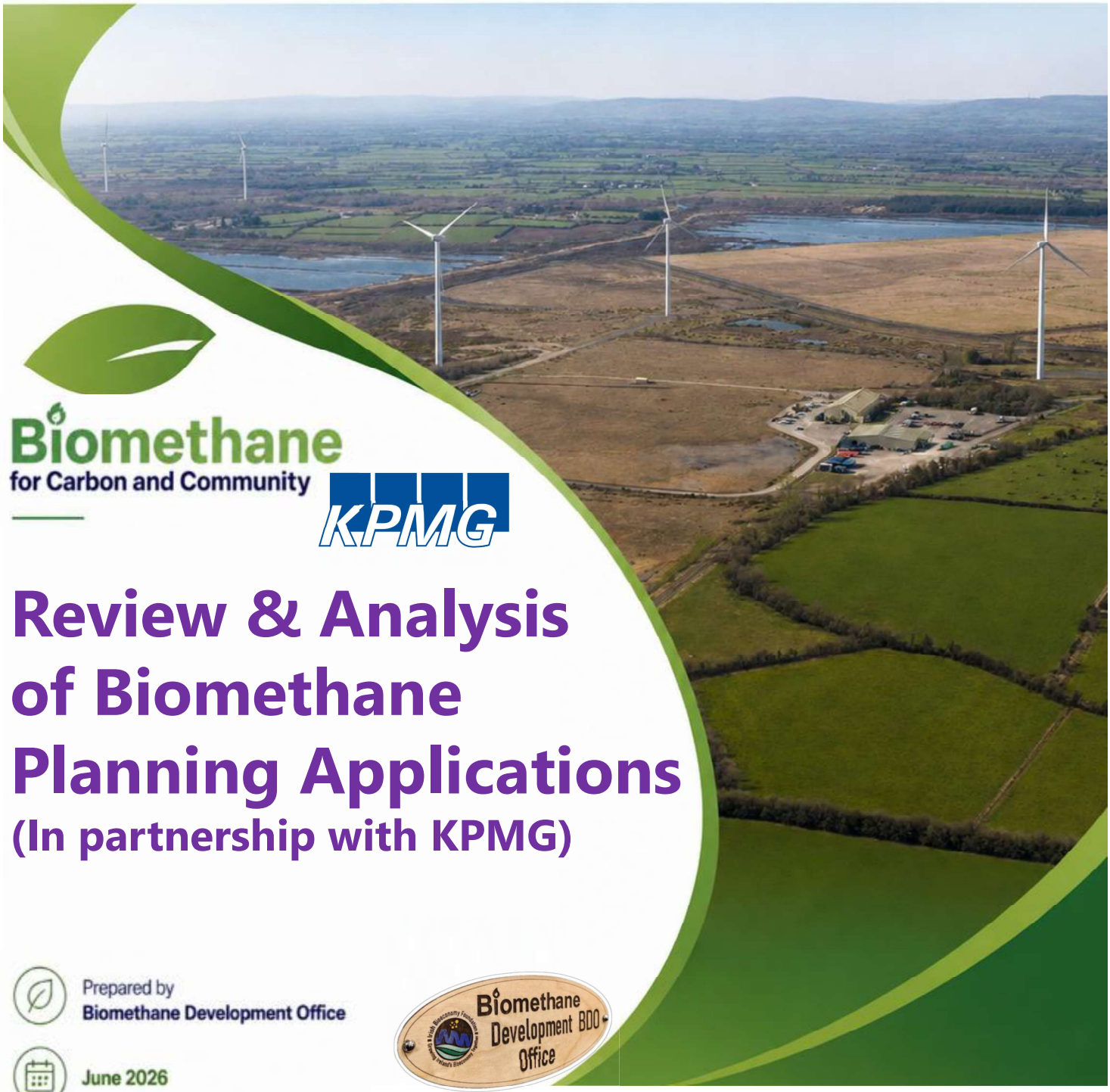
Comhairle Contae Thiobraid Árann
Tipperary County Council

TUS

TIPPERARY energy AGENCY



Biomethane for Carbon and Community

KPMG

Review & Analysis of Biomethane Planning Applications

(In partnership with KPMG)

Prepared by
Biomethane Development Office

June 2026

Biomethane Development Office

RECOGNITION

AD&BIOGAS INDUSTRY AWARDS 2026 AND GALA DINNER
Organised by ADBA
8 JULY | THE VOX | BIRMINGHAM | UK
Nominated for the **2026 AD & Biogas Industry Awards – Education Campaign of the Year**.

World Sustainable Energy Days
24 - 27 February 2026, Wels/Austria
BCC Project's paper selected for **the World Sustainable Energy Days 2026.**

ISEC 4th INTERNATIONAL SUSTAINABLE ENERGY CONFERENCE 2026
BCC Project's poster selected for **ISEC 2026**

Biomethane for Carbon and Community

Rialtas na hÉireann
Government of Ireland

Arna chomhchistiú ag an Aontas Eorpach
Co-funded by the European Union

Tionól Réigiúnach an Oirthir agus Lár Tíre
Eastern and Midland Regional Assembly

pobal
government supporting communities

The Biomethane for Carbon and Community is co-funded by the Government of Ireland and the European Union through the EU Just Transition Fund Programme 2021-2027.

Biomethane for Carbon and Community

Assessment of Biomethane Planning Applications in the Context of 2030 National Biomethane Delivery Targets

The Biomethane for Carbon and Community project is co-funded by the Government of Ireland and the European Union through the EU Just Transition Fund Programme 2021-2027.

KPMG Ireland

June 2026

This report is funded and prepared as part of the Biomethane for Carbon and Community (BCC) project.

Document review and approval

Revision history

Version	Author	Date	Revision
1.0	Dónal Ó Céileachair	17/02/2026	First draft
1.1	Dónal Ó Céileachair	07/04/2026	Reviewer comments addressed
1.2	Dónal Ó Céileachair	08/06/2026	Final comments addressed

This document has been reviewed by

	Reviewer	Date reviewed
1	David Mulcahy	18/02/2026
2	Clare Lee	23/02/2026
3	Jonathan Flood	27/02/2026
4	Ajay Sutrakar	06/03/2026
5	Clare Lee	10/04/2026
6	David Mulcahy	28/05/2026

This document has been approved by

Subject matter experts		
Name	Role	Signature
Russell Smyth	Partner, KPMG Corporate Finance	

Glossary

AA	Appropriate Assessment
ABP	An Bord Pleanála (legacy name for national planning appeals body)
ACP	An Coimisiún Pleanála
AD	Anaerobic digestion
AI	Artificial intelligence
AMS	Part of developer name “Carbon AMS”
BDO	Biomethane Development Office
CA11	County Development Plan policy code (example)
CDP	County Development Plan
CEMP	Construction and Environmental Management Plan
CHP	Combined heat and power
CIS	Construction Information Services
CPO	County Development Plan objective code (e.g., CPO 16.13/16.14)
ED	County Development Plan policy prefix (e.g., ED-P-9/ED-P-10)
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EPA	Environmental Protection Agency
EU	European Union
FIR	Further Information Request
GPT	Generative Pre-trained Transformer
GWh/yr	Gigawatt-hours per year
HGV	Heavy goods vehicle
IE	Industrial Emissions (licensing context)
LA	Local Authority
m	Metre(s)
NGO	Non-governmental organisation
NIS	Natura Impact Statement
NIS	Natura Impact Statement
NMP	Nutrient Management Plan
NPF	National Planning Framework
OCR	Optical Character Recognition
REN6/8/9	Renewable energy policy codes (example)
RSA	Road Safety Audit
SACs	Special Areas of Conservation
SEAI	Sustainable Energy Authority of Ireland
SI51	County Development Plan policy code (example)
SPAs	Special Protection Areas
SuDS	Sustainable Drainage Systems
tonnes	Metric tonnes
tpa	Tonnes per annum
yr	Year

Acknowledgements

This report was funded and prepared as part of the Biomethane for Carbon and Community (BCC) project.

The Biomethane for Carbon and Community Project (BCC) project is co-funded by the Government of Ireland and the European Union through the EU Just Transition Fund Programme 2021–2027.

We would like to thank BCC Steering Group, the BCC Advisory Gorup, and BCC project partners:

- Tipperary County Council (TCC),
- Technological University of the Shannon (TUS),
- the Irish Bioeconomy Foundation (IBF), and,
- Tipperary Energy Agency (TEA).

In addition, we thank Carbon AMS for participating in an interview and for sharing perspectives on biomethane project development and delivery in Ireland.

Contents

Acknowledgements iii

Executive Summary 1

1 Introduction and objectives 4
1.1 Biomethane policy context 4
1.2 Biomethane for Carbon and Community Project 5
1.3 Purpose of the review 6
1.4 Scope of work and methodology 6
1.4.1 Planning application identification and database development 7
1.4.2 Document processing and summarisation 7
1.4.3 Database development 7
1.5 Alignment with the National Biomethane Strategy 2024 8

2 Data compilation and overview 10
2.1 Summary of planning applications reviewed 10
2.2 Planning Application details 11
2.2.1 AD plant throughput and capacity ranges 11
2.2.2 Feedstock categories 12
2.2.3 Planning application decisions 13

3 Thematic findings 15
3.1 Recurring issues and trends in planning decisions 15
3.1.1 Overall pattern of outcomes 15
3.1.2 Dominant cross-cutting concerns 16
3.1.3 Key Environmental issues found 16
3.1.4 Traffic and road safety 17
3.1.5 Feedstock and nutrient management 17
3.2 Reasons for refusals and conditions for approvals 18
3.2.1 Common reasons for refusal 18
3.2.2 Assessment of Planning Conditions attached to grants of planning permission 20
3.2.3 Role of An Coimisiún Pleanála in shaping planning conditions where planning permission was granted on appeal 23
3.3 Consideration of planning policy and gaps across Planning Authorities 24
3.3.1 How planning policy alignment was assessed 24
3.3.2 Extent of explicit AD/biomethane policy support 25
3.3.3 Patterns in alignment ratings 26
3.3.4 Consistency and divergence between local authorities and An Coimisiún Pleanála 26
3.3.5 Identified gaps and opportunities for policy and guidance 27
3.4 Stakeholder submissions and common themes 28
3.4.1 Dominant unsupportive themes 28
3.4.2 Supportive Submissions to planning applications 30
3.4.3 Planning appellant types and their typical concerns 30

3.4.4 Influence of public objections on planning application decisions 31
3.5 Judicial reviews 34
3.6 Success in stakeholder engagement and planning 35

4 Planning Policy insights and recommendations 36
4.1 Update on evolving policy context 36
4.2 Areas for improvement in planning guidance (to inform/strengthen the forthcoming local authority support document) 36
4.3 Recommendations for national/local policy consistency 39
4.4 Suggested actions for stakeholders 41
4.4.1 National bodies & the Biomethane Development Office (BDO) 41
4.4.2 Local Authorities and An Coimisiún Pleanála 41
4.4.3 Developers and project promoters 42

5 Conclusion 43
5.1 Summary of key takeaways and implications of planning applications 43

A Appendices 46
A.1 Excel database 46
A.2 References to AD/biomethane/biogas in current CDPs 46

Executive Summary

Ireland's National Biomethane Strategy (DCEE and DAFM, 2024) sets an ambition to deliver up to 5.7 TWh of indigenous biomethane by 2030. This implies delivery at scale and pace, yet the evidence from the planning system indicates that the delivery of new biomethane production facilities is unlikely to meet the 2030 delivery targets set out by the National Bioeconomy Strategy.

Furthermore, it is found that the delivery of new facilities is being constrained less by the technological awareness and knowledge of this new and emerging sector, than by the time, complexity and uncertainty associated with planning and environmental consenting.

This report reviews a representative number of local authority planning and An Coimisiún Pleanála (ACP) planning application records for anaerobic digestion and biomethane developments and analyses the issues that most commonly determine outcomes, including the role of appeals and judicial review. The findings are intended to support policymakers in prioritising the interventions most likely to increase consent certainty, improve application quality and accelerate the delivery of new biomethane facilities towards targets for 2030 and beyond.

Key findings

- **Current planning pipeline is not yet at a scale that will enable 2030 targets.** Whilst planning permission is in place for a range of farm-scale and medium facilities broadly consistent with an agri-led model, the aggregate potential biomethane capacity captured in the reviewed applications remains materially below the 2030 ambition.
- **High dispute and delay risk:** Planning appeals are a defining feature of the sector's planning pathway. Approximately **44%** of planning applications assessed proceeded to planning appeal stage, indicating unusually high levels of contention with the local authority decision
- **Planning decisions refer to a consistent and identifiable "risk bundle"**. Across all local authorities decisions repeatedly focus on: (i) environmental risk management (odour, air quality, noise, water, biodiversity), (ii) traffic and road safety (HGV volumes, junction safety, road capacity), (iii) feedstock sourcing and nutrient management (traceability, landbank evidence, digestate controls), and (iv) EIA/AA screening and the robustness of Environmental Impact Assessment Report (EIAR) or Natura Impact Statement (NIS) where required.
- **Planning Permissions issued are rarely "light touch".** Where permissions are granted, they are typically accompanied by extensive and prescriptive conditions (including monitoring, operating limits, traffic controls and management plans). This indicates that many projects can be made acceptable, but only where risks are clearly evidenced and controllable.
- **Planning Refusals most often reflect information gaps or unresolved policy conflict,** rather than a rejection of biomethane in principle. Recurring refusal drivers include inadequate Environmental Impact Assessment (EIA) or Appropriate Assessment (AA) documentation, unresolved traffic safety constraints on rural roads, unclear feedstock and digestate pathways, and conflicts with specific County Development Plan (CDP) requirements (e.g., locational tests for large waste-led facilities or strategic road buffer/setback policies).

Policy priorities to unlock delivery

The findings of this assessment suggest that a set of targeted actions and interventions would help reduce uncertainty, increase consistency, and shorten the end-to-end consenting timeline, while maintaining environmental safeguards:

1. **The immediate production of national planning guidance (consider Section 28 guidance) for AD/biomethane (with standardised requirements).**

   Provide a clear, national statement of (i) minimum information requirements for applications, (ii) expected standards for odour/noise/air and water risk assessment, (iii) traffic assessment scope (including cumulative assessment thresholds), and (iv) a consistent approach to EIA/AA screening and documentation. This should be designed to reduce Further Information Requests, avoidable refusals and inconsistent interpretation across local authorities. We note this is a forthcoming action of the National Biomethane Strategy.

2. **Support planning policy with clear locational and scale distinctions in national guidance and county development plans.**

   This assessment shows better outcomes where planning policy is explicit and criteria are clear. Policymakers at the local authority level should support a consistent distinction between: (i) farm/agri-integrated plants (primarily agricultural feedstocks, local landbank for digestate) and (ii) larger waste-led or resource-intensive facilities (where stronger locational tests, zoning expectations and infrastructure requirements may be appropriate). Clear planning criteria reduce “policy conflict” refusals and lower appeal risk.

3. **Create a consenting “pathway” that integrates planning, environmental licensing and grid considerations early.**

   Many issues raised in planning relate to matters that also sit with environmental regulation (e.g., emissions, digestate handling) or delivery interfaces (e.g., access to gas grid injection). Policymakers should support coordinated pre-application engagement (local authority, relevant agencies and network operator) to identify showstoppers early and agree the scope of studies required. This will need support for local authority and An Coimisiún Pleanála inspectors in the form of national training support for biomethane development.

4. **Strengthen capacity and consistency across decision-makers.**

   Given the recurring nature of issues (EIA/AA, traffic, odour, nutrient management), targeted training and shared technical resources for planning authorities and ACP would improve consistency and reduce re-work between local and appeal stages.

5. **Improve the quality and transparency of applications and decision records.**

   A common theme in refusals is that planning authorities could not be satisfied with respect to the potential impacts of new development due to incomplete or generic information submitted with planning applications. Standard templates/checklists, clearer requirements for evidence of feedstock contracts/traceability and digestate landbank, and consistent monitoring/complaints frameworks would improve defensibility of both permissions and refusals and reduce judicial review risk. This could be addressed as part of new national planning guidance.

Conclusion:

The current rate of delivery of new biomethane gas facilities and the planning pipeline for new facilities is unlikely to meet the national 2030 Biomethane targets as set out in the Biomethane Strategy 2024

A step-change in the rate at which projects move from concept to consented, financeable developments is required. The most immediate and effective change would be to reduce planning uncertainty by standardising requirements, clarifying locational policy tests, and building consenting capacity, so that projects which are environmentally sound and properly sited can proceed more predictably, and projects that are not can be screened out earlier.

