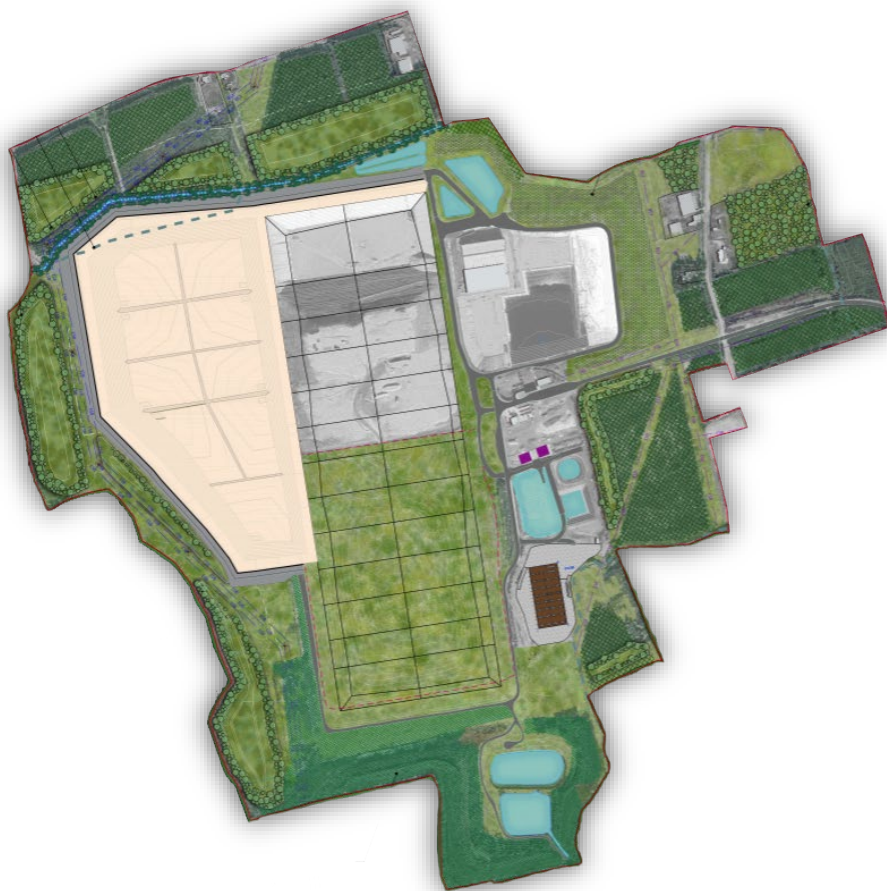


# Planning Report

Knockharley Landfill Development –  
Strategic Infrastructure Development  
(SID) Planning Application at  
Knockharley, Co. Meath



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## 1.0 INTRODUCTION AND EXECUTIVE SUMMARY

### 1.1 Application Overview

Knockharley Landfill Limited<sup>1</sup> (KLL) has retained Tom Phillips + Associates, Town Planning Consultants<sup>2</sup> in addition to a project team including AWN Consultants<sup>3</sup>, WSP Engineering Consultants<sup>4</sup>, MacroWorks<sup>5</sup>, Scott Cawley Ecology Consultants<sup>6</sup> and Keating & Associates<sup>7</sup> to apply to An Coimisiún Pleanála (‘the Commission’ / ACP) in respect of the proposed development consisting of the expansion of the existing landfill void space at Knockharley Landfill, Knockharley, Co. Meath, C15 FX09, in accordance with the provisions of section 37E of the *Planning and Development Act 2000 (as amended)* (‘the Act’).

As will be outlined in this report, 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 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*<sup>8</sup> (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 application proposes a (partial) solution to these challenges through the extension of the capacity and operational lifespan of the Knockharley Landfill by nearly twenty years. When combined with the Poolbeg waste-to-energy (WTE) facility, this long-term extension will significantly enhance the resilience and sustainability of the Ireland’s waste management infrastructure.

The application relates to development that comprises or is for the purposes of an activity requiring an Industrial Emissions Licence (IED). In this regard, it should be noted that the subject site already operates under IED Licence No. W0146-04 issued by the Environmental Protection Agency (EPA).

Payment of €100,000 has been made to An Coimisiún Pleanála in accordance with the relevant SID Application Fee requirements. Please find enclosed as Appendix A, confirmation of payment.

### 1.2 Rationale for the Proposed Development

Over the past two decades, Ireland has made significant strides in reducing its reliance on landfill as a method of waste disposal. The number of operational landfill sites has dropped dramatically, from 126 in 1998 to just three by 2024.<sup>9</sup> Likewise, the proportion of municipal solid waste (MSW)<sup>10</sup>

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<sup>5</sup> Hibernia House, Cherrywood Business Park, Loughlinstown, Dublin 18

<sup>6</sup> College House, 71-73 Rock Road, Blackrock, Co. Dublin, A94 F9X9

<sup>7</sup> 40 Lower Baggot Street, Dublin 2, D02 Y793

<sup>8</sup> [Mid-Term Evaluation of the National Hazardous Waste Management Plan 2021-2027](#).

<sup>9</sup> *Ireland’s State of the Environment Report 2024*, pg. 28, prepared by Environmental Protection Agency.

<sup>10</sup> While cognisant that MSW does not comprise all waste streams, we use its figures because it is well tracked at a national level by the Environmental Protection Agency (EPA) and provides for a clear understanding of general waste trends.

sent to landfill has fallen from 91%<sup>11</sup> to just 13%<sup>12</sup> over the same period. Despite this progress, landfill remains a critical component of Ireland's waste management infrastructure, as not all waste can be recycled, reused or used for energy recovery. Waste streams such as soils, ash, non-recyclable C&D materials and C&D fines such as grit etc continue to require landfill as a means for disposal.

Knockharley landfill, one of the few remaining facilities, has become increasingly vital. In 2021, planning permission was granted ABP ref: 303211)—through a SID application lodged in 2018<sup>13</sup>—to expand its annual intake from 88,000 to 396,000 tonnes, encompassing MSW, construction and demolition (C&D) waste, and incinerator bottom ash (IBA), with an additional provision of 44,000 tonnes for emergency contingencies. However, several converging factors, including population growth<sup>14</sup>, economic expansion<sup>15</sup>, reduced waste exports<sup>16</sup>, and unplanned shutdowns at WTE facilities<sup>17</sup>, have accelerated the consumption of Knockharley's available void space. As a result, the site is now projected to reach full capacity by 2029, three years earlier than anticipated at the time the previous 2018 application was lodged.

Currently, Ireland's MSW landfill demand stands at approximately 400,000 tonnes per year<sup>18</sup>, with a combined national acceptance capacity of around 458,000 tonnes across three privately operated landfills<sup>19</sup>. This margin is expected to tighten significantly due to the expiration of existing landfill permissions. Ballynagran landfill in Wicklow is scheduled to close in 2026<sup>20</sup>, and Drehid in Kildare—although it has secured planning permission for increased intake—has yet to obtain the necessary environmental licence at the time of writing this Report.<sup>21</sup>

Moreover, Ireland's municipal solid waste (MSW) generation is projected to rise significantly, reaching 3.8 million tonnes by 2030 and potentially 4.5 million tonnes by 2040. This increase is driven by sustained economic growth and a population expected to reach 6.1 million by 2040, with half of that growth concentrated in the Eastern and Midlands region.<sup>22</sup> Although the government aims to reduce landfilling to a maximum of 10% of MSW by 2035, Ireland will still require substantial landfill capacity: at least 415,000 tonnes annually.<sup>23</sup> If targets are missed, demand could exceed 585,000 tonnes per year by 2040.<sup>24</sup>

It is clear existing landfill infrastructure is under pressure. The Ballynagran landfill permission is set to expire by mid-2026, removing 150,000 tonnes of annual capacity unless renewed. Drehid has

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<sup>11</sup> Household, commercial, and street waste.

<sup>12</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pgs. 5 & 15, prepared by the Regional Waste Management Planning Office.

<sup>13</sup> <https://www.pleanala.ie/en-ie/case/303211>

<sup>14</sup> *Population Projections, The Flow of New Households and Structural Housing Demand*, pg. 34, prepared by the Economic & Social Research Institute

<sup>15</sup> *European Economic Forecast Autumn 2024*, pg. 92, prepared by the European Commission.

<sup>16</sup> *Waste Treatment Capacity Analysis-Q4 2024 & Projections 2025 Bulletin*, pg. 7, prepared by Regional Waste Management Planning Office.

<sup>17</sup> *Waste Treatment Capacity Analysis-Q4 2024* p. 2 & 6, prepared by Regional Waste Management Planning Office.

<sup>18</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pg. 8, prepared by the Regional Waste Management Planning Office.

<sup>19</sup> *National Waste Management Plan for a Circular Economy 2024-2030*, pg. 23, prepared by the Regional Waste Management Planning Office.

<sup>20</sup> WCC Planning Reg. Ref. 20/21.

<sup>21</sup> EPA Licence Application Reg No. W0201-05.

<sup>22</sup> *European Economic Forecast Autumn 2024*, pg. 92, prepared by the European Commission.

<sup>23</sup> The Landfill Directive (1999/31/EC as amended by Directive (EU) 2018/850).

<sup>24</sup> See Section 6.4, below.

secured planning for increased intake but awaits EPA licensing at the time of writing this Report.<sup>25</sup> The National Waste Management Plan warns of a treatment capacity shortfall of up to 300,000 tonnes by 2030, even if recycling and prevention measures succeed. Meanwhile, Ireland's reliance on exporting MSW is becoming unsustainable due to tightening EU regulations and declining demand from key importers like Sweden and the Netherlands.<sup>26</sup>

As such, landfill remains a vital component of Ireland's waste strategy. Knockharley landfill, with an annual MSW acceptance allowance of 188,000 tonnes, is, now more than ever, a critical piece of national infrastructure. However, with its void capacity projected to be exhausted by 2029, a growing deficit in MSW landfill capacity is guaranteed to occur unless an extension to operations is secured.<sup>27</sup>

Knockharley also plays a key role in managing waste that cannot be recycled or incinerated such as non-inert soils, non-recyclable C&D waste and Incinerator Bottom Ash (IBA), accepting 60,000 tonnes of C&D waste and up to 150,000 tonnes of IBA annually. With increasing construction activity and limited reuse options, demand for C&D landfill capacity is rising. Unplanned outages at Dublin's Waste-to-Energy (WTE) facility have further strained Knockharley's capacity<sup>28</sup> and delays in the Ringaskiddy incinerator project mean that anticipated incineration capacity has not materialised, pushing more waste toward landfill than originally forecast.<sup>29</sup> Knockharley's role is therefore more critical than ever in maintaining Ireland's waste management resilience.

To address the looming waste capacity deficit, strategic expansion of existing landfill sites is essential. Knockharley is well-positioned to support this need, with potential to expand westward and accommodate an additional 3.14 million tonnes of waste. This would extend its operational life by a projected fourteen years beyond 2029. Consolidating capacity at established sites like Knockharley aligns with sustainable development goals, reducing environmental impacts and improving operational efficiency compared to developing new, dispersed, landfills where no existing infrastructure exists.

Importantly, the proposed expansion focuses solely on increasing void capacity—not annual intake limits. Maintaining the current tonnage allowance supports Ireland's circular economy target of limiting MSW landfilling to 10% by 2035. The operators believe that with improved recycling and potential development of new WTE facilities, landfill demand can be managed sustainably. Expanding Knockharley's void capacity is therefore a strategic move to safeguard national waste management resilience without compromising long-term environmental objectives.

### 1.3 Details of the Proposed Development

The proposed development involves expanding the existing void capacity of the landfill facility through the construction of engineered landfill cells, delivering 4.12 million cubic metres of additional void space. This expansion will extend the facility's operational life by nearly twenty years (some 14 years past the expected life of the existing facility) and provide for significant, strategically important, waste management capacity to combat increasing pressure.

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<sup>25</sup> EPA Licence Application Reg No. W0201-05.

<sup>26</sup> *Waste Treatment Capacity Analysis-Q4 2024 & Projections 2025 Bulletin*, pg. 7, prepared by Regional Waste Management Planning Office.

<sup>27</sup> Projections show a shortfall of over 360,000 tonnes by 2036. See Section 6.4, below.

<sup>28</sup> *Waste Treatment Capacity Analysis-Q4 2024* p. 2 & 6, prepared by Regional Waste Management Planning Office.

<sup>29</sup> A previous grant of permission for the incinerator was quashed by the High Court in 2021— *Cork Harbour Alliance For A Safe Environment -v- An Bord Pleanála [2018 No. 593 JR]*—meaning that a challenge, again, is possible.

These cells will be progressively capped to a final post-settlement contour height of 85 mOD, consistent with existing permissions. Additional works include the diversion of the Knockharley Stream with a new culvert, and the relocation of 220 kV ESB powerlines, entailing the removal of three existing towers and construction of seven new towers ranging from 21 to 26 metres in height.

Further infrastructure enhancements include increasing the southern attenuation pond's capacity by approximately 5,812 m<sup>3</sup> and installing new leachate management systems including pumps, containerised Reverse Osmosis units, bunded slabs, and twelve storage tanks. The development also involves extending access roads, utilities, and telemetry systems.

To facilitate the expansion, approximately 15 hectares of commercial forestry will be felled around the site. Screening berms will be constructed at the site's boundaries, with amendments to previously permitted berm profiles. Landscaping will include 9 hectares of native woodland (in replacement of the less biodiverse conifer species) and planting on the capped berms. Upon completion, aftercare works will be undertaken, including removal of redundant infrastructure and environmental monitoring.

Importantly, as stated above, there will be no increase to the site's permitted annual waste acceptance, which remains at up to 396,000 tonnes per annum (with additional emergency intake capacity) and will not negatively affect the State's statutory EU landfill commitments.<sup>30</sup> The proposed development will bolster Ireland's capabilities to achieve Ireland's 10% target, providing the vital waste disposal capacity required in its transition toward a circular economy.

We also note, as detailed within the EIAR and Biodiversity Management Plan submitted as part of this application, that the proposed development will lead to a significant biodiversity net gain for the local area following the implementation of the site-wide landscape masterplan and aftercare treatment.

#### 1.4 Policy Support

EU Directive 2018/850 mandates, by 2035, that no more than 10% of municipal solid waste (MSW) is to be landfilled. The *National Waste Management Plan 2024–2030* confirms ongoing capacity issues, especially with the closure of Ballynagran landfill. The National Waste Management Plan and other strategic policies—including the *Climate Action Plan 2025*, the *Eastern and Midlands Regional Spatial and Economic Strategy*, and the *Meath County Development Plan 2021-2027* — support the need to retain and expand landfill capacity.

These policy documents recognise that, whilst recycling and recovery are priorities, landfill, at present, remains vital for residual waste disposal and emergency contingencies. They also highlight that reliance on waste exports is unsustainable and that infrastructure deficits must be addressed. Knockharley's 2021 permitted enhancements (ABP Ref. 303211-18), including IBA and leachate treatment facilities, equip the proposed development to serve future national needs, reinforcing its strategic importance within Ireland's waste management framework.

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<sup>30</sup> Including the reduction of waste deposited in landfill to 10% by 2035.



## 1.5 An Coimisiún Pleanála Pre-Planning Consultation

Two pre-planning consultation meetings have taken place with An Coimisiún Pleanála. The first meeting took place on 26<sup>th</sup> February 2025 at 11:00 am via Microsoft Teams. The Commission (or Board at the time) advised *inter alia* that the Applicant:

- Outline where the excavated material will be stored.
- Address ecological concerns, particularly regarding forestry clearance, stream diversion, and overhead line works
- Include a CEMP that is consistent with proposed EIAR mitigation measures and that a Habitat Management/Biodiversity Enhancement Plan is submitted.
- Carry out a Stage 2 Flood Risk Assessment.
- Set out the waste volumes and composition.
- Engage with Meath County Council, other statutory bodies, and the local community.
- Consider the impact of on scenic sensitive receptors.

A second pre-application consultation meeting took place with An Coimisiún Pleanála on 31<sup>st</sup> July 2025 at 11:00 am via Microsoft Teams in order to further discuss the proposed development and gather the Commission's further opinion based on a more progressed design.

At that pre-planning meeting, An Coimisiún Pleanála advised *inter alia* that the Applicant:

- Provide as much detail as possible on waste flows and the changing nature of the waste industry.
- Detail the destinations of all cut material and the OD level and heights of the proposed berms.
- Application and EIAR should look to address similar considerations as the previous Condition 5 of the 2021 permission (ABP Ref. 303211-18), which related to tree felling, replacement, and carbon sequestration.
- Clarify the overall capacity and lifespan of the proposed development.
- Consider the impacts of otter resulting from the stream diversion and consult with Inland Fisheries Ireland.
- Consider compliance with the Water Framework Directive.
- Consider the All-Ireland Pollinator Plan regarding site restoration and include native species where possible.
- Emphasise the biodiversity net gain of the overall project.

