Conserving and enhancing the quality of these resources will also become more important in a crowded and competitive world as well as our capacity to create beneficial uses from products previously considered as waste, creating circular economic benefits’.

The NPF recognises that a key future enabler for Dublin includes improving sustainability in terms of waste and waste management. More broadly than that, the NPF promotes 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 even eliminated. The NPF specifically states that:

‘In managing our waste needs, the NPF supports circular economy principles that minimise waste going to landfill and maximise waste as a resource. This means that prevention, preparation for reuse, recycling and recovery are prioritised in that order, over the disposal of waste’.

Due to its very nature and purpose, the subject waste recovery facility is wholly consistent with the waste related policies of the NPF and notably:

National Policy Objective 56 – *‘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’.*

In addition, the NPF targets a significant proportion of future urban development on infill / brownfield development sites. In particular, National Policy Objective 12 will seek to advance brownfield development

by making State lands available and legislating for enhanced powers of compulsory purchase of privately owned sites in brownfield areas to incentivise development in these areas:

National Policy Objective 12 – *‘The Government will establish a National Regeneration and Development Agency to work with local authorities, other public bodies and capital spending departments and agencies to co-ordinate and secure the best use of public lands, investment required within the capital envelopes provided in the National Development Plan and to drive the renewal of strategic areas not being utilised to their full potential. The Government will consider how best to make State lands available to such a body to kickstart its development role and to legislate for enhanced compulsory purchase powers to ensure that the necessary transformation of the places most in need of regeneration can take place more swiftly and effectively.’*

As part of Project Ireland 2040, the National Development Plan 2021-2030 sets out the Government’s overarching investment strategy and budget for the period 2021-2030. The NDP includes a series of sectoral strategies for the Circular Economy and Sustainable Resource Management and the preamble to the strategic investment priorities the NDP states that:

While the overall focus of Government waste policy is on prevention and waste minimisation, investment in indigenous waste treatment capacity remains critical to our environmental and economic well-being.

The NDP also lists the Strategic Investment Priorities for DECC to support the transition to a circular economy and the sustainable management of environmental resources. This investment includes projects and programmes committed to in the waste and circular economy policy including the following priorities relevant to the proposed development:

- *Delivering on commitments under the Circular Economy Strategy;*
- *Supporting the roll-out of the Circular Economy Programme, which will be delivered through the EPA; and*
- *Incentivise private investment in the circular economy through the Circular Economy Innovation Grants Schemes.*

The Hollywood facility is unique in being 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 soil recovery sites are not covered by the Landfill Directive and can only accept uncontaminated materials. To this end the policy to further develop brownfield sites requires the appropriate infrastructure to manage the associated wastes and the IMS site will be central to the delivery of this policy in the GDA.

6.2 Regional Planning Policy

6.2.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region

The *Regional Spatial and Economic Strategy* (RSES) prepared by the Eastern and Midland Regional Assembly (EMRA) adopted in 2019, replaces the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* which were prepared in 2010.

The purpose of the RSES for EMRA is to support the implementation of national government policies and to set out a framework for local economic development and spatial planning in the region. The RSES for EMRA is therefore a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives.

Compliance with the NPF and the Waste Management Plan for the region and reiterating those national and regional waste objectives to ensure there is continuity down to the more local county level development plans is a key reoccurring theme arising in the RSES for EMRA. Regional Policy Objectives (RPO) concerning regeneration and waste management contained within the RSES for EMRA are particularly relevant to the subject proposal.

In terms of regeneration, the following RPO is of relevance:

RPO 9.9 – *‘To support at a National level, efforts to explore ways to deal effectively with waste and contamination relating to brownfield regeneration’.*

In terms of waste management, the following RPO is of relevance:

RPO 10.25 – *‘Development plans shall identify how waste will be reduced, in line with the principles of the circular economy, facilitating the use of materials at their highest value for as long as possible and how remaining quantities of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food and shall take account of the requirements of the Eastern and Midlands Region Waste Management Plan’.*

6.2.2 Transport Strategy for the Greater Dublin Area 2016 - 2035

The Transport Strategy for the Greater Dublin Area, 2016 to 2035 also has some relevance for the subject application due to its proximity to the M1 motorway.