1 Introduction and objectives

1.1 Biomethane policy context

Before formal policy, state supports, and strategies emerged (pre-2018), Ireland's biomethane story was essentially a biogas story: activity centred on landfill-gas and wastewater digestion, with gas recovered for electricity generation or flaring and only a small number of agricultural/food-industry AD sites operating for on-site heat or power. SEAI's 2017 assessments[1] characterised the sector as nascent, noted "only a few AD plants" in operation, and concluded that wider roll-out, especially upgrading to biomethane and grid injection, would require targeted incentives and supportive tariff design. Reflecting this limited base, Ireland had one of the lowest renewable-heat shares in the EU by 2018, and no biomethane injection occurred until 2020, when the first gas was finally injected to the network, highlighting how the substantive biomethane market really begins only with the subsequent wave of government measures.

Ireland's policy journey on renewable gases began with the National Policy Statement on the Bioeconomy[2], which set out a cross-government ambition to harness biological resources and circular economy principles for decarbonisation and rural growth. It signalled that bio-based innovation, including anaerobic digestion and biogas, would be a pillar of climate, regional and enterprise policy, laying early groundwork for a future biomethane market. Building on that foundation, Government published the National Bioeconomy Action Plan 2023-2025[2], emphasising deployment and demonstration across agriculture and industry and preparing institutional forums to coordinate delivery.

In May 2024, Government published Ireland's first National Biomethane Strategy[3] (NBS), committing to up to 5.7 TWh of indigenous biomethane by 2030 and establishing an Interdepartmental Biomethane Implementation Group to drive delivery. The NBS frames 25 actions across five pillars: sustainability, demand creation, circular bioeconomy, economics, and enabling policy – explicitly positioning an agri-led, farmer-centric model and signposting enablers such as guarantees of origin, grid access, and appropriate market supports. In November 2025, Government added an environmental guardrail by publishing the Biomethane Environmental Sustainability Charter, codifying best practice on digestate management, sustainable feedstocks, plant operation and community engagement for projects receiving public support.[4]

The government has also introduced measures to increase demand for biomethane. The Renewable Transport Fuel Obligation (RTFO) incentivises biomethane in transport, particularly in hard-to-abate heavy-duty vehicles. Biomethane-powered combined heat-and-power (CHP) engines were also eligible for support under the Renewable Energy Feed-in Tariff (REFIT) scheme until it closed to new applicants in 2015.

The Renewable Heat Obligation (RHO) is intended to be the main driver of biomethane demand in Ireland.[5] Government first committed to an obligation on the heat sector in November 2022, arguing Ireland's low renewable heat share required a structural, fuel-neutral incentive to scale renewable gases and liquids alongside electrification. A dedicated RHO design programme followed, confirming that suppliers of fossil heating fuels will be required to ensure a defined share of renewable energy in heat supply. In

[1] Assessment of Costs and Benefits of Biogas and Biomethane
[2] Bioeconomy Policy
[3] National Biomethane Strategy
[4] Ministers O'Brien and Heydon mark key step to ensuring the development of a sustainable, indigenous biomethane sector in Ireland
[5] Renewable Heat Obligation

July 2025, Government approved priority drafting of the Renewable Heat Obligation Bill 2025, with NORA designated as scheme administrator and introductory obligation rates of 1.5% (year one) and 3% (year two) before review; the Bill is designed to commence administration in 2026 and to run through 2045. Crucially, Ministers flagged measures to support indigenously produced biomethane within the scheme design, subject to EU notification, aligning the RHO's mandated demand with the NBS's supply-side target and rural development objectives. Parliamentary updates through late-2025 and early-2026 reaffirm the timeline and confirm that final rates and trajectories will be adjusted aftermarket review to balance ambition with consumer cost impacts.

Taken together, the policy sequence moves from strategic intent (Bioeconomy Statement) to sector-specific scale-up (NBS), to a market-pull instrument (RHO) that should monetise renewable heat, particularly biomethane, and anchor long-term offtake for projects developed under the NBS sustainability framework.

1.2 Biomethane for Carbon and Community Project

This report is funded by, and forms part of, the Biomethane for Carbon and Community (BCC) project, a collaborative initiative led by Tipperary County Council (TCC), in partnership with the Technological University of the Shannon (TUS), the Irish Bioeconomy Foundation (IBF) and Tipperary Energy Agency (TEA). The BCC project aims to demonstrate how biomethane can support decarbonisation, rural development and community benefit, with a particular focus on delivery within the Tipperary Decarbonising Zone and the National Bioeconomy Campus at Lisheen. Within this context, the review provides a national evidence base on how anaerobic digestion (AD) and biomethane projects are progressing through Ireland's planning system, identifying the key factors that influence planning outcomes and the consistency of decision-making across Local Authorities and An Coimisiún Pleanála.

For future information please refer to the BDO website and the dedicated biomethane information webpage both found here:

https://biomethanedevelopmentoffice.ie/

Biomethane
Development Office

One of the key objectives of the BCC was to establish a Biomethane Development Office (BDO) located in the National Bioeconomy Campus site in Lisheen, Co. Tipperary. This BDO, as identified in the Shannon Estuary Economic Taskforce report, acts as an independent resource to support and enable communities, enterprises and the agriculture sector to develop an economically feasible and sustainable biomethane concept, with decarbonising at its core.

Prepared by KPMG Ireland, this assessment supports the wider objectives of the BCC project by translating national-level planning experience into practical insights that can inform local delivery, including alignment with the Tipperary County Council Climate Action Plan 2024. Drawing on KPMG's prior work across Ireland's biomethane sector – including policy analysis, planning and consenting reviews, and market and regulatory studies – this report strengthens the evidence base available to national bodies, Local Authorities and developers as Ireland seeks to scale biomethane production in line with its climate and energy ambitions.

1.3 Purpose of the review

The purpose of this review is to develop a clear, evidence-based understanding of how AD and biomethane projects are currently progressing through Ireland's planning system and how the biomethane industry is developing in the context of national targets set by government for biomethane production. As interest in biomethane accelerates in line with national climate commitments to reduce emissions and increase renewable energy penetration across all sectors of the economy, Local Authorities and An Coimisiún Pleanála are encountering a growing number of applications that vary widely in scale, feedstock type, environmental sensitivities and policy contexts. This review therefore aims to bring structure, consistency and insight to that evolving landscape, and to help steer national policy for biomethane in the context of meeting key national targets.

Specifically, the review seeks to:

- **Compile and analyse** all planning applications related to AD and biomethane production across Ireland, including their status, scale, feedstocks, environmental assessments, traffic characteristics and decision outcomes.
- **Identify recurring themes** in planning decisions, including the factors that most strongly influence approvals, refusals, and Further Information Requests, such as environmental risk management, traffic and road safety, feedstock clarity, nutrient management and EIA/AA adequacy.
- **Examine patterns of policy alignment** between applications and relevant County Development Plans, highlighting where local policy explicitly supports biomethane development and where ambiguity or tension exists.
- **Assess consistency and divergence** in decision-making across Local Authorities and at appeal stage, identifying where interpretation of planning policy, environmental safeguards or locational criteria differs between authorities.
- **Inform the work of the Biomethane Development Office (BDO)** by generating insights that can support future project development, engagement with communities and stakeholders, and the refinement of national and local policy guidance.
- **Provide an important and high-level review to National Government in how they might better support Biomethane gas development across the planning system in Ireland**

Overall, the review provides a structured foundation to improve transparency, reduce uncertainty, and support the development of a coherent planning environment for biomethane as Ireland accelerates its renewable gas ambitions.

1.4 Scope of work and methodology

This review was undertaken to produce a comprehensive, evidence-based assessment of how biomethane and anaerobic digestion (AD) projects are progressing through Ireland's planning system. The scope of work covers three main components:

(i) planning-application identification,

(ii) database development, and

(iii) thematic analysis of the compiled documents.

1.4.1 Planning application identification and database development

Construction Information Services (CIS) was used to source an initial dataset of planning applications relating to biomethane, biofuel, anaerobic digestion, and related renewable gas technologies.

A structured keyword search was performed within the CIS platform to identify all relevant planning records, including applications at various stages (e.g., submissions, decisions, appeals, commencements, withdrawals). The CIS dataset served as a robust starting point due to its consistent categorisation of project type, location and planning outcomes, ensuring coverage across all local authority areas.

Following extraction, the records were then independently reviewed and enhanced through additional research by the project team. This enrichment process included verifying planning details directly from Local Authority portals, adding relevant applications which were not captured through keyword matching, examining supporting documents and generating supplementary analytical fields relevant to biomethane sector assessment – such as plant scale, feedstock indicators, daily traffic volumes and decision-making factors. This information was added using details sourced from planning files and supporting documents.

Where available, relevant planning documents were downloaded directly from Local Authority portals (including application forms, EIAR/NIS reports, Further Information Requests, responses, and decision letters). These documents were saved down to support further analysis and to ensure completeness where CIS records alone did not capture the required level of detail.

1.4.2 Document processing and summarisation

To efficiently extract structured insights from a large and diverse set of planning documents, a GPT-5 powered AI tool was used to analyse all downloaded files. This supported consistent summarisation of key information such as environmental issues, traffic impacts, feedstock considerations, and policy-alignment narratives.

Where planning documents were scanned or non-machine-readable, optical character recognition (OCR) was applied using Adobe Acrobat to ensure that all material could be processed through the AI workflow. This step was essential for older planning files, hand-signed decision notices, and documents stored as image-based PDFs.

1.4.3 Database development

The enriched database and document summaries formed the basis of a structured thematic analysis. This analysis focused on identifying recurring patterns in:

- planning-authority reasons for refusal;
- conditions applied to approvals;
- policy-alignment assessments;
- key concerns raised in public submissions; and
- the consistency or divergence of approaches across Local Authorities and An Coimisiún Pleanála.

This combined dataset – CIS-derived records, enhanced planning-file evidence, OCR-processed documents, and AI-generated summaries – enabled a robust evidence base for comparative assessment across the full national planning pipeline.

1.5 Alignment with the National Biomethane Strategy 2024

Ireland's National Biomethane Strategy, published by DAFM and DCEE in May 2024, sets out a clear policy direction to accelerate domestic biomethane production in support of national climate targets, renewable-energy commitments and rural economic development. A target of up to 5.7 TWh of biomethane on the gas grid by 2030 was set, equivalent to ca. 10% of annual natural gas usage in Ireland – meeting this target would require the construction of between 150-200 AD plants. The strategy envisions an agri-led biomethane sector, highlighting the large quantities of agricultural resources, wastes, and by-products in Ireland which could be used as feedstocks in AD plants.

As Local Authorities are increasingly required to assess AD and biomethane planning applications as a direct result of the direction of the National Biomethane Strategy, the degree of alignment between individual planning applications and this national policy framework is a key consideration in the planning process. This review assesses policy alignment by examining how each application positions itself relative to the Strategy's core objectives, namely, sustainable feedstock use, greenhouse-gas reduction, circular-economy benefits, and the contribution of biomethane to decarbonising agriculture, transport, heat and industry.

For each planning record considered, the relevant County Development Plan (CDP) policies were reviewed, and the extent to which local policy reflects or supports these national priorities was evaluated. Across the dataset, three broad alignment patterns emerge.

1. First, projects closely integrated with agricultural practices, such as those relying on slurry, agricultural residues or locally sourced energy crops, tend to demonstrate clear alignment with both national and local renewable-energy objectives.

2. Second, some applications relied, at the time, on generic renewable-energy provisions in CDPs where biomethane was not explicitly referenced, resulting in partial alignment where other constraints (e.g., transport policy or locational criteria) interact with the national policy intent. We note that, today, most CDPs mention biomethane either explicitly or implicitly.

3. Third, a smaller number of cases reveal tensions between high-level national support and site-specific local policies, particularly where issues such as road capacity, landscape protection or zoning requirements limit the suitability of proposed locations.

The evidence suggests that it is the *substance* of objections and third-party submissions (e.g., traffic, environmental risk, policy conflict) rather than their *number* that most influences outcomes (see section 3.4.4); however, high levels of objection typically coincide with increased scrutiny and a higher likelihood of appeal, as these submissions often surface material planning issues that must be addressed in the decision-making record.

Overall, the analysis confirms that the planning pipeline broadly reflects the strategic intent of the National Biomethane Strategy to deliver an agri-led biomethane sector in

Ireland, with most projects targeting agricultural-based feedstocks. The planning pipeline assessed, however, currently indicates less than c.1.5 TWh of potential biomethane capacity across all applications, highlighting a substantial gap relative to the 5.7 TWh target set for 2030 and suggesting that achieving anything close to this level of deployment will be challenging under current conditions (it is recognised that a wider cohort of biomethane projects may exist at pre-planning, concept, or early development stage and are therefore not yet visible within the formal planning system).

Nonetheless, the findings underline the importance of clear, explicit planning policy support at Local Authority level, particularly for larger, more complex or waste-led AD projects, to ensure consistent interpretation and reduce uncertainty for developers, regulators and communities. Strengthening local planning policy clarity around biomethane, including clearer distinctions between farm-scale and industrial-scale developments, would support more consistent alignment with national objectives and help enable smoother, more transparent planning pathways as Ireland seeks to scale its biomethane sector.

2 Data compilation and overview

This section summarises the numbers and types of planning applications assessed for this study, including location, scale, feedstocks, local authority decision status, and whether an appeal to ACP was made and the status of that appeal.

2.1 Summary of planning applications reviewed

The planning applications reviewed in this study were submitted over a broad period, ranging from 2008 to 2025. In a small number of cases, decisions on those applications, particularly refusals or appeal determinations, were issued in 2026 and are included where relevant to reflect the most up-to-date outcomes.

The assessment focuses primarily on planning applications made to Local Authorities for AD and biomethane developments. For each Local Authority application, the review also considers any subsequent planning appeals to An Coimisiún Pleanála, including appeal outcomes where available. Appeal activity is therefore analysed as a second stage of the assessment rather than as a separate application cohort.

In total, the report analyses 78 local authority planning applications across 22 county councils, comprising new planning applications (listed below in Table 1) and extension-of-duration applications. Any subsequent appeals to ACP were also analysed. These were categorised as follows:

- Planning Application (n = 64): new planning permission applications, and
- Extension-of-Duration Applications (n=14): a request to the local council to extend the life of a live planning permission that is nearing its expiry date.

These applications indicate a broad national distribution rather than a concentration in a single region. Table 1 below lists the number of planning applications per City or County Council, excluding applications for an extension-of-duration.

Council	No. of Applications
Meath County Council	8
Cork County Council	6
Donegal County Council	6
Mayo County Council	5
Tipperary County Council	5
Fingal County Council	4
Kildare County Council	4
Waterford City & County Council	4
Kerry County Council	3
Galway County Council	2
Kilkenny County Council	2
Laois County Council	2
Limerick County Council	2
Offaly County Council	2
Westmeath County Council	2
Wexford County Council	2
Cavan County Council	1
Dublin City Council	1
Monaghan County Council	1
Roscommon County Council	1
South Dublin County Council	1
Wicklow County Council	1
Total	**64**

Table 1: Number of non-extension applications by county.

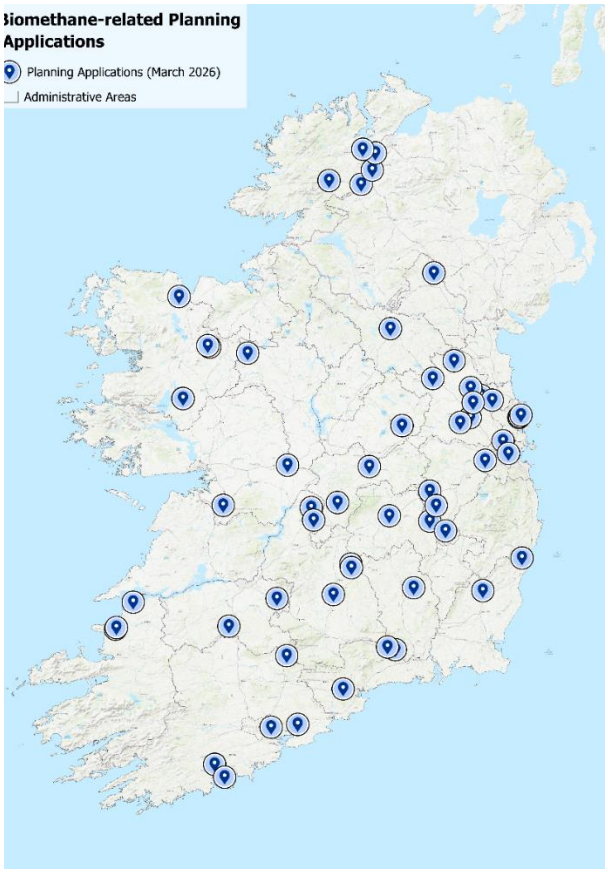


Figure 1: Location of biomethane planning applications detailed in this report.

