

Registered Company No. 279  
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Sharon Gorman  
Senior Consultant: Una Crox

April 2003

at Ballinderry  
Carbury  
Co. Kildare.

planning application for the  
extraction of sand and gravel over  
an area of 7.8 hectares, associated  
washing and screening plant, new  
access and access road, shipping  
office, site office, weighbridge,  
wheelwash, surface water  
settlement lagoon, staff facilities

Application details:

Submission to  
Kildare County Council

Applicant: Goode Concrete

Response to Request for  
Further Information

Register Reference: 02/1475

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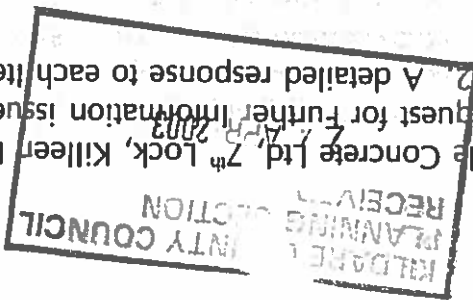
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# Planning Report

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Introduction

This submission is made on behalf of Goode Concrete Ltd, 7th Lock, Killdeer Road, Ballyfermot, Dublin 10 in response to a Request for Further Information issued by Kildare County Council on 25 October 2002. A detailed response to each item of information sought is provided below.



A number of modifications have been made to the proposed Operational Plan based on consultations with the Roads Department of Kildare County Council.

Faber Maunsell have discussed this matter with the Roads Department and have provided revised the proposals which include for the realignment of the County Road to the north of the site. The Roads Department has advised that these works are desirable as they will facilitate existing extractive operations in the area and will result in safety improvements on the local road network for all road users. As such, the proposed re-alignment represents a significant planning gain for the area which will be facilitated by the proposed development.

In accordance with the provisions of article 35(1)(c) of the Planning and Development Regulations 2001, revised public notices informing the public of the modifications have been published in the Irish Independent of 23 April 2003. Site Notices have also been erected at the locations used upon lodgement of the planning application. Two copies of the respective notices are attached herewith.

1. Item No. 1

Item No. 1 states:

1. The proposed development materially contravenes the County Development Plan, 1999 in relation to the extractive industry both in terms of soil type and its potential impact on the bloodstock industry in this area. Please submit your justification for such a material contravention. Please be advised that despite the details contained in your submission that the subject site is within an area that is classified as Class A Soils.

1.1 Class 'A' Soils

Paragraph 2.29.1 of the Kildare County Development Plan 1999 states:

'No sand and gravel extraction will be permitted under Class A soils, in areas of high amenity (as defined in this Plan) and their environs, or where conflict with the bloodstock industry might arise'

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1.1.1 Soils

The National Soil Survey indicates that the site is covered on the eastern side by A4 soils and on the western side by B1 soils. A4 soils are described as 'pastures somewhat liable to poaching; cultivation and harvesting difficult in unfavourable seasons'; B1 soils are defined as follows: 'moisture deficit in places in dry periods; crops mature unevenly; some steep slopes';

It is evident from an inspection of the National Soil Survey that the site is situated in an area characterised by a variation of soil types including D1 immediately north of the site, B1 on the western part of the site and to the south west, and U and D1 to the south. Accordingly, the general area is characterised by a variety of soil types, including Class A.

1.1.1.1 Inappropriate Policy Provision in the Development Plan

It is further submitted to the Planning Authority that the designation of soils in County Kildare was undertaken and published by National Soil Survey, Soils Division, An Foras Taluntais (now Teagasc) in the 1970's. Consultations have been undertaken with officials in Teagasc for the purposes of preparing this response. Teagasc advised that it is a state authority and as such was not in a position to provide direct consultancy services in respect of the clarification of the soils issue on the subject site.

Officials from Teagasc's offices in Kinsale did advise that the survey was carried out in the 1970's in order to establish soil types for the purposes of categorising lands for grant aid and subsidies. The survey, which is considered by Teagasc to be obsolete, was never intended as a tool to determine lands uses appropriate in the rural areas of any County. In this regard, it is noted that this specific policy was carried over directly from the Kildare County Development Plan 1985.

The relevance and appropriateness of this policy provision is evident when one considers the potential impact on Class A soils associated with extractive activities. The area of Co. Kildare is 169,550 ha (1,695 km<sup>2</sup>). Of this area, 82,238 ha are covered with Class A soils, representing 48.50% of the soils in the county. Taking a conservative estimate that some 70% of the soils on site may be Class A, the extraction area under Class A soils may be c.5.4 ha which represents 0.00065% of the Class A soils in Kildare.

Furthermore, that area of the site which is designated as Class A on the Soil Survey is categorized as Class A3. This is defined as an Class A soil that is 'somewhat liable to poaching'. This means that the land can not be used in very wet conditions, and grazing animals have to be taken off.

With regard to the long term impact of the proposed development on soils, it is submitted that the soil will be stored on site and replaced after the resource has

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been extracted, in accordance with the Mineral Planning Guidance Notes. It has been reported that in some instances the temporary movement and subsequent restoration of Class A topsoil may have a beneficial effect on the soil. So long as the Mineral Planning Guidance Notes are adhered to, the drainage of the soil will be improved. Accordingly, given that a substantial area of the site will be restored using the Class A soils, the long term impact is immaterial as a substantial area of the site will be returned to agricultural use.

#### 1.1.1.2 Precedents

It is further submitted that there are a number of precedents in the immediate area for the granting of permission for extractive operations on sites characterised by various soil types, including Class A soils. In this regard, Roadstone Provinces was granted planning permission for extraction on the lands immediately to the west of the subject site (Reg. Ref. 99/1200). This site, in common with the application site, is covered by both Class A4 soils and Class B1 soils.

Kilsaran was granted planning permission by Kildare County Council and An Bord Pleanála for extraction of sand and gravel and quarrying of stone on lands at Kilsarney further west of the site (Reg. Ref. 99/2042). This area is also characterised by Class A4 and Class B1 soils.

Permission was also granted by Kildare County Council at Boherkill, Rathangan, County Kildare for the retention and extension of an existing gravel pit (Reg. Ref. 1270/01). This application is the subject of a current appeal to An Bord Pleanála (ABP Ref: PL 09.130086). This site is located in Class 'A' Soils and a condition has been attached to the Schedule of Conditions (No. 2) which relates to the soil classification. The Condition is as follows:

*'This permission is limited to the physical size of 2.83 hectares as identified in the application, and shall not exceed a period of 5 years. No further quarrying shall take place on the site.*

*Reason: To restrict the further encroachment onto Class 'A' soils, as identified in section 2.29.1 (Sand and Gravel and Rock Quarrying) of the Kildare County Development Plan 1999, and in the interest of orderly development;*

Accordingly, it is submitted to the Planning Authority that there are precedents for granting permission on transitional areas characterised by Class A soils and other soil types occurring on the same site, and precedents for granting permission under exclusively Class A soils. Given the transitional nature of the site and the precedents for granting planning permission on similar sites without recourse to a material contravention, it is submitted that Kildare County Council has interpreted its own Development Plan to allow sufficient flexibility to permit developments on such transitional areas without recourse to the material contravention. Having regard to these precedents, it is considered to be unreasonable and inconsistent for

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Section 2.29 of the Kildare County Development Plan 1999 refers to Extractive Industries. It is stated that: 'gravel resources are important to the general economy

'No sand and gravel extraction will be permitted under Class A soils, in areas of high amenity (as defined in this Plan) and their environs, or where conflict with the bloodstock industry might arise'

Paragraph 2.29.1 of the Kildare County Development Plan 1999 states:

### 1.2 Potential Impact on the Bloodstock Industry

6. Given that a substantial area of the site will be restored using the Class A soils, the long term impact is immaterial as a substantial area of the site will be returned to agricultural use.