The *Transport Strategy for the Greater Dublin Area, 2016 to 2035*, (TSGDA) prepared by the National Transport Authority (NTA) sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare up to 2035. The purpose of the strategy is to contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.

The subject site is located circa 3km west of J5 on the M1 motorway. The TSGDA recognises the M1 / Corridor A (i.e. ‘Drogheda – Balbriggan – Swords – Airport – North Inner City – to Dublin City Centre’) as being of strategic importance to the strategic road network. It also notes that the M1 / Corridor A has limited scope for increases in radial road capacity along this corridor.

6.3 Local Planning Policy

The current local planning policy framework is set out in the Fingal Development Plan 2017 – 2023 (FDP). It is noted that the FDP is currently under review and the Draft Fingal Development Plan 2023 – 2029 is currently at amended draft status with an expected implementation date of January 2023. As the 2017 – 2023 Plan is the existing land use policy, this is addressed in this section with a commentary on the scope of potential changes contained within the Draft 2023 – 2029 Plan also noted.

6.3.1 Waste Management Objectives

Under the Waste Management Acts, the Development Plan is deemed to include the objectives of the Waste Management Plan for the administrative area, in this case the Eastern-Midlands Region Waste Management Plan 2015-2021. The FDP sets out the strategic visions for Fingal which includes the objective to make better use of key resources such as land and waste infrastructure.

The FDP recognises that in certain instances, quarries can be beneficial to the environment, particularly when decommissioned and when opportunities arise for habitat creation and alternative uses. In this respect and in the context of the proposed development, it will deliver on the strategic policy aims of the FDP by seeking to: *‘Secure the timely provision of infrastructure essential to the sustainable development of the County, in particular in areas of resource and waste management.’*

The FDP explicitly states that it has been prepared having full regard to the Eastern Midlands Region Waste Management Plan 2015-2021. **Table 6-1** sets out key specific objectives of the FDP which seek to ensure alignment with the Eastern Region Waste Management Plan 2015-2021. **Table 6-2** provides an overview of the draft policies and objectives of the Draft 2023 – 2029 FDP and the policy base is largely aligned with the existing FDP but with the draft FDP policies citing the need for the transition towards a circular economy in line with wider policy. In addition, the draft Plan policies make reference to any successor to the Eastern Midlands Region Waste Management Plan 2015 -2021 which is the National Waste Plan for a Circular Economy.

In short, the waste policies in the existing and draft land use plans identify the Eastern Midlands Region Waste Management Plan 2015 -2021 (or any subsequent plan) as the primary source of waste policy in the Fingal area. The proposed development does not only fulfil and comply with the policies of the National Waste Plan for a Circular Economy, but this Plan actively supports the proposed development as ‘nationally important infrastructure’.

Table 6-1 2017 – 2023 Fingal Development Plan Objectives on Waste Management

Objective	Description
Objective WM02	Facilitate the implementation of national legislation and national and regional waste management policy having regard to the waste hierarchy.
Objective WM03	Implement the provisions of the Eastern Midlands Region Waste Management Plan 2015 - 2021 or any subsequent Waste Management Plan applicable within the lifetime of the Development Plan. All prospective developments in the County will be expected to take account of the provisions of the Regional Waste Management Plan and adhere to the requirements of that Plan.
Objective WM04	Facilitate the transition from a waste management economy to a green circular economy to enhance employment and increase the value recovery and recirculation of resources.
Objective WM07	Promote the increased re-use of waste in accordance with the Eastern Midlands Region Waste Management Plan 2015 -2021 (or any subsequent plan).
Objective WM18	Ensure that construction and demolition Waste Management Plans meet the relevant recycling / recovery targets for such waste in accordance with the national legislation and regional waste management policy.
Objective WM19	Protect floodplains and biodiversity where construction and demolition waste is to be recovered by land reclamation.
Objective WM20	Implement the provisions of the National Hazardous Waste Management Plan 2014-2020 or any subsequent plan within the lifetime of the development plan.
Objective WM21	Promote public awareness of the dangers associated with the incorrect disposal of hazardous waste

Table 6-2 Draft 2023 – 2029 Fingal Development Plan Policies and Objectives on Waste Management