2.2 Planning Application details

2.2.1 AD plant throughput and capacity ranges

The analysis of plant throughput and capacity indicates that the current planning pipeline is dominated by small- to medium-scale anaerobic digestion facilities, broadly consistent with the size of plant envisaged under the National Biomethane Strategy. Most applications fall below 100,000 tonnes per annum (tpa) of feedstock throughput, with median plant sizes corresponding to modest biomethane output rather than large, regional-scale production. While this profile aligns with the Strategy's emphasis on farm-integrated and locally embedded projects, it also implies that a high volume of individual plants would be required to achieve the national target of 5.7 TWh by 2030. In the absence of a significant increase in either the number of projects progressing through planning or the emergence of larger-scale facilities, the throughput characteristics observed in the current planning pipeline suggest that meeting the national biomethane ambition will be challenging under present conditions.

Plant throughput values were found for 49 of 64 planning application records. The range is from 6,000 tpa to 165,000 tpa, with the median being 46,000 tpa.

Number of applications per plant scale band (non-extension, where tpa is stated):

Throughput band (tpa)	Number of non-extension applications
0-25k	19
25-50k	7
50-100k	21
100-200k	2

Table 2: Number of non-extension applications per plant scale band.

An energy equivalent is recorded for 39 planning applications. The range is from 1.6 GWh/yr to 143.2 GWh/yr, with the median being 25 GWh/yr.

Capacity band (GWh/yr)	Number of non-extension applications
≤10	14
10-25	3
25-50	14
50-100	6
>100	2

Table 3: Number of non-extension applications per plant scale band.

2.2.2 Feedstock categories

The feedstock profile of the planning applications assessed is strongly aligned with the National Biomethane Strategy's vision for an agri-led biomethane sector. The majority of applications reference agricultural-based feedstocks, particularly slurry, energy crops and agricultural residues, often in combination with food or industrial organic wastes through co-digestion. This reflects the Strategy's emphasis on mobilising indigenous agricultural resources while supporting nutrient management, circular economy outcomes and farm diversification. The prevalence of co-digestion also indicates a pragmatic approach by developers to improving plant performance and gas yields, while remaining anchored in an agricultural feedstock base.

During analysis of planning applications, any explicit mentions of feedstock use by each application was recorded and categorised, and many applications propose co-digestion (multiple categories in one scheme). The statistics below count how many planning applications mention each category of feedstock.

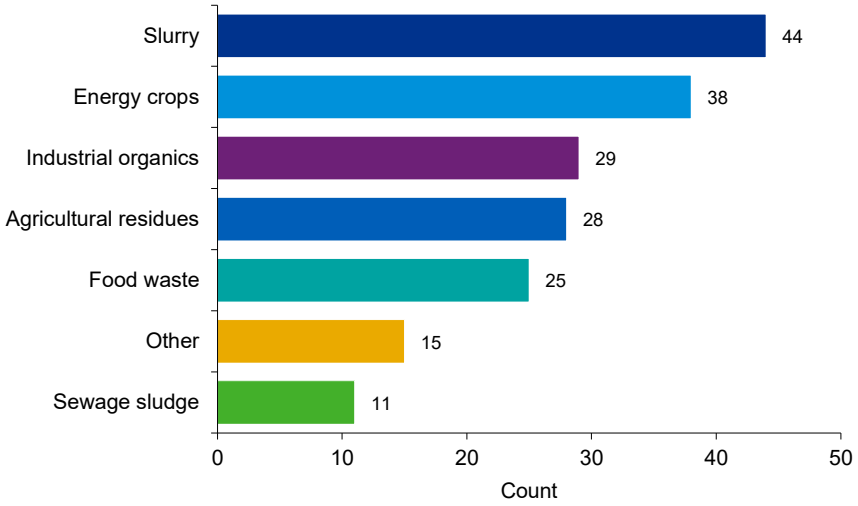


Figure 2: Number of non-extension applications containing reference to feedstock category.

Whilst applications most frequently reference agricultural and farm-based feedstocks, co-digestion (using a number of different feedstocks) is a common theme across all

applications. The applications indicate that most biomethane plants in Ireland are employing an agri-led feedstock strategy.

2.2.3 Planning application decisions

Local authority planning application decisions (including new planning applications and extension of duration planning applications over the study period were:

- Granted (44)
- Refused (20)
- Granted extension (13), and
- Refused extension (1).

Extension requests are not considered new grants/refusals: they represent a request to extend the duration of a permission that had already been awarded previously. The single refused extension request likewise reflects a decision not to extend a previously granted permission.

For non-extension planning applications, 28 appeals to ACP were recorded - ca. 44% of applications. This is a high number of appeals – in Ireland, appeal rates in all counties generally hover at around 7-10%, and no county exceeded 15% in recent years.[6] Residential housing – which accounts for ~66% of appeals by volume – still sees well under 15% of housing applications appealed in most areas. However, wind farms see almost every project appealed (approaching ~100% appeal involvement), reflecting their high controversy.[7,8] Biomethane's ~44% stands out as an extremely high sectoral appeal rate, indicating that nearly half of AD proposals end up in the appellate arena – a proportion far above typical sectoral averages and second only to the historically contentious wind sector. Across these appealed cases, recorded outcomes are

- Granted (13),
- Ongoing (8),
- Refused (4), and
- Withdrawn (3).

Two ABP decisions, which granted planning permission, had grant of permission quashed by the High Court after third party-triggered judicial review.

[6] https://www.opr.ie/wp-content/uploads/2025/02/eVxaHmFI0SIzg0s0RPxx8nFICpTNIFf0LMUMfHBO.pdf
[7] How a planning blockage is threatening Ireland's wind farm industry
[8] Planning Dashboard (Wind Energy Ireland's planning dashboard tracks only ABP decisions when reporting national progress; if a significant share of wind farms were being finally determined at local authority level, WEI could not credibly report national delivery using ABP data alone.)

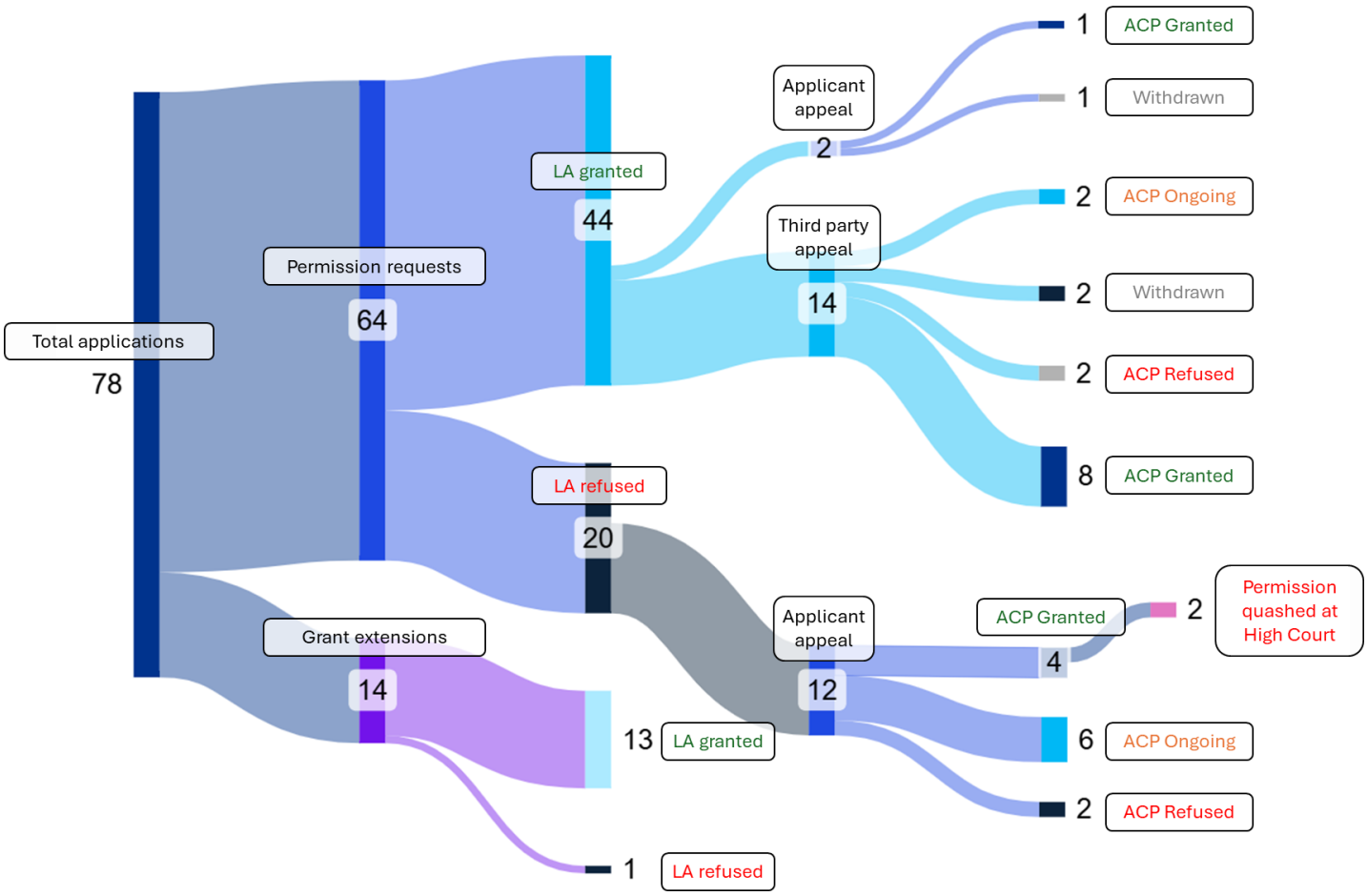


Figure 3: Sankey diagram of planning application status at local authority, ACP, and High Court level.

3 Thematic findings

Information from each planning application was assessed in terms of recurring themes and decision drivers observed across the application records and associated extracts (planning files, Further Information Requests, decision correspondence, and where available, appeal outcomes and policy references).

The objective was to identify patterns in how biomethane/AD proposals are assessed by both planning authorities and ACP, with particular attention paid to reasons for refusal and conditions attached to permissions, at both local authority and An Coimisiún Pleanála (ACP) stages.

In doing so, the analysis focuses on cross-cutting issue areas that repeatedly shape planning outcomes for biomethane/AD developments, distinguishing between:

(i) matters that are routinely addressed through planning conditions on a decision to grant planning permission, and

(ii) matters that tend to result in extended Further Information requests, planning refusals, and/or appeals to ACP.

Please see the published online dataset to investigate full case-by-case results (link in Appendix).

3.1 Recurring issues and trends in planning decisions

3.1.1 Overall pattern of outcomes

Across the analysed applications, AD and biomethane projects exhibit a mixed pattern of grants, refusals, and appeals, with a notable feature being the prevalence of permissions that are granted planning permission subject to extensive and detailed conditions.

Where planning permissions are granted, it was found extensive planning conditions were often attached. Typical grants of planning permission include multiple, highly prescriptive conditions dealing with environmental protection (odour, noise, air emissions, surface- and groundwater protection, biodiversity), traffic and road safety, feedstock and digestate management, and ongoing monitoring and reporting. In some decisions, tonnage caps, restrictions on feedstock types, limitations on operating hours, and requirements for landscaping and bunding are used to bring proposals within acceptable impact thresholds rather than fundamentally reshaping the project concept.

Planning permission refusals are most often related to deficiencies in information or non-compliance with planning policy, rather than outright opposition to the principle of biomethane development. Common features of refused applications include insufficient environmental documentation (for example, absence or inadequacy of Environmental Impact Assessment Report (EIAR) or Natura Impact Statement), unresolved traffic impacts, unclear feedstock sourcing and nutrient management, or incompatibility with local development plan objectives. In several documented cases, Local Authorities explicitly cite the lack of robust environmental reports or the inability to determine EIA/AA requirements as reasons for refusal.

Appeals to An Coimisiún Pleanála are a recurring part of the decision-making landscape. The Board frequently upholds Local Authority grants where applications demonstrate strong environmental assessment and mitigation and clear alignment with national and regional renewable energy policy. There are also examples where the Board overturns local refusals, particularly where additional technical information is provided at appeal and the strategic contribution of the project to climate and energy targets is evident. Conversely, ABP may confirm refusals in cases where environmental or traffic concerns remain unresolved or where Environmental Impact Assessment (EIA) or Appropriate Assessment (AA) is incomplete.

3.1.2 Dominant cross-cutting concerns

It was also found that a relatively consistent set of cross-cutting concerns shapes planning decisions on AD/biomethane projects, regardless of Local Authority area:

- Environmental risk management – particularly odour, air quality, noise, water protection and biodiversity impacts.
- Traffic and road safety – focusing on HGV movements, road capacity and junction safety.
- Feedstock sourcing and nutrient management – including traceability, sustainability and landbank adequacy for digestate.
- EIA/AA requirements and quality of assessment – completeness and robustness of EIAR and Natura Impact Statements where required.
- Development contributions and infrastructure impacts – the extent to which projects are required to contribute to road upgrades or other mitigation.

These issues appear repeatedly in the Further Information Request (FIR) topics, conditions attached to planning permissions, and reasons for planning refusal , suggesting that they form the core “risk bundle” through which planning authorities and ACP evaluate AD/biomethane proposals.

These cross-cutting concerns align with findings in a recent practitioner guide from William Fry (March 2026)[9], noting that the principal constraint on biomethane delivery in Ireland is not technology but the ability to progress projects through planning and environmental consenting. It highlights that, in practice, early site selection decisions strongly shape consenting risk, particularly: proximity to the Gas Networks Ireland network / a feasible grid injection point; availability of feedstock within a viable transport radius; road access capable of accommodating HGV movements; and adequate separation from sensitive receptors (including residential properties, European sites and watercourses). The guide also emphasises that land and rights assembly can be a material source of delay, including the need to secure option agreements/long-term leases and wayleaves for pipeline routes to the injection point, and to identify and address issues where agricultural land is subject to informal arrangements (e.g., conacre[10]) or other tenancy considerations.

3.1.3 Key Environmental issues found

Odour and air quality are among the most frequently cited considerations. Submissions, FIRs and conditions all reflect a strong concern that odour from feedstock reception,

[9] Biomethane Production Facilities in Ireland - WILLIAM FRY

[10] Conacre is a traditional Irish system of renting agricultural land, usually for a short-term, 11-month period for tillage or grazing.

digestion and digestate handling could impact residential amenity beyond site boundaries if not tightly controlled. Where applicants provide detailed odour impact assessments, specify enclosed handling systems and propose robust abatement and monitoring regimes, permissions are more likely to be granted (albeit with strict conditions). Conversely, where odour mitigation is poorly described or unsupported by analysis, odour risk becomes a central ground for refusal or for seeking substantial additional information.

Water quality and hydrology recur as key themes, particularly in applications involving high tonnages of digestate or locations in sensitive catchments. Planning authorities consistently seek evidence that storage, handling and landspreading of digestate will not lead to nutrient run-off, leachate or accidental discharges to surface or groundwater. Robust drainage design, containment measures, nutrient management plans and clear links to the Nitrates Directive and Good Agricultural Practice Regulations are therefore critical determinants of outcome.

Biodiversity and habitats considerations are most pronounced where sites lie close to, or within the zone of influence of, Natura 2000 designations and other sensitive ecological receptors. In these cases, the need for Appropriate Assessment is triggered, and the adequacy of ecological baseline work, impact assessment and mitigation measures can be decisive in planning outcomes. Incomplete or weak AA documentation is repeatedly associated with refusals or prolonged engagement at further-information stage.

3.1.4 Traffic and road safety

Across the dataset, traffic and road safety emerge as near-universal concerns. The import of feedstocks and export of digestate can significantly increase Heavy Goods Vehicle (HGV) movements, particularly on rural or local roads that may already be constrained. Planning authorities routinely seek detailed Traffic Impact Assessments and Road Safety Audits, with a focus on:

- Daily and peak HGV volumes and temporal distribution.
- Capacity and condition of the existing road network.
- Junction design, sightlines and interaction with vulnerable road users.
- Potential cumulative effects where multiple large developments share haul routes.

Mitigation measures commonly conditioned on grants include specified haul routes, new or improved access junctions, provision of turning lanes or passing bays, wheel-washing facilities, limits on delivery hours, and, in some cases, special development contributions towards road strengthening or maintenance. Where such mitigation cannot reasonably resolve identified risks – whether due to the inherent limitations of the local road network or the scale of projected traffic – the trend in the data is towards refusal.

3.1.5 Feedstock and nutrient management

Finally, the pipeline reveals a persistent emphasis on feedstock clarity and nutrient management. Local Authorities and An Coimisiún Pleanála look for clear, auditable information on feedstock types, origins and tonnages, and for nutrient management plans that demonstrate how digestate will be stored, handled and applied without breaching environmental limits.

Applications that specify predominantly local agricultural feedstocks, provide detailed landspreading plans and demonstrate compliance with relevant agri-environmental regulations tend to align better with policy objectives and are more likely to be granted, albeit with stringent monitoring conditions. In contrast, proposals with ambiguous feedstock supply chains, significant dependence on imported wastes, or inadequate landbank evidence for digestate spreading feature disproportionately among refusals and withdrawals.