5. The policy provision is considered to be inappropriate. The extraction area under Class A soils is in the order of c.4 ha which represents 0.000065% of the Class A soils in Kildare.

4. Class A soils cover 48.5% of County Kildare. It is unsustainable and inappropriate to sterilise an important national resource over nearly 50% of the County area, particularly in areas characterised by a variety of soil types where concentrations of sand and gravel occur.

3. The National Soil Survey is acknowledged by Teagasc as an inappropriate tool to determine land uses as it was undertaken in the 1970's for the purposes of grant aiding and subsidising agriculture.

2. The National Soil Survey does not provide definitive boundaries between soil types. The site is clearly in a transitional area characterised by four soil types occurring in the immediate area on or bounding the site.

1. There are numerous precedents in the area for granting planning permission without invoking the material contravention process on sites characterised by the same soil types. As such, Kildare County Council clearly interprets its own Development Plan to permit extractive uses in such transitional areas which include Class A soils without recourse to material contravention.

In summary, it is submitted to the Planning Authority that the proposed development does not represent a material contravention of the Development Plan by reference to Class A soils for the following reasons:

### 1.1.1.3 Summary

Kildare County Council to determine that this application represents a material contravention of the Development Plan.

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Paragraph 2.11 of the Kildare County Development Plan states the following policy objective for the Bloodstock Industry: 'It is the Council's policy to protect the

also noted that no bloodstock activity was observed during visits to the area. Co. Kildare are listed in the Directory, all of which are provided in Appendix B. It is comprehensive guide to bloodstock interests in Ireland. A total of 127 operations in operations included in the Irish Field Directory 2002 which provides a As noted above, neither of these holdings are included in the list of bloodstock

reside in their holding. interests in the vicinity of the site is incorrect. They state that a mare and a foal objection is that the statement in the EIS claiming that there are no bloodstock Eleanor Cox who have submitted a third party objection. One of their grounds of proposed area of extraction is Ballinderry House. The property is owned by Alan & Approximately 350 metres south of the application boundary and 400m south of the

Society. The objection further states that Margaret Millar is a senior judge with the Irish Pony

'Lands are laid out in a number of stud railed paddocks. Property also includes outhouses and stores. The property is used as a small farm for the breeding and rearing of show ponies and working hunter ponies and horses'.

boundary. The owners, David and Margaret Millar, state that the: application boundary and over 50 metres north of the proposed extraction Kilkandrick House is located approximately 25 metres north of the planning residences in the area in the vicinity of the subject site where bloodstock are kept. The third party objections examined on the public file have identified two

vicinity of the subject lands which may be affected by the proposed development. Appendix B provides a comprehensive list of all the stud farms in County Kildare as contained in the Irish Field Directory 2002. This publication provides a list of all bloodstock establishments in Ireland. The list does not include any operation in the

identifying bloodstock locations. have worked and lived in the area were also consulted for the purposes of stables and bloodstock being grazed or trained. Goode Concrete personnel who the vicinity of the site to identify such locations by reference to signs, fencing, interests in the area. A visual inspection was also undertaken by driving all roads in undertaken, The Irish Field Directory 2002 was consulted to identify bloodstock sensitive receptors in the vicinity of the site. As part of the Scoping exercise undertaken as part of the EIA process. This exercise included a careful review of It is submitted to the Planning Authority that a detailed Scoping exercise was

of bloodstock, and on residential amenities' (Paragraph 2.29.1). industry can have seriously detrimental effects on the landscape, on the operation some areas of the county' (Paragraph 2.29.1). It continues by stating that 'the and the sand and gravel extraction industry is a valuable source of employment in

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environmental qualities necessary for its successful operation. The high amenity value which investment in this industry requires will be protected from encroachment or spoliation by urban sprawl, ribbon development or other anti-amenity features or incompatible developments;

It is submitted that the EIS clearly establishes that the proposed development will not affect the environmental qualities necessary for the successful operation of the bloodstock industry having regard to the distance of the subject site from bloodstock operations, the nature and scale of those activities and the relatively small scale and managed impacts associated with the proposed development.

Dust emissions from the extraction operations will be minimised by implementing effective environmental management practices for the operation of the sand and gravel works. The potential impact of emissions to atmosphere associated with the operation of the sand and gravel works has been quantified and evaluated. The mitigation measures proposed will ensure that no adverse air quality impacts will result from the operation of this facility and all potential impacts be managed well within accepted national standards for rural and agricultural areas (Environmental Impact Statement, Section 7).

A comprehensive assessment of the potential noise impacts associated with this development has been completed. There are no adverse noise impacts predicted at noise sensitive receptors in the vicinity of the site as a result of this development. (Environmental Impact Statement, Section 8) There is no blasting associated with the proposed development.

Potential landscape and visual impacts at the local level and in the wider area are not significant, with only the local area experiencing localised impacts. Potential landscape impacts are minor or of no significance to the character of the local area. Opportunities for views of the proposed extraction are limited to the immediate proximity of the site. The mitigation bunding proposed will screen out any vision through gaps in the existing vegetation. Mitigating measures have been designed to enhance the existing planting. The proposed planting will continue to reduce the significance of visual impacts as it matures.

The overall impact of the proposed extraction is assessed as being of short-medium term negative impact, and as planting matures and progressive restoration is undertaken the visual significance of the extraction becoming even less. (Environmental Impact Statement, Section 9).

Therefore, having regard to the foregoing, the proposed development is unlikely to have any negative impact on the environmental quality of the area or on the environmental quality required for the successful operation of the bloodstock industry in the vicinity of the site.

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It is submitted that conflict will not arise with, nor will there be any serious detrimental effects on, the successful operation of the bloodstock industry in the vicinity of the site or in County Kildare.

2. Item No. 2

Item No. 2 states:

3. Please submit full details of your existing pit in this area, including number of years of operation, planning status of the activity, hours and days of operation, etc. Please advise if you own this pit. If you are not the owner please submit details of the owner.

In 1995, Goode Concrete Ltd. acquired a license agreement from the owner of the 140 acre sand and gravel pit at Kilglass, Carbury. The License agreement entitled the Company to extract manufacture and distribute different grades of aggregate.

The pit has been in operation since around 1950. It was operated by Kildare County Council between 1950 and 1980. Between 1980 and 1995 it was operated under licence by a number of operators including North Kildare Sand and Gravel and Foremask Sand and Gravel. The extraction operation is therefore a 'pre-63' use and is not the subject of any planning permissions.