The Applicant has taken on board the Commission's advice, and as such, the above is included within



this Application and captured within *inter alia* the submitted EIAR by AWN Consulting. We address each item listed above in section 1.6, below.

## 1.6 Response to An Coimisiún Pleanála Advice

The application documentation has been completed with all relevant detail seeking to satisfy the commentary raised by ACP in the pre-planning phase. Specific responses to the queries raised as contained within the EIAR and submitted documentation are sign-posted below for ease of reference:

- Outline where the excavated material will be stored.  
*Excavated material will be used in the construction of the proposed berms with the balance transported off-site for disposal. Excavated material for off-site disposal will be transported via HGVs that are already accessing the site to dispose of waste. Once waste is disposed of, relevant HGV's will be loaded with excavated material for transfer to an approved off-site location. Refer to Table 2.7 of the submitted EIAR and Section 13.12.5.1.*
- Address ecological concerns, particularly regarding forestry clearance, stream diversion, and overhead line works.  
*Please refer to Chapter 7 (Biodiversity) of the submitted EIAR which provides detail on the relevant biodiversity impacts as a result of the proposed tree felling, stream diversion and overhead line diversion. Please also refer to the submitted NIS.*
- Include a CEMP that is consistent with proposed EIAR mitigation measures and that a Habitat Management/Biodiversity Enhancement Plan is submitted.  
*A detailed CEMP has been prepared by WSP and is consistent with the mitigation measures contained within the EIAR. A Biodiversity Management Plan has also been prepared by Scott Cawley Ecology in addition to the proposed Reinstatement Plan by Macroworks.*
- Carry out a Stage 2 Flood Risk Assessment.  
*A Stage 2 Site Specific Flood Risk Assessment has been prepared by AWN and is submitted with this application.*
- Set out the waste volumes and composition.  
*The proposed waste volumes and composition are set out within Table 2.1 of the submitted EIAR and are not proposed to change from the permitted IED composition or volume.*
- Engage with Meath County Council, other statutory bodies, and the local community.  
*The applicant and relevant design team members have engaged with Meath County Council and other statutory bodies (incl. Inland Fisheries, ESB, Regional Waste Management Authority) through online meetings, circulation of material and in-person meetings on site. A public consultation session was also held on site as well as a Newsletter drop. Please refer to the submitted EIAR for further detail on pre-submission engagement and the Public Consultation Report prepared by Keating & Associates.*
- Consider the impact of on sensitive scenic receptors.  
*Please refer to Chapter 12 (Landscape and Visual) of the submitted EIAR which includes detailed assessment of impacts on sensitive scenic receptors.*

- Provide as much detail as possible on waste flows and the changing nature of the waste industry.  
*Please refer to section 1.2 of this report setting out the rationale for the development and the changing nature of the waste industry in Ireland. Please also see the Waste Input Assumptions contained within Section 4 of the 'Landfill Gas Assessment' prepared by WSP. Which outlines the predicted waste streams.*
- Detail the destinations of all cut material and the OD level and heights of the proposed berms.  
*The destinations of the proposed berms and the proposed OD heights are clearly set out in the drawings prepared by WSP and Macroworks. The construction phasing as set out in the EIAR and Phasing Plans by WSP confirms the phased approach and timing for berm construction.*
- Application and EIAR should look to address similar considerations as the previous Condition 5 of the 2021 permission (ABP Ref. 303211-18), which related to tree felling, replacement, and carbon sequestration.  
*Prior to tree felling occurring a calculation of the carbon sequestration value of the existing forestry will be undertaken to determine the level of off-set planting to occur. Off-set planting will be provided for in-country as per the mitigations within Section 7.7 (Mitigation Measures) and Table 2.7.*
- Clarify the overall capacity and lifespan of the proposed development.  
*The landfilling element of the Proposed Development is expected to have an operational lifespan of 17 years (including void construction but excluding restoration). The proposed development is estimated to provide approximately 4.12 million m<sup>3</sup> additional void space (3.32 million m<sup>3</sup> of additional constructed void space with further void space of 807,000 m<sup>3</sup> for the 'Piggyback Cell'). Refer to Chapter 2 and Table 2.13 (Expected timeline of the Proposed Development) for further detail.*
- Consider the impacts of otter resulting from the stream diversion and consult with Inland Fisheries Ireland.  
*Consultation has taken place with Inland Fisheries Ireland (IFI) regarding the design of the stream diversion and culvert. IFI conducted a site visit on 8th May 2025 as part of the consultation and following the visit issued correspondence to note they were satisfied with what was being proposed. Please refer to Chapter 7 (Biodiversity) of the EIAR for further details.*
- Consider compliance with the Water Framework Directive.  
*A WFD Assessment has been undertaken for the Proposed Development, the results of which are presented in Appendix 6.3 of Chapter 6 (Hydrology & Hydrogeology) and is included with the planning application documentation under a separate cover.*
- Consider the All-Ireland Pollinator Plan regarding site restoration and include native species where possible.  
*The All-Ireland Pollinator Plan and inclusion of native species are embedded within the proposed restoration plan and landscape plans prepared by Macroworks (Refer to Drawings LD Project West 1.5 and LD Project West 1.6.).*

- Emphasise the biodiversity net gain of the overall project.  
*The biodiversity net gain associated with the proposed development is set out within the submitted Biodiversity Management Plan prepared by Scott Cawley and confirms that the post-development landscape will provide an additional 347.89 Biodiversity units, and result in a net gain for all habitat types.*

## 1.7 Further Consultation with Stakeholders

Please refer to the submitted EIAR and Consultation report by Keating & Associates which confirms consultation with the following stakeholders:

- An Coimisiún Pleanála
- Meath County Council – July 2025 via Teams; August 2025 site visit
- ESB – July 2025 via Letter correspondence with ongoing updates (see Letter as Appendix E)
- Inland Fisheries Ireland – May 2025 site visit
- Eastern Regional Waste Management Office – July 2024 with ongoing updates
- Local Community – beginning November 2025 with Drop in Session, Newspaper Articles and Newsletter

A copy of the EIAR and application documents has also been circulated to the prescribed bodies as listed by ACP. Please refer to Appendix D of this report for all letters issued to the prescribed bodies.

## 1.8 The Subject Proposal Constitutes Strategic Infrastructure Development

Under Section 37A of the *Planning and Development Act (2000)* (as amended), jurisdiction over Planning Applications for Strategic Infrastructure Development (SID) falls under the remit of An Coimisiún Pleanála and not the local Planning Authority.

Section 37B of the *Act* states:

*“A person who proposes to apply for permission for any development specified in the Seventh Schedule shall, before making the Application, enter into consultations with the Board in relation to the proposed development.”*

The Seventh Schedule of the *Planning and Development Act (2000)* (as amended) sets out the Strategic Infrastructure Developments for the purposes of Sections 37A and 37B of the *Act*.

It is considered that the proposed development at the Knockharley Landfill Facility is Strategic Infrastructure Development as it falls under the heading ‘*Environmental Infrastructure*’ (Class 3) of the Seventh Schedule of the *Act*. This has been confirmed by ACP in its correspondence dated 13 October 2025, which confirms that the proposed development would be strategic infrastructure within the meaning of section 37E of the *Act* (Appendix B) and that the proposed development is a project of the type that would exceed the threshold set out in paragraph 3 – Environmental Infrastructure in the Seventh Schedule of the *Planning and Development Act, 2000* (as amended) being an installation for the disposal, treatment, or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes. The existing development is also a landfill which includes the disposal of hazardous waste to which Council Directive 91/689/EEC applies.

A list of 26 No. prescribed bodies (25 No. actual entities), to notify of the Application’s lodgement, was confirmed by An Coimisiún Pleanála; the applicant has notified and issued a copy of the

Application to all 25 No. of those prescribed bodies. A Letter has also been sent to the Eastern-Midlands Regional Waste Office, with offices in Dublin City Council, as we consider it a body that may be considered to have interest in the project, but which was not listed by the Commission. Copies of said 26 No. notice Letters are included within Appendix D of this Report.

## 2.0 SITE CONTEXT AND DESCRIPTION

The overall subject site comprises 135.2 hectares (Figure 2.1) of land to accommodate the ongoing operation of a landfill facility comprising waste disposal and recovery activities, and is located within Knockharley, County Meath.



**Figure 2.1:** Aerial Imagery of Site with indicative red line boundary (Source: Google Earth, May 2025, as annotated by TPA).

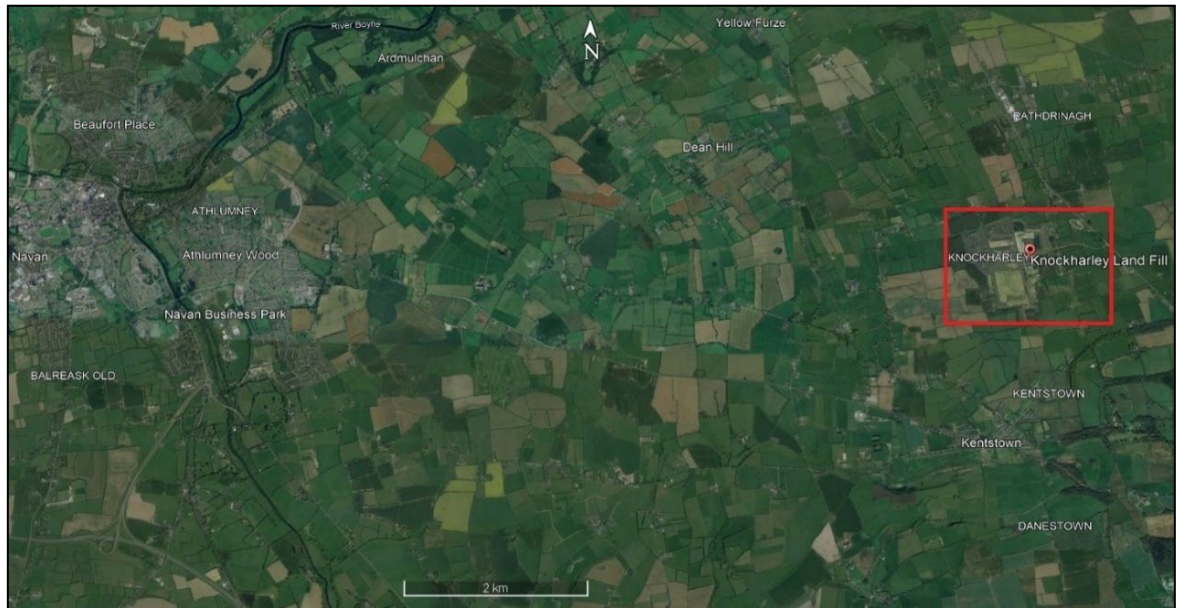
The site is zoned objective 'RA' - Rural Areas, "To protect and promote in a balanced way, the development of agriculture, forestry and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage", within the *Meath County Development Plan 2021-2027*.

The immediate surrounding area is characterised by greenfield sites, pocket forests, and clusters of residential homes along the local road network; the uses are chiefly agriculture and residential uses, with some enterprise.

The N2 motorway is located less than 5 minutes east of the site and provides ready access to the site.

The nearest sensitive receptors, as detailed within the accompanying EIAR, are the Knockharley Stream and residential dwellings located primarily to the east and north of the site.





**Figure 2.2:** Aerial imagery of Wider Site Area (Source: Google Earth, March 2024; annotated by TPA).

Concerning the wider locational context, the subject site is located approximately 7km south of Slane, 7km west of Duleek, and 10km west of Navan (as the largest proximate urban centre).

### **3.0 PLANNING HISTORY**

The following section provides an overview of the full (available) planning history for the subject land, according to Meath County Council (MCC) and An Coimisiún Pleanála (ACP) records.

#### **3.1 MCC Reg. Ref. 015006 (the 'Parent' Permission) (Appeal ACP Ref. 125891)**

On 11<sup>th</sup> January 2001, Meath County Council received an application from Celtic Waste Limited for development comprising the construction and operation of an engineered landfill 25ha in area and 15m in height, with an annual waste acceptance of 180,000 tonnes of non-hazardous waste for 14 years. The landfill included ancillary facilities of a leachate lagoon, surface water pond, gas flare, 900m long access road, admin building, and maintenance garage.

Additional information was requested by Meath County Council on 8<sup>th</sup> March 2001 and received on 17<sup>th</sup> May 2001. MCC decided to grant permission subject to 24 No. Conditions on 12<sup>th</sup> July 2001. An Coimisiún Pleanála received 5 No. Third-Party and 1 No. First-Party Appeals against the decision made by Meath County Council.

An Coimisiún Pleanála decided on 26<sup>th</sup> August 2001 to grant permission subject to 23 No. conditions.

Waste accepted at the facility was to originate from the Northeast Region (defined as the counties of Meath, Louth, Cavan and Monaghan) per Condition 2(a) of the grant.

Waste quantities accepted at the facility were restricted to 132,000 tonnes per annum until December 2007 and thereafter to a maximum of 88,000 tonnes per annum per Condition 2(b) of the grant.

### 3.2 MCC Reg. Ref. NA50453

On 24<sup>th</sup> November 2005, Meath County Council received an application from Greenstar Holdings Limited for development comprising a material change of use of a maintenance building to offices, and omission of Condition No. 2(a) of the Regulations. Ref. 01/5006 limiting the origin of waste accepted to Counties Meath, Louth, Cavan & Monaghan.

The Local Authority decided to issue a split decision permitting the change of use of a maintenance building to offices, including a proposed new first floor subject to 1 No. Condition on 20<sup>th</sup> April 2006, whilst refusing to omit Condition No. 2(a) of 01/5006.

### 3.3 MCC Reg. Ref. NA60336 (Appeal ACP Ref. 220331)

On 9<sup>th</sup> August 2006, Meath County Council received an application from Greenstar Holdings Limited for development comprising the modification of Condition No. 2(a) of Reg. Ref. 01/5006 to permit the acceptance of waste from adjoining regions.

Meath County Council decided to grant permission subject to 1 No. Condition on 2<sup>nd</sup> October 2006.

An Coimisiún Pleanála received a First-Party Appeal against the details of the decision to grant permission by Meath County Council.

An Coimisiún Pleanála decided to issue a split decision, permitting the proposed c. 2ha landfill footprint extension and the removal of the regional restriction on the origin of waste accepted at the facility, subject to 4 No. Conditions, while refusing an increase to 200,000 tonnes of waste acceptance per annum.

### 3.6 MCC Reg. Ref. NA70015

On 12<sup>th</sup> February 2007, Meath County Council received an application from Greenstar Holdings Limited for development comprising a phased landfill gas utilisation plant on a 0.3ha site to generate up to 4.2MW of electricity for input into the national grid.

Meath County Council decided to grant permission subject to 7 No. Conditions on 3<sup>rd</sup> April 2007.

### 3.7 ACP Ref. PA0009

On 12<sup>th</sup> November 2008, An Coimisiún Pleanála received an application from Greenstar Holdings Limited under Section 37(E) of the Act for development comprising the following:

*“Proposal to increase waste acceptance to 400,000 tonnes per annum via an installation for the disposal, treatment or recovery of waste with a capacity for an annual intake greater than 100,000 tonnes.”*

An Coimisiún Pleanála decided to refuse permission on 14<sup>th</sup> May 2009 for the following reasons:

*“It is considered that the proposal to increase the tonnage per annum intake at the facility*

*would compromise the viability of more sustainable waste infrastructure and would compromise the long-term waste infrastructure requirements of the region and the designation of Knockharley as the long-term residual landfill for the region.”*

### **3.8 MCC Reg. Ref. AA161431**

On 21<sup>st</sup> December 2016, Meath County Council received an application from Knockharley Landfill Limited for an extension of duration in relation to development under MCC Reg. Ref. 015006, comprising the following:

*“To develop and operate an engineered landfill to accept non-hazardous waste and ancillary facilities as described on the public notices.”<sup>31</sup>*

Meath County Council decided to grant permission on 17<sup>th</sup> January 2017, extending the duration of the planning permission to 26<sup>th</sup> August 2021.

### **3.9 MCC Reg. Ref. AA180145**

On 16<sup>th</sup> February 2018, Meath County Council received an application from Starrus LFG Limited for development comprising the installation of a solar farm atop the reclaimed landfill with an export capacity of 3MW.

Meath County Council decided to grant permission subject to 25 No. Conditions 21<sup>st</sup> June 2018.

This permission has not commenced and has subsequently expired.

### **3.10 ACP Ref. 303211**

On 12<sup>th</sup> December 2018, An Coimisiún Pleanála received an application from Knockharley Landfill Limited under Section 37(E) of the Act for development comprising an increase in non-hazardous waste acceptance to 435,000 tonnes per annum, including 150,000 tonnes of incinerator bottom ash and construction of a dedicated IBA facility. Wastes of household, commercial, industrial, including residual fines, non-hazardous contaminated soils, construction and demolition, and baled recyclables were to be accepted, in addition to 5,000 tonnes per annum of stable non-reactive hazardous waste, until landfill cells are full. The application also included the construction and operation of a biological treatment facility and a leachate management facility, along with landscape works, including felling of trees, relocation of existing power lines.