3.2 Reasons for refusals and conditions for approvals

3.2.1 Common reasons for refusal

Analysis of the reasons for refusal of planning applications shows that decisions to refuse permission for AD and biomethane projects are rarely based on a single issue. Instead, planning refusals typically cite multiple, inter-related concerns, almost always anchored in the adequacy of environmental assessment and the robustness of supporting information.

In the case of the single planning application for extension of duration refused the planning authority considered that no “substantial works” has been completed and that the extension would exceed maximum 5-year cap which is allowed under Section 42(4) of the Planning and Development Act, 2000.

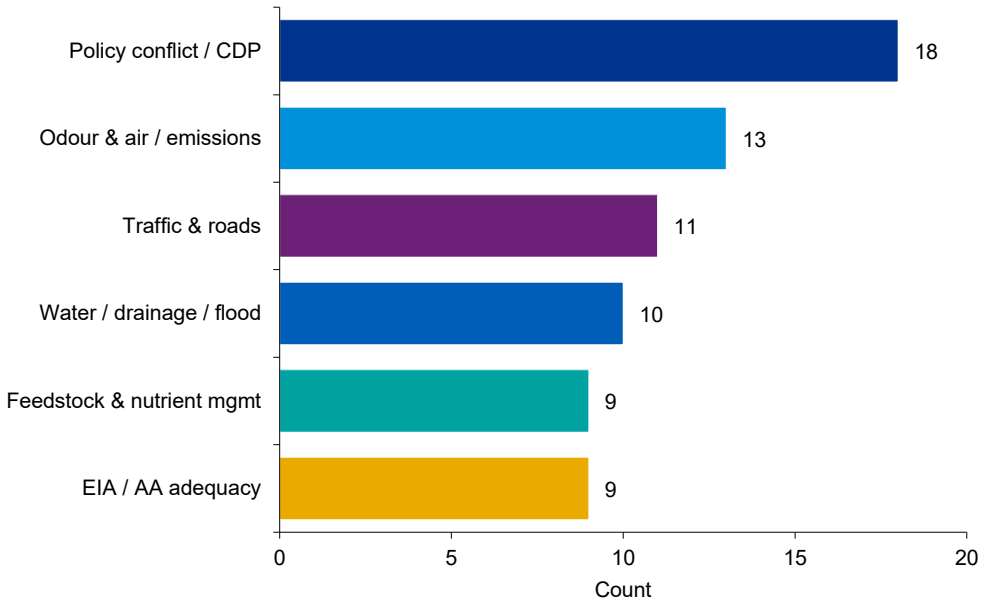


Figure 4: Number of non-extension refusals mentioning themes, at local authority stage.

Detailed category insights

1 Conflicts with planning policy

Most refusals explicitly reference local authority planning policy conflicts, such as inconsistency with County Development Plan objectives on rural amenity, settlement strategy, landscape protection or renewable energy, as well as proximity to sensitive receptors like residential clusters, schools or watercourses. In these cases,

policy-based concerns are often closely intertwined with the environmental and traffic issues described above, for example where cumulative impacts would undermine the character or environmental capacity of an area.

2 *Insufficient or unclear environmental information*

Beyond formal EIA/AA, many refusals highlight information gaps or ambiguity around emissions and environmental risk. Commonly cited gaps include incomplete detail on air emissions (odour, ammonia, greenhouse gases), noise and vibration, surface- and groundwater protection, accident and spill scenarios, or the management of process residues and wastes. Where such gaps prevent a clear judgement on the likely environmental effects of the development, authorities tend to refuse permission rather than rely on post-consent clarification.

3 *Traffic and road safety concerns*

Refusals often reference inadequately addressed traffic and road safety risks, particularly in rural contexts where road networks are constrained. Typical issues include the absence or insufficiency of Traffic Impact Assessments, under-estimation of heavy goods vehicle (HGV) movements, substandard road geometry or surfacing, poor sightlines at junctions, and lack of realistic mitigation. Where roads are judged incapable of safely accommodating the predicted levels of feedstock and digestate traffic – either in isolation or cumulatively – refusal is frequently justified on road safety grounds.

4 *Inadequate Environmental Impact Assessment (EIA) / Appropriate Assessment (AA)*

Typical deficiencies in EIAs, AAs, or Natura Impact Statements (NIS) cited in refusals include insufficient baseline data, limited assessment of cumulative impacts, lack of detailed or credible mitigation measures, and incomplete consideration of potential effects on European sites (SACs/SPAs) or nearby watercourses. Where the planning authority or An Coimisiún Pleanála cannot be satisfied that likely significant effects have been fully assessed and mitigated, refusal is the norm.

5 *Feedstock and nutrient management deficiencies*

A further recurring ground for refusal is uncertainty around feedstocks and digestate management. Applications are refused where there is:

- Lack of clarity on feedstock types, tonnages and sources;
- No clear evidence of sustainable or locally appropriate sourcing; or
- Inadequate or absent nutrient management plans for digestate landspreading.

Where the planning authority cannot be satisfied that digestate can be stored, handled and applied within the limits of the Nitrates and Good Agricultural Practice regulations, or that sufficient landbank is available to avoid nutrient overload in receiving catchments, refusal is common.

6 *Other environmental and amenity impacts*

Additional refusal reasons include unacceptable odour or noise impacts, visual and landscape intrusion, dust and air quality risks, flood risk, and – in some instances – the perceived insufficiency of community engagement or public consultation. These

are typically cited alongside, rather than instead of, the core EIA/AA, traffic and nutrient management concerns.

Overall, the pattern in the dataset is that AD and biomethane proposals are most vulnerable to refusal where key risk areas are under-assessed or described only in generic terms, and where the planning authority cannot impose conditions with sufficient confidence that adverse effects can be avoided.

3.2.2 Assessment of Planning Conditions attached to grants of planning permission

Where AD and biomethane projects receive planning permission, they are almost invariably accompanied by extensive and detailed conditions. The data show a broadly consistent suite of condition types across Local Authorities and An Coimisiún Pleanála, tailored to local circumstances but sharing common themes.

To categorise conditions meaningfully across applications and planning authorities, a set of ten thematic groups was developed. These groups were derived directly from key issue areas outlined in the RFQ, which emphasise environmental impacts, traffic, compliance with planning policy, and regulatory obligations, and recurrent patterns observed across conditions in the TUS dataset.

620 individual planning conditions were identified across a set of ten planning-relevant categories. These categories reflect common regulatory and policy issues relevant to biomethane development – environmental protection, water management, construction impacts, traffic, safety, heritage, and site integration – and additionally capture compliance, design/appearance, landscaping, and financial contribution requirements. All applications granted planning permissions included at least one condition. Note below that the below chart shows the count of conditions, not how many applications have a condition of that type. As some conditions can be counted towards more than one category, the sum of counts across all categories is greater than 620.

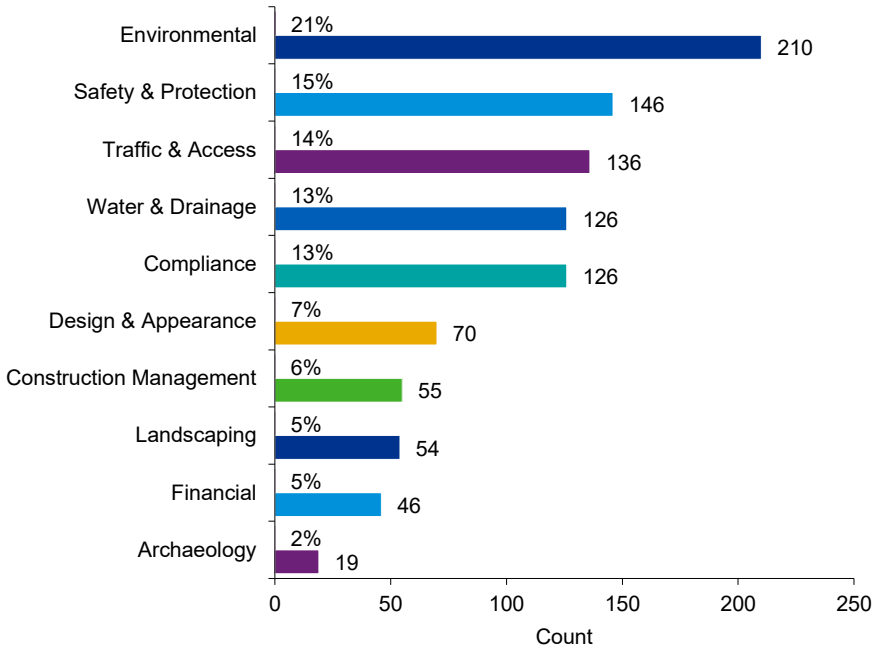


Figure 5: Theme count across conditions for approval at local authority stage.

Detailed category insights

1 Environmental Mitigation and Monitoring

Permissions typically require full implementation of all mitigation measures identified in the EIAR and/or NIS, alongside submission and adherence to Construction and Environmental Management Plans (CEMP/EMP). Ongoing monitoring of air, water, noise, odour, and biodiversity is frequently mandated, together with odour management plans, noise control regimes, complaints procedures, and, in some cases, triggers for review or additional mitigation if monitoring indicates exceedances. Where CHP engines or other noisy equipment are involved, authorities often require acoustic enclosures or equivalent noise abatement measures. Noise is treated as a measurable, enforceable environmental parameter, not simply a qualitative nuisance.

Environmental conditions show a high degree of consistency across local authorities: every major AD plant is subject to comprehensive controls on odour, noise, air emissions and implementation of mitigation.

2 Safety & Protection

Safety & Protection conditions typically address fire prevention, emergency access, and compliance with relevant safety standards and licensing regimes. Where hazardous materials or pressurised systems are in scope, conditions reference appropriate statutory controls and competent authority oversight, ensuring compatibility between planning conditions and the broader safety regulatory framework.

Safety & Protection conditions show that planning authorities see AD plants as high consequence facilities where containment, emergency preparedness and protection of human receptors are critical. The conditions bridge environmental engineering details (bunds, firewater) and broader public-health judgments.

3 Traffic Controls and Road Upgrades

Planning Permissions usually included conditions that:

- Cap daily and/or annual HGV movements;
- Restrict delivery and dispatch to specified hours;
- Require road and junction upgrades, improved sightlines, and wheel-washing facilities; and
- Mandate traffic management plans and routing agreements to avoid sensitive areas (e.g., schools or residential streets).

In some cases, development contributions are explicitly linked to the cost of road improvements necessitated by the development. Traffic & Access conditions demonstrate that local authorities are not only concerned with baseline road safety but also with structural improvements and ongoing operational impacts of HGV traffic.

4 Water and Drainage Management

Authorities frequently require stormwater management, effluent control, bunding, separation of clean and dirty water, and digestate storage/handling safeguards.

Monitoring conditions for surface water and groundwater quality are common, with clear reporting requirements and adaptive triggers if thresholds are breached. Compliance with nutrient management plans is typically tied to ongoing reporting.

Water & Drainage conditions are highly technical and consistent. They reveal that planning authorities are acutely focused on protecting groundwater, wells, and surface waters, and they operationalise this via detailed drainage, effluent and buffer-zone requirements.

5 Compliance, Reporting, Review and Adaptive Management

Many grants include conditions requiring regular reporting to the planning authority (for example, on monitoring results, traffic volumes, or compliance with nutrient management plans). Conditions frequently make explicit provision for review if monitoring reveals unforeseen impacts or non-compliance, allowing authorities to tighten controls if required. This creates a formal adaptive management framework that maintains impacts within acceptable limits over the project lifecycle and ensures adherence to submitted plans and documentation.

Many approvals set maximum annual throughput, for example, 20,000–50,000 tonnes per annum for smaller to medium plants, and higher for major facilities, and prescribe the types and sources of feedstock that may be accepted. Conditions often prohibit certain materials (e.g., municipal food wastes) unless specifically assessed and require robust record-keeping and traceability to allow inspection by the planning authority or other regulators. These controls interact with environmental, traffic, and water themes by constraining overall impact.

Compliance conditions form the legal backbone of permissions, ensuring projects remain within evaluated parameters and fully integrate national regulation.

6 Design, Appearance and Landscaping

Design and appearance conditions secure appropriate integration within landscape and visual contexts (e.g., building finishes, colour, height, and layout refinements). Landscaping conditions address site screening, boundary treatments, and habitat enhancement, often with phasing and aftercare requirements to ensure establishment and long-term effectiveness.

Design & Appearance conditions systemically push AD plants towards visually recessive, agriculturally compatible forms, reflecting a clear policy preference for minimising industrial character in rural landscapes.

Landscaping conditions demonstrate a fairly sophisticated approach: they integrate visual screening, biodiversity considerations, and professional standards, reinforcing the role of green infrastructure as a planning tool.

7 Construction and Operational Management

Conditions in this category secure CEMP/EMP implementation, construction-phase controls (e.g., dust, vibration, traffic interface, working hours), and operational protocols that minimise amenity impacts. Hours of operation are commonly restricted, especially at night and weekends, to manage noise and disturbance, with specific daytime and night-time noise limits set at site boundaries or nearest noise-sensitive receptors. These measures ensure the facilities are built and run in a

manner that aligns with best practice and keeps impacts within acceptable thresholds.

Construction Management conditions make it clear that planning authorities treat construction as a distinct risk phase, requiring proactive controls to protect neighbouring amenity and environmental quality.

8 Development Contributions and Financial Conditions

Standard development contributions under Local Authority schemes are routinely applied. In some instances, special contributions are levied to fund road improvements or other infrastructure directly linked to the project. These financial conditions are often discussed in appeals, with An Coimisiún Pleanála sometimes confirming, varying, or clarifying contribution amounts and their basis.

Financial conditions formalise the “polluter pays” principle at project scale, ensuring that roads, social infrastructure, and communities receive contributions commensurate with the scale of development.

9 Archaeology and Heritage

Where sites are in or near areas of known heritage sensitivity, archaeological conditions require pre-construction investigation, watching briefs, and notification protocols, ensuring that any discoveries are appropriately managed without undue delay.

Although only 2% of all conditions fall under this group, archaeology conditions are detailed where present and show a robust, standardised approach to managing unknown archaeological assets in greenfield, rural locations.

3.2.3 Role of An Coimisiún Pleanála in shaping planning conditions where planning permission was granted on appeal

The reviewed cases show that ACP plays a decisive role at appeal stage in determining whether projects are refused or approved subject to conditions. ACP generally upholds refusals where EIA, AA, or other key environmental information is inadequate, or where clear policy conflicts or unacceptable environmental or traffic impacts remain unresolved.

Conversely, where site-specific risks can be addressed, ACP often grants permission subject to strengthened and more prescriptive conditions, particularly in relation to environmental mitigation, monitoring, and traffic management. At appeal, ACP also frequently confirms or adjusts development contributions, sometimes refining their scale or structure, while reaffirming that developments must contribute appropriately to the infrastructure and mitigation measures on which their acceptability depends.

Taken together, this pattern, observed at both local authority and appeal stage, indicates a clear preference for conditional approval where impacts can be robustly mitigated and enforced, and for refusal where information gaps or policy conflicts prevent assurance of environmental protection and public safety.

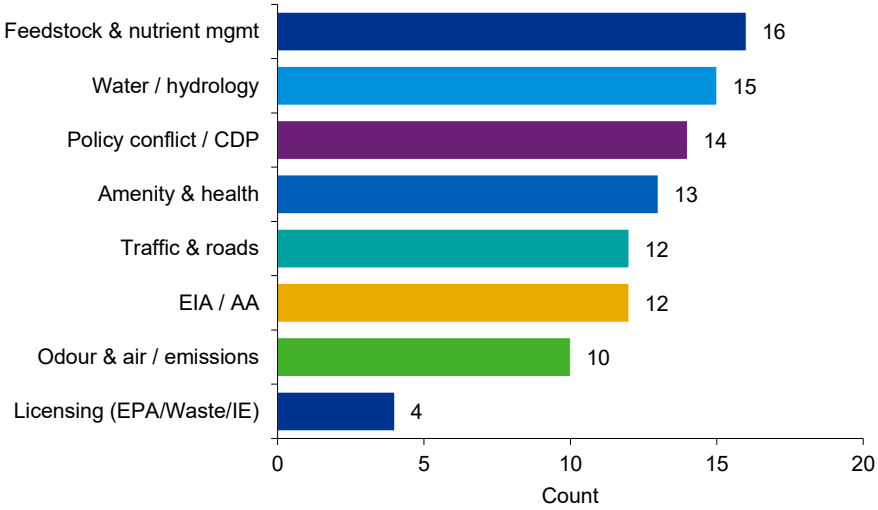


Figure 6: Count of appeals mentioning theme, of 26 appeals.

Among the 13 decisions examined that were granted planning permission on appeal, ABP comments on these issues in most cases (e.g., feedstock/nutrient and water in 11 and 12 of 13, respectively) but concludes they can be adequately mitigated through conditions and EPA licensing. In contrast, the four refused appeals are characterised by residual policy, water, or nutrient risks (each cited in three of the four) and, in some instances, unresolved licensing questions, leading ACP to find that the developments would be contrary to the proper planning and sustainable development of the area.