The pit operates from 0630 to 1830 hrs during the winter months and 0630 to 1900 during the summer period.

Planning permission was granted for a concrete batching plant and block yard by Kildare County Council and on appeal by An Bord Pleanála in 1996 (Reg. Ref. 95/1236).

Details in respect of the output of the plant and its planned relationship with the proposed development have been provided in section 1.4 of the EIS. The EIS states as follows:

Goode Concrete Ltd. operate a sand and gravel extraction and processing plant at Kilglass, Carbury, County Kildare, approximately 1 km south west of the subject site. The Kilglass operation comprises of an active sand and gravel pit, washing and screening plant, concrete batching plant and a concrete block plant. The site supplies the Company with approximately 600,000 tonnes per annum for supply of its Kildare and Dublin markets.

The estimated remaining reserve at the Kilglass pit is in the order of approximately 2,000,000 tonnes, providing approximately 3 to 4 years reserves at current output levels. The subject lands at Ballinderry were acquired as a natural extension of the Kilglass reserve, to supply the concrete and block plants on site and the Company's regional market. Goode Concrete attempted to acquire the lands between the Ballinderry site and the Kilglass operation to facilitate direct transportation over its own lands to the processing area by conveyor or dump truck. However, these intervening





A Map was included in the EIS (Figure 2.3) which outlines the location of extractive operations within a 30 mile radius of the subject site. Many of the pits identified have no recorded data on HGV movements and do not use the same haul routes as the proposed development. Therefore it is not considered feasible, necessary or appropriate to calculate the cumulative HGV movements associated with these pits.

It is noted that the Traffic Impact Assessment included in the EIS provided detailed information on traffic movements on the local road network, obtained from traffic surveys at 3 junctions in the area, a road network inventory, an existing traffic conditions assessment and a future year network assessment. The assessment also

- 3. Item No. 3 states: Please provide a detailed map of all gravel or rock quarries or mineral extraction sites or sand and gravel pits within a 30 mile radius of the site whether working or dormant or in existence and give the names of the operators. Please also provide the current levels of HGV's using each individual pit in order that the cumulative impact of HGV's in the area can be ascertained.

3. Item No. 3

Given the existing level of investment by the Company in the area, the local employment provision and skills required to be retained, the requirement for a source of aggregate close to the existing plant and established markets, and the occurrence of workable reserves in the area, an additional site for extension of operations in the Carbury area was sought. The Ballinderry site was identified and considered to be suitable by reference to the above criteria and with regard to the relatively low density of one-off dwellings in the area, accessibility to the Regional Road network and the established plant, and with regard to the policies and designations contained in the Kildare County Development Plan.

It is planned that the Ballinderry site, which is the subject of this application, will be operational by mid-2004, subject to the relevant grant of planning permission. On the basis that the Kilglass operation will produce 600,000 tonnes per annum to mid-2004, and 400,000 tonnes per annum thereafter, the reserve will be exhausted by mid-2006. There will be a maximum of two years in which extraction will occur at both sites, providing a suitable transitional period for establishment of the Ballinderry site.

Prior to the exhaustion of the reserves at Kilglass, it is proposed to work the Ballinderry resource as a supplementary supply to the Kilglass operation. The output from the combined plants will be in the order of 600,000 tonnes per annum, which is equivalent to the existing output from the Kilglass operation. It is envisaged that some 200,000 tonnes per annum will be extracted at Ballinderry and c400,000 at Kilglass. Accordingly, there will be no net increase in the quantity of material extracted or the number of traffic movements on the local road network.

lands were acquired by Roadstone Provinces Ltd. and it will not be possible to acquire the necessary interest to convey the material by land to the processing area.

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included for proposed and committed developments in the area. This assessment therefore established the existing level of usage of the road network by HGV traffic associated with other extractive operations in the wider area.

To further assist the Planning Authority in the determination of the application, we have calculated the cumulative HGV movements from the existing and permitted operations in the vicinity of the subject development from information available to the public in the Planning Department of Kildare County Council and which include:

- Kilsaran, Ballykane Hill – c2 loads per hr
- Lagan Cement\*, Brackagh – c3.2 trips per hour
- Campbell Gravel, Ballycowan - c4 trips per hour.
- Roadstone, Kilglass – c11 trips per hour
- Goode Concrete Ltd, Kilglass – c12 per hour.

\*Note. This permission is subject to a condition which permits the use of the site for the construction of the Kilcock Kinnefad M4 Extension only prior to the completion of the Motorway.

With regard to the request for details of all quarries, active and dormant, within a 30 mile radius of the site it is further submitted that this request is unreasonable as a 30 mile radius from the site covers a land area of approximately 4,512 sq km and includes all or part of the following Counties:

1. Kildare
2. Meath
3. Louth
4. Dublin
5. Westmeath
6. Offaly
7. Longford
8. Laois
9. Wicklow

Both Kilsaran Concrete and Lagan Cement have identified these sites to the satisfaction of the Planning Authority in respect of their applications at Kiltrathmurray and Brackagh, approximately 4 km north west of the proposed development. The information provided on Figure 2.3 of the EIS is consistent with the information submitted by Kilsaran.

The Kildare County Development Plan 1999 includes a provision that Kildare County Council will undertake a survey of all existing operations for development control purposes. Undertaking this survey has been an objective of the Council for over 20 years, having been included in the 1985 Development Plan. Such a survey has never been undertaken. It is noted, however, that under the provisions of Section 261 of the Planning and Development Act 2000, all operators are required to register their operations within 12 months of the coming into effect of the Section of the Act.

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Under this provision of the Act, individual operators will be required by law to provide Kildare County Council with details of their operations.

Having regard to the foregoing, it is considered to be unreasonable to request a private operator by way of a Request for Additional Information on a planning application to provide ownership and details in respect of all existing operators in county Kildare and in eight counties contiguous to Kildare. Provision is now made in law that this information will be provided independently by the operators responsible for each operation.

Furthermore, Goode Concrete Ltd. does not have the resources to undertake such a detailed survey, and the scale of the proposed operation does not and cannot justify the expenditure required to undertake such a survey.

The existing operations that are of relevance to the proposed development with regard to HGV movements are provided above and the Traffic Impact Assessment has provided details of all cumulative traffic movements in the area.

4. Item No. 4

Item No. 4 states:

- 4. Please state whether (a) it is proposed to operate and develop the proposed sand and gravel pit yourself or (b) it is proposed to lease or sell the site to a third party. In either case give full details of the operators experience in aggregate extraction and processing.

Mr Tom Goode, Managing Director of Goode Concrete Ltd., has over 37 years experience in the manufacture and distribution of readymix concrete, blocks, concrete products and aggregates.

In 1965 Mr Goode set up a sand and gravel business which was sold in 1973. In 1977 he set up Goode Aggregates Ltd. to manufacture and supply of readymixed concrete and aggregates. In 1987 this company was sold to Kilsaran Concrete Ltd.

In 1992, Goode Concrete Limited and Goode Sand and Gravel were set up to supply and manufacture concrete and aggregate.

In addition to the Kilglass pit, the Company operates two quarries at Ardahan and Gort, County Galway.