Policy/Objective	Description
Policy IUP20	Support the implementation of existing waste management policy and promote education and awareness on all issues associated with waste management, both at industry and community level, including the promotion of waste reduction by encouraging reuse, recycling and recovery of waste. Fingal County Council will continue to promote and support the objectives of the Eastern and Midlands Region Waste Management Plan 2015–2021, or such plans as may be updated.
Policy IUP21	Have regard to European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.
Policy IUP22	Support the principles of transition from a waste economy towards a green circular economy and implement good waste management and best practices to enable Fingal to become self-sufficient in terms of resource and waste management and to enhance employment and increase the value recovery and recirculation of resources.
Objective IUO28	Implement the provisions of the Eastern Midlands Region Waste Management Plan 2015–2021 or any subsequent Waste Management Plan applicable within the lifetime of the Development Plan. All prospective developments in the County will be expected to take account of the provisions of the Regional Waste Management Plan and adhere to the requirements of that Plan.
Objective IUO29	Provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping with the EU waste hierarchy, national legislation and regional waste management policy to adequately cater for Fingal's growing population.
Objective IUO30	Adhere to the recommendations of the National Hazardous Waste Management Plan 2014–2020 and any subsequent plan, and to co-operate with the EPA and other agencies in the planning, organisation and supervision of the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects. To continue to promote the use of clean technology and minimisation of hazardous waste production in all development within the County.
Policy IUP24	Promote and encourage the establishment of re-use, recycling and repair activities to prevent and minimise waste generation and disposal, in accordance with the Eastern Midlands Region Waste Management Plan 2015–2021 (or any subsequent plan).

6.3.2 Land Use Zoning

Within the FDP the subject site is zoned for 'HA – High Amenity' use. The area that immediately surrounds the subject site is also zoned for HA use while broader hinterland is zoned for 'R – Rural' use. (See **Figure 6-2**)

The purpose of the relevant HA zoning objective is to: *'Protect and enhance high amenity areas'*. This zoning objective has been applied to areas of Fingal that are considered to have a high landscape value and areas in which inappropriate development would contribute to a significant diminution of landscape value. According to the FDP, areas that are zoned HA meet one or more of the following criteria:

- Contain scenic landscape of high quality;
- Afford expansive or interesting views of surrounding areas;
- Are components in important views and prospects;
- Are unique or special within the County;
- Are important elements in defining the coastal character of the County;
- Act as a backdrop to important coastal views;
- Contain important groups of trees or woodland;
- Are elevated or ridge sites on which development would be obtrusive; and / or
- Provide public access to interesting attractive landscapes or to semi-natural areas.

The FDP sets out two specific objectives in relation to the HA zoning, notably:

Objective NH51 – *'Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place'*.

Objective NH52 – *'Ensure that development reflects and reinforces the distinctiveness and sense of place of High Amenity areas, including the retention of important features or characteristics, taking into account the various elements which contribute to its distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity'*.

According to the FDP, use classes that are permitted in principle on lands that are zoned HA include 'Open Space' and 'Office Ancillary to Permitted Use'.

It is noted that the FDP also allows for 'uses which do not conform to the zoning objective of the area' and the reasonable intensification of, extensions to and improvement of premises accommodating these uses will generally be permitted subject to normal planning criteria. This is stated as Objective Z05:

Objective Z05 – *'Generally, permit reasonable intensification of, extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria'*.

In this regard, while the current operation does not comply with the land use zoning, the extant permissions predate the designation and as a non-conforming use applies. As such, the proposed reasonable intensification of operations may be accommodated under the current land use policy.

This point was noted in the Chief Executive's Response (Volume I, page 450) to the IMS submission on land zoning during the consultation of the draft CDP which states that:

The subject lands are zoned HA-High Amenity, and it is requested that these are rezoned GE, to allow the existing waste management facility to expand and diversify and to cater for circular economy initiatives. There is currently an extant permission under planning reference F19A/0077 for the continued filling of the former quarry for a further 15-year period with construction and demolition waste material. It is noted that the current FDP and Draft Plan makes provision for the assessment of any non-conforming uses, Objective Z03 seeks to, 'Generally, permit reasonable intensification of, extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria.' Having regard to the history of the lands, the current use at the subject site is considered acceptable at this HA location as it will facilitate the restoration of a spent quarry to its original levels/appearance and is considered to accord with the 'HA' zoning objective and vision.

