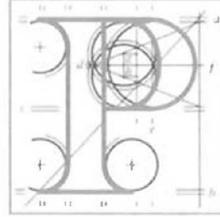


Our Case Number: ACP-323977-25



An
Coimisiún
Pleanála

JC Carroll and others
Veldonstown
Brownstown
Navan
Co. Meath

Date: 18 February 2026

Re: The proposed expansion of the existing landfill facility at the existing Knockharley Landfill in the townlands of Knockharley, Flemingstown and Tuiterrath Navan, Co. Meath

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Commission will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

PA04

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

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

Attachments:

Submission in respect of Knockharley Landfill - 12.02.2026.pdf

From: James Carroll <j_c_carroll@hotmail.com>
Sent: Thursday, February 12, 2026 12:44 PM
To: LAPS <laps@pleanala.ie>
Subject: Fw: Your Observation Reference: SID-OBS-004561

You don't often get email from j_c_carroll@hotmail.com. [Learn why this is important](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam

I spoke with an advisor a short while ago today in respect of a submission I have uploaded through the portal (attached here also). As the submission is by a number of people with addresses given at the top of the submission, I wanted to clarify that any correspondence should come to me at the following postal address:

JC Carroll
Veldonstown
Brownstown
Navan
Co. Meath

I would be very grateful if you could note this as appropriate.

Kind regards

James

From: An Bord Pleanála <no-reply@pleanala.ie>
Sent: Thursday 12 February 2026 12:24
To: JC CARROLL <j_c_carroll@hotmail.com>
Subject: Your Observation Reference: SID-OBS-004561



An
Coimisiún
Pleanála

Strategic Infrastructure Observation Confirmation

Your reference	SID-OBS-004561
An Coimisiún Pleanála case number or brief development description as provided	323977
Name	JC CARROLL
Fee	€50.00
What happens next?	Our staff will process your observation. This will take about five to seven working days. We will send a letter in the post to tell you if your observation is valid — or not.
Further information	You can get further information on Strategic Infrastructure on the An Coimisiún Pleanála website . This includes the Strategic Infrastructure Applications Public Guidance Document .

Conan Friel, Aled Ingman, Eileen
Rawat, Claire Colleran, Phillis Roe
each of
Curraghtown
Brownstown
Navan
Co. Meath

JC Carroll, Cathriona Reilly, Teresa
Carroll, Aoife Stanley, John
Rochford, Ian Carroll each of
Veldonstown
Brownstown
Navan
Co. Meath

Paul Connell, Paula Connell,
Carnuff Little,
Navan
Co. Meath

Maria Matthews
Kentstown
Navan
Co. Meath

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 12 February 2026

An Coimisiún Pleanála Case Reference: PA17.323977

The proposed expansion of the existing landfill facility at the existing Knockharley Landfill

Dear Sir / Madam

We are a group of near neighbours of the Knockharley Landfill and other concerned residents living in the vicinity of the landfill. We would like to object to the proposed extension of the landfill (the “**Proposed Extension**”) for the reasons outlined in this letter.

1. Further significant departure from original planning permission

- 1.1. The original application permitted in 2002 in respect of the Knockharley Landfill was for a landfill with an operation lifetime of 14 years (to 29 December 2016), with a maximum height of 15 metres with an annual waste limit of 132,000 tonnes of non-hazardous waste until December 2007, and decreasing to 80,000 tonnes per annum thereafter. Waste was to come from the north-east region only (Meath, Louth, Cavan and Monaghan).
- 1.2. By March 2007, An Bord Pleanála granted permission to extend the landfill footprint allowing for the continuation of an annual intake volume of 132,000 tonnes up to the end of December 2010, reverting to 88,000 tonnes per annum thereafter, and also removing the regional restriction on the origin of the waste accepted at the facility. Permission for an extension of 5 years to the duration of operation of the landfill was sought in 2016, and granted and so the expectation was that the landfill would close in 2021.
- 1.3. Closely following that decision a further planning application was lodged seeking a significant increase in the volume of waste accepted annually, from 88,000 tonnes annually to 440,000 tonnes including 5,000 tonnes of 'non-reactive hazardous waste'. An increase in the overall height for the remaining uncapped landfill area, was also sought. This was ultimately granted in 2021 and it was expected the landfill would be full by 2032.
- 1.4. Yet again, a further significant change is being sought both in terms of the overall footprint of the landfill and in the duration of the operation. The duration is to be 21 years, with landfilling expected to continue to 2043, and then a further 4 year period of capping – so essentially operations out to 2047. It should be noted that only the shorter 2043 period was noted in the November 2025 newsletter to near neighbours which would appear to be a significant omission.
- 1.5. What does all this mean? It means that on a very simple level, this landfill is of an extraordinarily different scale (**from 88k tonnes per annum to 440k tonnes + hazardous waste + incinerator bottom ash + removal of regional restriction**) and duration (**from 14 years to a proposed 45 years**) from the facility that had been originally imposed on the community.
- 1.6. The above picture does not take into account the many other applications (both granted and refused) for amendments to the landfill development (e.g. IBA facility, landfill gas power plant) which have meant that this development has been a continued source of anxiety for the local community as to what comes next. It is fair to assume that the current application will not be the last application and we can only expect worse to come. Each time we are told there are mitigants being put in place only to find that they are then removed or watered down in the subsequent application. The current application is no different particularly in respect of its western boundary.