An Coimisiún Pleanála granted permission subject to 17 No. Conditions on 30<sup>th</sup> April 2021.

It is crucial to note that the current planning application, which is the subject of this report, follows on from the successful delivery of planning permission ACP - 303211, some four years after the previous grant. The landfill's void space is now expected to be full by 2029 (11 years following the previous application being made). Therefore, to keep the landfill in operation, expansion of the landfill void space on adjoining land is needed.

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<sup>31</sup> “facilities as described in the public notices” are those of MCC Reg. Ref. 01/5006 as approved by ACP Ref. 125891 (Section 3.1 of this report).



## 4.0 EXISTING EPA-LICENSED LANDFILL FACILITY

The following section will detail the facility and its processes to further detail the existing context for the proposed development.

### 4.1 The Existing Facility and its Processes

In accordance with the permissions outlined above together with an IED licence issued by the EPA, the existing facility accepts 440,000 tonnes per annum; 435,000 tonnes of non-hazardous wastes including household, commercial, industrial (including residual fines and non-hazardous contaminated soils) and construction and demolition, and incinerator bottom ash (IBA) wastes, with the remaining 5,000 tonnes of stable non-reactive hazardous waste.

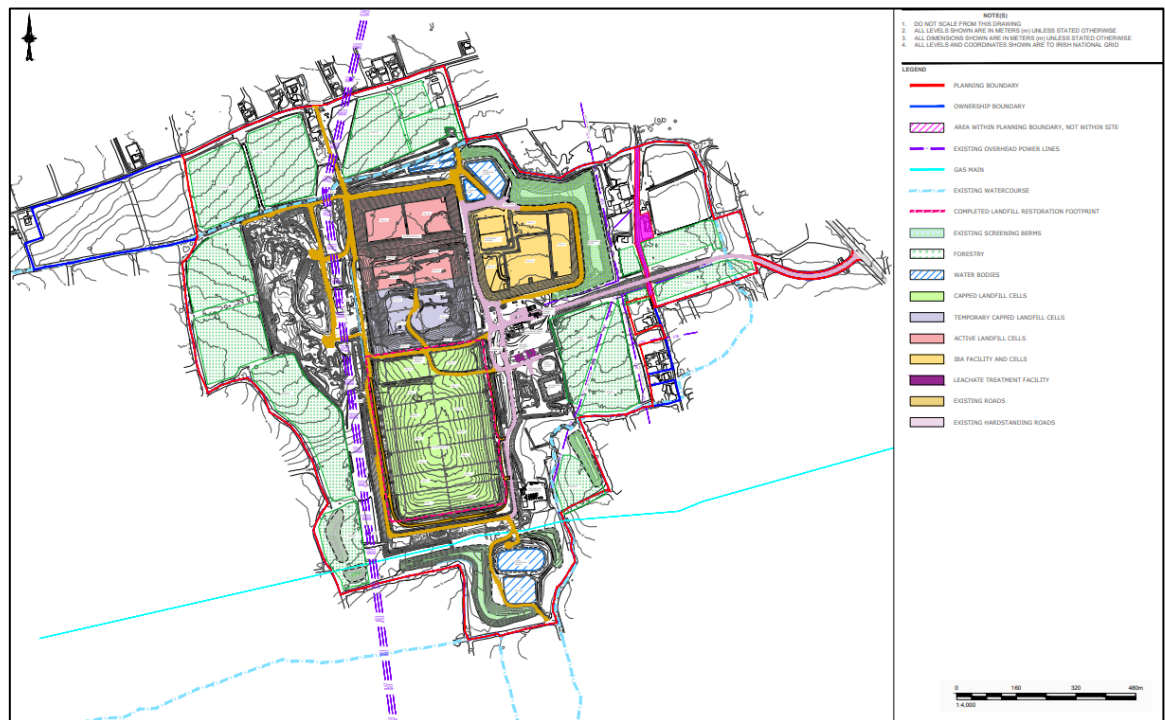
A total of 44,000 tonnes per annum is reserved as contingency capacity but has been utilised in recent years as a result of the mounting pressures on Ireland's other waste management facilities.

The delivery of new landfill cells at the facility is provided in phases. The initial phase required the excavation of a void space for future landfilling with excavated material used to construct landscape berms around the perimeter of the landfill void. As the initial landfill void is being filled with waste material, future landfill cells are excavated and so on. Once a landfill cell reaches full capacity it is capped and prepared for end of life landscaping etc.

The existing facility comprises *inter alia*:

- 26 No. landfill cells across 7 No. linear Phases for current landfilling and capping upon reaching capacity (cell Nos. 1 – 14 have been capped to date);
- Incinerator Bottom Ash (IBA) Cells (Cells 27, 28, 29) (currently under construction) for storage of up to 150,000 tonnes of IBA until recovery outlets are identified - to the east of landfill cell Nos. 20 and 22;
- IBA Process Building for the future recovery of the IBA is located at the corner of Cell 29 to the east of landfill cells Nos. 24 and 26;
- A landfill gas treatment compound located to the southeast of the landfill;
- 2 No. waste leachate lagoons (L1 and L3) located east of landfill cells No. 10 and 12, 3 No. 25m<sup>3</sup> bunded above ground tanks, 2 No. Intermediate Bulk Containers (IBCs), 1 No. containerised Reverse Osmosis plant units (C1) on one reinforced concrete bunded slab (Plant Bund) and 6 additional storage tanks on a second reinforced concrete bunded slab;
- A surface water management system, including surface water attenuation pond and wetland to the south of the landfill cells, and surface attenuation pond, wetlands and a holding pond to the northeast of the cells;
- An administration and maintenance building (including site office and weighbridge) to the east of the landfill, North-south running 220kV ESB line close to the western site boundary;

- 2 No. ESB Substations, one importing power to the Administration and maintenance buildings, with the other exporting from the gas treatment compound.
- Existing site access via the N2 from the east;
- Screening Berms up to a maximum height of 10 metres at the eastern boundaries and up to a maximum height of 6 metres at the northern/southern boundary; and
- Car park to the administrative area of the facility.



**Figure 4.1:** Existing Site Layout Plan (Source: WSP DWG No. 4, Rev B, dated: June 2025).

We note that the existing facility has permission for further development within its 10-year 2021 SID permission including the construction of a C&D fines building<sup>32</sup>, completion of the leachate management facility<sup>33</sup>, IBA Cell 30<sup>34</sup>, and screening berms to the west of the site<sup>35</sup>.

## 4.2 EPA Licence

Knockharley Landfill operates under an IED licence (No. W0146-04) issued by the Environmental Protection Agency (EPA) in accordance with the *Environmental Protection Agency Act 1992* (as amended) ('the EPA Act').

A Waste Licence (IE) No. W0146-01 was granted to Celtic Waste Limited (as the licensee, on behalf

<sup>32</sup> Permitted as a bio-stabilisation facility (ACP Ref: 303211) but approved to change to a C&D fines processing building through an April 2025 146B non-material alteration determination by the Commission. ACP Ref: PM17.321769

<sup>33</sup> Has only been partly completed at present due to half the facility only being required for the existing operations following detailed design—the full build-out of the facility is required to facilitate the proposed expansion.

<sup>34</sup> Permitted (ACP Ref: 303211) as a future “piggyback” cell between the IBA cells and the principal cells.

<sup>35</sup> Permitted (ACP Ref: 303211) in the 4<sup>th</sup> year of the permission’s enactment. The permitted screening berm strategy is proposed to be amended as part of this expansion application.

of Knockharley Landfill Limited) on 19<sup>th</sup> March 2003. This has since been replaced 3 No. Times by way of licence review applications, resulting in the successful renewal of the site's licence 2 No. times. The licences/applications are as follows:

- *W0146-02*, change of *W0146-01* classification to an IED licence, granted to Greenstar Holdings Limited (formerly Celtic Waste Limited) for use Class 3.5 (and 3.1, 3.4, 3.6, 3.13, 4.4, 4.9, 4.11, 4.13) of Schedule 1 of the EPA Act, 23 March 2010.
- *W0146-03*, IED licence review application withdrawn by the Agent 18 March 2011 (on behalf of Greenstar Holdings Limited) under Article 21 of the Waste Management (Licensing) Regulations 2004.
- *W0146-04*, IED licence granted to Knockharley Landfill Limited (after acquiring the site in March 2014) for use Class 11.5 – Waste (and 11.1, 11.4(b)(iii)) of Schedule 1 of the EPA Act, 16 May 2023.

*W0146-04* (The Licence) was transferred to Starrus Eco Holdings Limited on 22<sup>nd</sup> June 2018.

The Licence includes 12 No. conditions. 3 conditions are relevant for the purposes of the proposed development as follows:

#### Condition 1: Scope

##### 1.10 Waste Acceptance Hours and Hours of Operation—

- 1.10.1 With the exception of emergencies, or as approved by the Agency, waste shall only be accepted at or dispatched from the installation between the hours of 08:00 and 18:00 Monday to Saturday inclusive.
- 1.10.2 The installation shall be operated only during the hours of 07:30 to 18:30, Monday to Saturday inclusive.
- 1.10.3 The installation shall not operate or accept/dispatch waste on Sundays or Public Holidays without the approval of the Agency.
- 1.10.4 Construction activities shall only be carried out between the hours of 08:00 and 18:30 Monday to Friday and 08:00 to 14:00 on Saturdays.

#### Condition 3: Infrastructure and Operation—

##### 3.28 Waste Treatment infrastructure—

##### 3.28.1 Waste treatment infrastructure shall, at a minimum, comprise the following:

- (i) indoor waste acceptance, inspection, quarantine and storage areas for baled recyclables and baled MSW;
- (ii) IBA storage and treatment infrastructure, as per section 2.5 of the main Environmental Impact Assessment Report, unless otherwise required by Conditions of this licence, including separate storage areas within the IBA cells for waste treatment outputs and end-of-waste fractions as appropriate;
- (iii) leachate extraction, collection, storage and treatment (where implemented) infrastructure;
- (iv) landfill gas extraction, collection, desulphurisation infrastructure, utilisation and combustion/flaring infrastructure; and
- (v) waste management infrastructure.

Condition 6: Control and Monitoring—

6.16 Odour—

6.16.1 The licensee shall carry out an odour survey of the site operations daily.

The facility operates in compliance with its IED licence. An application to the EPA to increase the overall landfill capacity will be made, subject to planning permission being obtained.

## 5.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT <sup>36</sup>

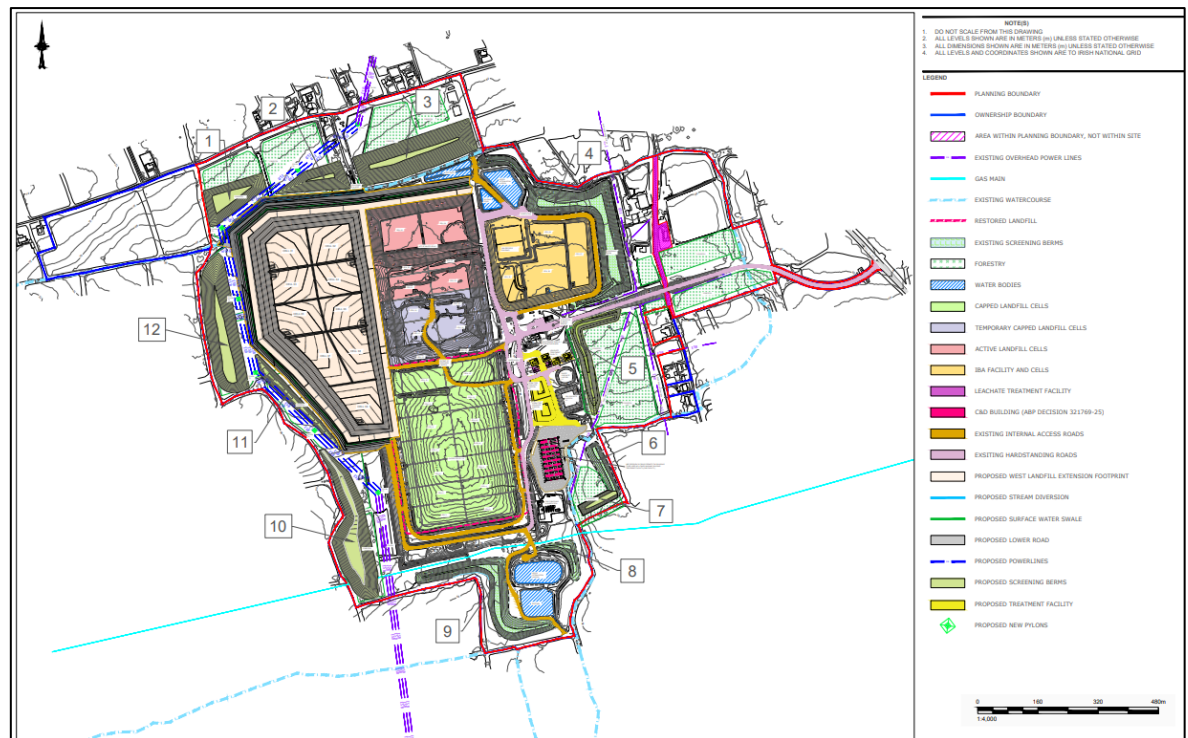
The proposed works for which permission is sought, as detailed within the relevant statutory notices and within this section, comprise a combination of enabling infrastructure, landfill cell development, and landscaping and capping activities. These works will take place within and adjacent to the footprint of the existing landfill, which is an operational facility regulated under Industrial Emissions Licence W0146-04. The construction phase will also overlap with ongoing permitted activities at the facility, including cell filling and berm construction under ACP Reg. Ref. 303211.

The development will consist of the following:

1. Extension of Landfill Footprint;
2. Tree Felling;
3. Knockharley Stream Diversion;
4. Relocation of Powerlines;
5. Surface Water Network Alterations;
6. Site Landscaping and Berm Development;
7. Works to Facilitate Landfill Gas Management System;
8. Works to Facilitate Leachate Management System;
9. Completion and Landfill Capping; and
10. Aftercare works.

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<sup>36</sup> The most comprehensive description of development can be found in Chapter 2 of the accompanying EIAR. It is that description that has been used by each consultant in their respective environmental assessments.



**Figure 5.1:** Proposed Site Layout Plan (Source: WSP).

The following section will detail these elements as follows:

## 5.1 Extension of Landfill Footprint

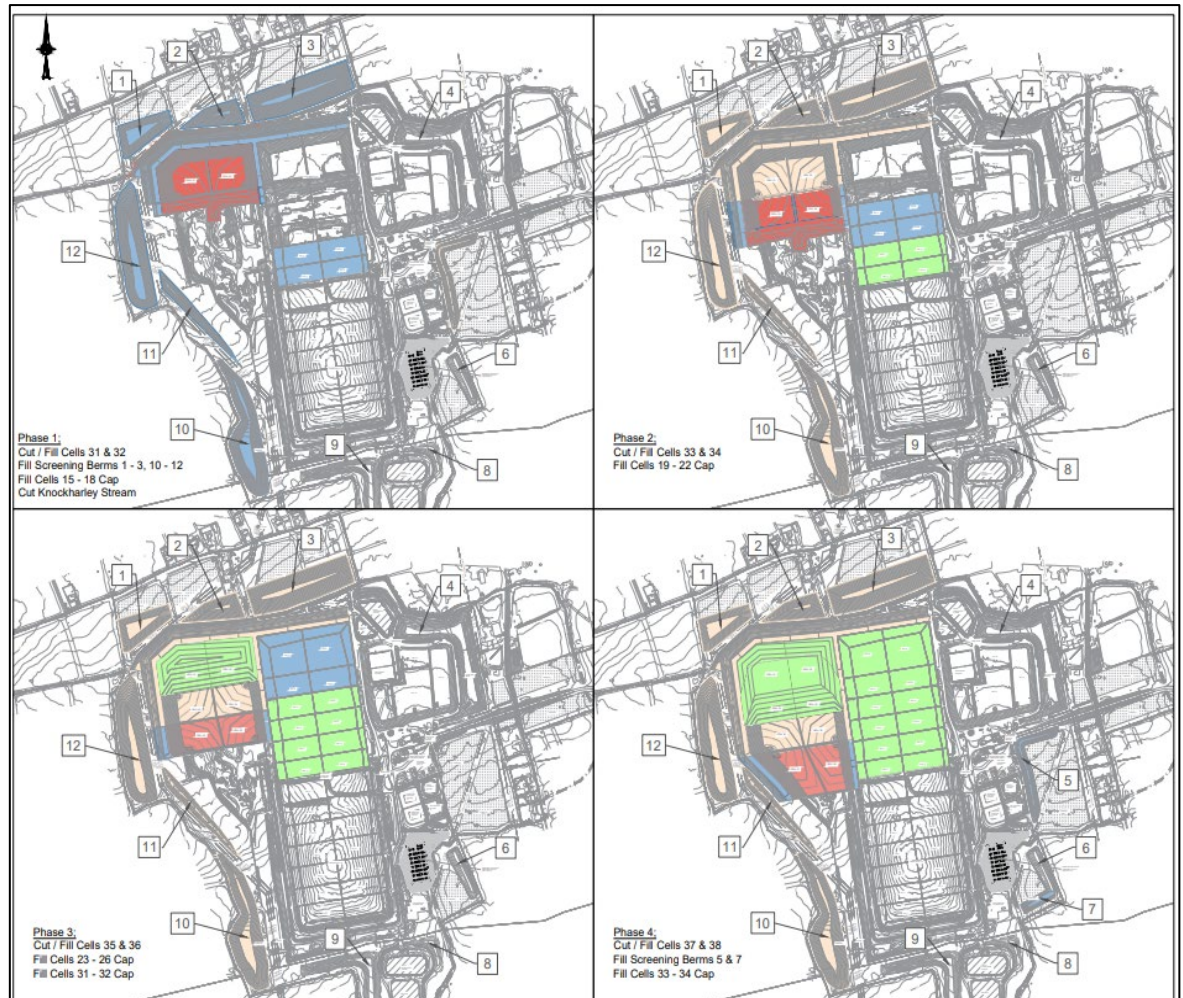
The Proposed Development comprises the phased extension of the existing landfill footprint through the construction of ten (10 No.) additional engineered landfill cells, including the 'Piggyback Cell'<sup>37</sup>.