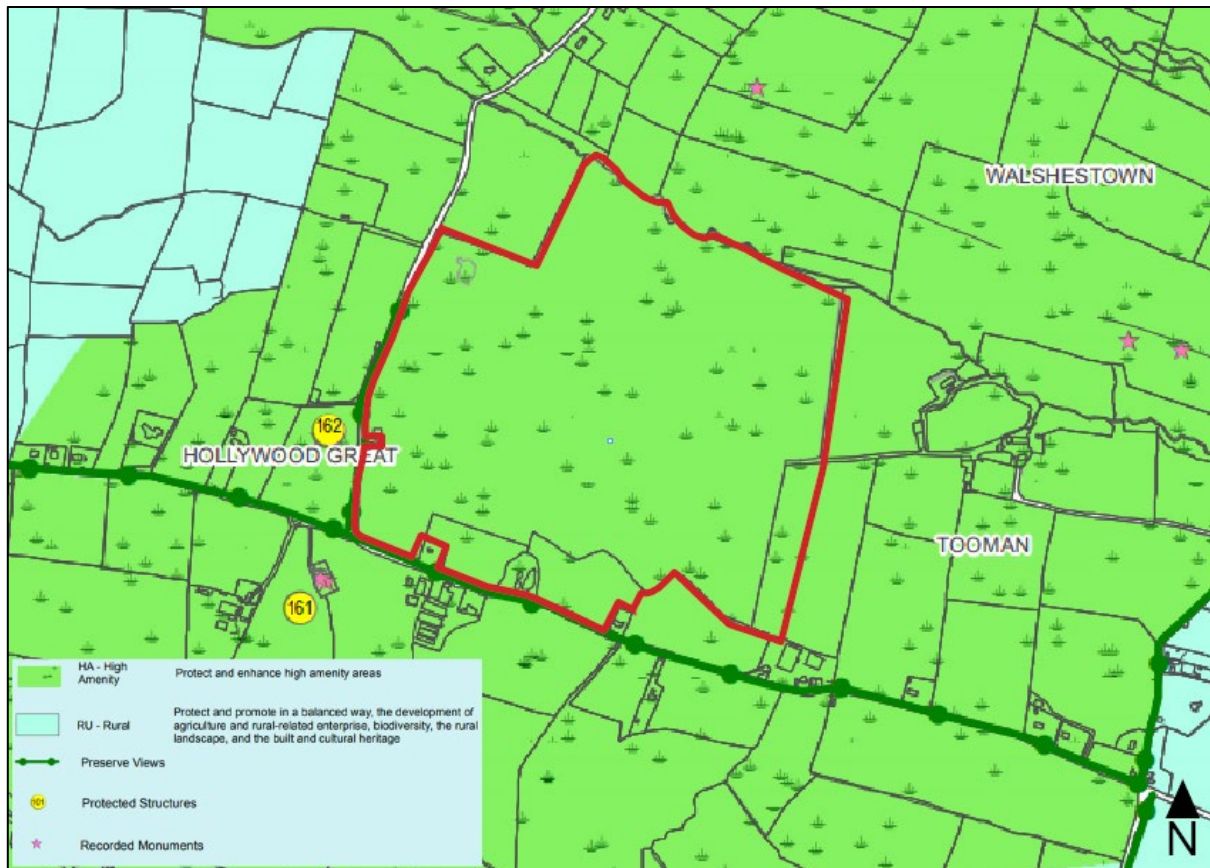


Figure 6-2 Land Use Zoning Map (indicative subject site outlined in red)

Source: Fingal Development Plan 2017-2023 (Extract from Sheet 2 Fingal North)

6.3.3 Preserve Views

As illustrated in **Figure 6-2**, a ‘Preserve Views’ strategic objective is identified along the southern (i.e. the road named ‘Sallowood View’ or referenced as local road LP-1080) and western boundary of the site (referenced as local road LP-1090) and also along the portion of the R108 regional road which is nearest the western hinterland of the site, in addition to a portion of the local link road to the M1 which concerns the eastern hinterland of the site. It is an objective of the Development Plan to:

Objective NH40 – ‘Protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan, from inappropriate development.’

It is considered that the infilling of the quarry and its return to open space will have a positive impact on the ‘Preserve Views’ identified in the FDP.

