



An
Bord
Pleanála

Record of Meeting ABP-321572-25

Case Reference / Description	ABP-321572-25 – SID Pre Application Consultation – Knockharley Landfill, Knockharley, Brownstown, Navan, County Meath		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	1 st Meeting		
Date	26/02/2025	Start Time	11:00am
Location	Virtually by Microsoft Teams	End Time	12:00pm

Representing An Bord Pleanála		
Staff Members		
Sarah Lynch, Assistant Director of Planning (Chair)		
Fiona Fair, Senior Planning Inspector		
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Representing the Prospective Applicant		
Brian Minogue - Tom Phillips and Associates		
Darren Crowe – WSP		
David Tobin – Beauparc		
Jonathan Gauntlett – AWN Consulting		
Andrew Lochaden – WSP		
Teri Hays – AWN Consulting		

Introduction

The Board referred to the letter received from the prospective applicant on the 23rd December 2024 , requesting pre-application consultations under section 37E of the Planning and Development Act, 2000, as amended and advised the prospective applicant that the first 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 that it wished to receive advice on from the Board. The Board mentioned the following general procedures in relation to the pre-application consultation process:

- 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 in any legal proceedings.

Presentation made by the prospective applicant:

The prospective applicant provided an overview of the site of the proposed development, which is located at Knockharley Landfill, covering an area of circa 135 hectares between Navan and Duleek, County Meath. It provided a high-level overview of the existing facility at the site which was originally permitted in 2001 and extended in size in 2021 following a grant of permission by the Board on foot of ABP-303211-18. It provided a brief overview of the infrastructure at the site, as listed on

the presentation, and stated that current activities at the facility are in line with the 2021 permission, including the construction of Incinerator Bottom Ash (IBA) cells and a gas treatment compound located to the south-east.

Utilising a site layout plan for the existing facility, the prospective applicant noted the brown area to be the facility which has been running for approximately 20 years, the pink area to be the working area, and the yellow area to be the IBA treatment facility which is currently under construction, designed to process material for reuse in road construction, or as a limestone substitute in the cement industry. The prospective applicant stated that the permitted landfill void space has been excavated and lined, and that the IBA facility is expected to be commissioned soon. It was also noted that the current construction activities at the site are concluding, and that the permitted landfill is coming to the end of its lifespan in terms of its existing footprint. The applicant stated that if gas is captured, methane is brought back to a central location and consumed, however, gas generation within the site is tapering off as the nature of the landfill material changes.

Providing a summary of the proposed development, the prospective applicant explained its intention to increase the existing landfill by constructing an additional active void space of 3.38 million m³ (volume) for landfilling. The perspective applicant stated that there is no intention to increase the permitted annual tonnage. At present, the Knockharley Landfill has a permitted capacity of 440,000 tonnes per annum. The project will seek to develop the existing lands that form part of the landfill site as additional active void space for the Knockharley Landfill. To accommodate the proposed expansion, the prospective applicant proposes to divert the Knockharley Stream, to relocate the existing 220KV overhead power lines, and to remove some planted forestry along the western boundary. It also proposes an amendment and extension of permitted berming, along with capping of the expanded void space in exhausted cells.

The prospective applicant provided an overview of the current landfill context in Ireland, noting Knockharley Landfill to be one of three existing operational landfills and stating that one of the other two facilities (Drehid) is expected to close in 2027/2028. It was explained that, without further expansion, Knockharley is projected

to reach its current permitted capacity by 2028/2029. The prospective applicant justified the need for the proposed expansion citing that the sustained economic growth combined with population the growth of Ireland results in an overall increase in generation of waste which requires landfilling. In relation to this, it noted that Metrolink North (ABP-314724-22), if developed, could generate up to 8 million tonnes of spoil, a portion of which will be landfilled, and maintain that failure to provide sufficient landfill capacity within the Republic of Ireland will result in the need to outsource landfill capacity to other international destinations. It was also stated that landfilling of waste has diminished as more municipal solid waste (MSW) is diverted to incineration / Energy from Wastes (EfWs) but explained that landfill remains the appropriate destination for non-combustible, non-recyclable and non-biodegradable wastes.