- 1.7. As a fundamental human right, we are entitled to peaceful enjoyment of our respective properties. As near neighbours, we submit that the incessant applications in respect of this landfill and the progressive intensification of its land area, and the extraordinary additional period for operation sought are infringing upon the peaceful enjoyment of our properties and the Proposed Extension should be refused. To the extent that this is believed to be an exaggeration, we respectfully ask An Coimisiún Pleanála to seek further information on the number of near neighbour homes that have been acquired by the operator, and that now fall within the land boundary of the landfill.
- 1.8. Furthermore, it is noted at 4.5.2.4 of the EIAR Volume 2 that 46 near neighbours are expected to be subjected to ground-level concentrations of odours that exceed guidelines and with the most impacted resident expected to be subjected to concentrations of 238% above EPA guidance. We submit that this infringes their right to peaceful enjoyment of their property in addition to the aforesaid and the Proposed Extension should be refused.
- 1.9. It should further be noted that in more recent times, there has been a significant increase in dust during drier times of year, with no evident source save for continued earth works and IBA related activities at the landfill. There does not appear to be adequate monitoring in place in this regard.

2. Western Boundary – substantial grid works/destruction of existing mitigants.

2.1. The western boundary of the landfill currently incorporates a forested area which was included as part of the mitigants for the original panning application. See the image immediately below¹ and the area ringed in red. This area forms an important part of screening of the facility along its western flank, along with providing a protective corridor for certain wildlife.