6.3.4 Protected Structures

There are two ‘Protected Structures’ listed in the Record of Protected Structures for Fingal County (RPS 0161 & 0162) that are located close to the subject site. These structures and all relevant broader considerations regarding cultural heritage are addressed in Chapter 15 Cultural Heritage of the EIAR. From a local planning policy perspective, the following objective of the FDP is noted:

Objective CH07 – ‘Ensure that development within the vicinity of a Recorded Monument or Zone of Archaeological Notification does not seriously detract from the setting of the feature, and is sited and designed appropriately.’

It is considered that the infilling of the quarry and its return to open space will have a positive impact on the Protected Structures identified in the Record for Protected Structures for Fingal County.

6.3.5 Access

The proposed development includes for a new entrance onto Sallowood View road (LP-1080). It is noted in this context that when considering new entrances, the FDP states that:

‘Where new entrances are necessary, the relevant road design standards will be applied (DMRB in rural situations i.e. the NRA Design Manual for Roads and Bridges - and DMURS in urban situations – Design Manual for Urban Roads and Streets). Such road standards are required to guarantee the safety of the general public in the County and protect the carrying capacity of the road network.’

It is also an objective of the FDP to:

Objective MT36 – *‘Maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG, (2012), the Trans-European Networks (TEN-T) Regulations and with regard to other policy documents, as required’.*

Further details with regards to the new entrance are explained and addressed in Chapter 13 of the EIAR.

6.3.6 Green Infrastructure

The FDP identifies green infrastructure as a key strategic asset for Fingal and therefore includes policies for the protection, creation and management of this resource in an integrated manner. The FDP includes a statement of policy in relation to green infrastructure which is to; *‘ensure that areas and networks of green infrastructure are identified, protected, enhanced, managed and created to provide a wide range of environmental, social and economic benefits to communities’.*

It is also an objective of the FDP to:

Objective GI02 – *‘Create an integrated and coherent green infrastructure for the County by requiring the retention of substantial networks of green space in urban, urban fringe and adjacent countryside areas to serve the needs of communities now and in the future including the need to adapt to climate change.’*

With specific reference to the subject proposal, it is noted that the Green Infrastructure maps of the FDP identifies that the subject site is located in the ‘High Lying Agricultural’ area from a landscape character site perspective and that part of the subject lands concern a ‘County Geological Heritage Site’. It is also noted that Green Infrastructure 1 identifies the subject lands as constituting a highly sensitive landscape (see **Figure 6-3**) and Green Infrastructure 2 identifies the site as a ‘Nature Development Area’ (see **Figure 6-4**). The manner in which the proposal interrelates with these green infrastructure strategic objectives is addressed in detail in Chapter 16 Landscape and Visual Impact.

