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Head Office: 80 Harcourt Street Dublin 2 D02 F449

Chief Executive Officer Meath County Council Buvinda House Dublin Road Navan County Meath C15 Y291

Meath County Council Planning Department FAO Mr Gerard Kellett Executive Planner Buvinda House Dublin Road Navan C15 Y291

15 December 2025

Dear Sir / Madam

RE: SID APPLICATION, CONTAINING AN EIAR, FOR A PROPOSED EXPANSION OF KNOCKHARLEY LANDFILL, NAVAN, CO. MEATH

1.0 INTRODUCTION

Knockharley landfill Ltd.¹ has retained Tom Phillips + Associates (Town Planning Consultants)², to issue, to prescribed bodies listed by An Coimisiún Pleanála in its Pre-Planning Closure Letter dated 13 October 2025 (Ref. ABP-321572-25), copies of a Strategic Infrastructure Development (SID) application in relation to a proposed development at the existing Knockharley Landfill.

The subject development comprises an increase to the landfill area by approximately 17.68 ha, which will provide approximately 4.12 million m3 of void space (3.32 million m3 of additional constructed void space with further void space of 807,000 m3 for the 'Piggyback Cell') for the continued disposal of waste.

Ireland faces significant challenges in responding to mounting pressure on its waste management infrastructure. If left unaddressed, this pressure could lead to serious consequences, including ultimately the non-collection of municipal waste. Provision of waste collection services and well-engineered waste management capacity is essential to avoid

TOWN PLANNING CONSULTANTS

¹ 24 Ballymount Road Upper, Dublin 24.

²80 Harcourt Street, Dublin 2, D02 F449.



contamination of water, soil, and air, the proliferation of life-threatening diseases, disruption of critical infrastructure, and the visible decline of urban and rural landscapes.

Key reports such as the *Mid-Term Evaluation of the National Hazardous Waste Management Plan 2021–2027* (2024) and the *Circular Economy and Waste Statistics Highlights Report 2021* (2022) underscore these challenges and identify that Ireland's transition to a circular economy is faltering.

This letter is provided in accordance with ACP's direction to notify the prescribed bodies.

2.0 CONCLUSION AND PLANNING PROCEDURE

The application comprises, inter alia:

- Statutory particulars including cover letter, application form, copies of notices, lists of prescribed bodies.
- Environmental Impact Assessment Report.
- AA Screening/NIS.
- Planning Report/Cover Letter.
- Planning Application drawings.

The planning application contents can be accessed at the following website: www.knockharleylandfillsid.ie

An Coimisiún Pleanála may grant permission for the strategic infrastructure development as proposed; or may grant permission subject to such modifications as it specifies in its decision; or may grant permission in part only, with or without any other modifications it may specify in its decision; or may refuse to grant permission for the proposed development. An Coimisiún Pleanála may attach to a grant of permission such conditions as it considers appropriate. Submissions or observations may be made only to An Coimisiún Pleanála ("the Commission"), 64 Marlborough Street Dublin 1 during the eight-week consultation period (commencing 19th December 2025 and ending 12th February 2026) relating to:

- i. The implications of the proposed development for proper planning and sustainable development;
- ii. The likely effects on the environment of the Proposed Development; and
- iii. The likely significant effects of the proposed development on the integrity of a European Site if carried out.

Any submissions or observations must be accompanied by a fee of €50 (except for certain prescribed bodies). Such submissions/observations must also include the following:

- I. The name of the person making the submission/observation, the name of the person acting on his/her behalf, if any, and the address to which any correspondence relating to the application should be sent;
- II. The subject matter of the submission or observation; and
- III. The reasons, considerations and arguments on which the submission or observation is based in full. (Article 217 of the Planning and Development Regulations refers).



Any submissions or observations which do not comply with the above requirements cannot be considered by the Commission. Any enquiries relating to the application process should be directed to the SID Section of An Coimisiún Pleanála (Tel. 01-8588100).

Yours sincerely

Brian Minogue

Associate

Tom Phillips + Associates



Appendix A: Schedule of Documents

The documentation outlined in the following section forms part, and is in support of, the subject planning application.

2 no. hard copies and 2 No. soft copies is provided to MCC.

The following particulars have been submitted with this application:

Planning Application Form and Appendices

A completed An Coimisiún Pleanála SID Planning Application Form dated 15 December 2025 prepared by Tom Phillips + Associates.