3.3 Consideration of planning policy and gaps across Planning Authorities

3.3.1 How planning policy alignment was assessed

A review of local authority planning policy was carried out, with particular reference to the County Development Plans and Renewable Energy Strategies in place.

For each AD/biomethane planning application, three policy items were tracked: (i) whether the relevant County Development Plan (CDP) explicitly refers to biomethane or anaerobic digestion, (ii) a short extract from the most relevant CDP policy, and (iii) an overall qualitative alignment rating (“clear”, “partial”, or “unclear”). These fields were assigned based on a review of the CDP’s renewable energy and rural development policies.

For example, where a CDP includes specific objectives to “support renewable energy including bio-energy and anaerobic digestion” and the proposal’s location and design are consistent with those objectives, the application is coded as having clear policy alignment. In contrast, where support is expressed only in general terms (e.g. for “energy from renewable sources”) or where other objectives (such as motorway setbacks or location on zoned land) pull in a different direction, the alignment is typically coded as partial or unclear.

Note: This analysis is consistent with the relevant CDPs *at the time each application was submitted.* It is our understanding that almost all CDPs now reference AD/biomethane explicitly or implicitly (see Appendix).

3.3.2 Extent of explicit AD/biomethane policy support

Across the results, three patterns emerge in how local authorities' CDPs reference AD and biomethane.

1 Explicit AD/biogas policies

Several authorities have adopted policies that specifically reference anaerobic digestion or biogas as preferred or acceptable forms of renewable energy, subject to environmental safeguards. Examples include:

- A Wexford case (file number: 20160469) where policy support is framed through objectives such as "support renewable energy including bioenergy and anaerobic digestion where environmental safeguards are met" (alignment rated clear).
- A Cavan case (file number: 16264) with policies to "support renewable energy including bioenergy and anaerobic digestion subject to safeguards", again coded as clear alignment.
- Multiple Mayo and Westmeath applications referencing policies (e.g. P-REN6/8/9 in Mayo; renewable energy policies in Westmeath) that explicitly encourage bio-energy and AD projects, with alignment consistently coded as clear.

2 Generic renewable energy policies with implicit AD coverage

In other authorities, the CDP does not name biomethane or AD directly but contains broad renewable energy or climate policies under which AD schemes are assessed. For instance:

- A Tipperary case (file number: 9510341) notes that the CDP "supports rural enterprise/renewables/waste management; no AD-specific policy located", but the decision still concludes that the proposal is "in accordance with the policies of the County Development Plan 2004", leading to a clear alignment rating.
- Another application (file number: WEB2472/24) is coded as having partial alignment where the CDP sets out energy and climate objectives (e.g. CA11, SI51) but does not reference AD explicitly; support is inferred rather than direct.

3 Cases with explicitly recorded gaps or tensions

There are also examples where, despite high-level support for renewables, other policy strands introduce tension for large-scale or specific AD configurations. For instance:

- A Kildare case at Ballyvass (file number: 2560920) is coded partial, with CDP policy stated as "facilitate and support the development of projects that convert biomass to gas or electricity…", but refusal reasons reference transport policy and a 91 m motorway setback requirement, signalling tension between renewable energy support and road/strategic corridor protection objectives.
- A Wicklow case (file number: 2560244) for a 90,000 tpa facility highlights CDP objectives CPO 16.13 and 16.14, which require large resource-intensive facilities to demonstrate resource efficiency and to locate on zoned employment lands unless a rural location is clearly justified. The application is refused for failing to meet these tests, illustrating that high-level renewable support is conditioned by strong locational criteria.

3.3.3 Patterns in alignment ratings

How well projects aligned with CDPs was rated, with the ratings across applications showing several consistent patterns:

1 *"Clear" alignment dominates where projects are farm- or agri-integrated*

Projects that are closely tied to agricultural land use – processing slurry, agricultural residues and energy crops – and located in areas where the CDP explicitly supports rural renewable energy or farm diversification tend to receive clear alignment ratings. This is evident in numerous Mayo, Westmeath, Meath, Wexford and Cavan cases, where policies to "support projects that convert biomass to energy" or "facilitate renewable energy including bio-energy" are cited verbatim.

2 *"Partial" alignment where renewable policies intersect with other constraints*

"Partial" alignment ratings typically arise where the CDP contains supportive renewable energy objectives, but the proposed project intersects with other, more restrictive policies (e.g. motorway setback zones, protection of strategic road function, or requirements to use zoned industrial/employment land for larger waste-led facilities). The Ballyvass (Kildare) case (file number: 2560920) is coded as partial, with the commentary noting that while renewable energy policies support the project in principle, transport and spatial policies pull in the opposite direction.

3 *"Unclear" alignment in the absence of AD-specific policy or where documentation is thin*

A smaller number of cases are coded as unclear, typically where CDPs reference rural economic development and farm diversification in general terms but do not explicitly address AD, and where the planning documentation does not clearly link the proposal back to specific renewable energy objectives. One Donegal case (file number: 1651411), for example, notes that policies *ED-P-9/ED-P-10* on rural economic development are referenced, but CDP support for AD is "unclear from documents", leading to an "unclear" alignment rating.

Overall, the ratings suggest that local planning policy frameworks were generally capable of accommodating biomethane projects, but clarity and confidence are significantly higher where CDPs include explicit AD/biogas references and clearly set out locational and environmental safeguards.

3.3.4 Consistency and divergence between local authorities and An Coimisiún Pleanála

In several cases, planning authorities refused permission on the basis of perceived policy conflict or inadequate environmental assessment, but ACP subsequently granted permission, explicitly citing alignment with national climate policy, the National Planning Framework, Regional Spatial and Economic Strategies, and the relevant County Development Plan. An Offaly case (file number: 20321) records the Board's conclusion that a large biogas facility "complies with the Offaly County Development Plan", aligns with EU/national waste and sustainable energy policies, and "would not seriously injure residential or local amenities", notwithstanding earlier local concerns.

Conversely, in other instances the Board has confirmed Local Authority refusals where the proposal failed to demonstrate compliance with key CDP objectives (for example,

location on rural lands where the plan required such facilities to be on zoned employment lands, or failure to demonstrate resource efficiency and traffic safety). The Wicklow example cited above illustrates this, with refusal grounded in non-compliance with specific CDP objectives on location and resource efficiency, despite the broader renewable energy context.

There are also cases, such as the Donegal example where the Board granted permission after an initial Local Authority refusal, where submission of additional EIS/AA material on appeal clarified policy alignment and allowed the Board to conclude that CDP renewable energy and environmental protection policies could be reconciled through conditions.

These patterns indicate that while national and regional climate/renewable policy are important reference points at appeal, the outcome still depends heavily on how well proposals demonstrate compliance with the detailed objectives and safeguards in individual CDPs.

3.3.5 Identified gaps and opportunities for policy and guidance

From the perspective of biomethane development, the compiled data highlight several recurring gaps and ambiguities in the current policy landscape:

1 Locational criteria for large-scale and waste-led plants

Some authorities (e.g. Wicklow) have introduced explicit requirements for large, resource-intensive AD facilities to locate on zoned employment lands and to demonstrate resource efficiency and carbon performance. Others rely more heavily on case-by-case assessment. This variation can produce divergent outcomes for projects of similar scale and function.

2 Balancing renewable energy objectives with transport and landscape policies

Cases such as Ballyvass (Kildare) show that even where CDPs strongly support renewable energy and biogas, other objectives – particularly those protecting the strategic function of national roads or high-value landscapes – can create policy tension and contribute to partial alignment ratings or refusals.

3 Clarity on the distinction between farm-based and industrial/waste-based AD

The dataset suggests that farm-integrated projects with clear agricultural linkages are more often coded as clearly aligned with CDPs, while larger, more “industrial” or waste-oriented projects encounter more mixed or partial alignment, especially where CDPs have not explicitly articulated criteria for such developments.

Future national guidance and local policy updates could:

- Encourage all CDPs to explicitly reference AD/biomethane, distinguishing between farm-scale and large-scale/waste-led facilities.
- Clarify locational principles (e.g. when industrial zoning is required; when rural locations are acceptable with appropriate safeguards).
- Provide more consistent guidance on how to balance renewable energy objectives with transport, landscape and settlement policies, to reduce the incidence of “partial” or “unclear” alignment ratings seen in the current dataset.

3.4 Stakeholder submissions and common themes

Submissions associated with the applications have been assessed, and for each application, the dataset records (where available):

- The theme of each submission
- The stance (supportive, unsupportive, neutral)
- A short representative quote, and
- The stakeholder type (resident, elected representatives, state body/agency, NGO).

This structure allows cross-comparison of issues raised across different local authorities and project types, regardless of the way submissions were originally recorded in individual planning files. Submissions range from single comments by statutory consultees (such as the EPA, Inland Fisheries Ireland or Loughs Agency) through to multiple public and political representations on larger or more contentious schemes.

3.4.1 Dominant unsupportive themes

Across the dataset, unsupportive submissions converge around a consistent set of concerns. These map closely to the planning issues highlighted in Sections 3.1and 3.2, but provide a more fine-grained view of how those issues are perceived by local communities, public agencies and other stakeholders.

1 Environmental and public health / safety

Environmental impacts and public health and safety are the most frequently coded themes. Examples include:

- A Kerry application where a submission expresses concern that “environmental impacts and public health and safety impacts of the proposed development should be considered”, coded under “Environmental and public health/safety” with an unsupportive stance.
- Submissions in several cases raising fears about odour, air quality, and potential health impacts on nearby residents, often linked to the storage and handling of feedstocks and digestate.
- Objections that highlight the risk of major accidents or emergency events at large AD plants, particularly where ammonia or high-pressure gas infrastructure is involved.

2 Traffic and road safety

Concerns about HGV traffic, road safety and road capacity are a second dominant theme:

- Submissions repeatedly flag the suitability of local roads for increased HGV movements, with fears of conflict with existing traffic, limited sightlines and inadequate passing opportunities – especially on local roads and in the vicinity of schools.
- In some cases, third-party comments specifically reference the number of weekly vehicle movements and challenge the applicant’s traffic modelling, or question the adequacy of proposed passing bays and road upgrades.

- These concerns are often echoed in the FIR topics and in the conditions or refusal reasons discussed earlier, indicating a strong feedback loop between submissions and the traffic analysis carried out by planning authorities.

3 *Amenity, odour, noise and visual impact*

A large number of unsupportive submissions focus on amenity impacts, particularly:

- Odour nuisance from reception halls, digesters and digestate storage;
- Noise from plant operations, CHP engines and traffic; and
- Visual intrusion of large tanks, buildings and lighting columns in rural landscapes.

For example, in the Kildare Evergreen case (Lackaghmore, Monasterevin), submissions are categorised under odour, noise, traffic safety, flood risk/surface water, biodiversity, visual impact, health concerns and consultation, reflecting a broad set of amenity and environmental worries among local residents.

4 *Water, flooding and biodiversity*

Submissions also frequently raise:

- Risks of water pollution from runoff or accidental spills, and adequacy of proposed SuDS measures;
- Concerns about flood risk, either to the site or to neighbouring land; and
- Potential impacts on habitats and protected species, particularly where sites are close to rivers, wetlands or Natura 2000 sites.

In the Cappanihane (Limerick) case, for example, submissions reference water/flooding, biodiversity and landscape as central objections, alongside odour, health, traffic and major accident readiness.

5 *Food vs energy and land use change*

A smaller but significant subset of submissions raises policy-type concerns about food security and land use:

- In one Meath case, residents specifically reference the Renewable Energy Directive 2018 in relation to transferring land from food production to energy production, and the need under the Habitats Directive to identify land to be used for energy crops, expressing an unsupportive stance.

These submissions illustrate wider societal debates about the balance between energy and food production and the role of AD in agricultural land use change.

6 *Application completeness and transparency*

Finally, several submissions contest the completeness or transparency of planning documentation:

- Comments that the application “lacks details”, that key figures are missing or that cumulative impacts have not been assessed;
- Criticism of limited or late community consultation.

– These procedural concerns often feed into Local Authority requests for further information and can contribute to refusals where key gaps remain unaddressed.

3.4.2 Supportive Submissions to planning applications

This assessment found a small number of supportive or conditionally supportive submissions, particularly from political representatives, sectoral organisations and, in some cases, local residents or businesses.

Key supportive narratives include:

1 Climate, energy and circular economy benefits

Supporters emphasise that AD and biomethane projects:

– Help to deliver national and EU renewable energy targets;
– Contribute to climate mitigation and compliance with the Climate Action Plan; and
– Enable better management of agricultural residues and organic wastes, aligning with circular economy principles.

2 Rural economic development and farm diversification

Submissions from elected members and farming interests highlight opportunities for:

– Additional farm income;
– Local job creation; and
– Strengthening rural economies through value-added processing of farm by-products.

For example, the Lunderstown (Meath) case records letters of representation from elected representatives explicitly in support of the application, coded as a “political support” theme with a supportive stance.

3 Alignment with development plan and strategic policy

Some supportive submissions explicitly anchor their arguments in CDP or national policy, pointing to local renewable energy objectives and the potential role of the project in achieving them.

At larger industrial-type sites, there are also examples where business or sectoral organisations support AD as part of a broader industrial decarbonisation or waste-to-energy strategy.

3.4.3 Planning appellant types and their typical concerns

The submission analysis reveals key differences between typical planning appellants:

- Local residents tend to focus on direct amenity and health-related impacts: odour, noise, visual effects, traffic safety, perceived health risks and property values.

- Elected representatives appear on both sides: some lodging supportive letters emphasising rural economic and climate benefits; others echoing constituent concerns about traffic and amenity or calling for more stringent conditions.
- State bodies and agencies (e.g. EPA, Inland Fisheries, Loughs Agency, Department of Agriculture) usually adopt a technical and regulatory focus, raising issues around water quality, licensing requirements, flood risk, habitat protection and compliance with sectoral guidelines. Examples include:
  - An EPA submission noted in a Tipperary case (pig farm AD) where the main emphasis is on nutrient management, groundwater protection and adherence to waste and animal-by-product regulations;
  - Loughs Agency comments in a Donegal case stressing pollution prevention and appropriate SUDS and drainage design.

NGOs or sectoral organisations appear in a smaller number of cases, typically on larger or more urban-proximate projects, raising wider questions about sustainability, climate policy coherence and precedent for further industrialisation of rural areas.

3.4.4 Influence of public objections on planning application decisions

A high volume of public objections often coincides with refusals of AD or biomethane plant applications in Ireland, but it is not an automatic or formal reason for denial. Planning authorities base decisions on planning merits – especially environmental, safety, and policy factors – yet many AD proposals that attracted large numbers of third-party objections were ultimately refused, at least at local authority stage. In these cases, the objections usually highlighted genuine planning issues (such as traffic hazards, zoning conflicts, or environmental risks), which the authorities cited in their refusal reasons. Conversely, projects that address all regulatory concerns can still be approved despite significant opposition, particularly on appeal, if they comply with planning guidelines and national policy goals. The substance of objections, not just the number, tends to determine the outcome. Large-scale opposition often flags serious issues that lead to refusal, while mere volume alone cannot veto a compliant project. Below are examples and outcomes where public objections have influenced decisions and how planning bodies have responded.

- 2014–2015, Lusk, Co. Dublin (file number: F14A/0187): A proposed AD waste-to-energy plant near Lusk village (Regeens) ignited intense pushback. Over 600 people lodged formal objections to Fingal County Council, citing that the site was the “wrong place” – too close to homes and the community – with fears of odours, noise, pollution, and heavy traffic. Local representatives (TDs and councillors) joined the opposition. Following this large volume of objections, the community expected planners to “recognise the unsuitability” of the site. The council refused permission, essentially validating the community’s concerns about land-use zoning and environmental impact (the plant was deemed an industrial use incompatible with the rural area). The number of objections by itself wasn’t a legal reason, but the issues raised – proximity to a village, potential nuisance and risk – were pivotal in the refusal.

- 2025, Ballyvass, Co. Kildare (file number: 2560920): Kildare County Council faced over 230 submissions and observations from individuals and groups regarding a proposed biomethane AD facility at Ballyvass, Castledermot. The opposition focused on odour, health and air quality, traffic on local roads, an “inappropriate location,” and general environmental risks. In October 2025 the council refused permission on three key grounds, all closely aligned with concerns raised in objections: (1) the rural

local road network was too narrow and substandard to handle the truck traffic (posing a traffic hazard and setting an “undesirable precedent” for such development); (2) the AD plant’s siting only 91 m from a motorway violated the county development plan’s safety buffer for national roads; and (3) the project’s Environmental Impact Assessment hadn’t properly assessed hydrological and water-quality risks, particularly given sensitive nearby habitats (EU-protected sites). In short, the planning authority’s refusal echoed the primary issues in the 230+ objections – road safety, policy compliance, and environmental protection – rather than any notion of “too many objectors” on its own. (The developer, CycleØ, has since appealed this refusal to An Coimisiún Pleanála; the final outcome is pending as of the writing of this report.)