The prospective applicant noted that refuse and recycling of waste within the state has increased and highlighted that although the percentage of waste going to disposal will continue to be reduced in line with EU mandatory requirements, there will still be a requirement for certain wastes to be landfilled.

The prospective applicant provided an overview of the proposed engineering design. It provided details relating to the proposed expansion stating that it adheres to EPA design guidelines from the past 20 years. The proposed expansion will extend laterally to the west and aligns with the elevations and design of the current facility, ensuring visual integration with the surrounding landscape. Construction will employ a leapfrog system, whereby sections are built in a staggered approach, allowing ongoing operations while new cells are completed. Screening Berms will be constructed around the edges, and the existing Knockharley stream will be diverted to accommodate the development. The overall concept aims to create a cohesive landscape by filling the valley between the existing and proposed facilities.

The prospective applicant stated that the proposed development is in line with EPA Landfill Manuals and that the non-hazardous waste design complies with both EU regulation and the licence conditions. Providing diagrams of the Typical Clay Layer Section and Capping Section the prospective applicant explained the phased cell construction using site-won material.

The prospective applicant provided an overview of the key environmental considerations, indicating that a comprehensive EIA Report and Flood Risk Assessment are being prepared. It stated that hydrology is a key environmental concern due to the diversion of the stream and explained that Appropriate Assessment Stage 1 and Stage 2 (if required) will be undertaken. Traffic and Transport and Landscape Design and Visual Impact are also key considerations.

In relation to ecological surveys undertaken, the prospective applicant maintained that it has not identified any significant constraints in relation to habitats, bats, wintering birds, etc. However, they highlight that the area has poor classification under the Water framework Directive (WFD). It was noted that the Flemingstown Stream connects to the River Nanny, which flows into the Irish Sea about 20km downstream (North-West Irish Sea SPA).

The prospective applicant gave an overview of the scenic designations and various views within a 5km radius of the site. In relation to Visual Receptors, it was noted that the site is well screened and that it is not intended that the project would impact visual receptors adjoining the site.

The prospective applicant gave its opinion that the proposed development constitutes strategic infrastructure development, stating that the development falls within the scope of criteria set out in the section 37A of the Planning and Development Act 2000, as amended. It noted its engagement with EirGrid and acknowledged the need for formal engagement with Meath County Council and additional engagement with other relevant authorities, statutory bodies and departments prior to submission of any application.

Discussion:

- The Board's representatives noted that, during the oral hearing held into An Bord Pleanála case reference ABP-303211-18, it was stated that the pretreatment and density of deposited material could extend the landfills lifespan by up to 15 years. In relation to this, the Board's representatives sought clarification in relation to the change in waste and its impact on the current lifespan. The prospective applicant clarified that the nature of waste has changed in the last 10 years and has increased in volume. At the time of the

OH it was expected that waste would be diverted to a new incinerator in Cork. This has not happened resulting in more waste being sent to landfill.