Planning Report

This Planning Report prepared by Tom Phillips + Associates and dated 11 December 2025.

Letters to Prescribed Bodies

26 No. Letters to the prescribed bodies (including 1 No. Cover Letter to Meath County Council Planning Authority) are appended to this Planning Report.

Planning Application Fee

A payment has been made by EFT to An Coimisiún Pleanála, dated 2 December 2025, in the amount of €100,000.00 representing the SID Planning Application fee payable. Proof of this payment is appended to this Application.

Site & Newspaper Notice(s)

- Original page of the *Irish Daily Star* dated 11 December 2025. Original page of the *Meath Chronicle*, dated 13 December 2025.
- Site Notice dated 11 December 2025, erected at 1 No. location at the site.

Confirmation of Publication of EIAR on Department of Housing, Local Government and Heritage Website

Confirmation of publication of the EIAR for the proposed development on the EIA Portal, appended to this *Planning Report*.

Engineering Services Report



An Engineering Services Report prepared by WSP.

Landfill Gas Assessment

A Landfill Gas Assessment prepared by WSP.

Site Drainage and SuDS Technical Memo and Appendices (including run-off calculations and culvert hydrologic and hydraulic assessment)

A Site Drainage and SuDS Technical Memo and Appendices (including run-off calculations and culvert hydrologic and hydraulic assessment) prepared by WSP.

Site Specific Flood Risk Assessment

A Site-Specific Flood Risk Assessment prepared by AWN.

Construction & Environment Management Plan

An Outline Construction & Environment Management Plan and prepared by WSP.

Resource Waste Management Plan

A Resource Waste Management Plan prepared by WSP.

Appropriate Assessment Screening Report

An Appropriate Assessment Screening Report prepared by Scott Cawley.

Natura Impact Statement

A Natura Impact Statement prepared by Scott Cawley.

Invasive Species Management Plan

An Invasive Species Management Plan prepared by Scott Cawley.

Biodiversity Management Plan

A Biodiversity Management Plan prepared by Scott Cawley.

Consultation Report



A Consultation Report prepared by Keatings.

Photomontages

Photomontages prepared by MacroWorks.

Drawings

All plans and drawings have been prepared by WSP and Macroworks as follows:

Drawing Name	Drawing	Scale	Author
	No.	1:	
Planning/Engineering Drawings	1	I	1
01 - Planning KLL_Site Location Map_1_25000	001	25000	WSP
02 - Planning_KLL_Ownership Boundary	002	5000	WSP
03 - Planning_KLL_Site Location Map	003	5000	WSP
04 - Planning_KLL_Existing Site Layout	004	4000	WSP
05 - Planning_KLL_Permitted Site Layout	005	4000	WSP
06 - Planning_KLL_Permitted Site Layout_Planning Elements	006	4000	WSP
07 - Planning_KLL_Proposed Site Layout	006	4000	WSP
08 - Planning KLL_Proposed Site Layout Plan Tile Reference	08	4000	WSP
09 - Planning KLL_Proposed Site Layout Plan Sheet 1 of 9	09	1000	WSP
10 - Planning KLL_Proposed Site Layout Plan Sheet 2 of 9	10	1000	WSP
11 - Planning KLL_Proposed Site Layout Plan Sheet 3 of 9	11	1000	WSP
12 - Planning KLL_Proposed Site Layout Plan Sheet 4 of 9	12	1000	WSP
13 - Planning KLL_Proposed Site Layout Plan Sheet 5 of 9	13	1000	WSP
14 - Planning KLL_Proposed Site Layout Plan Sheet 6 of 9	14	1000	WSP
15 - Planning KLL_Proposed Site Layout Plan Sheet 7 of 9	15	1000	WSP
16 - Planning KLL_Proposed Site Layout Plan Sheet 8 of 9	16	1000	WSP
17 - Planning KLL_Proposed Site Layout Plan Sheet 9 of 9	17	1000	WSP
18 - Planning_KLL_Existing Site Monitoring Layout	018	As	WSP
		shown	
19 - Planning KLL_Proposed Monitoring Locations	019	4000	WSP
20-01 - Planning_KLL_Proposed Cut & Fill Phasing 1 - 4	020-01	6000	WSP
20-02 - Planning_KLL_Proposed Cut & Fill Phasing 5 - 7	020-02	6000	WSP
21 - Planning_KLL_Proposed Cell Filling Sequence Plan	021	Various	WSP
22 - Planning_KLL_Proposed Site Layout with Cap	022	4000	WSP
23-01 - Planning_KLL_Proposed Site Cross Sections AA - BB	23-01	1000	WSP
23-02 - Planning_KLL_Proposed Site Cross Sections CC, DD & EE	023-02	1000	WSP
24 - Planning KLL - Proposed & Existing Internal Roads	024	4000	WSP
25-01 - Planning KLL - Existing Utilities Site Layout	025-01	2500	WSP
25-02 - Planning KLL - Proposed Site Utilities Layout	025-02	3000	WSP
26 - Planning_KLL_Existing Foul & SW Layout	026	3000	WSP
27 - Planning_KLL_Proposed SW Layout – Active Landfill	027	3000	WSP
28 - Planning_KLL_Proposed SW Layout – Closed Layout	028	3000	WSP
29-01 - Planning_KLL_Proposed SW Layout Sections	029-01	1000	WSP
29-02 - Planning KLL Proposed SW Sections Details	029-02	Various	WSP