The Company currently operates concrete plants at Carbury, Ballycoolin, Ballyfermot, Galway and Naas.

It is intended that the pit will be operated by Goode Concrete Ltd. as detailed in the EIS.

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5. Item No. 5

Item No. 5 states:

5. A number of objections have been received in relation to the proposed development, you are requested to examine same and submit your detailed response, alternative proposal, etc. to each of these objections.

A review of the issues raised in the submissions on file has been undertaken as part of the preparation of this response. A summary of all grounds of objections submitted is presented in Appendix 1. The review undertaken established that the Planning Authority has specifically requested Additional Information in respect of all of the substantive planning and environmental issues raised in the objections. As such, the responses provided in this submission apply to the substantive grounds of submission raised in the objections.

6. Item No. 6

Item No. 6 states:

6. It is considered that the EIS submitted has not adequately dealt with a number of matters, please submit a revised Environmental Impact Statement that shall have due regard to the following:-

a. The cumulative impacts of the proposed development in conjunction with existing and permitted sand and gravel extraction in both the immediate area and general area.

By correspondence dated 9 January 2003 the Planning Authority was requested to identify which aspects of the environment the Planning Authority considered had not be adequately addressed. By letter dated 6 February 2003, the Planning Authority responded stating that:

'You are advised that the Environmental Impact Statement is required to comply with all legislation governing same and in particular Schedule 6 of the Planning and Development Regulations 2001. In relation to your query on the cumulative impacts of the proposed development you are advised to note the requirements of 2(c) of the said schedule';

Section 2(c) of Schedule 6 requires that:

'a description of the likely significant effects (including direct, indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative) of the proposed development in the environment resulting from:

- the existence of the proposed development,

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Similarly the traffic section included detailed information on traffic movements on the local road network, obtained from traffic surveys at 3 junctions in the area, a road network inventory, an existing traffic conditions assessment and a future year network assessment. The assessment also included for proposed and committed

the combined impact of all on-site operations (section 8.3.5).  
with noise impacts from other works on site (section 8.3.3) traffic (section 8.3.4) and do not generate significant noise levels in the area. The Noise section also deals Section 8 that the existing industrial operations are not dominant sources of noise in the vicinity of the site including the extractive operation to the west. It is stated in Appendix 8.1 examined the cumulative impact of other noise sources presented in Section 8 of the EIS, the baseline noise survey in relation to noise, assessed in Section 7 of the EIS, deals with

'the existing extractive operation bordering the west of the proposed site is not adversely impacting on air quality in the area'.

indicate that:  
For example, in relation to air quality, assessed in Section 7 of the EIS, deals with the likely impacts on the environment from dust deposition, the baseline studies

quarries in the wider area.  
Figure 2.3 identifies the indicative location of all sand and gravel pits and

the operation of surrounding pits. (Emphasis added).  
traffic, landscape and water. All baseline studies contained in the EIS include for attention has been afforded to cumulative impacts with regard to dust, noise, cumulative impact of the established and proposed developments. Particular operation further west. The preparation of this EIS has afforded full regard to the the south west, the Roadstone Provinces operation to the west, and the Kilsaran operations in the vicinity of the site, including the Coode Concrete operation to resources of sand and gravel. There are a number of established extractive 'The area in which the site is situated is characterised by extensive proven

Section 1.9 of the EIS refers specifically to 'Cumulative Impacts' and states:

the environment are referred to in each section of the EIS.  
likely cumulative impacts referred to in Section 2(c) of Schedule 6 on each aspect of impacts (including cumulative impacts), and mitigation measures. Thereby, the section referring to the existing environment, the proposed development, likely Format' structure, which examines each aspect of the environment as a separate The EIS prepared in support of the subject application was prepared in the 'Grouped

environment'.  
and a description of the forecasting methods used to assess the effects on the

- the use of natural resources,
- the emission of pollutants, the creation of nuisances and the elimination of waste,

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developments in the area. This assessment therefore established the existing level of usage of the road network by HGV traffic associated with other extractive operations in the wider area.

It is submitted to the Planning Authority that all of the consultants involved in the preparation of the EIS have extensive knowledge and experience of the extractive industry and all are satisfied that the information provided is fully compliant with the EIS Regulations, best practice in environmental impact assessment, and has fully provided for all existing and committed developments in the area which could have a cumulative impact on the environment. In the absence of any specific issues raised by the Planning Authority, and in the absence of any technical reports on the public file addressing these issues, the review of the EIS undertaken by the consultants involved concludes that all cumulative impacts have been adequately addressed.

Item No. 6b states:

b. Please map the nature and extent of all equine activities in the vicinity of the subject site and adequately assess the impacts that the proposed development will have on same.

As stated above, a detailed Scoping exercise was undertaken as part of the EIA process. This exercise included a careful review of sensitive receptors in the vicinity of the site. As part of the Scoping exercise undertaken, The Irish Field Directory 2002 was consulted to identify bloodstock interests in the area. A visual inspection was also undertaken by driving all roads in the vicinity of the site to identify such locations by reference to signs, fencing, stables and bloodstock being grazed or trained. Goode Concrete personnel who have worked and lived in the area were also consulted for the purposes of identifying bloodstock locations.

Appendix B provides a comprehensive list of all the stud farms in County Kildare as contained in the Irish Field Directory 2002. This publication provides a list of all bloodstock establishments in Ireland. The list does not include any activity in the vicinity of the subject lands which may be affected by the proposed development. The potential impact of the proposed development on the equine activities identified in the area, which are not considered to be intensive thoroughbred 'bloodstock' operations, have been addressed in Section 1, above.

Item No. 6c states:

c. The Environmental Impact Statement has stated conflicting operating hours. Please advise of the operating hours proposed.

The proposed operating hours of the subject development are set out in section 3.11 of the EIS. The proposed hours for extractive and processing activities are:

08:00 to 19:00 hours from Monday to Friday; and  
08:00 to 13:00 hours on Saturday

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It is noted that the re-alignment proposed results in the sterilisation of reserves on site. The Roads Department has agreed that the cost of the land associated with the re-alignment will be off-set against financial contributions sought on any grant of planning permission.

Faber Maunsell have discussed this matter with the Roads Department of Kildare County Council and have provided revised the proposals which include for the realignment of the County Road. The Roads Department has advised that these works are desirable as they will facilitate existing extractive operations in the area and will result in safety improvements on the local road network. As such, the proposed re-alignment represents a significant planning gain for the area.

7. The proposed access of the Carbury - Broadford Road is considered unacceptable, you are advised that if the Planning Authority were to consider granting planning permission that access should be off the minor road. Please submit your revised proposals accordingly.

Item No. 7 states:  
7. Item No. 7

Photomontages are attached herewith which depict the existing situation, the extent of operation, and final restoration. The photomontages have been prepared on the basis of the revised road layout, as provided for as part of this response. The location of these photomontages have been agreed with the Planning Authority.

e. Please provide photomontages (each photograph to be A4 size) of the existing site and of the proposed development. This shall include the impact on the nearby dwellings, on Clonuff Bridge and on the existing road junction.