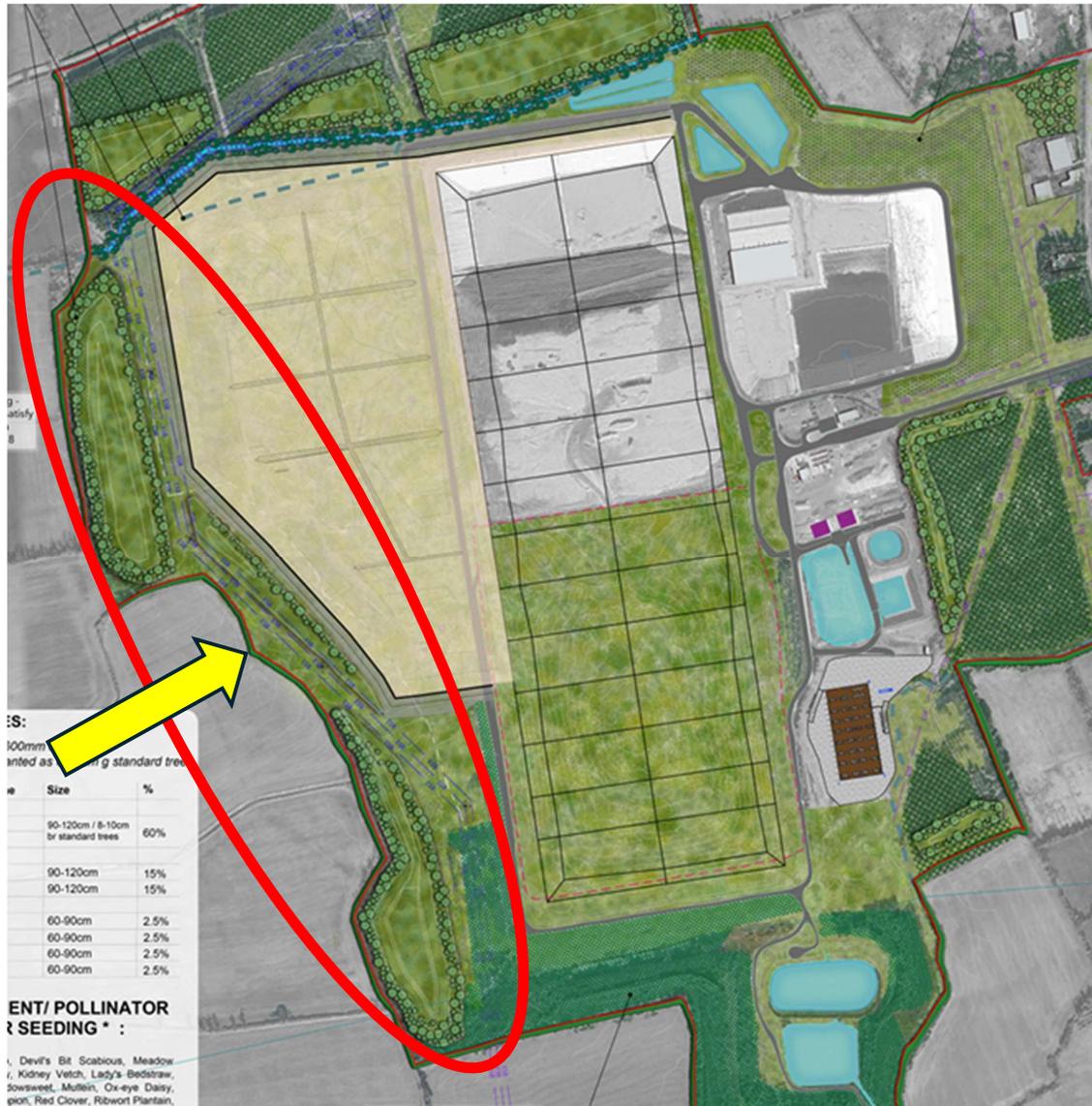


2.2. The Proposed Extension removes most of the planted area per the image below (see ringed red area) and in particular contains an area that is very much exposed (see arrow in yellow) given the proposed routing of electricity pylons along the actual boundary of the site means there is no further area in which tree screening can remain, nor in which a material earth berm that could provide some screening could be constructed or in which area of existing forest screening could remain. It should be noted that no image mock-up has been provided with the application which shows what the development will be like, including during construction phase, where all buffer to the west has been removed. It should be further noted that no assessment has been undertaken as to the viability of placing transmission wires underground for a section of the grid route, to allow for potential screening/planting to take place along the western boundary. Further, no alternate design has been

¹ Source: Apple maps

submitted whereby the Proposed Expansion area is reduced, to allow for alternate pylon layout, alongside meaningful berm and tree screening on the western boundary.

Image source – File on ACP portal Applicant documents>Application Documents>drawings>Macroworks> 20251105_05_LD_Project_West (Landscape Plan).pdf



2.3. Further, the proposed rerouting of grid infrastructure requires a number of additional pylons. The layout and increased volume of pylons will bring a substantial change to the current rural landscape – please see page 36 of 56 of the “Montages” report.

2.4. We submit that the removal of existing mitigants, the significant visual impact of the routing of electricity pylons, and a lack of sufficient replacement mitigants on the western boundary the much reduced mitigant measures has not been fully assessed by the Applicant, and the Proposed Extension should be refused.

3. Alternatives to the Proposed Expansion not meaningfully assessed

- 3.1. The EIAR provides only a minimal and largely procedural treatment of alternative locations, including greenfield sites, devoting just a single page in Chapter 3 to “Alternative Project Locations” and offering no detailed site-selection methodology, no multi-criteria screening, and no environmental comparison between the Knockharley site and any other potential locations. Although the EIAR mentions that the landfill is an extension of an existing facility, it does not present evidence-based reasoning for discounting greenfield options, nor does it evaluate whether such alternatives might have offered lower impacts in terms of hydrology, biodiversity, traffic, landscape, or human health. Instead, it asserts that alternative locations are not applicable, but this rationale is not substantiated with any structured analysis, mapping exercise, constraint study, or comparative environmental assessment.
- 3.2. Furthermore, the EIAR’s environmental assessments—including those relating to land, soils, geology, hydrology, biodiversity, landscape/visual, traffic, climate, air quality, and cultural heritage—are all strictly site-specific to Knockharley, with no equivalent assessment of any greenfield alternative sites. This creates a substantive gap in the alternatives examination: the EIAR demonstrates that the chosen site can be engineered and mitigated, but it does not determine whether another site may have inherently posed fewer constraints or lower environmental risks. Even the strategic need arguments—such as the documented national landfill capacity shortfall—are framed exclusively as justification for extending Knockharley rather than as a basis for undertaking a systematic search for alternative locations.
- 3.3. Finally, although the EIAR includes comparative consideration of different engineering layouts and design concepts within the existing Knockharley facility, these are not substitutes for evaluating alternative sites. The report assesses, stream diversions, cell layouts, and mitigation measures, but all within the confines of the pre-selected site. The absence of any comparative analysis of greenfield sites means that the EIAR does not demonstrate compliance with the EIA Directive’s requirement to examine “reasonable alternatives,” including those involving different geographical locations. As a result, the document’s alternatives assessment appears incomplete, leaving a lack of transparency as to whether Knockharley is indeed the least environmentally impactful or most sustainable location when compared to feasible greenfield alternatives.
- 3.4. We submit that the EIAR has not appropriately assessed alternatives and we submit to An Coimisiún Pleanála that permission should be refused.