This extension will increase the landfill area by approximately 17.68 ha and provide approximately 4.12 million m<sup>3</sup> (3.32 million m<sup>3</sup> of additional constructed void space with further void space of 807,000 m<sup>3</sup> for the 'Piggyback Cell') for the continued disposal of non-hazardous waste and limited quantities of hazardous waste, thereby extending the operational lifespan of the facility.

The Proposed Development will be phased over a period of approximately 17 years and will be constructed in a north to south format.

<sup>37</sup> A piggyback landfill cell is a waste cell built on top of a landfill to expand capacity vertically, reusing existing infrastructure and minimising land use.





**Figure 5.2:** Proposed Site Layout Plan (Source: WSP).

### 5.2.1 Tree Felling and Screening Berms

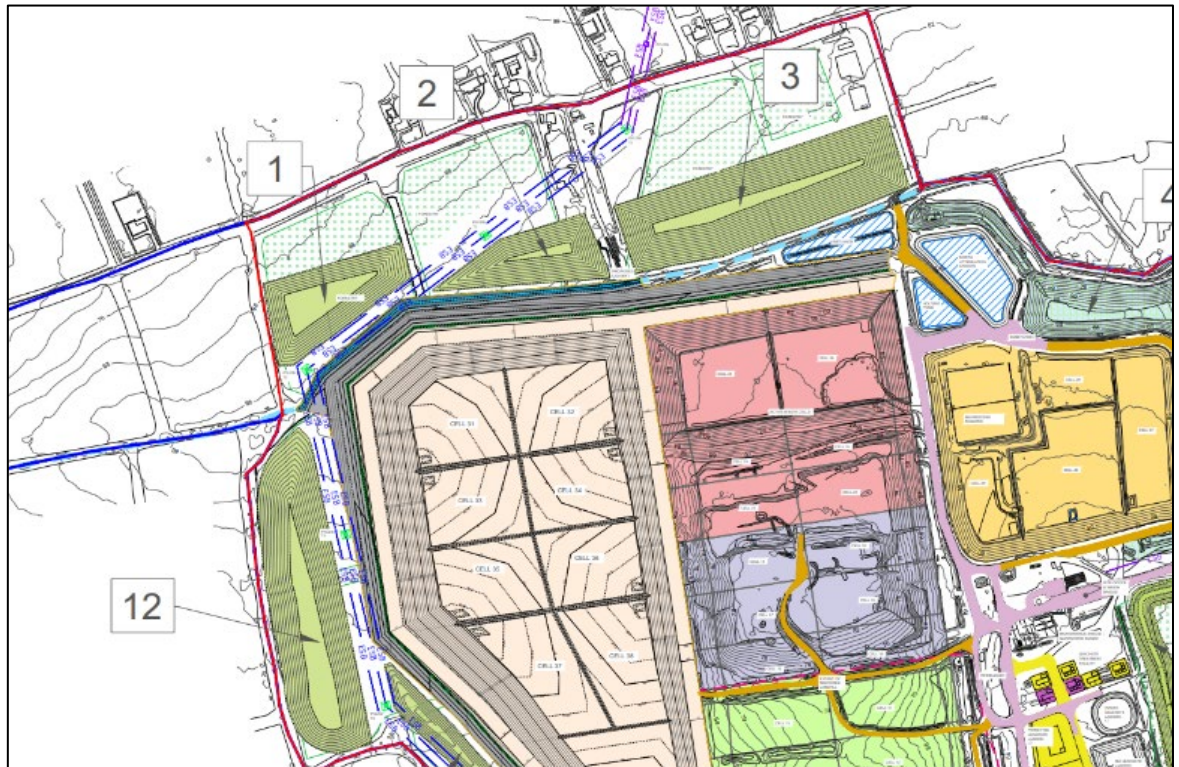
To facilitate the expansion, approximately 15 hectares of commercial forestry will be felled around the site and will be subject to a future Forestry Licence (to be obtaining prior to any future felling). Upon completion of the tree felling (in phases), screening berms will be constructed up to a maximum height of 79 m AOD at the western, northern, eastern, and southern boundaries of the facility using excavated material from the landfill void space. The proposed berm strategy includes amendments to the permitted western berm profile and part of the permitted eastern berm profile, which is permitted to a maximum height of 10 m under the site's extant planning permission (ABP Ref. 303211). Landscaping will include a mix of native woodland and hedgerow.

### 5.3 Knockharley Stream Diversion

As part of the extension of the landfill footprint, the diversion of the Knockharley Stream and the establishment of a new culvert along this diversion are required to facilitate a new access road crossing over the stream.

The diversion will not be culverted except where road crossings are required and where the stream traverses the alignment of the permitted Screening Berm. Construction of the proposed culvert will

be subject to the approval of the Office of Public Works (OPW), under Section 50 of the Arterial Drainage Act, 1945.



**Figure 5.3:** Proposed Site Layout Plan (Source: WSP).

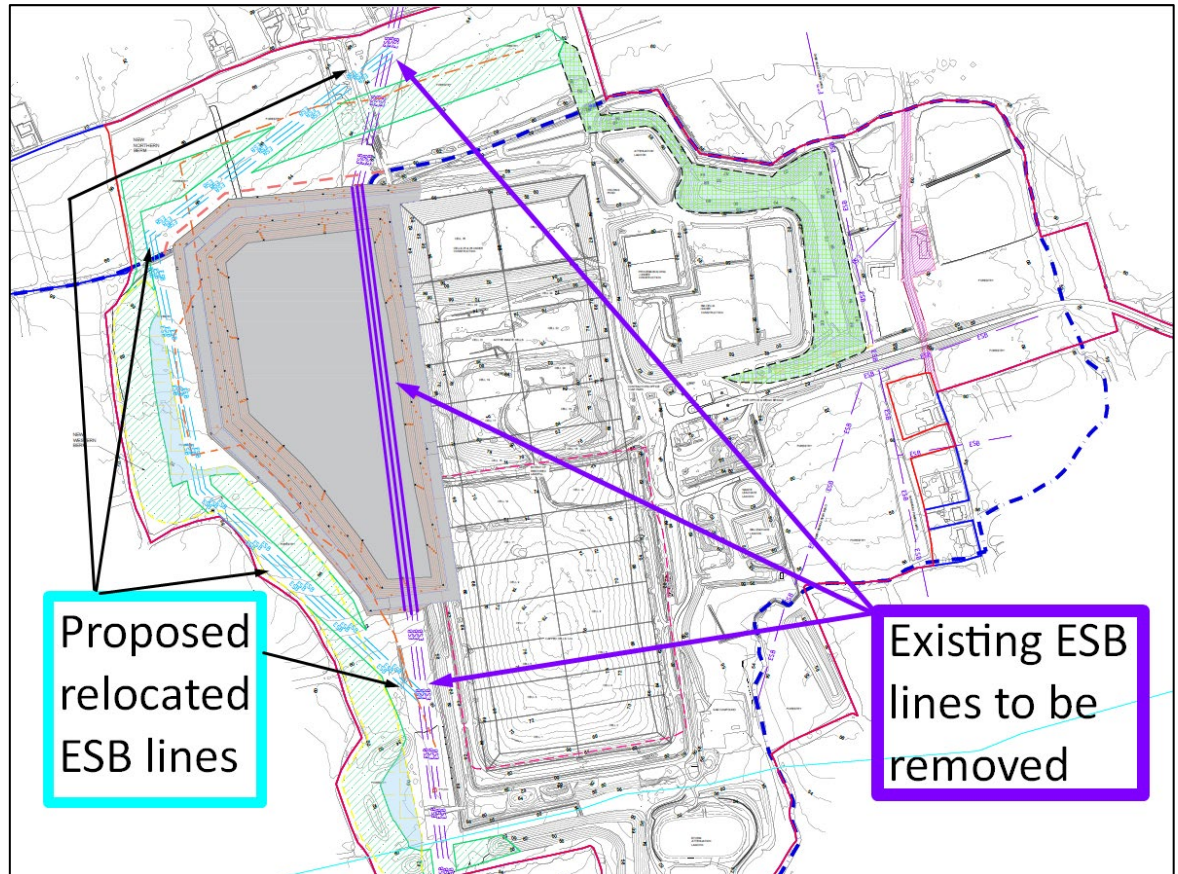
#### **5.4 Relocation of Powerlines**

As part of the Proposed Development, the relocation of an existing 220 kV overhead ESB powerline is required. The replacement of the existing overhead ESB line is necessary to allow the expansion of the Knockharley Landfill Facility Void Space to the west of the site.

The Proposed Development will realign this overhead line within the wider site boundary. The relocation works will involve the decommissioning and removal of three (3 No.) existing 220 kV transmission towers that currently pass through the site.

The relocation works will be carried out in close coordination with ESB Networks and in compliance with all relevant health and safety legislation, electrical infrastructure guidelines, and environmental best practice. Pre-submission consultation has occurred with ESB who, as legal owner of the distribution and transmission system, have consented to the submission of the application by Knockharley Landfill Limited which includes alteration and diversion of the Louth-Woodlands 220 kV Overhead Line to facilitate a landfill development and extension.





**Figure 5.4:** Overview with expanded landfill void space, existing ESB overhead line and its proposed replacement at the west end shown (Source: WSP).

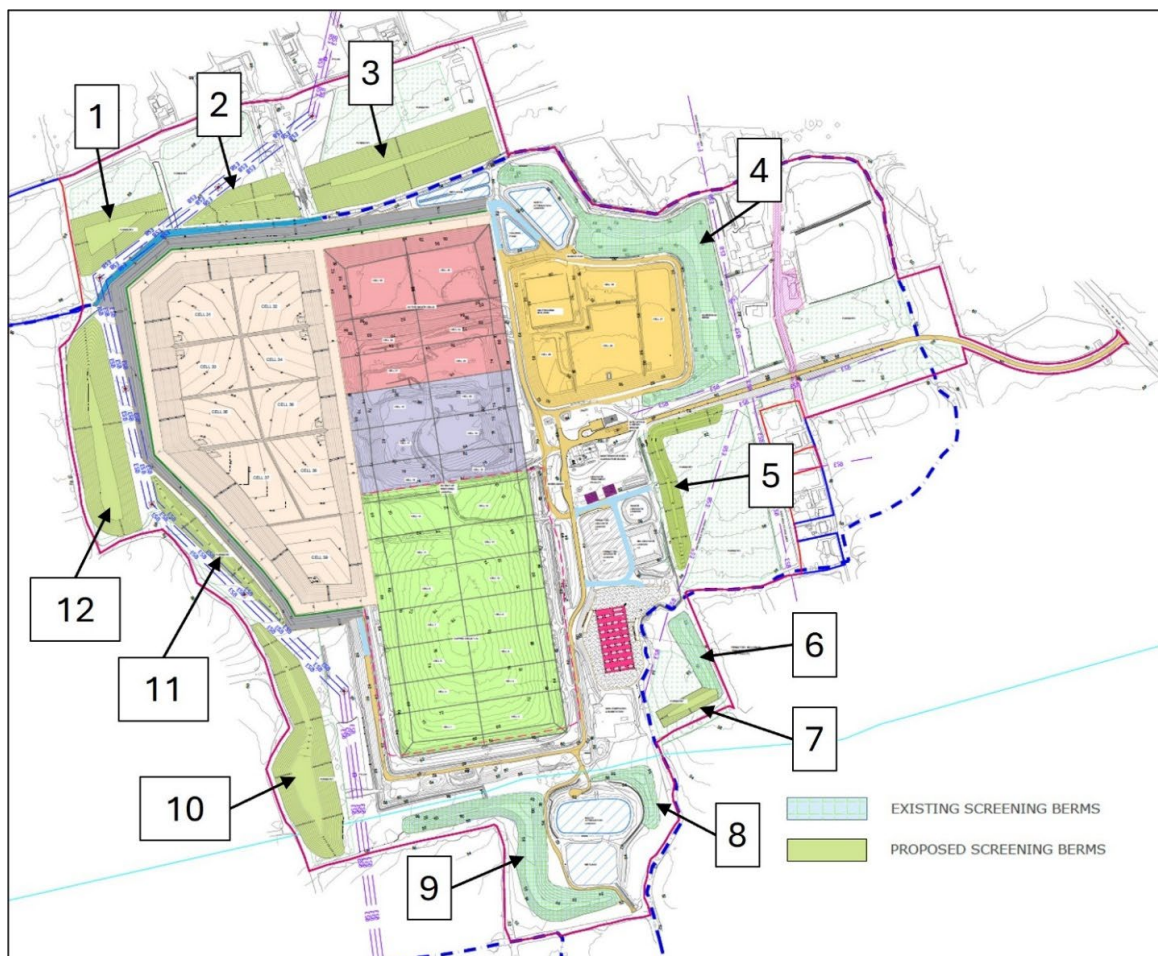
## 5.5 Surface Water Network Alterations

The current surface water infrastructure system on the landfill site is split into two catchments: the northern catchment system, which includes a holding pond and the northern attenuation pond, and the southern catchment system, which includes the southern attenuation pond. The Proposed Development will continue to drain to both these catchments for surface water management.

One continuous swale will be constructed around the newly proposed landfill cell perimeter. A portion of this swale will direct surface water towards the northern attenuation pond, and a portion will direct surface water towards the southern attenuation pond.

## 5.6 Site Landscaping and Berm Development

As part of the Proposed Development, a comprehensive site landscaping and berm development strategy will be implemented to visually integrate the landfill facility into the surrounding landscape, mitigate potential visual and acoustic impacts, and contribute to the long-term restoration and ecological enhancement of the site.



**Figure 5.5:** Proposed, Permitted and Existing Landscaping Berm Layout.

Please see the Landscape Drawings prepared by Macroworks and the Biodiversity Management Plan prepared by Scott Cawley, submitted with the planning application. Berms will be formed through the reuse of excavated soils arising from the construction of landfill cells. This approach supports the principles of resource efficiency and sustainability by reducing the requirement for off-site disposal of excavated material and minimising the need for importation of fill.

We note that, due to these works, c. 9 ha of newly created native woodland will be established on site, representing a net biodiversity gain stemming from the project.

Proposed and Permitted Berm Volumes		
Berm Number	Status	Berm Volume (m <sup>3</sup> )
1	Proposed	52,938 m <sup>3</sup>
2	Proposed	38,651 m <sup>3</sup>
3	Proposed (partially permitted)	191,790 m <sup>3</sup>
4	Permitted and Constructed	-
5	Proposed	26,708 m <sup>3</sup>
6	Permitted and Constructed	-
7	Proposed	7,367 m <sup>3</sup>
8	Permitted and Constructed	-

9	Permitted and Constructed	-
10	Permitted and Partially Constructed (proposed alteration)	133,774 m <sup>3</sup>
11	Permitted and Not Constructed (proposed alteration)	21,962 m <sup>3</sup>
12	Permitted and Not Constructed (proposed alteration)	154,492 m <sup>3</sup>
<b>Total Proposed (including partially permitted)</b>		<b>317,454 m<sup>3</sup></b>
Total Proposed (incl. partially permitted) and Permitted (not constructed or partially constructed)		627,682 m <sup>3</sup>

**Table 1:** Proposed and Permitted Berm Volumes (Source: AWN Consulting, EIAR (Chapter No. 2)).

## 5.7 Works to Facilitate Landfill Gas Management System

The proposed landfill gas management system for the landfill cells will follow the same methodology as previously permitted and operated on-site. These works are explained in comprehensive technical detail within Chapter No. 2 of the EIAR submitted with this application, prepared by AWN Consulting. Please also see the submitted *Landfill Gas Assessment*, prepared by WSP and submitted with the application.