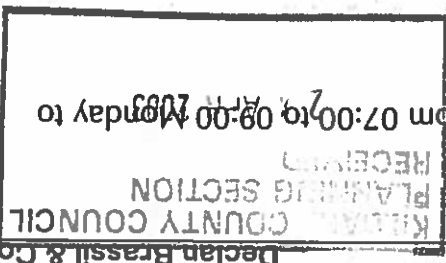
Item No. 6e states:

The flora and fauna assessment contained in the EIS was prepared by Mr Roger Goodwille, Applications Ecologist. A response to this specific issue has been prepared by Mr Goodwille and is attached herewith as Appendix C.

d. The flora and fauna section as submitted provides insufficient detail on the existing flora and fauna in this area. A proper audit/inventory of the flora and fauna on the site is required.

Item 6d states:

It is proposed to load and remove material from site from 07:00 to 09:00 Monday to Saturday.



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Archaeological Consultancy Services Ltd. has consulted with Duchas in respect of this requirement and has carried out the required investigations. The ACSL report concludes that the millpond site is outside the site boundary and will not be impacted by the proposed development.

9. The archaeological report identifies a possible former mill pond immediately adjacent to the subject site. While it is stated that no impact is anticipated as long as the site boundaries are effectively maintained, Duchas, The Heritage Service and the Planning Authority requires plans and details as further information regarding the proposed protection/treatment of the boundary during and after works. This is required in order to ensure impact is avoided on this feature. The archaeologist engaged shall examine the proposal and comment.

Item No. 9 states:

9 Item No. 9

The Request for Additional Information identified specific site investigations required to be carried out. Archaeological Consultancy Services Ltd. has consulted with Duchas and has carried out the investigations specified in the request. The Report of ACSL is attached herewith.

8. Duchas have received an archaeological assessment as part of the EIS submitted. The subject site is located in an archaeologically sensitive area. A number of potential archaeological features were identified which Duchas requires to be further examined prior to any decision. This will enable Duchas, the Heritage Service to formulate an informed archaeological condition before the planning decision is taken. It should be borne in mind, that if significant archaeological remains are found, refusal might still be considered or further monitoring or excavation required.

Item No. 8 states:

8. Item No. 8

Revised layout plans which incorporates the proposed changes are submitted herewith. Public notices advising of the amendments are also submitted. It is proposed that the new junction and road realignment will be constructed as far as the proposed site entrance for the purpose of servicing the site upon implementation of the permission. The remaining section of the road will be constructed in consultation with Kildare County Council. In this regard, it is considered unreasonable that the proposed development be delayed pending the construction of the totality of the road re-alignment.

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Appendix 1  
Summary of Submissions on Planning File

Name of Objector	Grounds of Objection		
Rosaleen McCabe Patrick McCabe	<ul style="list-style-type: none"> <li>Low Standards employed by Goode Concrete at Kilglass</li> <li>Traffic from existing pit.</li> <li>Damage to property from truck</li> <li>Dust from Lorries</li> <li>Hours of Operation (Time and Days)</li> <li>Roadstone operating properly.</li> </ul>		
Alan & Eleanor Cox, Ballinderry House	<ul style="list-style-type: none"> <li>Ballinderry House – occupied and being restored</li> <li>No bloodstock interests in vicinity of site – history of quality bloodstock breeding</li> <li>No reference made to cattle grazing in adjoining fields</li> <li>Views from south (Ballinderry House) how was information collated?</li> <li>Professionalism of Brassill Jarvis &amp; Co. Ltd. No research. Questions research on dust, noise, vibration.</li> </ul>		<ul style="list-style-type: none"> <li>Site offers shelter from prevailing wind and pleasant view</li> <li>Kilcandrick House exposed to noise, dust and interference</li> <li>Impossible to continue to breed ponies and horses</li> <li>Detract from the amenity value of the property</li> <li>EIS acknowledges the impact on Kilcandrick House</li> <li>Effect on site and horse breeding from prevailing wind if hill removed</li> <li>Impact on water supply from washing of gravel, spillages, no plan in place to prevent such contamination.</li> <li>Dredging below water table – risk of contamination of ground water</li> <li>Scale of the development means ground water pollution probable.</li> <li>Stream tributary of River Boyne – impact on spawning salmon.</li> <li>Ground water vulnerability in the area – extract from EIS re 'wells possible targets for ground water pollution'</li> <li>Impact form dust on property – no leaves on trees during foaling</li> <li>Air quality, breathing difficulties and adverse effects on health from the dust.</li> <li>Noise from heavy machinery and lorries affect residents</li> <li>Noise will affect the livestock (horses)</li> <li>Noise levels differ in Tables 8.1 and 8.3 with lower figure when quarry in operation. – inaccurate and incorrect</li> <li>Damage to roads from heavy lorries as no foundations under tarmac.</li> <li>Traffic movements nuisance and hazard.</li> <li>26 traffic movements per hour</li> <li>Proposed lake after reinstatement – hazard to safety and risk of pollution to ground water</li> <li>No management plan for upkeep of reinstated site – danger</li> </ul>
David & Margaret Miller, Kilcandrick House			

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<ul style="list-style-type: none"> <li>and pollution, danger of illegal dumping.</li> <li>Objectors were not informed by GCL of proposal prior to application. This sensitive group were not identified in the EIS</li> </ul>	
<ul style="list-style-type: none"> <li>Already in conflict with the company over Kilglass pit.</li> <li>Many problems relating to noise and dust</li> <li>Lorries drawing 24 hours a day</li> <li>Requests to GCL management ignored.</li> <li>Proposed quarry lead to even greater problems</li> </ul>	<p>John McCabe C McCabe</p>
<ul style="list-style-type: none"> <li>Already in conflict with the company over Kilglass pit.</li> <li>Many problems relating to noise and dust</li> <li>Lorries drawing 24 hours a day</li> <li>Requests to GCL management ignored.</li> <li>Proposed quarry lead to even greater problems</li> </ul>	<p>S &amp; M Regan</p>
<ul style="list-style-type: none"> <li>Already in conflict with the company over Kilglass pit.</li> <li>Many problems relating to noise and dust</li> <li>Lorries drawing 24 hours a day</li> <li>Requests to GCL management ignored.</li> <li>Proposed quarry lead to even greater problems</li> </ul>	<p>Julie Walshe Jerry Walshe</p>
<ul style="list-style-type: none"> <li>Already in conflict with the company over Kilglass pit.</li> <li>Many problems relating to noise and dust</li> <li>Lorries drawing 24 hours a day</li> <li>Requests to GCL management ignored.</li> <li>Proposed quarry lead to even greater problems</li> </ul>	<p>Linda McCabe C Nolan</p>
<ul style="list-style-type: none"> <li>Already in conflict with the company over Kilglass pit.</li> <li>Many problems relating to noise and dust</li> <li>Lorries drawing 24 hours a day</li> <li>Requests to GCL management ignored.</li> <li>Proposed quarry lead to even greater problems</li> </ul>	<p>N &amp; L McMonagle</p>
<ul style="list-style-type: none"> <li>Already in conflict with the company over Kilglass pit.</li> <li>Many problems relating to noise and dust</li> <li>Lorries drawing 24 hours a day</li> <li>Requests to GCL management ignored.</li> <li>Proposed quarry lead to even greater problems</li> </ul>	<p>Carmel Killeen John Killeen</p>