30 - Planning_KLL_Existing Leachate Infrastructure	030	2000	WSP
31 - Planning_KLL_Proposed Leachate Infrastructure	031	2500	WSP
32 - Planning_Leachate Collection and Extraction Details for		Various	WSP
Proposed Cells			
33 - Planning_KLL_Existing Gas Infrastructure Site Layout	033	2000	WSP
34 - Planning_KLL_Proposed Gas Infrastructure Site Layout	034	2500	WSP
35 - Planning_KLL_Proposed Typical Cell Sections & Details	035	Various	WSP
36 - Planning_KLL_Proposed Typical Cell Details	036	Various	WSP
37 - Planning_KLL_Capping & Landfill Gas Infrastructure Details	037	40	WSP
Landscape Drawings			
EXISTING_SCENARIO	1.1	3000	Macroworks
AS_PERMITTED_REMOVALS PLAN	1.1	3000	Macroworks
AS_PERMITTED_LANDSCAPE_PLAN	1.3	3000	Macroworks
PROPOSED_REMOVALS_PLAN	1.4	3000	Macroworks
LANDSCAPE_MITIGATION_PLAN	1.5	3000	Macroworks
REINSTATEMENT_PLAN	1.6	3000	Macroworks

 Table 3: Drawings submitted with this application.

Environmental Impact Assessment Report (EIAR)

EIAR prepared in respect of this Application, comprising: a Non-Technical Summary and 17 No. Chapters addressing the following topics:

Chapter No.	Environmental Aspect	Contributor
Non-Technical Summary (NTS)	Non-Technical Summary of Full EIAR	AWN
1	Introduction	AWN
2	Description of Proposed Development	AWN
3	Alternatives Considered	AWN
4	Population & Human Health	AWN
5	Land, Soils, Geology & Hydrogeology	AWN
6	Hydrology	AWN
7	Biodiversity (Flora & Fauna)	Scott Cawley
8	Air Quality & Odour	AWN
9	Climate	AWN
10	Noise & Vibration	AWN
11	Landscape & Visual Site Assessment	MacroWorks



12	Archaeological, Architectural and Cultural Heritage	CRDS
13	Traffic and Transportation Assessment	AWN/TrafficWise
14	Materials Assets: Traffic & Transport	AWN
15	Interactions	AWN
16	Cumulative Impacts	AWN
17	Mitigation	AWN

 Table 4: EIAR prepared in respect of this Application.



Appendix B: Notification of the Board's decision concerning whether the development is SID

Our Case Number: ABP-321572-25

Your Reference: Knockharley Landfill Limited



Tom Phillips & Associates

Action: PR 23 - 32 7

Date Rec'd. 1 & OCT 2025

Project Ref & planne

Tom Philips and Associates 80 Harcourt Street Dublin 2 D02 F449

Date: 13 October 2025

Re: Pre-Application Consultation - Knockharley L'andfill, Knockharley, Brownstown, Navan, County

Meath

Knockharley Landfill, Knockharley, Brownstown, Navan, County Meath

Dear Sir / Madam.

Please be advised that following consultations under section 37B of the Planning and Development Act, 2000 as amended, the Commission hereby serves notice under section 37B(4)(a) that it is of the opinion that the proposed development falls within the scope of paragraphs 37A(2)(a), (b) and (c) of the Act. Accordingly, the Commission has decided that the proposed development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act 2000, as amended. Any application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 37E of the Act.