## 5.8 Works to Facilitate Leachate Management System

Similar to the landfill gas management system works, the leachate management system will follow the same methodology as previously permitted and operated on-site.

These works are explained in comprehensive technical detail within Chapter No. 2 of the EIAR submitted with this application, prepared by AWN Consulting.

## 5.9 Completion and Landscape Capping

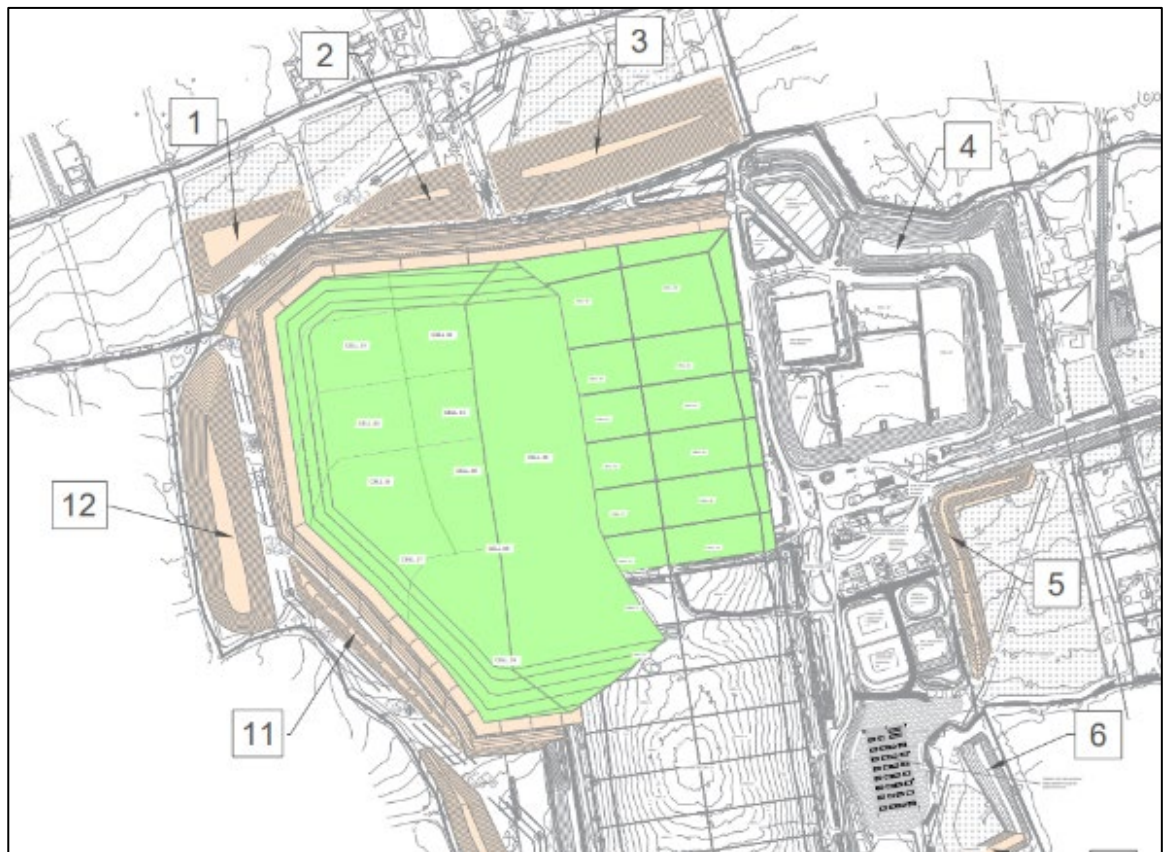
Upon reaching full capacity, each of the proposed landfill cells will be progressively capped in accordance with the facility's waste licence and relevant environmental and engineering standards. The capping process is a critical component of the landfill lifecycle and serves multiple functions, including minimising rainwater infiltration, controlling landfill gas emissions, improving visual integration with the surrounding landscape, and facilitating final restoration and aftercare.

The cap on the expanded void space will total a volume of 149,900 m<sup>3</sup> when completed, and it is designed to tie into the then-existing landfill cap<sup>38</sup> on the northern element of the currently permitted cells.

This join between the proposed and permitted caps will be of a type referred to as a "piggyback cell" – this is when a landfill cell is constructed on top of or onto the side of an existing landfill capped cell, allowing for a horizontal expansion of the existing facility. The piggyback cell will be capped upon final filling.

<sup>38</sup> Yet to be completed as the remaining permitted cells at the facility are still operational and yet to be filled.





**Figure 5.6:** Overview of the proposed development when piggyback cell capping is in place (Source: WSP).

## 5.10 Aftercare Works

Upon completion, aftercare works will be undertaken, including removal of redundant infrastructure and environmental monitoring as set out within Chapter 2.6.3 of the submitted EIAR.

## 6.0 NEED FOR THE PROPOSED DEVELOPMENT

### 6.1 Overview

As summarised within Section 1 of this subject report, there is an urgent need for increased waste disposal capacity in Ireland. The number of landfills that now accept municipal waste for disposal has been decreasing from 126 No. operational facilities in 1998<sup>39</sup> to 7 No. operational facilities in 2016 to just 3 No. operational facilities<sup>40</sup> in 2024 – Knockharley landfill being one of these three<sup>41</sup>.

<sup>39</sup> *National Waste Database Report 2001*, pg. 65, prepared by Environmental Protection Agency.

<sup>40</sup> *Ballynagran landfill in Wicklow is scheduled to close in 2026<sup>40</sup>, and although Drehid in Kildare has secured planning permission for increased intake, it has yet to obtain the necessary environmental licence at the time of writing this Report.*

<sup>41</sup> *Ireland's State of the Environment Report 2024*, pg. 28, prepared by Environmental Protection Agency.

This has resulted in a decrease from 91% of Municipal Solid Waste (MSW)<sup>42</sup> being landfilled in 1998<sup>43</sup> to 16% in 2021<sup>44</sup> and just 13% in 2024<sup>45</sup>.

Whilst Ireland has made strides, and continues to make strides, in terms of sustainable waste management, landfilling is still a necessary element of Ireland's waste management system for all waste streams. Whilst every effort is made to manage waste in accordance with the waste hierarchy with an emphasis on reduction, reuse, recycling and energy recovery, waste streams that cannot be recycled or incinerated are still generated and therefore must be managed in accordance in safe and as environmentally friendly as possible such as at designated, well managed facilities such as Knockharley Landfill.

In 2021, Knockharley landfill (a landfill in operation since 2003) received a grant of planning permission to increase the annual tonnage of waste received at the facility from 88,000 tonnes of waste per year to 396,000 tonnes; the application was lodged in 2018.<sup>46</sup> The application at the time projected that upon ramping up of tonnage receipt to the facility, the expanded landfill void could accommodate landfilling of waste until c. 2032. The application in 2018 sought an annual capacity of 396,000 tonnes, which included 188,000 tonnes of MSW, some 60,000 tonnes of C&D Waste, and 150,000 tonnes of Incinerator Bottom Ash (IBA). A contingency of 44,000 tonnes, to be released only by the Regional Waste Management Office for emergency, unplanned, or unexpected events, was also included for as part of the planning permission.

Whilst the expanded landfill void was permitted to accommodate a quantum of some 4 million tonnes of waste in total (in 2022, capacity for some 1.9 million tonnes remained<sup>47</sup>), it was not projected that the maximum annual landfill capacity would be utilised year over year or that the permitted contingency capacity would be required to be released. In reality, due to a number of factors including increased population growth, effects of a growing economy, a reduction in waste exports, unplanned outages at the country's waste-to-energy (WTE) Facilities<sup>48</sup>, and expected closures of existing landfill facilities have resulted in an increased need for expanded landfill capacity in the immediate future, as set out below. At current run-rates, the total capacity of the Knockharley Landfill will soon be exhausted, and the Facility will be full by 2029.

## 6.2 Effects of Increased Population & A Growing Economy

Ireland is experiencing significant population growth at present. Figures from the Central Statistics Office (CSO) point to the fact that in the 12 months to the end of April 2024, the population in Ireland rose by 98,700 people, which was the largest 12-month increase since 2008.<sup>49</sup> As noted previously, the Revised National Planning Framework notes a national population of 6.1 to 6.3 million people by 2040.

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<sup>42</sup> Household, commercial, and street waste.

<sup>43</sup> *National Waste Database Report 2001*, pg. 18, prepared by Environmental Protection Agency.

<sup>44</sup> *Ireland's State of the Environment Report 2024*, pg. 414, prepared by Environmental Protection Agency.

<sup>45</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pgs. 5 & 15, prepared by the Regional Waste Management Planning Office.

<sup>46</sup> ACP Ref. 303211.

<sup>47</sup> *EPA Inspector's Report on an Industrial Emissions Licence Review, Licence Register Number W0146-04*, pg. 9 & 10, dated 15 March 2023.

<sup>48</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pg. 2, prepared by the Regional Waste Management Planning Office.

<sup>49</sup> [Population and Migration Estimates, April 2024](#).

In turn, Ireland's economy has grown with this population increase. Ireland has experienced consistent economic growth over the past decade (2015-2025), which has been characterised by GDP increases.

The combination of growth in population and the economy, has informed an increased demand and supply of development of all natures, including residential, employment and commercial, and the associated infrastructure required to facilitate such development. This, in combination with other factors discussed, has led to further pressure upon means of waste management, including that of landfills.

While cognisant that MSW does not comprise all waste streams, we use its figures, below, because it is well tracked at a national level by the Environmental Protection Agency (EPA) and provides for a clear understanding of general waste trends.

Over the last five years, on average, per year, some 40% of MSW was recycled (including composting/anaerobic digestion) (c. 1.4 million tonnes<sup>50</sup>), 47% sent to incinerator or exported (c. 1.3 million tonnes<sup>51</sup>), and 13% landfilled (c. 400,000 tonnes<sup>52</sup>).

Overall, this means that Ireland has a current MSW landfill demand of some 400,000 tonnes per year<sup>53</sup>, but with a current annual landfill acceptance allowance of just in excess (458,000 tonnes<sup>54</sup>), at Ireland's three private landfills – Ballynagaran (Co. Wicklow), Drehid (Co. Kildare), and Knockharely (Co. Meath).

Ireland's MSW generation is projected to increase to 3.8 million tonnes by 2030 and could be as high as 4.5 million by 2040. According to a November 2024 European Commission (EC) report, Ireland is expected to experience economic growth in 2025 at 4%, with an additional 3.6% by 2026<sup>55</sup>. This economic growth is occurring as Ireland's population continues to expand, with a projected increase of one million additional persons by 2040, totalling a population of 6.1 million.<sup>56</sup> Approximately 50% of this increase is predicted to take place in the Eastern and Midlands regions.<sup>57</sup> Whilst the percentage of MSW being landfilled will continue to reduce, with a maximum of 10% of all MSW to be landfilled, as mandated by the transposed EU Directive into the 2020 European Union (Landfill) Regulations<sup>58</sup>. It is likely that Ireland will still need to have at least 415 thousand tonnes in annual landfill acceptance capacity to serve Ireland's imminent landfill MSW demands. If the 10% target isn't met, MSW landfill demand could be 540 thousand tonnes per year by 2035 and by 2040, it could be upwards of 585 thousand tonnes per year.

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<sup>50</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pg. 8, prepared by the Regional Waste Management Planning Office.

<sup>51</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pg. 8, prepared by the Regional Waste Management Planning Office.

<sup>52</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pg. 8, prepared by the Regional Waste Management Planning Office.

<sup>53</sup> *Waste Treatment Capacity Analysis Q4 2024 & Projections 2025 Bulletin*, pg. 8, prepared by the Regional Waste Management Planning Office.

<sup>54</sup> *National Waste Management Plan for a Circular Economy 2024-2030*, pg. 23, prepared by the Regional Waste Management Planning Office.

<sup>55</sup> *European Economic Forecast Autumn 2024*, pg. 92, prepared by the European Commission.

<sup>56</sup> *Final Draft Revised National Planning Framework*, pg. 10, prepared by the Department of Housing, Planning and Local Government

<sup>57</sup> *Population Projections, The Flow of New Households and Structural Housing Demand*, pg. 34, prepared by the Economic & Social Research Institute.

<sup>58</sup> [S.I. No. 321/2020 - European Union \(Landfill\) Regulations 2020.](#)

### 6.3 Expected Closures of Existing MSW Capacity & Reduced MSW Export

Notwithstanding the likely increase in MSW generation, the existing landfill annual acceptance allowance is under significant threat. The current planning permission for the landfill at Ballynagran expires in June 2026 (WCC Planning Reg. Ref. 20/21) after which some 150,000 tonnes of MSW annual acceptance allowance will no longer be available unless new planning permission is secured; however, no planning applications or pre-planning consultations are recorded as being in the system, meaning it is likely that Ballynagran will soon fully cease operations. Whilst the landfill at Drehid has recently received planning permission (ACP Reg. Ref. 317292) for increased acceptance of some 120,000 tonnes of MSW per year<sup>59</sup>, it is yet to acquire an Industrial Emissions License from the EPA for the same at the time of writing this Report.<sup>60</sup>

This shortfall in annual landfill acceptance allowance is highlighted in the *National Waste Management Plan for a Circular Economy 2024-2030*, which states that:

*“There is a **current shortfall in treatment capacity** [annual acceptance allowance] . . . in 2023, with the available treatment capacity [annual acceptance allowance] **declining in the period to 2030**”.*

And:

*“assuming all pending capacity [annual acceptance allowance] changes are delivered, **a shortfall in treatment capacity [annual acceptance allowance] of the order of circa 200,000 tonnes by 2030 will still remain** (assuming the prevention interventions and the range of recycling impacts are successful). If these interventions are unsuccessful, the shortfall in treatment capacity [annual acceptance allowance] **may be as high as circa 300,000 tonnes by 2030**.”*

[Our emphasis.]

Moreover, Ireland’s reliance on exporting much of its MSW is at risk of being exposed as a result of recent, more stringent EU regulations and less demand for our waste from our biggest customers – the Netherlands and Sweden (exporting MSW for use as fuel has decreased by 5% on average every year since 2019<sup>61</sup>). This is also highlighted in the *National Waste Management Plan for a Circular Economy 2024-2030*, which states that:

*“EPA waste statistics for 2021 show that circa 400,000 tonnes of rMSW were exported for final treatment, indicating that the shortfall in treatment capacity is being managed through exports. **Relying on this level of export is neither sustainable nor complies with the principles of self-sufficiency and proximity, and the analysis suggests the need for further treatment capacity within the State.**”*

[Our emphasis.]

<sup>59</sup> Conditioned to this quantum of MSW disposal via Condition 2(b) of ABP’s Order, dated 6 September 2024.

<sup>60</sup> EPA Licence Application Reg No. W0201-05.

<sup>61</sup> *Waste Treatment Capacity Analysis-Q4 2024 & Projections 2025 Bulletin*, pg. 7, prepared by Regional Waste Management Planning Office.



Notwithstanding the need to move away from waste export, this reduction in waste exports and reduced demand from importing countries has been emphasised recently, with far reduced demand from Sweden occurring due to warmer winters being experienced and hence reduced demand for heat from their WTE facilities<sup>62</sup>.

#### 6.4 Landfill as a Necessary Requirement

It is clear that at a European and National Level, landfill is recognised as an absolutely necessary element of the waste hierarchy within the circular economy model. Moreover, given the uncertainty surrounding Ireland's residual waste disposal demands and annual acceptable allowance capacity, Knockharley landfill, with its acceptance allowance of 188,000 tonnes of MSW per year (of an overall 396,000 tonnes with contingency of 44,000 tonnes for all waste streams), is, now more than ever, a critical piece of the country's waste infrastructure.

However, the acceptance capacity at Knockharley is also under threat. This is because the landfill's 'void capacity' (i.e. how much total waste it can accommodate in the life of its operation) is quickly filling up. It is currently projected that the void capacity for Knockharley will be full by the year 2029, rather than 2032 as previously predicted within the 2018 application.

	2026	2028	2030	2032	2034	2036
<b>Ballynagran</b>	150k	Planning to expire	Planning to expire	Planning to expire	Planning to expire	Planning to expire
<b>Drehid</b>	120k	120k	120k	120k	120k	120k
<b>Knockharley</b>	188k	188k	Void capacity to be full	Void capacity to be full	Void capacity to be full	Void capacity to be full
<b>Total Capacity</b>	458k	458k	120k	120k	120k	120k
<b>Projected Demand</b>	407k	422k	436k	451k	466k	481k
<b>Projected Deficit</b>	<b>+51k</b>	<b>-144k</b>	<b>-316k</b>	<b>-331k</b>	<b>-346k</b>	<b>-361k</b>

**Table 2:** Projected MSW annual landfill acceptance capacity and projected MSW annual landfill demand until 2036. Projected demand calculated by applying total projected MSW for each year times 0.115 (11.5% is the median of Ireland's current landfill rate (13%) and Ireland's targeted landfill rate for 2035 (10%)).