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## Appendix B Bloodstock Operations in County Kildare

Irish Field Directory 2002

1.	AIRLIE STUD: GRANGEWILLIAM, MAYNOOTH, CO KILDARE. OWNERS: SONIA ROGERS AND ANTHONY ROGERS
2.	ARDOON STUD: NEWBRIDGE, CO KILDARE OWNER: ARDOON STUD MANAGEMENT, NEWBRIDGE, CO KILDARE
3.	ASHFIELD STUD: NEWTOWN, DONORE, NEAS, CO KILDARE OWNER: PETER MAHER
4.	ASHGROVE STUD: KILDANGAN, CO KILDARE OWNER: IAN AND VALERIE DALGETTY, KILDANGAN, CO KILDARE
5.	AUSTINS WELL STUD: GREAT CONNELL, NEWBRIDGE, CO KILDARE OWNER: SUSAN MCKEON
6.	BALLINTAGGART HOUSE STUD: BALLINTAGGART HOUSE, COLBINSTOWN, CO KILDARE OWNER: R. O'TOOLE
7.	BALLYBURN STUD: CASTLEDERMOT, CO KILDARE. OWNER: MARY T. QUINN
8.	BALLYMANY STUD: THE CURRIGH, CO. KILDARE OWNER: KILDANGAN STUD
9.	BALLYPRIOR STUD: RATHASKER ROAD, NAAS, CO KILDARE OWNER: VILLA DOSA SRI
10.	BALLYSAX MANOR STUD: THE CURRAGE, CO KILDARE
11.	BARODA STUD: NEWBRIDGE, CO KILDARE OWNER: PHILIP AND JANE MYERSCOUGH
12.	BARONRATH STUD: STRAFFAN, CO. KILDARE OWNER: CHARLES O'BRIEN
13.	BARRETTA STUD: MILGROVE, BRACKNAGH, RATHANGAN, CO KILDARE OWNER: BRENDAN LAFFAN
14.	BERT HOUSE STUD: ATHY, CO KILDARE OWNER: MAURICE PHELAN
15.	BLACKHALL STUD: CLANE, CO KILDARE. OWNER: KILDANGAN STUD CO UNLTD
16.	BLACKRATH STUD: BALLYTORE, ATHY, CO KILDARE OWNER: IRIS LATHAM

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35.	COOLIGMARTIN STUD: DONADEA, NAAS, CO KILDARE OWNER: KEVIN AND PETER O'BRIEN
34.	COOLAGHKNOCK STUD: COOLAGHKNOCK, KILDARE OWNER:
33.	COMMONSTON STUD: MOONE, CO KILDARE OWNER: JOHN HARRINGTON
32.	COLBINSTON LODGE STUD: COLBINSTON, CO KILDARE OWNER: MR AND MRS BEN JELLETT
31.	CLARA VIEW STUD: MOUNT PROSPECT, RATHANGAN, CO KILDARE OWNERS: IAN HANAMY AND K. ALEN
30.	CHURCHLAND STUD: CONYNGHAM LODGE, THE CURRAGH, CO KILDARE OWNER: MRS CON COLLINS
29.	CHEERINE STUD: FRIARSTOWN, THE CURRAGE, CO KILDARE WONER: WAI KAI WONG & PARTNERS
28.	CASTLEVIEW STUD: CALVERSTOWN, KILCULLEN, CO. KILDARE OWNER: THOMAS HICKEY
27.	CASTLESIZE HOUSE STUD: SAILINS, CO KILDARE OWNER:
26.	CASTLEMARTIN STUD FARM: KILCULLEN, CO KILDARE OWNER: DR TONY O'REILLY
25.	CASTLEMARTIN ABBEY HOUSE STUD: CASTLEMARTIN, KILCULLEN, CO KILDARE. OWNER: JOHN C. HAYDEN
24.	CASTLEDILON STUD: STRAFFAN, CO KILDARE OWNER: MR AND MRS MICHAEL HILLMAN
23.	CALVERSTOWN HOUSE STUD: KILCULLEN, CO KILDARE OWNERS: M.K. MC CALL AND MRS P.J. MC CALL
22.	CADAMSTOWN STUD: BROADFORD, MOYALLEY, CO. KILDARE OWNER: MADELINE AND CARMEL BOURKE
21.	BRYANSTOWN HOUSE STUD: KILCOCK, CO. KILDARE OWNER: BERNARD COOKE
20.	BROWNSTOWN STUD: THE CURRAGH, CO KILDARE OWNER: BROWNSTOWN STUD PARTNERSHIP
19.	BROOKLYN STUD: PROSPEROUS, NAAS, CO. KILDARE OWNER: BRENDAN COSTELLO
18.	BROGESTOWN STUD: KILL, CO KILDARE OWNER: MICHAEL DALTON
17.	BROADFIELD STUD: NAAS, CO KILDARE OWNER: MRS A. WHITEHEAD

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Declan Brassill & Co  
7 APR 2003

SECTION  
COUNT

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36.	CORBALLY HOUSE STUD: ATHY, CO KILDARE OWNER: C.J. AN DF. A. MASTERSON
37.	CORDEFF STUD: WEWSTON PARK, LEIXLIP, CO KILDARE OWNER: JAMES AN DBRIDGETTE EGAN
38.	COURTOWN STUD: KILCOCK, CO KILDARE OWNER: BRENDAN O'MAHONY
39.	CROTANSTOWN HOUSE: THE CURRAGH, CO KILDARE
40.	CURRAGH STUD: MELITTA ROAD, KILDARE OWNER: MRS B.M. MURLESS
41.	DAMASTOWN STUD: BALLYBRACK, KILCOCK, CO KILDARE OWNER: DAMASTOWN STUD.
42.	DEER PARK HOUSE STUD: CALVERSTOW, KILCULLEN, CO KILDARE OWNERS: G. WILLIAM AND SUSAN ROBINSON
43.	DERRINSTOWN STUD: MAYNOOTH, CO KILDARE OWNER: DERRINSTOWN STUD LTD
44.	DERRYVARROGE STUD: DERRYVARROGE, DONADEA, NAAS, CO KILDARE OWNERS: JUSTIN JORDAN AND SEAN JORDAN
45.	EAGLE LODGE STUD: SUNCROFT, THE CURRAGH, CO KILDARE OWNER: FRANK STEWART
46.	EDENMIST STUD: KILCULLEN, CO KILDARE OWNER: MR AND MRS ALLAN NORTON
47.	ERINDALE STUD: NEWTOWN, KILDARE OWNER: MR AND MRS KEVIN PRENDERGAST
48.	EYREFIELD HOUSE STUD: THE CURRAGH, CO KILDARE OWNER: EYREFIELD HOUSE STUD PARTNERSHIP
49.	EYREFIELD LODGE STUD: THE CURRAGE, CO KILDARE OWNER: SIR EDMUND LODER BT.
50.	FORENAGHTS STUD: NAAS, CO KILDARE OWNER: FORENAGHTS STUD FARM LTD.
51.	GILLTOWN STUD: KILCULLEN, CO KILDARE OWNER:
52.	GLENDALOUGH STUD: DUNMURRY, CO KILDARE OWNER: JOHN J. BRESLIN
53.	GRANGEMORE STUD: POLLARDSTOWN, NEWBRIDGE, CO WICKLOW
54.	HARCOURT STUD: MOORTOWN, CARAGH, NAAS, CO KILDARE OWNERS: SARAH COLLEN AND RAY JENNINGS