When large numbers of objections converge on concrete planning problems, councils have often ruled against the development. Local authorities in Ireland do not reject proposals simply by counting objections, but public opposition can be influential because it frequently brings relevant shortcomings to light (traffic dangers, environmental omissions, etc.). A council planner must address each issue raised in submissions, and if the project fails on those points, refusal is likely. In essence, the volume of objections tends to be a proxy for the severity of concerns: truly problematic proposals naturally generate more opposition, which then bolsters the case for refusal.

However, the relationship is not absolute. Not every strongly opposed project is stopped, and not every approval comes with few objections. Key examples show planning bodies sometimes approve AD/biomethane plants despite controversy, provided planning requirements are met:

- 2025, Lisheen (former mine site) Co. Tipperary (file number: 2460936): Tipperary County Council granted permission for a large AD plant at the disused Lisheen Mine site (near Moyne/Thurles), a location that was promoted as an energy hub. This was appealed to ACP by a number of local residents with objections. Neighbours argued the development was “not appropriate” for the area, voicing worries about odour, air quality degradation, flooding risk, and property devaluation near their homes. Despite these objections, ACP upheld the planning approval. An inspector reviewed the case and recommended granting permission with 15 conditions to mitigate impacts. Among the conditions were a cap on feedstock input (max ~98,000 tonnes/year) and requirements for annual monitoring reports to the council. In this decision, ACP essentially determined that the project’s benefits and mitigations outweighed the drawbacks, given the strategic nature of the site and compliance with planning standards. The local objections (on smell, traffic, etc.) were noted, but the board found that with strict conditions the facility could operate without undue harm to amenities. This case shows that strong opposition doesn’t guarantee defeat of a project – if the site is deemed suitable (Lisheen was an existing industrial site, not a greenfield by homes) and if the developer addresses concerns through design and conditions, approval can still be obtained.

- 2019–2021, Glenmore, Co. Donegal (file number: 1950042): An existing AD plant at Glenmore, near Ballybofey, sought to expand by adding additional digesters. The local community (Glenmore Action Group) fiercely opposed this expansion – they appealed Donegal County Council’s decision to grant approval to ACP. The objectors feared worsening odour, noise, traffic congestion in local villages, and risk of spills polluting the River Finn, which is a prized salmon fishery. After lengthy consideration, ACP granted the expansion in 2021, overruling the community’s appeals. The Board acknowledged the concerns (it scrutinised impacts on biodiversity, water, air, traffic, noise, visual amenity, etc.) but was satisfied that the developer’s mitigation measures (and additional planning conditions) would prevent

significant environmental harm. The approval came with 17 conditions controlling various aspects (including limits on feedstock tonnage, biogas storage, waste disposal methods, and operating hours). In its report, ACP even noted positive impacts like local employment and renewable energy production, suggesting these benefits, combined with conditions, tipped the balance in favour of permission. This outcome underscores that national planners may take a broader view, supporting renewable energy projects in principle as long as they are made safe – even when "the voice of the community" is against it. Notably, the community felt ignored by the initial grant and hoped the appeal would halt the project, but in the end technical compliance carried more weight than sheer opposition.

A high number of objections is a reliable indicator that an AD/biomethane proposal faces serious issues or local impacts – and indeed many such proposals have been refused by councils with those very issues cited. There isn't a stated numeric threshold that causes refusal but planning authorities do respond to well-founded community objections. For instance, in Tipperary's 2026 Killough Quarry case (file number: 1385275), residents' submissions about groundwater contamination risk, traffic and safety were explicitly validated by the council's refusal reasons. At the same time, projects can survive at ACP stage if they convincingly resolve the objections. As the push for renewable energy grows, planners are trying to balance local concerns with national climate targets. This has led to some contentious approvals on appeal – but with stringent conditions to tackle the exact problems raised by objectors.

The highest objection counts (hundreds of submissions) tend to occur when a project is perceived as particularly poorly sited or risky, which often leads to a refusal citing those very issues. Meanwhile, projects that ultimately passed (Lisheen, Donegal's expansion, etc.) had fewer objections or more easily mitigated concerns, and decisions in their favour hinged on meeting formal requirements rather than appeasing public sentiment.

There is a noticeable correlation in practice between a high number of third-party objections and an AD/biomethane project being refused planning permission in Ireland – but it's a correlation driven by the substance of the objections, not a rule that "many objections equals automatic refusal." In the last 20 years, Irish planning authorities and ACP have repeatedly sided with communities when objections revealed genuine planning conflicts (environmental hazards, zoning issues, road safety, etc.). Many proposed AD plants with strong local opposition were turned down at the county level (e.g. Dublin/Lusk, Kildare, Tipperary) for the reasons the objectors feared. Public objections – ranging from a dozen to several hundred – have been instrumental in flagging these issues and influencing officials' decisions.

However, the sheer volume of objections by itself is not an official refusal criterion. Planning bodies evaluate the content: a single well-founded objection on, say, a violation of the development plan can carry more weight than a hundred generic complaints. This is evident in cases like Offaly (Ballyduff, file number: 20321) where even without an overwhelming number of public objections, the plan's incompatibility with zoning led to eventual cancellation by the courts. It's also seen where national policy priorities (renewable energy targets) come into play – some projects have overcome local opposition on appeal because they satisfied technical and regulatory requirements and were aligned with policy, as long as mitigating conditions were imposed.

In summary, when an AD/biomethane proposal draws a high volume of objections, it's usually symptomatic of real planning concerns, and those concerns often lead to a refusal in the initial decision. The planning history of the past two decades in Ireland shows a de facto trend: the greater the public outcry (especially on environmental and

amenity grounds), the tougher the scrutiny, and the more likely the project will need to be significantly modified or will be rejected. Yet, each case is decided on its merits. A well-prepared project can still secure approval despite opposition if it demonstrably meets all planning and environmental standards. Likewise, even modest opposition can succeed if it spotlights a critical flaw. Going forward, with clearer guidelines and the government's push for biomethane, we may see more consistency – but community objections will undoubtedly remain a key part of the process, ensuring that local environmental and safety considerations are not overlooked in planning decisions.

3.5 Judicial reviews

In three cases, the High Court's intervention resulted in the permissions awarded by ACP being quashed, illustrating how legal challenges can overturn planning outcomes even after an ACP decision and, in some cases, force a re-run (or restart) of the consenting process.

The Galway case (file number: 191812) was subject to judicial review and the matter was remitted, effectively reactivating the appeal/decision process. The judicial review was resolved by consent (the Board indicated it would not oppose the decision), and the core issue cited was the Board's failure to properly consider the re-classification of the relevant regional road at the proposed entrance location. As a result, the project's planning status is not resolved through the original permission and requires reconsideration under the remitted process.

For the Offaly case (file number: 20321), the judicial review also resulted in the permission being quashed, with the High Court finding that the grant materially conflicted with the development plan zoning objectives (including a Strategic Employment Zone (SEZ) designation) and that the Board had failed to provide adequate reasons, particularly on how a low-employment proposal could comply with SEZ objectives; the record also notes a separate finding that the Board failed to publish the EIAR as required.

Finally, the Meath case (file number 120218) was likewise quashed on judicial review, with the key failing relating to Seveso III/COMAH[11] screening and control: the Court found there was insufficient evidence to justify the conclusion that biogas quantities would remain below a stated threshold and that the condition imposed did not include the necessary prescriptive controls to secure that limit, leaving no extant permission and indicating that any future proposal would require a more robust evidential basis and revised application approach.

Taken together, these judicial review outcomes reinforce a consistent theme: biomethane projects remain vulnerable to legal challenge where the planning record does not clearly demonstrate that all relevant policy requirements and technical constraints have been properly considered and translated into reasons and enforceable conditions. In each case, the Court's focus was less on the principle of development and more on the adequacy of the decision-making process, whether in addressing a material change in the road context (Galway), reconciling a grant with development plan zoning and procedural publication requirements (Offaly), or evidencing and controlling

[11] Seveso III is the EU's major-hazard safety directive (Directive 2012/18/EU) for sites that store/use dangerous substances above certain thresholds. It's aimed at preventing major accidents (e.g., fire, explosion, toxic release) and limiting consequences for people and the environment.
COMAH ("Control of Major Accident Hazards") is the name commonly used for the national laws that implement Seveso III. In Ireland, this is done via the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015), which transpose Seveso III.

COMAH/Seveso-related risk thresholds (Meath). For developers and decision-makers, the practical implication is that consent resilience depends on front-loading robust evidence, aligning proposals with plan-led policy objectives, and framing conditions with sufficient precision to secure critical safety and environmental limits.

3.6 Success in stakeholder engagement and planning

KPMG have discussed the planning process and stakeholder engagement with a developer, Carbon AMS, who have begun construction on a biomethane plant in Duleek, Co. Meath. They outline below their thoughts regarding stakeholder engagement and success in the planning process."

> *"A successful approach to stakeholder engagement and the planning process for AD plants relies on early, personal, and locally grounded outreach. Whilst some Developers emphasise that large "townhall-style" events can backfire by mobilising opposition, we think that showing vulnerability to the public goes a long way towards building trust and getting approval.*
>
> *Meaningful engagement often starts with door-to-door conversations that put the developer in front of people directly and allow for genuine education about the project. Credibility matters: the farmer should be the applicant, as it is the farmer who is the key enabler - looking to diversify their current operations and without the farmer, there would be no project.*
>
> *When engagement is done well, communities tend to respect the transparency shown in smaller town-hall meetings and one-to-one interactions. From a planning perspective,*
>
> *if projects were being scored on quality alone, proximity to the grid would be the number-one criterion, but it is effective stakeholder engagement that ultimately determines whether a project gains local acceptance and progresses smoothly through planning."*

4 Planning Policy insights and recommendations

Ireland's planning pipeline for AD and biomethane development shows a consistent set of decision drivers across Local Authorities and at appeal. Planning Refusals in the context of the planning applications examined are most often linked to deficiencies in supporting information and/or policy non-compliance, rather than opposition to the principle of biomethane development. Where planning permission was granted, they were found to be accompanied by conditions and extensive controls applied to manage environmental risk, traffic impacts, feedstock/digestate and nutrient management, and monitoring/reporting obligations.

4.1 Update on evolving policy context

The national policy and governance context for biomethane has advanced since publication of the National Biomethane Strategy. A Biomethane Strategy Implementation Group, chaired by DCEE, has been established with responsibility for delivering enabling actions, including the development of guidance to support Local Authorities when assessing AD and biorefinery planning applications (Action 5g), and review of resourcing requirements across planning/licensing bodies (Action 5f). In parallel, Government has published a Biomethane Environmental Sustainability Charter, setting out best-practice expectations for environmentally responsible project design, construction and operation, applicable to projects in receipt of public funded support (or operating under a national AD/biomethane support scheme).

There is currently no standalone Section 28 planning guideline specific to anaerobic digestion or biomethane development in Ireland. In practice, planning authorities assess such developments within the existing statutory planning framework, having regard to the National Planning Framework, relevant Section 28 planning guidelines, County Development Plan policies, and applicable environmental assessment requirements, including EIA and Appropriate Assessment where relevant. Government has confirmed that dedicated planning guidance for anaerobic digestion and biomethane is in preparation as part of the implementation of the National Biomethane Strategy, intended to support more consistent assessment of these projects at local authority level. The recommendations in Sections 4.2 and 4.3 are intended to inform and support the development of this forthcoming guidance, drawing on observed patterns in planning outcomes to date.

Notwithstanding this progress, a dedicated planning "support document" for Local Authorities was confirmed in late 2025 by Minister O'Brien as still in preparation and expected to be finalised early in 2026.[12] Accordingly, the recommendations below are intended to (i) align with and build upon the Sustainability Charter and existing governance structures, and (ii) provide evidence-based inputs to strengthen consistency, clarity and efficiency in planning assessment as the sector scales.

4.2 Areas for improvement in planning guidance (to inform/strengthen the forthcoming local authority support document)

1 Standardise expectations for the core risk bundle in planning submissions

[12] Energy Production – Tuesday, 25 Mar 2025 – Parliamentary Questions (34th Dáil) – Houses of the Oireachtas

A recurring theme in planning outcomes is that AD/biomethane applications are often delayed, refused, or appealed where the "risk bundle" is not evidenced to a consistent standard (see section 3.1.2). Government has recognised the need for local authority planning guidelines that support authorities in assessing AD projects consistently.[12]

Recommendation: The forthcoming local authority guidance (as per Action 5g of the NBS) should define a proportionate minimum evidence set (scaled by plant typology/size and site sensitivity) for:

- odour/air emissions and operational amenity management;
- traffic and road safety (including HGV profiling and route constraints);
- feedstock traceability and digestate/nutrient management evidence; and
- EIA/AA screening triggers and the minimum quality bar for EIAR/NIS where required.

This is intended to reduce variability in application quality across counties and reduce refusals driven by preventable information gaps, while remaining consistent with the State's direction of travel on biomethane deployment.

2 *Translate 'Sustainability Charter' principles into planning-stage evidence requirements*

The Biomethane Environmental Sustainability Charter was published by DCEE in May 2025[13] and applies to publicly supported projects, establishing best-practice commitments on digestate management, sustainable feedstock production, plant design/operation, and community/local engagement.

Recommendation: Any local authority guidance should bridge the gap between "principles" and "planning files", and convert Charter commitments into planning-stage evidence requirements suitable for pre-application engagement, for example:

- auditable feedstock sourcing/traceability statements (and how these align with the Charter's sustainability expectations);
- digestate handling, storage and landbank mapping/nutrient balance evidence, expressed in a standard format;
- methane leakage management and operational monitoring commitments presented in planning terms; and
- a structured community engagement plan (e.g., liaison arrangements, disclosure materials) that can be assessed consistently.

This approach does not duplicate licensing requirements; rather it ensures that planning authorities have a consistent, front-loaded evidence basis for determining whether the development is acceptable in principle and capable of being conditioned.

3 *Clearer, more consistent traffic and road safety assessment conventions*

Traffic and road safety emerge as near-universal concerns, particularly where HGV movements interact with constrained rural roads and junction safety.

[13] Ministers O'Brien and Heydon mark key step to ensuring the development of a sustainable, indigenous biomethane sector in Ireland

Recommendation: The local authority guidance should standardise:

- how applicants report daily/peak HGV volumes and temporal distribution;
- the baseline road/junction evidence expected;
- when Road Safety Audits and cumulative route assessments are required; and
- the typical "menu" of enforceable mitigation (routing agreements, delivery windows, junction upgrades, wheel-wash, movement caps).

4 *Strengthen consistency on nutrient management, digestate landbank evidence and traceability*

The Sustainability Charter places explicit emphasis on digestate management and sustainable feedstocks as core principles for an environmentally responsible biomethane sector.

Recommendation: The forthcoming local authority guidance should define minimum planning-stage expectations for:

- digestate storage design and water protection measures (expressed in standard drawings/inputs);
- mapped landbank evidence and nutrient budgeting conventions;
- record-keeping and traceability expectations that can be conditioned; and
- how planning documentation should reference compliance pathways with relevant regulatory regimes (without substituting for licensing).

Note: SEAI has published an AD Manual of Consenting Procedures[14] to help stakeholders navigate permits and licences across project stages. The LA planning guidance can reference this as background but should remain focused on decision consistency at planning stage.

5 *Clarify EIA/AA screening expectations and the quality bar for EIAR/NIS material*

Government statements on the need for planning guidance reflect the complexity of these projects and the need for consistent approaches to environmental assessment in planning.

Recommendation: The Local Authority guidance should provide:

- a consistent framework for EIA/AA screening in the AD/biomethane context;
- minimum ecological baseline expectations (scaled by sensitivity);
- a clear approach to cumulative impacts; and
- an enforceability lens (i.e., mitigation measures that can be conditioned and monitored)

Where sites are close to Natura 2000 designations or sensitive receptors, the adequacy of ecological baseline work, cumulative effects assessment and enforceable mitigation can be decisive. A consistent framework (again, suited to inclusion in the LA support document) would reduce uncertainty and refusal risk

[14] Anaerobic-Digestion-Manual-SEAI.pdf

where authorities cannot conclude that likely significant effects have been fully assessed and mitigated.

6 Provide clearer guidance on the planning–licensing interface (EPA / ABP / waste / IE / other consents)

The dataset indicates that licensing considerations (Waste/IE/EPA) arise explicitly in a subset of appeals. AD projects operate within an existing regulatory framework spanning multiple competent authorities, reinforcing the need for joined-up clarity at planning stage.