While showing a clear trajectory of Ireland's declining MSW capacity, the above tables do not factor in C&D waste, IBA, or contingency waste intake. With those waste streams factored in, it is considered that the overall waste capacity deficit could be far more severe. As such, if additional capacity is not secured soon, Ireland could be left with a disastrous landfill capacity deficit within the next decade.

#### 6.5 Increased C&D Waste Demand & The Role of Incineration

Notwithstanding the disposal of MSW, which accounts for c. 43% of Knockharley's overall annual permitted acceptance capacity,<sup>63</sup> Knockharley landfill also plays a critical role in the disposal of

<sup>62</sup> G. Strandberg et al., *Bespoke climate indicators for the Swedish energy sector – a stakeholder focused approach*, Climate Services, Volume 34, 2024.

<sup>63</sup> *Waste Treatment Capacity Analysis-Q4 2024* p. 6, prepared by Regional Waste Management Planning Office.

Construction & Demolition (C&D) waste. Knockharley has an annual capacity for some 60,000 tonnes of C&D waste (c. 13.5% of its overall permitted capacity), contributing to a significant portion of Ireland's ever-increasing C&D waste disposal demand. The demand for C&D waste to landfill has increased at a quicker rate than previously anticipated. This is because of Ireland's growing economy and construction sector, leading to a need to accommodate waste that can't be reused, recycled or otherwise returned to the circular economy. Recent issues with building materials have resulted in additional tonnages of material that are deemed to be un-recyclable and therefore must be disposed of.

Recent unplanned closures of the Dublin WTE Facility have resulted in the need for Knockharley Landfill to accept a greater proportion of the permitted maximum capacity than was forecast to occur in the previous grant.<sup>64</sup> This has also impacted the overall capacity available within the landfill void.

Moreover, with some 40% of Ireland's MSW going to domestic incineration<sup>65</sup>, there is no export of IBA resulting from incineration and therefore all IBA is currently disposed of in landfill in Ireland. Knockharley is the only facility, outside of the Dublin Waste-to-Energy (WTE) facility, that is permitted to manage IBA. Knockharley is permitted to landfill 150,000 tonnes of IBA per year, for a period of 5 years, while exploring the potential for future recovery of its aggregate. Whilst it is expected that a significant portion of the IBA aggregate at Knockharley will be used in future road construction (embankments, sub-bases), concrete block, and cement production (subject to licencing etc), the landfill demand remains.

We note that WTE plants also have periods of reduced intake during their preventive maintenance periods.<sup>66</sup>

Inversely, the long-standing delays of consent for the Ringaskiddy incinerator, Co. Cork must, too, be considered. At the time of when the previous Knockharley SID application was prepared (2018) it was projected that the Ringaskiddy incinerator/WTE facility would be consented. However, after 24 years since the project was first mooted, planning permission is still not secured. As such, the 240,000 tonnes per year of MSW that the Ringaskiddy incinerator was/is proposed to consume did not/will not come online during life of the existing SID permission. This means that the MSW that was projected to go to incineration was/is more than what actually materialised leading to more MWS needing going to landfill than was projected in 2018.

A planning application is currently with An Comisiún Pleanála<sup>67</sup> following remittal by the High Court, and is not likely to be determined in the next number of months based on other similarly remitted cases to the Commission. It is noted that there is also possibility of further Judicial Review<sup>68</sup> and the time it takes to secure a post-permission EPA licence, means it is unlikely that the project will be operational in the immediate future.

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<sup>64</sup> *Waste Treatment Capacity Analysis-Q4 2024* p. 2 & 6, prepared by Regional Waste Management Planning Office.

<sup>65</sup> *Waste Treatment Capacity Analysis-Q4 2024 & Projections 2025 Bulletin*, pg. 14, prepared by Regional Waste Management Planning Office.

<sup>66</sup> *Waste Treatment Capacity Analysis-Q4 2024* p. 13, prepared by Regional Waste Management Planning Office.

<sup>67</sup> Reg. Ref. 318802.

<sup>68</sup> A previous grant of permission for the incinerator was quashed by the High Court in 2021— *Cork Harbour Alliance For A Safe Environment -v- An Bord Pleanála [2018 No. 593 JR]*—meaning that a challenge, again, is possible.

## 6.6 Emergency Contingency

The regional waste management plans all acknowledge a landfill contingency requirement. For example, it is stated in Section 16.4.3 of the *Eastern and Midlands Waste Management Plan 2015 – 2021* that:

*“There is also a need to maintain a contingency supply, in response to potential situations which pose a risk to the health and well-being of citizens, livestock and the environment”.*

Moreover, the National Waste Management Plan states that it is an objective:

*“To maintain adequate disposal capacity at Landfills and provide for contingency capacity for unseen events.”*

As such, there are situations where contingency capacity is required. For example, emergency measures, in accordance with Section 56 of the Waste Management Act 1996 (as amended), can be implemented by the Regional Waste Management Office. Historically, Knockharley has played a significant role in contingency responses, including in 2016 when it took in some 105,000 tonnes of waste above its normal authorised annual intake and in 2017/18 when it took in an additional 40,000 tonnes of waste.

More recently, Knockharley received approval from Meath County Council for the acceptance of 32,000 tonnes of waste of the permitted 44,000 contingency capacity. The contingency requests were granted due to the impact of a fire at the Cappagh Road materials recovery facility,<sup>69</sup> and increased IBA demand as a result of the aforementioned issues at the Poolbeg WTE plant. In 2025, the contingency capacity was again released by Meath County Council to facilitate the safe disposal of increasing volumes of C&D materials arising in the market and to provide accommodation for additional volumes of MSW requiring disposal arising from an outage at the Poolbeg WTE plant.

These contingency intakes have all accelerated the rate at which Knockharley’s permitted void capacity is filling up. It is likely that such contingency intakes will continue, and possibly worsen, in the years to come, with the economy and population increasing, more IBA being produced, less waste going to export, and Ballynagran landfill ceasing operations.

Notwithstanding foreseen events, there is, of course, the possibility of unforeseen events, including global natural and human-made disasters, which could inform the need for further emergency contingency waste storage and disposal.

## 6.7 Additional Void Capacity as the Solution

To combat the imminent waste capacity deficit that Ireland is on a trajectory for, it is clear that an increase in void capacity for Knockharley Landfill is of significant strategic importance. As landfills are, manifestly, land-intensive operations, Ireland needs to be selective regarding where this additional capacity is provided. In respect of sustainable development ambitions, it is considered that consolidation at existing facilities should be the first ‘*port of call*’ when exploring suitable options. We emphasise this as, as outlined at the beginning of this document, Ireland has achieved a lot by consolidating its previous 100+ landfills into just three. Consolidation of waste infrastructure significantly reduces vehicular trips, air quality emissions, and general visual impact

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<sup>69</sup> *Waste Treatment Capacity Analysis-Q4 2024* p. 6, prepared by Regional Waste Management Planning Office.

compared to a larger network of smaller, dispersed landfills. It also increases efficiencies in terms of operational management and effective tracking, which ultimately can help reduce the amount of landfilled waste.

Knockharley landfill has the space to expand westwards to accommodate a void capacity of 4.12 million cubic metres of waste, which equates to a capacity for some 3.14 million tonnes of waste. At current max waste acceptance rates (c. 440,000 tonnes per year), the proposed additional landfill void would extend the life of this critical facility for approximately a further 14 years past 2029.

It is considered that increased void space at Knockharley is only one piece of the jigsaw when it comes to resolving Ireland's imminent landfill capacity deficit. Other operators and the Government have a significant role to play, also. As such, it is not proposed to increase the annual tonnage allowance, by way of this planning application, because, as other operators work towards securing additional void capacity/acceptance capacity, the stress that is currently on Knockharley's acceptance capacity should be eased; increased tonnage will only result in Knockharley's void capacity filling up sooner and is not deemed an appropriate solution at this time. Moreover, the Applicant/Operator considers that the current maximum annual tonnage acceptance allowance is being managed effectively and appropriately on site with limited public complaints received.

## **6.8 Biodiversity Net-Gain and the Modern 'Sustainable' Landfill Model**

As part of the proposal, a comprehensive landscaping plan will be implemented to visually integrate the site into its surroundings and support long-term ecological restoration. Excavated soils from the construction of landfill cells will be repurposed to form new and extended berms along the site boundaries, providing effective screening of operational areas and helping to minimise the transmission of *inter alia* noise and dust beyond the site.

Once constructed, these berms will be topped with a layer of nutrient-rich topsoil and seeded with a mix of native trees, grasses, and wildflowers to promote vegetation growth, stabilise the soil, and foster habitat development.

A substantial number of native trees and hedgerows will be planted wherever has been deemed feasible to further enhance biodiversity and contribute to the site's restoration goals. The broader landscaping plan also includes the enrichment of existing vegetation, the introduction of additional native species, and the creation of habitat corridors to support and connect local wildlife populations.

It should be noted that biodiversity net gain approach being employed by the project team and applicant is not a statutory requirement within Ireland, nor is there set guidance in the Irish context; rather, Biodiversity Net Gain has been a target set by the applicant and design team in effort to make the proposed development an exemplar approach to sustainable landfill restoration of a substantial site and to align with the applicant's overall commitments to ESG.

Overall, today's landfill model represents a significantly more sustainable approach compared to past practices. While the core concept remains the same—disposing of waste in the ground—modern landfills are governed by advanced technologies, rigorous processes, and strict environmental regulations. These improvements have transformed landfilling into a far more controlled and environmentally responsible method of waste management than it ever previously was. Impermeable membranes and advanced leachate management and treatment systems reduce the possible impacts of contamination, tremendously.

Moreover, the natural decomposition of waste within the landfill generates gas that can be harnessed to produce electricity. This process not only reduces greenhouse gas emissions but also contributes to energy recovery, with the facility generating approximately 3 megawatts of electricity annually as a valuable by-product of its operations.

Lastly, the Knockharley landfill site holds long-term potential for ecological restoration and recreational reuse. With robust management systems in place, it is well-positioned to follow the successful trajectory of other rehabilitated landfills across Ireland. Former sites such as Balleally Landfill (now Rogerstown Park near Donabate) and Ballyogan Landfill (the future Jamestown Park in Carrickmines) demonstrate how these spaces can be transformed into valuable public amenities. Rogerstown Park officially opened in 2019<sup>70</sup>, while Jamestown Park remains in its 'aftercare' phase and is expected to open in the coming years<sup>71</sup>. Knockharley is no exception and has the potential to become a future asset for both the environment and the community.



Figure 6.1: Image taken at the opening of Rogerstown Park in Fingal in 2019. (Source: Fingal County Council.)

<sup>70</sup> <https://www.fingal.ie/news/fingal-county-council-opens-rogerstown-park>

<sup>71</sup> <chrome-extension://efaidnbmninnibpcjpcglclefindmkaj/https://leap.epa.ie/docs/3c55bc26-27be-4e82-b72b-21b198ed46d9.pdf>

## 7.0 PLANNING POLICY CONTEXT AND LEGISLATIVE CONTEXT

### 7.1 EU Directive 2018/850

The *EU Directive 2018/850* (the ‘*Landfill Directive*’)<sup>72</sup> requires that:

*“Member States shall take the necessary measures to ensure that by 2035 the amount of municipal waste landfilled is reduced to 10% or less of the total amount of municipal waste generated (by weight).”*

As such, while the projected figures for the generation of municipal waste indicate that the overall tonnage is likely to increase to 2035, the State is obliged under both Irish and European Law to ensure that the tonnage of disposed municipal waste is 10% or less of the total amount of municipal waste generated by 2035.

Though while the percentage of municipal waste to be disposed of in landfill is to be reduced under legal obligation by 2035, as noted above, this does not equate to a cessation of the requirement to landfill.

As stated in Section 6, above, at 2024 rates, c. 13% of all MSW went to landfill, which equates to a reduction of 85% of MSW going to landfill in 1998.

So, whilst Ireland moves towards the legally obligated requirement of 10% or less by 2035, landfill will continue to form part of the waste hierarchy.

Therefore, we submit that the need for the proposed development—to ensure that an operational capacity of a permitted land fill facility is sufficient to meet the required disposal capacity—is of strategic importance to the State.

### 7.2 National Waste Management Plan for a Circular Economy 2024–2030

The recently published *National Waste Management Plan for a Circular Economy 2024–2030* states that the:

*“... the existing capacity of 1.68 million tonnes potentially increasing to 1.74 million tonnes in 2025, but then reducing again with the closure of the Ballynagran Landfill from 2027 and Drehid from 2028.”*

Therefore, following the possible closures of the Ballynagran and Drehid facilities, the Knockharley Landfill will be required for the disposal of waste that would have gone to these facilities. This will significantly increase the pressure on the existing Knockharley facility. As referenced in s. 6, above, under current run-rates, the landfill facility at Knockharley, subject of this proposal, is expected to reach capacity c. 2029. Therefore, increased void space at Knockharley is necessary to ensure that the State can dispose of waste in the proper manner.

The *National Waste Management Plan for a Circular Economy* states:

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<sup>72</sup> [As transposed by S.I. No. 321/2020 – European Union \(Landfill\) Regulations 2020](#)



*“The business-as-usual MSW scenario ... predicts continued growth in **MSW generation in the short term to reach up to 3.5 million tonnes by the end of the Plan period in 2030** (a 10% increase from 2020).”*

**[Our emphasis.]**

As set out above, the number of landfill facilities within the State is reduced from 126 No. facilities in 1998 to 7 No. facilities in 2016 to just 3 No. landfills operational in 2025; however, since 2016, the tonnage of waste being produced has increased by c. 17% and is likely to continue to increase to 2030 and beyond. Whilst there has been an increase in recycling and reuse since 2016, there continues to be a need for certain waste streams to go to landfill.

The need for expansion of the existing landfill is supported by the publication of the *National Waste Management Plan for a Circular Economy 2024-2030* (hereafter referred to as the *National Waste Management Plan*).

This forward-looking document, while seeking to shift the focus from strictly waste disposal and a linear economy to a circular economy where materials and products remain in productive use for longer, also maintains that landfills are a necessary element of the waste management framework. In Section 7 of *Volume II: Policy Responses and Actions* of the *National Waste Management Plan for a Circular Economy*, it states:

*“While the trend of decreased disposal to landfill has continued in recent years, **there remains a need to retain disposal capacity within the State to manage residual MSW** coupled with wider disposal policies in Focus Area 15.”*

**[Our emphasis.]**

‘Focus Area No. 15’ of the *National Waste Management Plan* relates to ‘Disposal Infrastructure’.

The *National Waste Management Plan* defines ‘Disposal Infrastructure’ as:

*“Disposal infrastructure includes any operation which is not recovery, even where the operation has as a secondary consequence such as the reclamation of substances or energy.”*

While the purpose of ‘Disposal Infrastructure’ is defined as follows in the *National Waste Management Plan*:

*“To maintain adequate disposal capacity at Landfills and provide for contingency capacity for unseen events.”*

Municipal waste in Ireland is treated via recycling, incineration, exportation, or composting / anaerobic digestion processes where appropriate. The remaining waste that cannot be treated is landfilled or exported. The amount of landfill capacity within Ireland will determine how much of this remaining waste can be landfilled.

Core Policy 8 of the *National Waste Management Plan* states that it is policy to:

*“Monitor the provision of waste infrastructure to ensure that there is **adequate appropriate infrastructure in place and where deficits exist to support solutions in line with the waste hierarchy, self-sufficiency, proximity and circularity.**”*



[Our emphasis.]

Section 4 *Core Policies of Volume II: Policy Responses and Actions of the National Waste Management Plan* states that:

***“There is a waste treatment capacity deficit within the State, which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling).***

***Reliance on exports is not sustainable, and the identification of existing and future critical infrastructure is required.<sup>73</sup> for the final treatment of Municipal Waste is essential to protect, promote and ensure continuity of supply in the market.”***

[Our emphasis.]

As such, the *National Waste Management Plan* recognises that there is a deficit with regard to the waste capacity treatment of the State, in particular that exported waste (accounting for over 40% of MSW in the last 5 years) could be treated inside the State, if the required facilities are available.

Furthermore, Core Policy 8 of the *National Waste Management Plan* sets out that, where there is a deficit in infrastructure, solutions in line with the waste hierarchy, self-sufficiency, proximity, and circularity are supported.

Under the previous SID Grant of Permission at the Knockharley Landfill Facility (ACP Ref. 303211), new infrastructure elements were permitted, such as the leachate management facility, the building for the biological treatment of organic MSW, and the dedicated Incinerator Bottom Ash (IBA) facility.