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55.	HART LIVERY FARM: NEWLAND NORTH, NAAS, CO KILDARE OWNER: CHRISTOPHER AND PAULA HART
56.	HOLLYHILL STUD: BRANNOCKSTOWN, NAAS, CO KILDARE OWNER:
57.	IRISH NATIONAL STUD: TULLY, CO KILDARE OWNER: IRISH NATIONAL STUD CO LTD
58.	IRISH THOROUGHbred STUD: GRAY, ABBEY ROAD, KILDARE OWNER: JOHN MICHAEL
59.	JOCKEY HALL STUD: THE CURRAGH, CO KILDARE OWNER: ROBERT AND JACQUELINE NORRIS
60.	JUDDMONTE FARMS IRELAND LTD: FERRANS STUD, TRIM ROAD, KILCOCK, CO MEATH OWNER: JUDDMONTE FARMS IRELAND LTD
61.	JUDDMONTE FARMS IRELAND LTD: NEW ABBEY STUD, KILCULLEN, CO KILDARE OWNER: JUDDMONTE FARMS IRELAND LTD
62.	JUGGINSTOWN HOUSE STUD: JIGGINSTOWN, NAAS, CO KILDARE OWNER: TERENCE MC DONALD
63.	KENNYCOURT STUD FARM: KENNYCOURT, BRANNOCKSTOWN, CO KILDARE OWNER: EUGENE MC DERMOT
64.	KILCOO STUD: ATHY, CO KILDARE OWNER: RICHARD AND MARY ROSE KEHOE
65.	KILDANGAN STUD: MONASTEREVAN, CO KILDARE OWNER: KILDANGAN STUD
66.	KILDARRAGH STUD: KILDANGAN, MONASTEREVAN, CO KILDARE OWNERS: PETER W KAVANAGH AND LADYWOOD ESTATES CO
67.	KILL INTERNATIONAL STUD: KILL, CO KILDARE OWNER: FINIAN FLANNELLY
68.	KILLEENEA STUD: CELBRIDGE, CO KILDARE OWNER: GERALD COLCLOUGH
69.	KILMACREDOCK STUD: MAYNOOTH, CO KILDARE OWNER: SONIA ROGERS
70.	KILNAMORAGH STUD: DONADEA, NAAS, CO KILDARE OWNER: JAMES BROWNE
71.	KILNANTOGUE STUD: KILNANTOGUE, RATHANGAN, CO KILDARE OWNER: LARRY C. FLOOD
72.	KLINTA ARABIANS: LIFFEY LODGE, CARAGH, NAAS, CO KILDARE OWNER: MRS GUNILLA HAMER
73.	KNOCKLONG HOUSE STUD: CELBRIDGE, CO KILDARE OWNER: PATRICK O'NEILL

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92.	NEWBERRY STUD FARM LTD: KILCULLEN, CO KILDARE OWNER: NEWBERRY STUD FARM LTD
91.	NEW HOLINS STUD: BOSTON, STRAFFAN, CO KILDARE OWNER: A.G. AND DR. O. BAILEY
90.	MOYGADY STUD FARM LTD: MOYGLARE, MAYNOOTH, CO KILDARE OWNER: MR AND MRS WALTER HAFFNER
89.	MOYGADY STUD: MAYNOOTH, CO KILDARE OWNER: OLIVER MURPHY
88.	MOUNT PROSPECT STUD: RATHANGAN, CO KILDARE OWNER: RAYMOND CONLON
87.	MORRISTOWN LATTIN STUD: NAAS, CO KILDARE OWNER: MR AND MRS GAY O'CALLAGHAN
86.	MORGANSTOWN STUD: BALLYMORE EUSTACE, NAAS, CO KILDARE OWNER: J.P.N. PARKER
85.	MORRATH STUD: BEECHTREE, RATHMORE, NAAS, CO KILDARE OWNER: DAVID CORNWALL
84.	MOORHILL HOUSE STUD: BRANNOCKSTOWN, NAAS, CO KILDARE OWNER: BRIAN AND SARAH MULLINS
83.	MILTOWN STUD: MILTOWN, NEWBRIDGE, CO KILDARE OWNER: JIM AND GERALDINE RYAN
82.	MEADOW COURT STUD: ABBEVILLE AND MEADOW COURT STUDS, MADDENSTOWN OWNER: JOHN AND EIMAR MULHERN
81.	MARGUERITE LODGE STUD: KILTEEL, NAAS, CO KILDARE OWNER: C. AND M. BYRNE
80.	LOVESTONE STUD: RATHANGAN, CO KILDARE OWNER: JOHN A. STRAFFORD MVB MRCS
79.	LOUGHTOWN STUD LTD: DONADEA, NAAS, CO KILDARE OWNER:
78.	LOUGHBROWN STUD: THE CURRACH, CO KILDARE OWNER: MAC CANN, MRS J.A.
77.	LISIEUX STUD: MADDENSTOWN, THE CURRACH, CO KILDARE OWNER: MICHAEL COLLINS
76.	LISHEEN STUD: KILKEA, CASTLEDERMOT, CO KILDARE OWNER: HOMER SCOTT
75.	LIPSTOWN STUD: NARRAGHMORE, ATHY CO KILDARE OWNER:
74.	LARCH HILL STUD: KILCOCK, CO KILDARE OWNER: PETER J. BARRY

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93.	NEWLANDS LODGE STUD: NEWLANDS, NAAS, CO KILDARE OWNER:
94.	NEWTOWN LODGE STUD: KILDARE, CO KILDARE OWNER: D. MC GREGOR
95.	NEWTOWN STUD: NAAS, CO KILDARE OWNER: BRIAN AND SHEILA GRASSICK
96.	OAK LODGE STUD: NAAS, CO KILDARE OWNER: PAT FITZSIMONS
97.	OAKLAWN STUD: FRIARSTOWN, KILDARE, CO KILDARE OWNER: JOHN AND CLODAGH MC STAY
98.	OGHILL HOUSE STUD: OGHILL HOUSE, MONASTEREVAN, CO KILDARE OWNER: HYLAND BROTHERS
99.	OLD CONNELL STUD: NEWBRIDGE, CO KILDARE OWNER: KILDANGAN STUD
100.	OLD MEADOW STUD: DONADEA, NAAS, CO KILDARE OWNER: WELD FAMILY
101.	OLDTOWN STUD: NAAS, CO KILDARE OWNERS: MAJ J. H. DE-BURGH AND H. DE-BURGH
102.	OSBORNE LODGE STUD: KILDARE OWNER: MICHAEL HURLEY
103.	OWENSTOWN STUD: MAYNOOTH, CO KILDARE OWNER: J. TUTHILL
104.	PIER HOUSE STUD: MARTINSTOWN, THE CURRAGH, CO KILDARE OWNER: MICHAEL MORRIN
105.	PIPERS HILL STUD: NAAS, CO KILDARE OWNER: MRS C.L AND D. K. WELD
106.	POLLARDSTOWN LODGE STUD: POLLARDSTOWN, THE CURRAGH, CO KILDARE OWNER: P.V. GILSON
107.	PROSPEROUS STUD: PROSPEROUS, NAAS, CO KILDARE OWNER: PATRICK CUMMINS
108.	QUINNSBORO STUD: QUINNSBORO, MONASTERVIN, CO KILDARE OWNER: LARRY AND MARY MC CORMACK
109.	RAGUSA STUD: BALLYMORE-EUSTACE, CO KILDARE OWNER: KILDANGAN STUD
110.	RATHASKER STUD: KILCULLEN ROAD, NAAS, CO KILDARE OWNER: MAURICE BURNS
111.	RATHMUCK STUD: RATHMUCK, KILDARE, CO KILDARE OWNER: EDWARD AND SINEAD SEXTON