Recommendation: The Local Authority guidance should specify the minimum disclosure expected in planning files regarding:

- licensing triggers/thresholds and intended consent pathway;
- what is "in scope" for planning assessment versus what will be addressed under licensing; and
- standard wording/approaches for planning conditions that appropriately link operation to licensing outcomes (where legally appropriate), reducing avoidable uncertainty and appeals

4.3 Recommendations for national/local policy consistency

The dataset indicates that planning outcomes become more predictable where there is clear alignment between national policy intent and local policy articulation. In practice, Government has recognised the need for centralised planning guidance to support Local Authorities assessing AD plants, and has indicated this work is ongoing. The recommendations below focus on the policy-consistency layer that should accompany (and be reinforced by) the forthcoming Local Authority guidance.

1 Model policy for AD/biomethane in County Development Plans

Recommendation: Develop and publish national model CDP policy wording for AD/biomethane to reduce reliance on generic renewable energy provisions and to improve consistency across counties. This should explicitly distinguish between:

- farm-scale/agri-integrated AD (primarily slurry/residues with localised traffic); and
- large-scale / regional / waste-led biomethane plants (grid injection, higher HGV intensity, potentially more complex environmental interfaces).

This aligns with Government's stated objective to support Local Authorities through clearer guidance when assessing AD proposals.

2 Consistent locational and resource-efficiency principles

Government statements and media reporting underline that AD projects are significant infrastructure and that planning must consider location, visual impact, land-zoning plans and ecology, with requirements currently spread across multiple instruments.

Recommendation: Embed a common national set of locational and resource-efficiency principles in guidance (and encourage uptake through CDP updates), including:

- when industrial/employment zoning local locational guidance is expected for larger, resource-intensive facilities;
- what constitutes an acceptable rural location justification (e.g., proximity to feedstocks, appropriate road access, environmental capacity);
- minimum expectations on proximity to enabling infrastructure (gas/grid connections where relevant) and haul-route suitability; and
- a transparent approach to upstream/downstream carbon considerations (e.g., transport intensity), to avoid perverse siting outcomes.

3 Align planning policy more explicitly with national climate/biomethane targets and governance

Appeal decisions granting permission often lean heavily on alignment with national climate/renewable policy (Climate Action Plan, NPF, regional strategies) and state that the project "complies with the County Development Plan" and "provides an acceptable form of energy recovery from agricultural waste". Government has reiterated its commitment to scale biomethane and has positioned the Sustainability Charter as a key deliverable under the Strategy, overseen by the Biomethane Implementation Group.

Recommendation: Ensure that statutory planning guidance and CDP review processes explicitly reference:

- the national biomethane target and the State's enabling pathway;
- the Sustainability Charter as the best-practice baseline for publicly supported projects; and
- the role of consistent planning assessment conventions in facilitating delivery while protecting environmental and community outcomes.

4 Practical implementation: publish supporting templates and training for Local Authorities

Government has flagged that delivery of the biomethane target requires specialist capacity across agencies and that AD projects require consideration of multiple factors at planning stage.

Recommendation: Alongside the Local Authority support document, publish a practical "toolkit" comprising:

- standard pre-application and validation checklists;
- model condition libraries (traffic, odour, monitoring, nutrient management, reporting);
- template tables for HGV reporting and digestate landbank evidence; and
- targeted training modules for planners and elected members to support consistent interpretation and reduce county-by-county divergence.

4.4 Suggested actions for stakeholders

4.4.1 National bodies & the Biomethane Development Office (BDO)

Objective: accelerate sector delivery by reducing avoidable planning and consenting friction, while maintaining environmental safeguards.

Actions:

- Publish the local authority guidance (Action 5g of the NBS) as a single, practical decision-support tool (checklists, templates, model conditions and example evidence packs).
- Translate the Biomethane Environmental Sustainability Charter into planning-stage evidence requirements (e.g., feedstock traceability, digestate landbank mapping, methane leakage monitoring, and community engagement outputs).
- Issue standard templates that LAs can require at validation / pre-application stage (traffic/HGV reporting tables, odour management summary, digestate/NMP summary, and EIA/AA screening inputs).
- Deliver targeted training (planners, elected members, inspectors) on the "core risk bundle" (odour/air, water, traffic, nutrient management, EIA/AA) and how it should be evidenced and conditioned.
- Signpost existing consenting navigation resources (e.g., SEAI consenting manual / permit finder) within the LA support pack to reduce duplication and confusion on the planning–licensing interface.

Deliverables:

- A nationally consistent minimum evidence set by project typology/scale and sensitivity.
- A modular model condition library (traffic, odour, monitoring, nutrient management, reporting).

4.4.2 Local Authorities and An Coimisiún Pleanála

Objective: improve consistency, transparency and predictability in decision-making, reducing refusals driven by preventable information gaps.

Actions:

- Adopt structured pre-application engagement for AD/biomethane proposals, using a standard checklist aligned to the recurring "risk bundle" (traffic, odour, water, nutrient management, EIA/AA).
- Use consistent decision templates that explicitly map (i) information requests, (ii) refusal reasons, and (iii) conditions to the same checklist headings—supporting comparability across counties and at appeal.
- Standardise traffic assessment expectations (HGV profiling, route constraints, RSA triggers, cumulative route assessment) for rural road contexts where traffic is repeatedly determinative.
- Strengthen front-loaded nutrient/digestate evidence requirements (landbank mapping and nutrient budgets) to address a recurrent driver of refusals and appeal scrutiny.

- Clarify planning–licensing boundaries at pre-app and FIR stage (what must be evidenced in planning, what will be addressed under EPA/waste/IE pathways), reducing uncertainty and appeal risk.
- At ACP level, continue to signal clearly in appeal decisions where stronger early documentation would likely have avoided refusal/FIR cycles, to reinforce learning back into local practice.

Deliverables:

- A consistent approach to EIA/AA screening and EIAR/NIS quality thresholds for AD/biomethane project types.

4.4.3 Developers and project promoters

Objective: reduce refusal/appeal risk by evidencing the "risk bundle" to a consistent, auditable standard from the outset.

Actions:

- Front-load feedstock and nutrient management evidence, including:
  - documented feedstock contracts / letters of intent;
  - mapped digestate landbank; and
  - nutrient budgeting in a standard, auditable format.
- Commission traffic impact assessment and RSA early, and design mitigation into the scheme (access/junction design, passing bays where required, routeing agreements, delivery windows and caps).
- Invest in robust EIA/AA scoping and documentation, with particular focus on cumulative impacts and enforceable mitigation where sensitivity is high (water and ecology are repeatedly determinative).
- Embed Charter-aligned commitments (digestate safeguards, sustainable feedstock, methane leakage controls, community engagement outputs) in planning documentation for publicly supported schemes.
- Proactively address recurring community concerns (traffic, odour, water/flood, amenity/health) with clear design choices (enclosed reception, defined haul routes, monitoring/complaints procedures, landscaping).

Actions:

- A concise "planning pack" summary that clearly evidences:
  - risk bundle compliance,
  - enforceable mitigation,
  - monitoring and reporting commitments.

5 Conclusion

There is sufficient planning application activity related to Ireland's biomethane and anaerobic digestion (AD) industry to show clear, repeatable decision patterns across Local Authorities and at appeal to APB.

Across the 78 planning applications reviewed, the overall picture is one of active development progress, alongside persistent friction points that predictably drive refusals, extended further-information cycles, and appeals. The dataset includes 64 standard (non-extension) planning applications and 14 extension-of-duration applications, with local authorities approving ca. 68% of planning applications (44 granted and 20 refused), while planning applications for extension of durations largely reflect the continuation of previously granted permissions (13 granted extensions; 1 refused extension).

A consistent finding is that where projects granted planning permission, they are typically accompanied by extensive, prescriptive planning conditions covering environmental protection (odour, air emissions, noise, water protection and biodiversity), traffic and road safety, feedstock/digestate controls, and monitoring and reporting. This reflects a planning environment in which AD/biomethane is increasingly treated as acceptable in principle, but only where applicants demonstrate robust impact assessment and where enforceable mitigation can be clearly specified.

Equally, the evidence indicates that refusals are most often driven by information and policy compliance deficits rather than opposition to biomethane as a technology. Refused cases commonly feature insufficient or inadequate environmental documentation (including EIA/AA material where required), unresolved traffic impacts, unclear feedstock sourcing and nutrient management, or incompatibility with County Development Plan objectives. In the non-extension refusals, policy conflict is referenced in the vast majority of decisions, with odour/air emissions, traffic/road safety and water/drainage issues also frequently cited.

Appeals are therefore a recurring feature of the pipeline, and the role of An Coimisiún Pleanála is materially important in shaping outcomes – both by upholding refusals where key environmental or traffic concerns remain unresolved, and by granting permission (with strengthened conditions) where additional technical detail demonstrates that site-specific risks can be managed. This reinforces a central conclusion of the review: the planning system can facilitate biomethane growth, but it does so through a relatively stable "risk bundle" lens that applicants must address consistently and credibly from the outset.

5.1 Summary of key takeaways and implications of planning applications

1 *The planning "risk bundle" is stable and predictable. Outcomes can be made more consistent.*

Across the dataset, the same cross-cutting issues repeatedly shape decisions: environmental risk management (especially odour, air quality, noise, water protection and biodiversity), traffic and road safety, feedstock sourcing and nutrient/digestate management, and EIA/AA requirements and the quality of assessment. These themes appear consistently in further information requests,

conditions, and refusal reasons, indicating that they form the core analytical frame through which decision-makers evaluate AD/biomethane proposals.

2 *"Grant with conditions" is the dominant pathway, but only where enforceable mitigation is front-loaded.*

Where permissions are granted, conditions most frequently relate to environmental management and mitigation, construction and operational management, and water/drainage controls, with traffic/access and safety requirements also common. This underscores that AD/biomethane projects are routinely progressed through planning via detailed operational safeguards, monitoring regimes and defined controls (e.g., movement caps, routing, hours, and water protection measures), rather than through a lighter-touch approach.

3 *Refusals are largely avoidable where application quality and policy alignment are strengthened early.*

The refusal analysis shows that decisions to refuse typically cite multiple inter-related concerns, anchored in the adequacy of environmental assessment and the robustness of supporting information, often intertwined with County Development Plan compliance. This suggests a practical opportunity to reduce refusals and shorten timelines through clearer minimum evidence expectations at validation and pre-application stage – especially for odour/air, traffic, water protection, feedstock traceability, digestate landbank evidence, and EIA/AA screening and documentation quality.

4 *Policy alignment is generally achievable, but clarity varies by county, creating uneven risk for developers and decision-makers.*

The review finds that local policy alignment is strongest where County Development Plans explicitly reference AD/biogas/biomethane and set out clear locational and environmental safeguards. Where policy support is generic (renewables in principle) or where other spatial/transport/locational objectives introduce tension, particularly for larger or more waste-led schemes, alignment is more frequently partial or unclear. This variation increases uncertainty and can contribute to divergent outcomes for similar project types.

5 *The system is moving toward more structured guidance – this review provides an evidence base to support that shift.*

The report notes that national governance and best-practice expectations have advanced, while a dedicated planning support document for Local Authorities has been in preparation and expected to be finalised in early 2026. In that context, the strongest implication of this analysis is that consistency and speed in decision-making can be improved if the sector converges on a proportionate, standardised evidence set for the core "risk bundle," and if policy wording and templates support consistent interpretation across counties and at appeal.

Overall implication: the planning pathway for AD/biomethane in Ireland is workable and increasingly established, with 64% the non-extension permission requests resulting in a grant of permission either at local authority or ACP stage, but it remains highly sensitive to application completeness, the quality of environmental and traffic evidence, and demonstrable alignment with local policy. Strengthening consistency, through clearer local policy references, standardised evidence expectations, and practical tools (checklists, templates and model conditions), would reduce avoidable refusals and

appeals while maintaining the environmental and community safeguards that are central to planning decisions.

In the context of Ireland's ambition to deliver up to 5.7 TWh of indigenous biomethane by 2030, the evidence reviewed suggests that the period to the late-2020s will be critical. Given typical development timelines for AD and biomethane projects – from planning submission through consent, financing, construction and commissioning – the projects currently in, or entering, the planning system over the next few years will largely determine whether the 2030 target can be credibly approached. Delays, refusals, or prolonged appeals at planning stage therefore have implications beyond individual projects, as they directly constrain the volume of capacity that can be delivered within the remaining timeframe to 2030. Improving consistency, clarity and predictability in planning decision-making over this period is a key enabling factor for meeting national biomethane ambitions.

A Appendices

A.1 Excel database

Link available here:

A.2 References to AD/biomethane/biogas in current CDPs

Local Authority	Development Plan (Years)	AD/Biomethane Mention?	Summary of Relevant Policy/Reference	Reference (Section/Page)
Carlow County Council	**Carlow County Development Plan 2022–2028**	**Yes**	Supports development of biogas (Anaerobic Digestion) plants at suitable locations, including on-farm facilities, as part of the county's bioenergy strategy. Policy BE P4 explicitly encourages anaerobic digesters for renewable gas production and energy generation.	*Ch. 7: Climate Action & Energy*, Policy BE P4 (Bioenergy)
Cavan County Council	**Cavan County Development Plan 2022–2028**	**No (no explicit mention)**	The plan addresses renewable energy and waste management in general terms, but does not explicitly reference anaerobic digestion or biomethane. (Local amendments during the plan's adoption removed earlier prohibitive language, effectively allowing AD facilities in appropriate industrial/waste contexts, but without naming them directly. The plan's focus is on general support for renewable energy projects and waste management infrastructure.)	*Cavan CDP 2022–2028* (No direct AD/biomethane policy)
Clare County Council	**Clare County Development Plan 2023–2029**	**Yes** (implicit)	Bioenergy and biogas are addressed as part of renewable energy strategy. The plan supports development of bioenergy facilities (including those producing biogas via AD) in line with climate targets. *Example:* It sets objectives to facilitate combined heat-and-power and bioenergy projects using organic wastes and biomass. (Direct terms "anaerobic digestion" or "biomethane" are not used, but support for biogas production is included under renewable energy goals.)	*Clare CDP 2023–2029*, Vol. 1, Ch. 2: Climate Action, Objective CDP2.19 (Bio-Energy)
Cork City Council	**Cork City Development Plan 2022–2028**	**Yes**	Recognises AD in waste management and energy contexts. The plan's sustainability policies mention anaerobic digestion as a method to treat organic waste (e.g., food waste, sewage sludge) and produce biogas for renewable energy. It encourages exploring AD technology to support a circular economy and reduce landfill use in the city.	*Cork City CDP 2022–2028*, Chapter on Waste Management & Energy (AD as waste-to-energy strategy)
Cork County Council	**Cork County Development**	**Yes**	Promotes biomethane and AD projects. The plan includes objectives to facilitate	*Cork County CDP 2022–2028*, Energy Strategy (Renewable Energy) –

	Plan 2022–2028		anaerobic digestion facilities (especially farm-based or community AD plants) for managing agricultural wastes and generating renewable gas/electricity. It highlights the potential of biomethane production from organic waste and supports integration of this renewable gas into the energy supply, in line with national climate and energy policies.	policies supporting AD/biomethane development (official plan document; Section on renewable energy and bioenergy projects).
Donegal County Council	**Donegal County Development Plan 2018–2024** (extended)	**Yes**	Endorses AD for biogas from waste. In the plan's Renewable Energy chapter, Donegal County commits to supporting biogas production via anaerobic digestion of organic wastes (e.g. agricultural slurry, food waste) as a renewable energy source. It encourages appropriately sited AD plants in rural areas to both manage farm waste and generate biogas for heat/power, provided environmental safeguards are in place.	*Donegal CDP 2018–2024*, Section 7.2 Renewable Energy (policy supporting AD/biogas in waste management & energy) – *Donegal County Council website* (Renewable Energy policies, 2018–2024 Plan).
Dublin City Council	**Dublin City Development Plan 2022–2028**	**Yes**	References AD in context of sustainable waste-to-energy. The plan discusses exploring anaerobic digestion of organic waste (e.g., from municipal solid waste and wastewater treatment) to produce biogas as a renewable energy source. AD is presented as part of the city's strategy to reduce landfill use and greenhouse gas emissions in line with climate action goals.	*Dublin City CDP 2022–2028*, Chapter on Waste Management & Renewable Energy (AD for biogas from organic waste)
Dún Laoghaire–Rathdown Co. Council	**Dún Laoghaire–Rathdown (DLR) County Development Plan 2022–2028**	**Yes**	Supports renewable energy including biogas. The DLR plan's Climate Action policies encourage the development of renewable energy infrastructure, explicitly including bioenergy. While not detailing AD by name, the plan notes biogas as a form of renewable energy and supports the principle of using anaerobic digestion to convert organic waste to energy (aligned with circular economy objectives and the regional climate action strategy).	*DLR CDP 2022–2028*, Section 11: Climate Action & Energy (policies supporting biogas/AD in waste and energy context – DLR CDP document, Energy Policies section).
Fingal County Council	**Fingal Development Plan 2023–2029**	**Yes**	Explicit support for AD of organic waste. Fingal's plan contains strong circular economy and renewable energy policies. It specifically supports anaerobic digestion as a method to treat organic wastes (including farm waste, food waste, wastewater sludge) to produce biogas/biomethane. It recognizes the role of AD in achieving national targets (Ireland's 5.7 TWh biomethane by 2030 goal) and includes objectives to facilitate AD facilities and potentially inject renewable gas into the grid in the future (in line with Gas Networks Ireland plans).	*Fingal DP 2023–2029*, Chapter on Climate Action & Environment – see policies on Bioenergy and AD (Fingal Dev. Plan, Renewable Energy section; official PDF, pp. 274–277).