These new elements at Knockharley will enhance the capabilities of the Facility to manage waste in a more efficient and sustainable manner. This equips Knockharley to deal with a greater concentration of the flow of waste within the State following the projected closures of the Ballynagran and Drehid facilities.

### 7.3 Revised National Planning Framework (NPF) 2025

Regarding the management of waste, the NPF states that:

***“Ireland has actively improved its waste management systems, but we remain heavily reliant on export markets for the treatment of residual, recyclable and hazardous waste. A population increase of around one million people, alongside economic growth to 2040, will increase pressure on waste management capacity, as consumption is still a key driver of waste generation.***

***While the ultimate aim is to decouple, as much as possible, consumption from waste generation over time, additional investment in waste management infrastructure, and in particular different types of waste treatment, will be required.”***

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<sup>73</sup> Table 4-1: *Criteria for Nationally and Regionally Important Infrastructure* set out in *Volume II: Policy Responses and Actions* includes Non-hazardous Landfill with a capacity of greater than 100,000 tonnes per annum to be critical infrastructure at the national level.

[Our emphasis.]

NPO 67 states that it is an objective to:

*“Support the circular and bio economy, including in particular through **greater efficiency in land and materials management**, promoting the sustainable re-use and refurbishment of existing buildings and structures, **while conserving cultural and natural heritage**, the greater use of renewable resources and by **reducing the rate of land use change from urban sprawl and new development**”.*

[Our emphasis.]

The NPF seeks “adequate capacity and systems to manage waste in an environmentally safe and sustainable manner”.<sup>74</sup>

The Proposed Development seeks to undertake development works for and within the existing site so that minimal land use change occurs while enabling retention of natural heritage assets that might be compromised on *de novo* sites, which is consistent with NPO 67.

By accepting a variety of waste types from several regions, proper materials management is actively achieved, thereby supporting a “*healthy environment, economy and society*.”<sup>75</sup>

Regarding resource efficiency and transition to a low-carbon economy, the NPF states that:

*“The extent to which we prioritise brownfield over greenfield use, encourage the use and reuse of buildings in urban and rural areas, and reduce sprawl, will all help to **increase the efficiency of land use and the pace of soil sealing**, i.e. the covering of the ground by an impermeable material which can result in soil degradation”.*

[Our emphasis.]

Knockharley Landfill is a unique site, being unsuitable for agricultural or residential use at any scale in the future. Through the continued utilisation of an active waste management site, similar effects can be prevented from occurring elsewhere within Ireland by the efficient land use of an existing waste management facility upon a brownfield site.

## 7.4 The Climate Action and Low Carbon Development (amendment) Act 2021

Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 states that:

- (1) “A relevant body shall, in so far as practicable, perform its functions in a manner consistent with: (a) the most recent approved climate action plan,
- (b) the most recent approved national long-term climate action strategy,
- (c) the most recent approved national adaptation framework and approved sectoral adaptation plans,
- (d) the furtherance of the national climate objective, and

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<sup>74</sup> Revised NPF, 2025, pg. 123.

<sup>75</sup> Revised NPF, 2025, pg. 136.

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”

The Proposed Development is aligned with the above-mentioned plans, strategies and objectives as outlined in Chapter 9 of the submitted EIAR.

#### 7.4 Climate Action Plan (CAP) 2025

The *Climate Action Plan 2025* is the third statutory update to Ireland’s Climate Action Plan under the *Climate Action and Low Carbon Development (Amendment) Act 2021*. Following the introduction in 2022 of economy-wide carbon budgets and sectoral emissions ceilings, the plan implements legally binding, department-specific carbon budgets for the first time.

A key component of the plan includes stronger levies on landfills and an overall reduction in the quantity of waste sent to them, targeted for no more than 10% of total Irish waste.

It is considered that the Proposed Development fully aligns with the Climate Action Plan by serving the <10% of waste going to landfill. The proposed development will extend Ireland’s landfill capacity, and so, as previously explained within this report, facilitate other alternative waste management options to be explored/developed into the future.

#### 7.5 Eastern and Midlands Regional Assembly Regional Spatial Economic Strategy 2019 - 2031

The EMRA RSES states that

*“Alignment of growth with enabling infrastructure – To promote quality infrastructure provision and **capacity improvement**, in tandem with new development and aligned with national projects and improvements in water and wastewater, sustainable energy, **waste management and resource efficiency**”*

[Our emphasis.]

RPO 10.25 states that:

*“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 quantum’s 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.”*

[Our emphasis.]

The RSES reinforces the need for capacity improvement and a move towards a circular economy, which the development proposals seek to achieve. The proposed development will extend Ireland’s landfill capacity while allowing for other circular economy alternatives to be explored/developed into the future.

## 7.6 Eastern - Midlands Region Waste Management Plan 2015 – 2021

Although it has elapsed and with no revised edition has been published, the *Eastern Midlands Region Waste Management Plan 2015-2021* is still recognised by the *Meath County Development Plan 2021–2027*. The Waste Management Plan recognises a clear need for increased waste management capacity on a contingency basis.

E10. The waste plan recognises the need for on-going disposal capacity to be available in response to events which pose a risk to the environment and/or health of humans & livestock. The local authorities of each region will monitor available contingency capacity annually.

**Figure 7.1:** Extract from the Eastern - Midlands Region Waste Management Plan 2015 – 2021.

Whilst the Plan does not state a general need for increased waste management capacity it is significantly out of date, and it does not account for the imminent closure of the Ballynagran Landfill Facility in Co. Wicklow.

As such, it is considered that there is both a need for increased waste management capacity on a contingency basis, as recognised by Objective E10 above and the need for increased waste capacity generally.

## 7.7 Meath County Development Plan 2021-2027

The *Meath County Development Plan 2021-2027* sets out the Council's policy and objectives for development of the County through 2027. It seeks to enable the county to continue making a significant contribution to the nation's economic recovery after COVID-19 by promoting sustainable development and facilitating stable economic growth to deliver long-term benefits.

The objective of Zoning Category 'RA' - Rural Areas, in which the site is located, is *"to protect and promote in a balanced way, the development of agriculture, forestry and sustainable rural related enterprise, community facilities, biodiversity, the rural landscape, and the built and cultural heritage."*

Chapter 6, Infrastructure Policy 61 states that it is policy:

*"To facilitate the implementation of National Waste Legislation, National and Regional Waste Management Policy and the circular economy."*

Chapter 6, Infrastructure Policy 63 states that it is policy:

*"To encourage the development of waste infrastructure and associated developments in appropriate locations, as deemed necessary in accordance with the requirements of the current Eastern Midlands Region Waste Management Plan and the Draft Waste Facility Siting Guidelines 2016 (when finalised) or any subsequent replacement guidelines."*

The importance of proper waste management in Co. Meath is clearly observable within the Development Plan. The development of waste infrastructure, such as Knockharley Landfill, is supported where appropriately placed. As such, the Proposed Development is supported by the

development plan policy as it constitutes the expansion of an existing strategically located site.

Compliance with the Development Plan is further detailed within the following section of this report.

## 8.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT

We have reviewed the *Meath County Development Plan 2021-2027* and respond, below, to the relevant development management standards and policy objectives relating to the Proposed Development.

### 8.1 Environmental Impact Assessment

Section 11.1.3 of the Development Plan states:

*An EIAR is required to accompany a planning application for development of a class set out in Schedule 5 of the Planning and Development Regulations 2001, as amended, which exceeds a limit, quantity or threshold set for that class of development. In the assessment of the EIAR of the proposed development (including the entire project), the relevant guidelines include the DECLG (2013) Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment."*

As detailed previously within this report, an EIAR, prepared by AWN Consulting, has been submitted with this subject application, addressing the following elements pertinent to the assessment of the application:

- Human health and population;
- Land, soils and geology;
- Hydrology and hydrogeology;
- Biodiversity;
- Air quality and odour;
- Climate;
- Noise and vibration;
- Landscape and visual impact;
- Archaeology, Architectural and Cultural Heritage;
- Traffic and transport;
- Waste and utilities;
- Alternatives and



- Interactions between elements discussed.

## 8.2 Appropriate Assessment

Section 11.1.4 of the Development Plan states:

*“Appropriate Assessment (AA) is a focused and detailed assessment regarding the implementation of a plan or project, alone and in combination with other plans and projects, on the integrity of a Natura 2000 site. There are four phases to the process, firstly the preparation of a Screening Report (Stage 1) and if, following screening, it is considered that further assessment is required a Natura Impact Statement (Stage 2 Appropriate Assessment) must be prepared (Refer to Chapter 8- Cultural & Natural Heritage Strategy and in particular HER OBJ 33 for further detail and guidance on AA). The remaining two phases are assessment of alternative solutions (Stage 3) and assessment where no alternative solutions exist and where adverse impacts remain (Stage 4)”.*

In line with this guidance, Irish law, EU law and industry best practice, a Natura Impact Statement has been prepared by AWN Consulting and submitted with this application, concluding as follows:

*“Following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the Proposed Development and the effective implementation of the prescribed mitigation measures (including design mitigation), that the Proposed Development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects”.*

## 8.3 Biodiversity

Section 8.9 of the Development Plan details numerous objectives pertaining to biodiversity considerations for proposed development as follows:

HER POL 27:

*“To protect, conserve and enhance the County’s biodiversity where appropriate”.*

HER POL 28:

*“To integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including mitigation and/or compensation measures, as appropriate”.*

HER POL 31:

*“To ensure that the ecological impact of all development proposals on habitats and species are appropriately assessed by suitably qualified professional(s) in accordance with best practice guidelines – e.g. the preparation of an Ecological Impact Assessment (EcIA), Screening Statement for Appropriate Assessment, Environmental Impact Assessment, Natura Impact Statement (NIS), species surveys etc. (as appropriate)”.*

HER OBJ 30:

*“To implement, in partnership with the Department of Culture, Heritage and the Gaeltacht, relevant stakeholders and the community, the objectives and actions of Ireland’s National*

*Biodiversity Action Plan 2017 - 2021, which relate to the remit and functions of Meath County Council”.*

HER OBJ 31:

*“To implement, in partnership with the Department of Culture, Heritage and the Gaeltacht, relevant stakeholders and the community, the objectives and actions of the County Meath Biodiversity Plan 2015-2020 and any revisions thereof”.*

In this regard, we would highlight that issues pertaining to biodiversity have been a key consideration at all stages of design and pre-application discussions with the Commission and the Local Authority.

These concerns are addressed within Chapter No. 7 of the EIAR submitted with this application, as well as a Biodiversity Management Plan, also prepared by AWN Consulting and submitted with this application.

It is submitted that while the EIAR submitted with this application finds that the Proposed Development, during construction and operation, will not lead to any likely negative significant effects, alone or cumulatively with other developments, upon the receiving environment, the Biodiversity Management Plan also notes that the Proposed Development will, in fact, lead to a biodiversity net gain within the subject site.

The Plan sets out biodiversity enhancement measures for areas set aside from the Proposed Development and measures to maintain and enhance habitats, including linear habitats (i.e. hedgerows, treeline, watercourses) and non-linear habitats (i.e. agricultural grassland and wet grassland). A detailed programme for the maintenance and monitoring of all the biodiversity enhancement measures is described within this Biodiversity Management Plan, which will be undertaken by the appointed SQE and reported to Meath County Council to ensure the long-term conservation of biodiversity within the site and the surrounding environment.

The Proposed Development, it is submitted, will not simply see mitigation measures to protect the receiving environment, but will see habitat enhancement and a resulting biodiversity net gain.

#### **8.4 Land Use Zoning Categories**

Section 11.14.6 of the Development Plan sets out the details of each of the zoning categories, including the specific zoning objective and permissible uses and uses open for consideration.

As detailed previously within this Report, the subject is zoned ‘RA- Rural Areas’, the aim of which is defined as:

*“To protect and promote in a balanced way, the development of agriculture, forestry and sustainable rural-related enterprise, community facilities, biodiversity, the rural landscape, and the built and cultural heritage”.*

This section of the Development Plan further notes:

*“The primary objective is to protect and promote the value and future sustainability of rural areas. Agriculture, forestry, tourism and rural-related resource enterprises will be employed for the benefit of the local and wider population. A balanced approach involving the protection and promotion of rural biodiversity, promotion of the integrity of the*

*landscape, and enhancement of the built and cultural heritage will be adopted”.*

We submit that the proposal accords with the established use of the site permitted under several applications detailed within this report. We would also note that, as detailed within this section, the Proposed Development, will achieve a balanced approach of continued local employment as well as future biodiversity net-gain for the area.

It is also noted that landfill is not a listed use within the RA – Rural Area zoning, notwithstanding this, section 11.14.2 notes that such uses will be considered on their individual merits and will only be permitted if they enhance, complement, are ancillary to, or neutral to the zoning objective. Furthermore, it is noted that there are instances across the County of established uses, such as Knockharley Landfill, that do not conform to the zoning objective for the particular location. Any proposals for the expansion, improvement, or alteration of such uses will be considered on their individual merits. As set out above and throughout this report, it is demonstrated that the proposed development will not compromise the zoning objective and will create local employment and long term net biodiversity gain whilst also facilitating a development of strategic importance to the state.

## 8.5 Waste Management

Section 6.17 of the Development Plan details several subsections regarding waste management, which are pertinent to this application.

Section 6.17.2 sets out the statutory context for waste management developments. As outlined previously within this report, the Proposed Development is in compliance with all relevant international and national guidance pertaining to development of this nature.

Section 6.17.3.1 of the Development Plan concerns waste management and the circular economy, noting:

*“The circular economy is one where materials remain in use at their highest value for the longest period of time and are then upcycled/recycled or reused, thereby minimising the volume of residual waste”.*

In this regard, as detailed within the introduction to this report, it is noted that the Proposed Development will not negatively impact Ireland's aims to achieve a circular economy, but rather will act to realistically enable such by ensuring necessary waste management capacity and by providing such contingency capacity in the event of unforeseen circumstances.

Section 6.17.3.6 deals with waste disposal, noting specifically in regard to Knockharley landfill that:

*“The Knockharley regional landfill, near Kentstown, accessed off the N2 National Primary Route, is a privately operated landfill facility which has capacity beyond the lifetime of this Plan. It is recognised that a contingency capacity for landfill is required to facilitate emergency situations, for example, the management of waste from a foot and mouth disease outbreak”.*

In turn, the Proposed Development will ensure that the subject landfill has ready and available contingency capacity in the event of such a need.

Section 6.17.3.7 of the Development Plan addresses construction and demolition waste, noting:

*“Given the move away from landfill, which is a significant outlet for C&D waste, alternative recovery options will be required to facilitate C&D Waste in the future years. The EC (Waste Directive) Regulations 2011 set a 70% target for the re-use, recycling and recovery of man-made C&D waste in Ireland by 2020. It is imperative that the capacity to manage C & D Waste is made available, and this is a requisite to facilitate key economic development in the County.”*

As detailed previously within this report, the Proposed Development will ensure Knockharley Landfill can provide a source of waste management security, which will facilitate this shift to alternative recovery options and ensure capacity in the event of an emergency.

Section 6.19 of the Development Plan concerns air pollution, noting:

*“The Council’s role in relation to air quality is to promote a reduction in air pollution, through the implementation of relevant legislation and through the provision of advice and guidance on best practice”.*

Chapter No. 8 of the EIAR submitted with this application assesses air quality and odour effects in respect of this proposed development, both individually and in regard to interactions and interrelations, with negative, slight and long-term effects being predicted to stem from this development.

Section 6.20 of the Development Plan concerns noise pollution, noting:

*“Noise is defined as being so loud, so continuous, so repeated, of such pitch or duration or occurring at such times that it gives a person reasonable cause for annoyance. Environmental noise means unwanted or harmful outdoor sound created by human activities, including noise emitted by means of transport, road, rail and air traffic and from sites of industrial activity. It is among the most frequent sources of complaint regarding environmental issues in Ireland and throughout Europe, especially in densely populated urban areas and residential areas”.*

In turn, it is submitted that the Proposed Development will accord with European, national, regional, and local planning policies, and it is acceptable in respect of its likely effects on the environment and the proper planning and sustainable development of the area.

## **9.0 DOCUMENTS INCLUDED WITH THIS APPLICATION**

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

As agreed with ACP case officers 2 No. hard copies and 1 No. soft copies of all documents are provided to the Commission.

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.<sup>76</sup>

### ***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)***

---

<sup>76</sup> Site Location Map Displays Exact Location and matches previous application on the site.