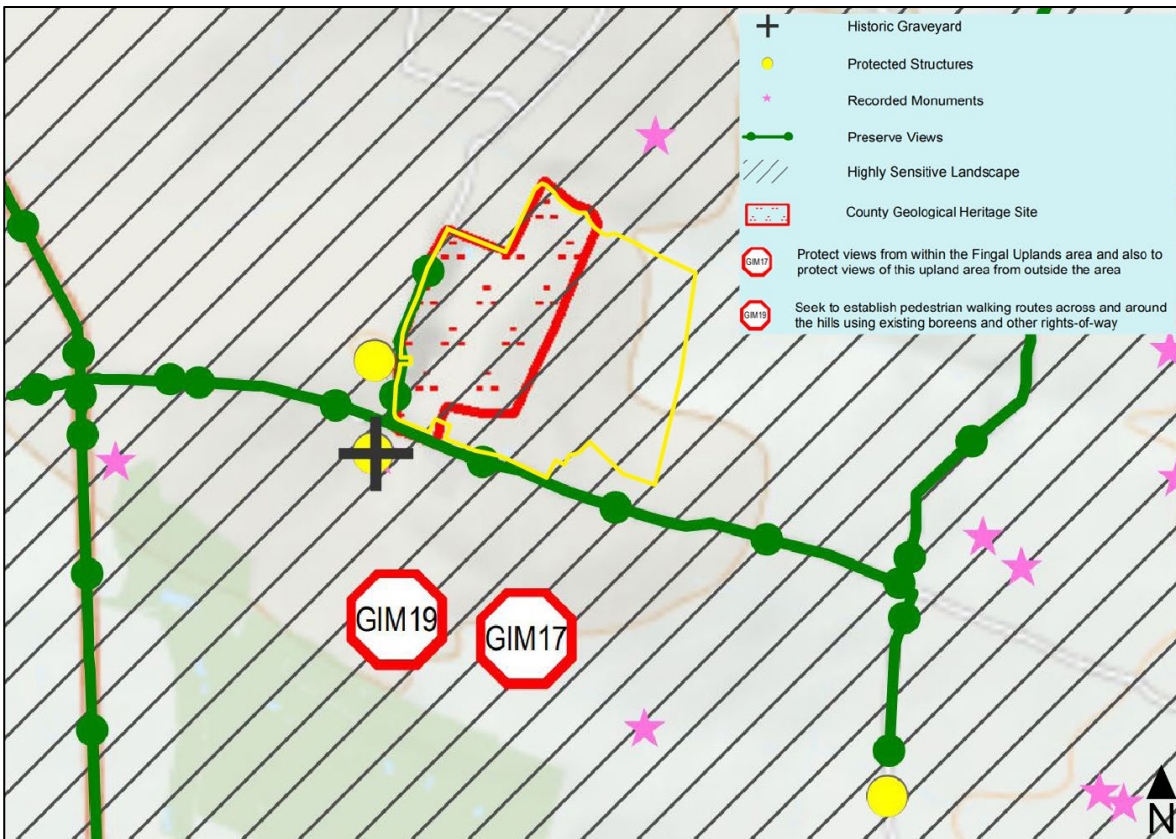


Figure 6-3 Green Infrastructure 1 Map (indicative subject site outlined in yellow)

Source: Fingal Development Plan 2017-2023 (Extract from Green Infrastructure 1)



Figure 6-4 Green Infrastructure 2 Map (indicative subject site outlined in red)

Source: Fingal Development Plan 2017-2023 (Extract from Green Infrastructure 2)

6.4 Planning Conclusions

Due to its very purpose and nature, the proposed development fully accords with the relevant strategic objectives as set out in the NPF, notably, the circular and bio economy and the management of waste. The RSES for EMRA contains regional planning policy in relation to regeneration and waste management which supports the subject proposal. In addition, from a regional transportation perspective, the proposed development maintains the strategic objectives of its surrounding road network as set out in the TSGDA.

In terms of the local planning policy context, while the subject lands are zoned HA, the proposed diversification of operations at Hollywood landfill will ultimately enable the achievement of the purpose of this zoning objective through site restoration, i.e. to *'project and enhance high amenity areas'*. In relation to the use classes of the FDP, the end result arising from the proposed development accords with those uses that are permitted in principle on lands that are zoned HA (i.e. 'Open Space' and 'Office Ancillary to Permitted Use').

More broadly, the proposed integrated waste recovery facility and all associated reinstatement proposals concerning the subject lands accords with the preserve views, protected structures, access and green infrastructure objectives of the FDP. The manner in which this is achieved is addressed in detail in Chapter 13 (Traffic), Chapter 15 (Cultural Heritage) and Chapter 16 (Landscape) of the EIAR.

In conclusion, from a planning and development policy perspective, the subject proposal complies with all relevant national, regional and local level plans and all associated objectives that concern the proper planning and sustainable development of the area.

7 CONCLUSION

This SID application seeks planning permission for the development of an integrated waste management facility focused on circular economy initiatives at this site at Hollywood Great, Nag's Head, Naul, Co. Dublin. The Applicant is the owner and operator of this site.

In summary, the proposed development consists of a 25-year operating lifetime to develop engineered landfill cells on the site of the existing quarry to landfill a mixture of non-hazardous and inert wastes at a rate of 500,000 tonnes per annum.

The need for the proposed development may be largely defined as demonstrating an urgent demand for capacity to treat construction, demolition and other wastes in the Greater Dublin Area (GDA) coupled with an abundant supply of capacity for the landfilling of these wastes in an existing engineered landfill.

It is respectfully submitted that the proposed scheme has been designed with consideration for and is compliant with the guidance and development standards set out in national, regional and local policy documents. It is also considered that this SID application has been prepared in accordance with the Act and the Regulations.

Having regard for the reasons, considerations and arguments set out in this Planning Report and the accompanying drawings and reports, that the Board issue a Grant Order for the proposed development in the interest of proper planning and sustainable development.