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112.	REDTHORN STUD: CLANE, CO KILDARE OWNER: MARTIN T. COONAN
113.	ROSE REEF STUD: WALTERSTOWN, SALLINS, NAAS, CO KILDARE OWNER: JOHN WALSH
114.	SAGAMORE STUD: BALINTAGART, COLINSTOWN, CO KILDARE OWNER: TED NAUGHTON
115.	SALLYMOUNT STUD: KILCULLEN, CO KILDARE OWNER:
116.	SHESHOON STUD: THE CURRAGH, CO KILDARE OWNER:
117.	SIMMONSTOWN STUD: CELBRIDGE, CO KILDARE OWNER: SONIA ROGERS
118.	SOMERTON STUD: PROSPEROUS, NAAS, CO KILDARE OWNER: ALBERT WELD
119.	ST ANNS STUD: ST ANNS, MADDENSTOWN, THE CURRAGH, CO KILDARE OWNER: BREDA DOYLE
120.	STONEBROOK STUD: BALLYMORE-EUSTACE, CO KILDARE OWNER: MR AND MRS J. MARTIN-SMITH
121.	SUNNYHILL STUD: KILCULLEN, CO KILDARE OWNER: MICHAEL AND SHEELAGH HIGKEY
122.	SWEEP LANE STUD: NURNEY, CO KILDARE OWNER: AIDAN SEXTON
123.	SWORDESTOWN STUD: NAAS CO KILDARE OWNER: CATHAL M. RYAN
124.	TETRARCH STUD: BARONRATH, STRAFFAN, CO KILDARE OWNER: SEAMUS PHELAN
125.	THE COTTAGE STUD: HODGESTOWN, KILCOCK, CO KILDARE OWNER: TOM AND PAUL MONAGHAN
126.	THE MILLHOUSE STUD: BALLYSHANNON, KILCULLEN, CO KILDARE OWNERS: R.H. THOMAS AND VIVIEN COX
127.	WATERSTOWN STUD: WATERSTOWN, SALLINS, CO KILDARE OWNER: KAY BRADY
128.	WOODVIEW STUD: MAYNOOTH, CO KILDARE OWNER: MR AND MRS W.J. BYRNE
129.	YEOMANSTOWN LODGE STUD: YEOMANSTOWN, NAAS, CO KILDARE OWNER: MRS H.D. MC CALMONT
130.	YEOMANSTOWN STUD: NAAS, CO KILDARE OWNER: MR AND MRS GAY O'CALLAGHAN,

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Prepared by Roger Goodwillie, Applications Ecologist

Appendix C Response to Item No. 6d.

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## Additional Information on Flora and Fauna

It is totally impracticable to produce an inventory of the flora and fauna of the site in question. Not only would it require the services of about 10 specialists in order to be able to deal with every likely organism but it would also take a full year to cover the seasonal changes.

Accordingly, as the EPA guidelines advise, the aim for flora is to describe the habitats on site and their vegetation, to assess their significance and that of any rare species and to determine the impacts on them and possible mitigation measures. The account submitted already in the EIS deals adequately with these topics and was produced by a competent ecologist. If the site had a greater level of interest it would have been given more detailed treatment. For fauna the treatment should be dictated by the potential interest of the species present. If particular habitats occur that may support invertebrates of note a proper analysis of these has to be done. In the present case all habitats were essentially farmland without features of potential faunal interest.

I append a list of organisms that may be of use in determining the application

Plants	
Acer pseudoplatanus	Deschampsia cespitosa
Achillea millefolium	Dryopteris filix-mas
Agrostis capillaris	Elytigia repens
Agrostis stolonifera	Epilobium hirsutum
Alnus glutinosa	Eurhynchium praelongum
Angelica sylvestris	Festuca rubra
Anthoxanthum odoratum	Filipendula ulmaria
Anthriscus sylvestris	Fragaria vesca
Apium nodiflorum	Fraxinus excelsior
Arctium minus	Galium aparine
Arthenatherum elatius	Geranium robertianum
Arum maculatum	Gemum urbanum
Bellis perennis	Glechoma hederacea
Brachypodium sylvaticum	Glyceria fluitans
Calliergon cuspidatum	Holcus lanatus
Campithecium lutescens	Hypochoeris radicata
Cardamine flexuosa	Ilex aquifolium
Cerastium fontanum	Iris pseudacorus
Cirsium arvense	Juncus effusus
Cirsium palustre	Juncus inflexus
Cirsium vulgare	Lapsana communis
Crataegus monogyna	Lolium perenne
Cynosurus cristatus	Lonicera periclymenum
Dactylis glomerata	Lotus corniculatus
Dactylis glomerata	Luzula campestris

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**Mammal**

- Badger
- Brown rat
- Fox
- Rabbit

**Birds**

- Blackbird
- Blue tit
- Chaffinch
- Duncock
- Hooded crow
- Jackdaw
- Linnet
- Long-tailed tit
- Robin
- Rook
- Song thrush
- Starling
- Woodpigeon
- Wren

- Moeblingia trinervia
- Phleum pratense
- Phyllitis scolopendrium
- Plantago lanceolata
- Poa pratensis
- Poa trivialis
- Polypodium vulgare
- Polystichum setiferum
- Potentilla reptans
- Primula vulgaris
- Prunella vulgaris
- Prunus spinosa
- Ranunculus bulbosus
- Ranunculus ficaria
- Ranunculus repens
- Rhytidadelphus squarrosus
- Rosa canina
- Rubus fruticosus
- Rumex acetosa
- Rumex crispus
- Rumex obtusifolius
- Rumex sanguineus
- Salix cinerea
- Stellaria graminea
- Symphoricarpos albus
- Thamnobryum alopecuroides
- Trifolium pratense
- Trifolium repens
- Ulmus procera
- Urtica dioica
- Veronica beccabunga
- Veronica chamaedrys
- Veronica serpyllifolia
- Vicia sepium
- Viola riviniana

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