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 No.	Scale 1:—	Author
<b>Planning/Engineering Drawings</b>			
Site Location Map_1_25000	001	25000	WSP
Ownership Boundary	002	5000	WSP
Site Location Map	003	5000	WSP
Existing Site Layout	004	4000	WSP
Permitted Site Layout	005	4000	WSP
Permitted Site Layout_Planning Elements	006	4000	WSP
Proposed Site Layout	006	4000	WSP
Proposed Site Layout Plan Tile Reference	08	4000	WSP
Proposed Site Layout Plan Sheet 1 of 9	09	1000	WSP
Proposed Site Layout Plan Sheet 2 of 9	10	1000	WSP
Proposed Site Layout Plan Sheet 3 of 9	11	1000	WSP
Proposed Site Layout Plan Sheet 4 of 9	12	1000	WSP
Proposed Site Layout Plan Sheet 5 of 9	13	1000	WSP
Proposed Site Layout Plan Sheet 6 of 9	14	1000	WSP
Proposed Site Layout Plan Sheet 7 of 9	15	1000	WSP
Proposed Site Layout Plan Sheet 8 of 9	16	1000	WSP
Proposed Site Layout Plan Sheet 9 of 9	17	1000	WSP
Existing Site Monitoring Layout	018	As shown	WSP
Proposed Monitoring Locations	019	4000	WSP
Proposed Cut & Fill Phasing 1 - 4	020-01	6000	WSP
Proposed Cut & Fill Phasing 5 - 7	020-02	6000	WSP
Proposed Cell Filling Sequence Plan	021	Various	WSP
Proposed Site Layout with Cap	022	4000	WSP
Proposed Site Cross Sections AA - BB	23-01	1000	WSP
Proposed Site Cross Sections CC, DD & EE	023-02	1000	WSP
Proposed & Existing Internal Roads	024	4000	WSP
Existing Utilities Site Layout	025-01	2500	WSP
Proposed Site Utilities Layout	025-02	3000	WSP
Existing Foul & SW Layout	026	3000	WSP
Proposed SW Layout – Active Landfill	027	3000	WSP
Proposed SW Layout – Closed Layout	028	3000	WSP
Proposed SW Layout Sections	029-01	1000	WSP
Proposed SW Sections_Details	029-02	Various	WSP
Existing Leachate Infrastructure	030	2000	WSP
Proposed Leachate Infrastructure	031	2500	WSP
Leachate Collection and Extraction Details for Proposed Cells	031	Various	WSP
Existing Gas Infrastructure Site Layout	033	2000	WSP
Proposed Gas Infrastructure Site Layout	034	2500	WSP
Proposed Typical Cell Sections & Details	035	Various	WSP
Proposed Typical Cell Details	036	Various	WSP
Capping & Landfill Gas Infrastructure Details	037	40	WSP
<b>Landscape Drawings</b>			
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

### ***ESRI Shapefile CAD File of Site Boundary***

USB Stick with application site boundary, as shown in the submitted plans/drawings, as an ESRI DWG CAD File in the Irish Transverse Mercator (ITM IRENET95) co-ordinate reference system (only submitted to An Coimisiún Pleanála as required).

### ***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
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Table 4: EIAR prepared in respect of this Application.

10.0 CONCLUSION

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 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 application proposes a (partial) solution to these challenges through the extension of the capacity and operational lifespan of the Knockharley Landfill by nearly twenty years. When combined with the Poolbeg waste-to-energy (WTE) facility, this long-term extension will significantly enhance the resilience and sustainability of the Ireland’s waste management infrastructure.

The application relates to development that comprises or is for the purposes of an activity requiring an Industrial Emissions Licence (IED). In this regard, it should be noted that the subject site already operates under IED Licence No. W0146-04 issued by the Environmental Protection Agency (EPA).

Payment of €100,000 has been made to An Coimisiún Pleanála in accordance with the relevant SID Application Fee requirements. Please find enclosed as Appendix A, confirmation of payment.

Yours sincerely,

**Brian Minogue**  
**Associate Director**  
**Tom Phillips + Associates Encl.**



## APPENDIX A – CONFIRMATION OF PAYMENT

View Ad Hoc Payment								
Ad Hoc Payment	Ad Hoc Payment: An Bord PLeanalà - 02/12/2025							
Status	Complete							
Ad Hoc Payment Information								
Company	SEHL Starrus Eco Holdings Ltd							
Bank Account	SEHL - Payments Account							
Payee	An Bord PLeanalà							
Currency	EUR							
Eliminate Foreign Exchar	No							
Default Tax Option	Calculate Tax Due to Supplier							
Default Tax Code								
Payment Date	02/12/2025							
Payment Type	SEPA							
Ship-To Address								
Reconciliation Status	Unreconciled							
Payment Details								
Part of Settlement Run	SETT-SEHL-000000046							
Part of Group	Ad Hoc Payment(SEPA) for SEHL - Payments Account							
Transaction Reference	2533600331							
Total Payment Amount	100,000.00							
Memo								
Addenda								
External Reference								
Tax Authority Form Type								
TIN Type								
Tax ID								
Tax Payment	No							
Settlement Bank Account								
Settlement Bank Account								
Account	Account Nickname	Bank Name	Account Type	Account Number	IBAN	Prenote Status	Inactive	
An Bord PLeanalà	An Bord PLeanalà	AIB	Checking	*****6067	*****0 67	None	No	



## APPENDIX B – ACP NOTICE SID

**Our Case Number:** ABP-321572-25

**Your Reference:** Knockharley Landfill Limited



An  
Coimisiún  
Pleanála

Tom Phillips and Associates  
80 Harcourt Street  
Dublin 2  
D02 F449

**Tom Phillips & Associates**

Action: *PL 23 - 3270*

Date Rec'd. 14 OCT 2025

Project Ref & planner

**Date:** 13 October 2025

**Re:** Pre-Application Consultation – Knockharley Landfill, 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.

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

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

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

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

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.

Tel  
Glas Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Facs  
Website  
Email

(01) 858 8100  
1800 275 175  
(01) 872 2684  
www.pleanala.ie  
communications@pleanala.ie

64 Sráid Macilbhríde  
Baile Átha Cliath 1  
D01 V902

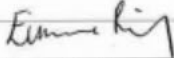
64 Marlborough Street  
Dublin 1  
D01 V902

General information on judicial review procedures is contained on the following website:  
[www.citizensinformation.ie](http://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](mailto:laps@pleanala.ie) quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,



Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

PC09

Tel (01) 858 8100  
Glao Áitiúil 1800 275 175  
Facs (01) 872 2684  
Láithreán Gréasáin [www.pleanala.ie](http://www.pleanala.ie)  
Rinchead Email [communications@pleanala.ie](mailto:communications@pleanala.ie)

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

## **APPENDIX C – EIA PORTAL CONFIRMATION**

Subject: EIA **Portal** Confirmation Number: 2025238

Dear Brian,

An EIA **Portal** notification was received on 08/12/2025 in respect of this proposed application. The information provided has been uploaded to the EIA **Portal** on 09/12/2025 under EIA **Portal** ID number 2025238 and is available to view at <http://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>.

**Portal ID:** 2025238

**Competent Authority:** An Coimisiún Pleanála

**Applicant Name:** Knockharley Landfill Limited c/o Tom Phillips + Associates

**Location:** Knockharley Landfill in the townlands of Knockharley, Flemingstown and Tuiterrath Navan, Co. Meath (C15 FX09)

**Description:** Expansion of the existing landfill facility

**Linear Development:** No

**Date Uploaded to Portal:** 09/12/2025

Regards,  
Emmet

EIA **Portal** team

---

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
Department of Housing, Local Government and Heritage

Teach an Chustaim, Baile Átha Cliath 1, D01 W6X0  
Custom House, Dublin 1, D01 W6X0

---

T +353 (0) 1 888 2000



## **APPENDIX D – LETTERS TO PRESCRIBED BODIES**



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

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.<sup>1</sup> has retained Tom Phillips + Associates (Town Planning Consultants)<sup>2</sup>, 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 m<sup>3</sup> of void space (3.32 million m<sup>3</sup> of additional constructed void space with further void space of 807,000 m<sup>3</sup> 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 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.

---

<sup>1</sup> 24 Ballymount Road Upper, Dublin 24.

<sup>2</sup> 80 Harcourt Street, Dublin 2, D02 F449.

## 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](http://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 12<sup>th</sup> February 2026) relating to:

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Yours sincerely

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**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**

Dublin City Council  
Civic Offices  
Wood Quay  
Dublin 8  
D08 RF3F

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**

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The subject development comprises an increase to the landfill area by approximately 17.68 ha, which will provide approximately 4.12 million m<sup>3</sup> of void space (3.32 million m<sup>3</sup> of additional constructed void space with further void space of 807,000 m<sup>3</sup> 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 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.

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

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<sup>1</sup> 24 Ballymount Road Upper, Dublin 24.

<sup>2</sup> 80 Harcourt Street, Dublin 2, D02 F449.

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The application comprises, *inter alia*:

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Department of Environment, Climate and Communications  
29-31 Adelaide Road  
Dublin 2  
D02 X285

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Minister for Housing Local Government and Heritage  
Custom House  
Dublin  
D01 W6X0

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Dun Laoghaire Rathdown County Council  
2 Marine Rd  
Dún Laoghaire  
Co. Dublin  
A96 K6C9

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Department of Agriculture, Food and the Marine  
Agriculture House  
Kildare Street  
D02 WK12

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Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media  
23 Kildare Street  
Dublin 2  
D02 TD30

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

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## 2.0 CONCLUSION AND PLANNING PROCEDURE

The application comprises, *inter alia*:

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**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**

EirGrid plc  
The Oval  
160 Shelbourne Road  
Ballsbridge  
Dublin 4

15 December 2025

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Environmental Protection Agency  
Johnstown Castle  
Wexford  
Y35 W821

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ESB  
27 Fitzwilliam Street Lower  
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The Heritage Council  
Church Ln  
Gardens  
Kilkenny  
R95 X264

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Yours sincerely

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**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**

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

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**

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

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<sup>1</sup> 24 Ballymount Road Upper, Dublin 24.

<sup>2</sup> 80 Harcourt Street, Dublin 2, D02 F449.

## 2.0 CONCLUSION AND PLANNING PROCEDURE

The application comprises, *inter alia*:

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Health Services Executive  
Dr Steevens' Hospital  
Dublin 8

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Inland Fisheries Ireland  
3044 Lake Drive  
Citywest Business Campus  
Dublin 24

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

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Kildare County Council  
Devoy Park  
Naas  
Co Kildare  
W91 X77F

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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  
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**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. [\[1\]](#)

### ***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.

***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





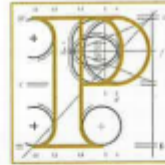
12	Archaeological, Architectural and Cultural Heritage	CRDS
13	Traffic and Transportation Assessment	AWN/TrafficWise
14	Materials Assets: Traffic & Transport	AWN
15	Interactions	AWN
16	Cumulative Impacts	AWN
17	Mitigation	AWN

**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



An  
Coimisiún  
Pleanála

Tom Phillips and Associates  
80 Harcourt Street  
Dublin 2  
D02 F449

**Tom Phillips & Associates**

Action: *PR 23 - 3270*

Date Rec'd: 14 OCT 2025

Project Ref & planner

**Date:** 13 October 2025

**Re:** Pre-Application Consultation – Knockharley Landfill, 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.

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

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

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

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

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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Glaos Áitiúil 1800 275 175  
Facs (01) 872 2684  
Láithreán Gréasáin www.pleanala.ie  
Ríomhphost Email communications@pleanala.ie

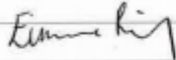
64 Sráid Macilbhríde 64 Marlborough Street  
Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

General information on judicial review procedures is contained on the following website:  
[www.citizensinformation.ie](http://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](mailto:laps@pleanala.ie) quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,



Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

PC09

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Glao Áitiúil 1800 275 175  
Facs (01) 872 2684  
Láithreán Gréasáin [www.pleanala.ie](http://www.pleanala.ie)  
Eimhear Reilly [communications@pleanala.ie](mailto:communications@pleanala.ie)

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Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

Minister of Climate Energy and the Environment  
Department of Environment, Climate and Communications  
29-31 Adelaide Road  
Dublin 2  
D02 X285

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.<sup>1</sup> has retained Tom Phillips + Associates (Town Planning Consultants)<sup>2</sup>, 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 m<sup>3</sup> of void space (3.32 million m<sup>3</sup> of additional constructed void space with further void space of 807,000 m<sup>3</sup> 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 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.

---

<sup>1</sup> 24 Ballymount Road Upper, Dublin 24.

<sup>2</sup> 80 Harcourt Street, Dublin 2, D02 F449.



## 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](http://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 12<sup>th</sup> 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).

We endeavored to make contact with you requesting whether you would accept an electronic copy. Due to the extent of documentation submitted (over 2,000 pages) and the number of prescribed bodies listed, and due to the nature of the development (a waste landfill), we have tried to limit the amount of printing requirements in the interests of the environment and sustainability.



As such, please find enclosed at [www.knockharleylandfillsid.ie](http://www.knockharleylandfillsid.ie), an electronic copy of all planning documentation submitted. We will also issue to you, by post, an electronic CD copy in due course. Should you require a hard copy of the application, please do not hesitate to contact the undersigned.

Yours sincerely

---

**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**



OPW  
Jonathan Swift Street  
Trim  
Co Meath  
C15 NX36

15 December 2025

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**Associate**  
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The Eastern & Midland Regional Assembly  
3rd Floor North  
Ballymun Civic Centre  
Main Street  
Ballymun  
Dublin 9  
D09 C8P5

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South Dublin County Council  
County Hall Tallaght  
Dublin 24  
D24 YNN5

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**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**

Transport Infrastructure Ireland  
Parkgate Business Centre  
Parkgate St  
Dublin 8

15 December 2025

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- 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).

We endeavored to make contact with you requesting whether you would accept an electronic copy. Due to the extent of documentation submitted (over 2,000 pages) and the number of prescribed bodies listed, and due to the nature of the development (a waste landfill), we have tried to limit the amount of printing requirements in the interests of the environment and sustainability.



As such, please find enclosed at [www.knockharleylandfillsid.ie](http://www.knockharleylandfillsid.ie), an electronic copy of all planning documentation submitted. We will also issue to you, by post, an electronic CD copy in due course. Should you require a hard copy of the application, please do not hesitate to contact the undersigned.

Yours sincerely

---

**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**

Waterways Ireland Headquarters  
2 Sligo Road  
Enniskillen  
Fermanagh  
BT74 7JY2

Waterways Ireland Eastern Regional Office  
Floor 2 Block C  
Ashtowngate  
Navan Road  
Dublin 15  
D15 Y3EK

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.<sup>1</sup> has retained Tom Phillips + Associates (Town Planning Consultants)<sup>2</sup>, 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 m<sup>3</sup> of void space (3.32 million m<sup>3</sup> of additional constructed void space with further void space of 807,000 m<sup>3</sup> 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 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.

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<sup>1</sup> 24 Ballymount Road Upper, Dublin 24.

<sup>2</sup> 80 Harcourt Street, Dublin 2, D02 F449.

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](http://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 12<sup>th</sup> 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
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Yours sincerely

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**Brian Minogue**  
**Associate**  
**Tom Phillips + Associates**

## APPENDIX E – ESB LETTER



NETWORKS

ESB Networks  
Three Gateway, Bóthar An Phoirt Thoir  
Baile Átha Cliath 3, D03 R583, Éire  
Fón 1800 372 757

[esbnetworks.ie](http://esbnetworks.ie)

ESB Networks  
Three Gateway, East Wall Road  
Dublin 3, D03 R583, Ireland  
Phone 1800 372 757

An Coimisiún Pleanála,  
64-67 Marlborough Street  
Dublin 1

17<sup>th</sup> July 2024

Proposed Development: Alteration of the Louth-Woodlands 220 kV Overhead Line

To whom it may concern,

The Electricity Supply Board (hereinafter referred to as the 'ESB') of 27 Lower Fitzwilliam Street, Dublin 2 was constituted by the Electricity Supply Act 1927. ESB is the licensed Distribution System Owner pursuant to section 14(1)(k) of the Electricity Regulation Act 1999 and the licensed Transmission system owner pursuant to section 14(1)(f) of the Electricity Regulation Act 1999.

As legal owner of the distribution and transmission system ESB consents to the submission of a application by Knockharley Landfill Limited to alter and divert the Louth-Woodlands 220 kV Overhead Line to facilitate a landfill development and extension.

ESB must nonetheless draw to the attention of the Planning Authority that this consent does not relate to the merits or any aspect of this application by Knockharley Landfill Limited as ESB may not have had sight of this application prior to the issue of this letter, and separate submissions in respect of planning issues may be made if requested by the Planning Authority or if necessary, in ESB's view.

This letter of consent does not give permission to access the lands for the execution of the proposed works.

Yours faithfully,

James Finn  
Network Capacity Deployment Manager



**Dublin Office:**

80 Harcourt Street  
Dublin 2  
D02 F449

**t** +353 1 478 6055

**Cork Office:**

Mathew House  
Father Mathew Street  
Cork T12 TN56

**t** +353 21 206 6596

**e** [info@tpa.ie](mailto:info@tpa.ie)

**w** [www.tpa.ie](http://www.tpa.ie)