Galway City Council	**Galway City Development Plan 2023–2029**	**Yes** (general)	Acknowledges biogas in renewable energy mix. The plan emphasizes sustainable waste management and energy, noting biogas as a renewable resource (e.g. capturing gas from wastewater treatment or landfill). There is general support for waste-to-energy initiatives, including AD, but no specific AD infrastructure policy. (The plan's focus is on broad support for renewable energy technologies and improved waste management; any AD projects would align with these strategies.)	*Galway City CDP 2023–2029*, Section on Infrastructure & Environment – references to biogas in waste management/energy recovery context (Galway City Dev. Plan document).
Galway County Council	**Galway County Development Plan 2022–2028**	**Yes**	Promotes bioenergy, including biogas. Galway County's plan supports a range of renewable energies. In its Climate & Energy objectives, it encourages biogas production from agricultural and food waste as part of rural economic development and climate action. While the terms "anaerobic digestion" and "biomethane" are not prominent in the text, the plan clearly endorses developing bioenergy facilities (which would cover AD plants) to capture energy from farm residues, consistent with national policy on expanding indigenous biomethane supply.	*Galway County CDP 2022–2028*, Chapter on Climate Change & Renewable Energy – policies encouraging bioenergy/biogas from agricultural residues (official plan document; Climate Action & Energy section).
Kerry County Council	**Kerry County Development Plan 2022–2028**	**Yes**	Detailed policies on AD and "renewable gas." Chapter 12 (Energy) contains specific objectives KCDP 12-25 and KCDP 12-26 to facilitate sustainable development of bioenergy plants, including anaerobic digestors. The plan allows AD facilities on appropriately zoned land or on farms (small-scale AD), provided they meet environmental and planning criteria. It also explicitly promotes renewable gas (biomethane) as a clean energy source to be harnessed: e.g., the plan notes that biomethane can be injected into the gas grid as a carbon-neutral fuel to decarbonise heat, transport, and industry. These strong pro-AD policies reflect Kerry's strategy to leverage its agricultural sector for biogas/biomethane production.	*Kerry CDP 2022–2028*, Chapter 12: Energy, Policies KCDP 12-25 & 12-26 (Facilitating AD/Biogas Plants); *Renewable Gas in Gas Network* discussion
Kildare County Council	**Kildare County Development Plan 2023–2029**	**Yes**	Highlights biogas and biomethane integration. In Chapter 7 (*Energy & Communications*), Kildare's plan addresses "low-carbon and renewable gases." It notes that biogas can be injected into the natural gas network once upgraded to biomethane, thereby replacing fossil gas. The plan emphasizes the role of biomethane, describing it as	*Kildare CDP 2023–2029*, Ch. 7: Energy & Communications, Section 7.9 *"Bio-Energy"* (biogas injection into gas grid); (explanation of biomethane's benefits)

			an upgraded form of biogas that is fully compatible with the existing gas grid and useful for decarbonising heat, transport, power generation, and supporting sustainable agriculture. Kildare's policies support developing indigenous renewable gas (biomethane) to improve energy security and reduce emissions.	
Kilkenny County Council	**Kilkenny County Development Plan 2021–2027**	**Yes**	Encourages AD for waste-to-energy. The plan's renewable energy chapter supports the development of biomass and biogas (AD) projects. It includes a policy to facilitate farm-scale anaerobic digestion plants that convert agricultural waste (like animal slurry or food waste) into biogas. This is framed as part of Kilkenny's climate action and circular economy measures, aiming to reduce waste to landfill and provide renewable energy for local use.	*Kilkenny CDP 2021–2027*, Section on Renewable Energy – policies encouraging biomass/biogas energy (Kilkenny Dev. Plan document; policy to support farm AD facilities).
Laois County Council	**Laois County Development Plan 2021–2027**	**Yes**	Supports bioenergy including AD. Laois's plan outlines a commitment to developing renewable energy sources. Under its Energy & Climate policies, the council encourages bioenergy projects. This includes supporting anaerobic digestion facilities – particularly for agriculture (e.g., using farm waste/slurry to produce biogas) – as a means to generate renewable heat/electricity and to achieve waste management objectives. The plan stipulates that any AD developments must be appropriately sited to protect local communities and the environment.	*Laois CDP 2021–2027*, Energy & Climate Change section – support for anaerobic digestion of organic wastes (Laois County Dev. Plan, policy on bioenergy/AD).
Leitrim County Council	**Leitrim County Development Plan 2023–2029**	**Yes**	Includes AD in renewable energy goals. Leitrim's rural development and climate policies mention investigating bioenergy options. The plan expresses support for small-scale AD plants (e.g., farm-based digesters) as a way to manage agricultural waste and produce biogas for local energy use. This aligns with the county's strategy to promote sustainable rural enterprises and to contribute to climate action. (While references to AD/biomethane are brief, the intention to facilitate such renewable energy projects is clear.)	*Leitrim CDP 2023–2029*, Renewable Energy & Climate Action chapter – reference to anaerobic digestion and bioenergy in rural economy context (Leitrim Dev. Plan document).
Limerick City & County Council	**Limerick Development Plan 2022–2028**	**Yes**	Emphasizes green energy, including AD. Limerick's unified city-county plan promotes renewable and low-carbon energy. It supports bioenergy production (explicitly including biogas via anaerobic digestion) as part of the strategy to reach carbon-neutral status by 2050. The plan encourages AD	*Limerick DP 2022–2028*, Chapter 5: Climate & Green Energy – policies supporting anaerobic digestion/biogas projects (Limerick Dev. Plan, Renewable Energy policies).

			facilities to treat organic wastes (from agriculture, food industry, municipal waste) and produce biomethane/biogas for use as a renewable fuel, in line with Limerick's Climate Action commitments.	
Longford County Council	**Longford County Development Plan 2021–2027**	**Yes**	Endorses AD for renewable energy. The plan highlights biomass and biogas as important components of Longford's renewable energy potential. A specific objective encourages anaerobic digestion facilities to process agricultural by-products (like slurry or energy crops) into biogas for local heat and power use, helping to reduce greenhouse gas emissions. These facilities are promoted particularly in the context of farm diversification and sustainable waste management, with attention to preventing negative impacts on environment or neighbors.	*Longford CDP 2021–2027*, Section: Infrastructure & Environment – policy on supporting anaerobic digestion for waste-to-energy (Longford Dev. Plan document, Renewable Energy objectives).
Louth County Council	**Louth County Development Plan 2021–2027**	**Yes**	Includes AD in climate and waste policies. Louth's plan, under its Environment & Climate Change chapter, references anaerobic digestion as a beneficial technology for waste management and renewable energy. It encourages using AD to process organic waste (notably from the agri-food sector and municipal sources) to generate biogas, thus supporting the circular economy and reducing landfill. Policies aim to facilitate AD projects that contribute to Louth's renewable energy supply, aligned with national climate targets.	*Louth CDP 2021–2027*, Chapter 8: Environment, Climate Change & Infrastructure – reference to anaerobic digestion (Louth Dev. Plan, Waste Management & Energy policies).
Mayo County Council	**Mayo County Development Plan 2022–2028**	**Yes**	Promotes biogas via AD. Mayo's plan, in its Renewable Energy strategy, identifies anaerobic digestion as a key opportunity. It supports establishing AD plants to convert agricultural waste, food waste, and other organics into biogas for heat or electricity generation. This is part of Mayo's broader goal to increase renewable energy (wind, solar, bioenergy, etc.) and lower carbon emissions. The plan also notes potential for biogas to be upgraded to biomethane as a transport or grid fuel.	*Mayo CDP 2022–2028*, Energy & Climate Change chapter – specific references to anaerobic digestion in renewable energy policies (Mayo Dev. Plan document, Renewable Energy section).
Meath County Council	**Meath County Development Plan 2021–2027**	**Yes**	Highlights AD in circular economy and energy. Meath's plan places strong emphasis on the bioeconomy. It specifically mentions anaerobic digestion as a method to produce renewable gas (biomethane) from organic materials (like food/agricultural waste). The plan supports AD facilities in appropriate locations (e.g., on	*Meath CDP 2021–2027*, Climate Action & Circular Economy section – policies encouraging anaerobic digestion/biogas projects (Meath Dev. Plan, e.g., Policy EC POL 9 – Bioeconomy & AD).

			farms or in industrial zones) to supply biomethane for local energy use and injection into the gas grid. These policies aim to reduce waste, lower emissions, and stimulate rural economic activity through biogas production.	
Monaghan County Council	**Monaghan County Development Plan 2025–2031** (adopted July 2025)	**Yes**	Continues support for AD and biogas. Monaghan's newly adopted plan (replacing the 2019–2025 plan) maintains a focus on renewable energy in its rural economy. It encourages anaerobic digesters to manage farm and food industry waste, producing biogas that can generate heat/electricity or be refined into biomethane. Building on the previous plan, it provides guidance for siting AD plants (e.g., on farms or in industrial areas) to ensure environmental protection and community acceptance, reflecting Monaghan's large agri-food sector and interest in biogas projects in recent years.	*Monaghan CDP 2025–2031*, Energy & Climate Change chapter – references to anaerobic digestion and biogas (Monaghan Dev. Plan document, Renewable Energy policies).
Offaly County Council	**Offaly County Development Plan 2021–2027**	**Yes**	Dedicated AD policy section. Offaly's plan has a specific sub-section on Anaerobic Digestion in Chapter 3 (Climate Action & Energy). It notes that biogas/biomethane from AD is a carbon-neutral renewable fuel that can be used for heat, power, and transport. The plan sets objectives to support the development of anaerobic digestion plants in the county, including facilitating biomethane injection into the gas grid and encouraging farmers and industry to invest in AD technology. Offaly's strong focus on AD aligns with its transition away from peat and towards alternative rural enterprises like bioenergy.	Offaly CDP 2021–2027, Ch. 3: Climate Action & Energy, Section 3.2.5 *"Biogas from Biomass and Waste"* – Anaerobic Digestion policies
Roscommon County Council	**Roscommon County Development Plan 2022–2028**	**Yes**	Encourages AD as part of bioenergy development. Roscommon's plan includes policies on renewable energy with an emphasis on bioenergy (given the county's agricultural base). It supports anaerobic digestion facilities that use farm waste and other biomass to produce biogas and/or electricity. The plan identifies AD as a way to add value in the agriculture sector, reduce waste and emissions, and generate local energy. Any proposed AD projects must comply with environmental and planning standards, particularly due to Roscommon's sensitive waterways and landscapes.	*Roscommon CDP 2022–2028*, Renewable Energy chapter – policy support for bioenergy and biogas (Roscommon Dev. Plan, relevant policy e.g., *Objective REn 5* for AD on farms and waste facilities).
Sligo County Council	**Sligo County Development Plan 2017–2023** (extended to 2024)	**Yes** (general)	General reference to AD/biogas in older plan. Sligo's current plan (2017–2023, extended pending a new plan) broadly supports renewable energy	*Sligo CDP 2017–2023 (extended)*, Section 9.4: Renewable Energy – mentions of biogas/AD as a renewable resource

			projects, including biogas production via AD. It notes that anaerobic digestion of agricultural and municipal waste can contribute to sustainable energy supply and waste reduction. While details are limited, the plan's renewable energy section encourages exploring waste-to-energy solutions like AD. *(Sligo's next development plan (2025–2031) is expected to continue or strengthen these policies.)*	(Sligo Dev. Plan document).
South Dublin County Council	**South Dublin County Development Plan 2022–2028**	**Yes**	AD promoted for organic waste management. South Dublin's plan contains policies on waste management and energy that reference anaerobic digestion. It encourages the AD of organic wastes (from households, farms, industries) to produce biogas for use in heating or as fuel, consistent with the region's Climate Action Plan. Additionally, the plan supports developing infrastructure to allow biomethane injection into the gas grid (e.g., via Compressed Natural Gas, CNG, facilities), recognizing biomethane as a key component of sustainable transport and energy supply in the Dublin area.	*South Dublin CDP 2022–2028*, Section 6: Infrastructure & Environmental Quality – policies on organic waste treatment and AD/biogas (South Dublin Dev. Plan, Waste & Energy policies).
Tipperary County Council	**Tipperary County Development Plan 2022–2028**	**Yes**	Bioenergy (including AD) is a priority. Tipperary's plan (notably in its Renewable Energy Strategy, Volume 3) puts significant emphasis on biogas/biomethane. It supports anaerobic digestion plants to convert farm waste, food processing by-products, and other organics into biogas for electricity and heat. For example, the plan references a successful AD facility at Lisheen (a former mining site turned bioeconomy campus) as a model for future projects. Tipperary encourages further biomethane production to supply renewable gas for local use and potentially feed into the national grid, aligned with its leadership in sustainable energy initiatives.	Tipperary CDP 2022–2028, *Renewable Energy Strategy (Vol. 3)* – sections on Bioenergy & Biogas (Tipperary Dev. Plan official PDF, Bioenergy policies and case studies).
Waterford City & County Council	**Waterford City & County Development Plan 2022–2028**	**Yes**	Integrates AD in waste and energy policies. Waterford's plan – covering both city and county – supports anaerobic digestion of organic materials as a sustainable waste management and energy recovery solution. Policies in the Climate Action and Renewable Energy chapter call for facilitating AD of agricultural waste, food waste, and wastewater sludge to produce biogas/biomethane for local industry and transport fuel. The plan envisions appropriately	*Waterford City & County DP 2022–2028*, Climate Action & Renewable Energy chapter – support for anaerobic digestion and renewable gas (Waterford Dev. Plan document, policies on bioenergy and waste reuse).

			sited AD plants (e.g., in industrial zones or near large agricultural operations) that can help meet renewable energy targets and provide biofertilizer as a by-product.	
Westmeath County Council	**Westmeath County Development Plan 2021–2027**	**Yes**	Advocates for biogas via AD. Westmeath's development plan acknowledges the county's strong agriculture sector and the opportunities for biogas production through AD. Under its Energy & Climate section, the plan includes an objective to support the establishment of anaerobic digestion plants to process farm wastes and generate renewable energy. It emphasizes that such projects can aid in meeting climate targets, provided they comply with environmental protection and do not adversely affect local communities.	*Westmeath CDP 2021–2027*, Section 8.5: Energy & Climate Change – policy objective promoting anaerobic digestion for renewable energy (Westmeath Dev. Plan document, Renewable Energy policies).
Wexford County Council	**Wexford County Development Plan 2022–2028**	**Yes**	Promotes biomethane production. Wexford's plan (Energy Strategy chapter) explicitly encourages biofuel and biomethane projects. It sets a policy to facilitate anaerobic digestion of organic by-products from Wexford's farming and food sectors, aiming to produce biogas/biomethane for energy. The plan highlights AD as part of diversifying the rural economy and meeting renewable energy generation targets, noting Wexford's high potential for biomass supply. Environmental safeguards and proper siting (e.g., avoiding proximity to residential areas unless small-scale on-farm digesters) are required for any AD development.	*Wexford CDP 2022–2028*, Energy & Climate Action chapter – specific policy on biomethane/AD (Wexford Dev. Plan document, Bioenergy Policy EN07 supporting AD for biomethane).
Wicklow County Council	**Wicklow County Development Plan 2022–2028**	**Yes**	Includes AD in renewable energy mix. Wicklow's plan supports a broad range of renewable energies. Within its Climate Action and Energy policies, it references biomass and biogas as key resources. The council encourages investigating anaerobic digestion opportunities (particularly farm-based AD) as part of its strategy to achieve national climate targets (notably Ireland's 2030 biomethane goal). While details are brief, the plan aligns with national policy in recognizing biomethane as a future low-carbon fuel that can substitute natural gas and reduce agricultural emissions.	*Wicklow CDP 2022–2028*, Chapter on Climate & Energy – references to biogas/anaerobic digestion (Wicklow Dev. Plan document, Renewable Energy objectives).

Contact us

Russell Smyth
Partner, KPMG Sustainable Futures
T +44 7738 603 869
E russell.smyth@kpmg.ie

Dónal Ó Céileachair
Manager, KPMG Sustainable Futures
T +353 86 204 1114
E donal.oceileachair@kpmg.ie

Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.

www.kpmg.com

© 2026 Copyright owned by one or more of the KPMG International entities. KPMG International entities provide no services to clients. All rights reserved. KPMG refers to the global organization or to one or more of the member firms of KPMG International Limited ("KPMG International"), each of which is a separate legal entity. KPMG International Limited is a private English company limited by guarantee and does not provide services to clients.

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.