4. In-combination effect

4.1. The materials submitted by the Applicant have not considered in any level of detail the in-combination effect of the following adjacent developments currently at various stages in the planning system:

- 1) Ref: 2561357 (Meath County Council): Utility scale solar development
- 2) Ref: 2460842 (Meath County Council) ACP 323483-25: 180 Megawatt gas fired peaking power plant
- 3) Ref: VC17.322056 (ACP) - Construction of a Grid Connection, Substation and All Associated developments.

4.2. These are substantial developments being planned in the immediate vicinity of the Knockharley Landfill. There is some discussion at 12.9 of EIAR Volume 2 of the cumulative impact of the projects, but it is surface level commentary.

4.3. It should be noted that where the Applicant refers to the planned 165 hectare solar farm, it says it is not in the planning system. At the point the Application had been submitted to An Coimisiún Pleanála on 17 December 2025, the application for the solar farm had been submitted to Meath County Council on three occasions between 5 November 2025 and 12 December 2025 (though ultimately invalidated on all three occasions, with the last invalidation occurring late in January 2026). It is assumed a further application will be forthcoming in the near-term. Given that the solar farm development will clearly require grid connection works, and the Application also requires substantial grid works to be undertaken (i.e. movement of pylons), it is reasonable to assume that the Applicant and the solar farm developer are coordinating in some way and would have access to intended planning documents prior to any application actually being submitted to the local authority. The same is true of the gas power plant development which also requires grid connection works, which in turn are impacted by the Proposed Extension. As such, it is reasonable to assume there is coordination between each project and their relevant advisers, and yet the projects are being treated as distinct and any in-combination effect framed as immaterial.

4.4. The Proposed Extension requires substantial earth works and removal of existing buffers/mitigations on the western side of the site, which is very much adjacent to the proposed gas fired power plant, the solar farm development and the grid works. The proposed gas fired power plant, the solar farm development and the grid works would themselves require significant earth works during construction, and yet the potential impact of the three projects from a soil disturbance/dust nuisance, habitat disruption, and traffic impact on both local roads and the N2 have not been

assessed together.

4.5. The three developments, alongside the landfill and its proposed extension is very much a proposed deep industrialisation of a substantial area of land: this is in no way anticipated in the current Meath County Development plan (2021-2027), and runs counter to the rural area zoning objective: “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.” There has been no public consultation on what is in substance a proposed change of land use to industrial land when these interrelated developments are taken together, and there has been no material contravention resolution for such change in zoning.

4.6. Given the Proposed Extension runs contrary to the rural area zoning objective, we submit to An Coimisiún Pleanála that planning should be refused.

5. Other observations

5.1. The following are some additional, non-exhaustive observations in respect of the Proposed Extension application.

- 5.1.1. Material inconsistencies in the EIAR (e.g., habitat loss reported as 12.9 ha vs 25.2 ha, conflicting programme lengths) undermine the “clear, complete, reliable” requirement of the EPA EIAR Guidelines (2022).
- 5.1.2. Earthworks will be substantial (~1.77–1.8 Mm³ excavated; ~367,000–420,000 m³ exported), yet residual impacts are labelled “not significant”.
- 5.1.3. Appropriate Assessment (AA) relies on mitigation to avoid effects, contrary to established principles that significant effects cannot be excluded by mitigation at screening stage, especially given odour/ landfill gas uncertainties.
- 5.1.4. The assessment of the methane emissions as against The proposal is not consistent with Section 15 of the Climate Change and Low Carbon
- 5.1.5. The application does not look at compliance with sectoral emission ceilings beyond 2030. Given the development seeks to operate well in to 2040, it should demonstrate compliance with emission reductions targets and sectoral emission ceilings.
- 5.1.6. The second stage Appropriate Assessment, as recommended in the Appropriate Assessment does not seem to have been made available.
- 5.1.7. The Knockharley Stream within the proposed development is noted as ‘poor’ in terms of water quality. It is not clear how the further works will not worsen this situation.
- 5.1.8. It is not clear what the capacity of the leachate lagoons on site are and whether such lagoons could overflow during a high rain event.