- In relation to a query from the Board's representatives in relation to where the excavated material will be stored, given that the area identified for the proposed development is currently used as a storage area for excavated material from the existing landfill area the prospective applicant clarified its intention to cap the existing landfill, remove the material as it prepares to excavate, and form the Berms around the site. It was stated that a leapfrog concept will be implemented in relation to excavation, whereby one cell is excavated at a time, to progressively build landscaping Berms around the perimeter of the proposed development.
- The Board's representatives inquired about the current materials and related environmental implications, ecological issues, and the restringing and upgrading of the lines and tower relocation. The prospective applicant clarified that while permission was granted by Meath County Council for the restringing and upgrading of the lines, it didn't grant permission for the relocation of the towers. Discussions had occurred with Eirgrid regarding the relocation of the towers prior to the approval of the restringing.
- The Board's representatives inquired about the permitted total capacity per annum for the site and its contingency capacity. The prospective applicant explained that the total capacity is 440,000 tonnes with 10% (44,000 tonnes) reserved by the local government management agency which is managed by Dublin City Council. To release the 10% when market conditions are necessary, permissions must be sought from Dublin City Council. This is intended for use during major outages of incinerators or unexpected events, such as a sudden halt in overseas shipping to ensure adequate void capacity for waste management. Last year 32,000 tonnes were released. The prospective applicant also engages in quarterly meetings with the EPA, local authorities, and the management agency to monitor waste generation and flow, influencing decisions on contingency capacity release.
- The prospective applicant confirmed it has held informal meetings with Meath County Council and is planning to hold formal meetings soon. Relevant planning authorities are aware of the proposed development. The perspective

applicant was advised to consult with Meath County Council and any other relevant planning authority, environmental departments, traffic departments etc.

- The Board's representatives inquired further about the implications of operational challenges on waste management strategies. The prospective applicant explained that the unexpected lightness of construction and demolition (C&D) waste, along with the significant volume of bio stabilised material, has complicated waste handling processes. Despite the low odour and minimal methane generation associated with bio stabilised materials, the high ash content poses difficulties for recycling this type of material, which further exacerbates operational constraints. Additionally, the presence of a considerable number of soils complicates waste management strategy, as it requires specific handling and disposal considerations to ensure compliance with environmental regulations.
- The Board's representatives questioned the expected lifespan of the extension before it reaches capacity, with the prospective applicant responding that it is anticipated to be between 10-30 years.
- Regarding the impact on transportation routes in Duleek and the contingency capacity, the prospective applicant clarified that there will be no changes to the overall tonnage and haulage routes. In discussions with the LGMA, it was indicated that the contingency capacity would be maintained and could only be utilized with local authority approval.
- The importance of addressing previous ecological concerns from the earlier application was discussed, particularly regarding protected species (Otter for example), as highlighted in an external report. Additionally, an inquiry was made about the proposed diversions, specifically whether these will be open channels or culverted. In response, the prospective applicant indicated that the plan is to implement an open channel wherever feasible.
- The Board's representatives reiterated the need for the forestry clearance, stream diversion, and overhead line works to be considered from an ecological perspective and that a screening process be undertaken to determine the need to proceed to Stage 2.

- It was advised that any Construction Environmental Management Plan be consistent with proposed mitigation, and that a Habitat Management Plan and Enhancement Rehabilitation Plan is submitted.
- The Board representatives queried what public consultation would be carried out and whether there have been any complaints from the public on the existing landfill site. The prospective applicant stated it is an IE License Site where complaints are documented. It also stated that the number of complaints has decreased over the past 15 years due to a reduction in putrescible waste, which has made operations less problematic compared to other landfills. This has contributed to lower complaint levels and good relations with the local community. The prospective applicant proposes to engage with stakeholders and has been in discussions with a consulting company to assist in creating a stakeholder engagement document. This document will be shared with the local community prior to the submission of the planning application.
- The Board's representatives advised of the importance of carrying out a Stage 2 Assessment in relation to ground and surface water, and advised the prospective applicant, in the absence of any current Irish guidelines, to consult current U.K. guidelines regarding Water Framework Directives.
- It was advised that any proposal needs to clearly and unambiguously set out what the waste volume and mix comprises, in any future application. There is no room for errors. Clarity is essential in any application before the Board.
- In relation to the project timeline, the prospective applicant stated its intention to lodge the SID application in mid-2025 and noted that it may request a further meeting before requesting formal closure of the pre-application process.

Conclusion:

The Board's representatives advised that onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Board's representatives advised that the record of the instant meeting will issue in the meantime and the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

**Sarah Lynch****Assistant Director of Planning**