Please also be informed that the Commission considers that the pre-application consultation process in respect of this proposed development is now closed.

The following is a list of prescribed bodies to be notified of the application for the proposed development.

- Department of the Environment, Climate and Communications
- Department of Housing, Local Government and Heritage
- Minister of Climate Energy and the Environment
- Eastern and Midland Regional Assembly
- Environmental Protection Agency (EPA)
- Health Service Executive (HSE)
- Health and Safety Authority (HSA)
- 8. Irish Water / Uisce Eireann
- Transport Infrastructure Ireland (TII)
- 10. Dublin City Council
- Dún Laoghaire-Rathdown County Council
- 12. Fingal County Council
- 13. South Dublin County Council
- Kildare County Council
- 15. Meath County Council
- 16. Any other relevant Local Authority

Teil Glao Áitiúil Facs Láithreán Gréasáin Ríomhphost Tel LoCall Fax Website Email (01) 858 8100 1800 275 175 (01) 872 2684 www.pleanala.ie communications@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902 64 Marlborough Street Dublin 1 D01 V902



17. The Heritage Council 18 Failte Ireland 19. An Taisce 20 Inland Fisheries 21. Waterways Ireland Department of Agriculture, Food & Marine 22. 23. Department of Culture, Communications and Sport 24. Office of Public Works (OPW) 25. EirGrid A & aqilling moi 26

Further notifications should also be made where deemed appropriate.

In accordance with section 146(5) of the Planning and Development Act, 2000 as amended, the Commission will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The following information relates to challenges to the validity of a decision of An Coimisiún Pleanála under the provisions of the Planning and Development Act 2000, as amended:

Judicial review of An Coimisiún Pleanála decisions under the provisions of the Planning and Development Acts (as amended).

A person wishing to challenge the validity of a Commission decision may do so by way of judicial review only. Sections 50, 50A and 50B of the Planning and Development Act 2000 (as substituted by section 13 of the Planning and Development (Strategic Infrastructure) Act 2006, as amended/substituted by sections 32 and 33 of the Planning and Development (Amendment) Act 2010 and as amended by sections 20 and 21 of the Environment (Miscellaneous Provisions) Act 2011) contain provisions in relation to challenges to the validity of a decision of the Commission.

The validity of a decision taken by the Commission may only be questioned by making an application for judicial review under Order 84 of The Rules of the Superior Courts (S.I. No. 15 of 1986). Sub-section 50(7) of the Planning and Development Act 2000 requires that subject to any extension to the time period which may be allowed by the High Court in accordance with subsection 50(8), any application for judicial review must be made within 8 weeks of the decision of the Commission. It should be noted that any challenge taken under section 50 may question only the validity of the decision and the Courts do not adjudicate on the merits of the development from the perspectives of the proper planning and sustainable development of the area and/or effects on the environment. Section 50A states that leave for judicial review shall not be granted unless the Court is satisfied that there are substantial grounds for contending that the decision is invalid or ought to be quashed and that the applicant has a sufficient interest in the matter which is the subject of the application or in cases involving environmental impact assessment is a body complying with specified criteria.

Section 50B contains provisions in relation to the cost of judicial review proceedings in the High Court relating to specified types of development (including proceedings relating to decisions or actions pursuant to a law of the state that gives effect to the public participation and access to justice provisions of Council Directive 85/337/EEC i.e. the EIA Directive and to the provisions of Directive 2001/12/EC i.e. Directive on the assessment of the effects on the environment of certain plans and programmes). The general provision contained in section 50B is that in such cases each party shall bear its own costs. The Court however may award costs against any party in specified circumstances. There is also provision for the Court to award the costs of proceedings or a portion of such costs to an applicant against a respondent or notice party where relief is obtained to the extent that the action or omission of the respondent or notice party contributed to the relief being obtained.

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General information on judicial review procedures is contained on the following website: www.citizensinformation.ie.

Disclaimer: The above is intended for information purposes. It does not purport to be a legally binding interpretation of the relevant provisions, and it would be advisable for persons contemplating legal action to seek legal advice.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email laps@pleanala.ie quoting the above mentioned An Coimisiún Pleanala reference number in any correspondence with the Commission.

Yours faithfully,

Eimear Reilly

Executive Officer Direct Line: 01-8737184

PC09

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