- 5.1.9. Active badger habitats and red and amber listed bird species (e.g. Snipe, Yellowhammer) have been recorded in surveys conducted for immediately adjacent developments (see 4.1 (1) and (2) above) and yet they are not considered in this application.

6. Insufficient community engagement

6.1. In respect of community engagement, for the scale of the Proposed Extension the Applicant sets out details at 1.3.2 of the EIAR Volume 2. There are a number of things to note about how this engagement was undertaken:

- 6.1.1. The website for the development is essentially a document repository reflecting the information submitted to An Coimisiún Pleanála. Many of the documents linked on the website are technical in nature and may seem impenetrable to many in the local community and beyond. As at the date of this submission, there is no easily accessible overview on the website setting out the key information in respect of the Proposed Extension, including highlighting which near neighbours are likely to be most impacted.
- 6.1.2. The public consultation did not include an open evening or open evenings. Essentially the Applicant required people to be available during working hours to come to the landfill facility. Further, it seems that the public consultation was timed to coincide with the busy period in the run up to Christmas. Further, given the consultation was occurring immediately before the application was submitted, there does not seem to have been a genuine attempt to take feedback on board and seek to address community concerns in the planning documentation – if any concerns were taken on board, this is not detailed in the EIAR.
- 6.1.3. For some individuals who attended at site, the Applicant rescheduled appointments to attend at site to a time after the application had been submitted meaning feedback could not be considered prior to application.

7. Community fund

7.1. The applicant in its November 2025 letter to nearby households has stated “*The existing operation currently provides €10,000 per month to local community projects*” and “*The proposed extension would include an increase in community funding that could exceed €1m over its lifespan*”. With respect, these amounts are vanishingly small given the irreversible and enduring nature of the development, and the permanent shadow it places on our community, including inviting further industrial development in the area surrounding the development (with the landfill

being used as justification in part for the location of those developments listed in paragraph 4.1 above.

- 7.2. Whilst we are opposed to the expansion of the landfill and the increase in its duration, if An Coimisiún Pleanála is minded to grant permission we ask that:
 - 7.2.1. a substantial uplift in community funding is put in place to undertake environmental and biodiversity enhancements (e.g. sufficient funding to (i) purchase land to build a community owned park/woodland and walkways/cycleways that could link by foot and bike with Balrath Woods from the village of Kentstown along with measures that could enhance the natural amenity of the Nanny river including potential boardwalks, community café, community swimming pond, nature based flood defence measures amongst other things, (ii) to provide supports to improve the poor rated water quality of the Knockharley stream, and (iii) to provide enhanced financial support for home energy upgrades (e.g. insulation upgrades, rooftop solar and battery support) in the community.
 - 7.2.2. A more transparent approach to management and governance of the Community Fund is put in place, including putting a community trust in place for long term use of the funds, and establishing measures to ensure proper governance and accessibility of the funds (i.e. a move away from the current opaque system operated by Meath County Council where it is not clear how to access funds, or when grant application windows might open).
- 7.3. Whilst there do not appear to be guidelines in Ireland on amounts that could be made available to communities, it is noted that in the UK, landfill operators can direct up to 5.3% of their landfill tax liability to community and environmental projects near landfill sites. There is an active waste tax rate of approximately £91 – £94 per tonne, and so when applying a 5.3% rate it means approximately £4.80 to £5 per tonne of waste is potentially available for community projects. This translates into an amount of approximately €5.50 to €5.74 per tonne being available for community funds – and in the case of the Knockharley landfill this would equate to an annual figure being available to the community of approximately €2.42 million to €2.53 million.
- 7.4. Whilst we are opposed to the expansion of the landfill and the increase in its duration, if An Coimisiún Pleanála is minded to grant permission we ask that it considers the following:
 - 7.4.1. Including a condition that there can be no further extensions of time for operation of the landfill;

7.4.2. Including a condition that the capped landfill is overplanted with native woodland, and a community park and walkways are created in and around such woodland, and made available for long term use by the community.

7.4.3. Including a condition that a feasibility study is undertaken to provide public walkways within new and existing wooded areas to the north of the site (see image below) and that such pathways (and any necessary parking provision) are developed where safe to do so whilst operations are ongoing at the site.



For the reasons outlined above, we request that An Coimisiún Pleanála refuse permission for this Proposed Extension of the Knockharley landfill.

Conan Friel
Aled Ingman
Eileen Rawat
Claire Colleran
Phillis Roe
JC Carroll
Cathriona Reilly
Teresa Carroll
Aoife Stanley
John Rochford
Ian Carroll
Paula Connell
Paul Connell
Maria Matthews