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**Sent:** 08 May 2020 11:59  
**To:** Siobhan Egan <[S.Egan@epa.ie](mailto:S.Egan@epa.ie)>  
**Subject:** 180453a - Inert Soil Waste Recovery Facility - Halverstown

Hi Siobhan,

Hope all is well with you. Please find attached a copy of the EIA in relation to the Inert Soil Waste Recovery Facility at Halverstown, as permitted under planning ref 18/453. I have also set out below the planning history for the site.

The relevant planning history associated with the subject site is as follows:

- 15/189:** Application by Kilsaran Concrete for planning permission for an inert soil and stone / construction and demolition waste recovery facility. Permission was **granted** by Kildare County Council on 06/09/2016. This permission authorised the importation and recovery of inert soil and stone waste, comprising of 20,000-25,000 tonnes per annum for a period of 4-5 years, to partially restore the former extraction and silt settlement lagoon in the southern part of the Kilsaran landholding at Halverstown only and does not authorise a waste recycling facility. This restoration will require an intake of 20,000-25,000 tonnes of soil and stones per year for a period of 4-5 years.
- 02/850:** Application by Kilsaran Concrete Ltd. for permission for sand and gravel development and associated processing on 32.4ha. The Planning Authority issued a notification of its decision to **grant** permission for the proposed development on 11/06/2003 which was subsequently upheld by **An Bord Pleanala** on 28/11/2003 (under ABP Ref. PL09203493) following third party appeals.
- 06/651:** Permission **granted** for the extraction of sand and gravel with processing that includes crushing, washing (with associated silt disposal lagoons) and screening and all ancillary works and structures on a total site measuring 37.0 hectares. The application was accompanied by an EIS. (An Bord Pleanala Ref. 223574).
- 04/1109:** Permission **granted** to Kilsaran Ltd for Readymix plant at existing operation & for 32 hectares extension to existing sand & gravel operation. This application is accompanied by an EIS. This application was refused by Kildare Co. Co. and subsequently granted by An Bord Pleanala.

I trust this is in order.

Kind Regards,  
John

**John O' Hara,**

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## **Environmental Impact Assessment (EIA)**

To accompany Planning Report for Reg. Ref. 18/453

### **1. Introduction**

The content of this EIA has been prepared in accordance with the DECLG 'Guidelines for Planning Authorities and An Bórd Pleanála on carrying out Environmental Impact Assessment (2018)', and namely Section 8 of same entitled 'Outline and Guide to Key Sections of the Act'. The aim of this EIA is to identify and assess the effects of the proposed development on various environmental factors, in order to assist in considering whether it is consistent with the proper planning and sustainable development of the area. An assessment of the adequacy of the information contained in the planning application and Environmental Impact Assessment Report (EIAR) is therefore required. The content of a number of chapters of the EIAR are more pertinent to the competent internal departments of the Planning Authority. This EIA has therefore also been informed by reports received from the Planning Authority's internal departments. Submissions received from prescribed bodies and third parties have also been taken into account. In the interest of clarity and legibility for the reader it is proposed to structure this EIA in line with the sequencing of the information contained in the EIAR. It is not the intention of this EIA Report to summarise the content of the EIAR, but rather to address the information contained therein in a direct and succinct manner.

### **2. Directive 2014/52/EU**

Where applications for planning permission received on or after 16<sup>th</sup> May 2017 and falling within the scope of Directive 2011/92/EU or within the scope of Directive 2014/52/EU, competent authorities are advised to consider applying the requirements of Directive 2014/52/EU. In this regard the application was submitted on the 23<sup>rd</sup> April 2018 and is considered to fall within the provisions of the 2014 Directive. It was noted that the applicant has submitted an EIAR in compliance with 2014/52/EU.

### **3. Environmental Impact Assessment**

#### **3.1 Context**

Chapter 1 of the EIAR outlines the statutory requirement for the Environmental Impact Assessment Report given that the proposed annual intake of the proposed waste recovery facility will exceed 25,000 tonnes and therefore there is a requirement for an EIA under the provisions of paragraph 11 of Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, wherein it is stated:

*"(b) Installations for the disposal of waste with an annual intake of greater than 25,000 tonnes not included in Part 1 of this Schedule".*

The structure of the EIAR is provided along with information on the site of the development, screening and scoping for the EIAR and difficulties encountered with the EIAR compilation and a list of contributors involved in the preparation of the EIAR.

#### **3.2 Project Description**

Chapter 2 summaries the proposed development and consists of:

- The use of approximately 1,200,000 tonnes of imported inert natural materials, principally excess soil, stones and/or broken rock to fill and restore a disturbed landform created by previous extraction of sand and gravel and to improve lands currently in agricultural use;
- The use of existing and/or previously approved site and services infrastructure including, site office, staff welfare facilities, weighbridge (with dedicated office), wheelwash, hardstand areas, fuel storage tanks, waste inspection and quarantine facility and covered shed;
- Separation of any construction and demolition waste (principally concrete, metal, timber, PVC pipes and plastic) inadvertently imported to site prior to removal off-site to authorised waste disposal or recovery facilities;
- Temporary stockpiling of topsoil and subsoil pending re-use as cover material for final restoration of the site;
- Restoration of the excavated landform (including placement of cover soils and seeding) to its natural habitat, rough grazing and tillage;
- Environmental monitoring of noise, dust and groundwater for the duration of the site restoration works and for a short period thereafter.

The lands will be filled using only inert soil materials imported from external, pre-approved development sites. No peat, contaminated soils or non-hazardous waste will be accepted at the proposed recovery facility. It envisaged that the following wastes (EWC codes) will be deposited (or recovered) at the facility:

- 17 05 04 Soil and stones other than those mentioned in 17 05 03;
- 17 05 06 Dredging spoil other than those mentioned in 17 05 05;
- 20 02 02 Soil and stone from municipal facilities.

A separate waste licence application, associated with the proposed development, is to be lodged with the Environmental Protection Agency (EPA).

The following site development works will be required for the proposed recovery facility:

Years	Development Description
1	Remove scrub and vegetation from the western infill area
1	Placement of hardstanding materials for the proposed internal temporary haul roads to allow access to the active infill areas
2	Topsoil stripping from the northern infill area in preparation for placement of inert material

The proposed restoration is to be undertaken on a phased basis, with the submitted application documentation identifying six separate phases which are outlined below.

Phase	Years (est.)	Development Description
1	1	<ul style="list-style-type: none"> <li>▪ Remove Scrub and Vegetation from the Western Infill Area;</li> <li>▪ Placement of hardstanding materials for the proposed internal temporary haul roads to allow access to the active infill areas.</li> </ul>
2	1-2	Infill of Area 1: Southern part of Pit Workings
3	2	Topsoil Stripping from the Northern Infill Area in preparation for placement of Inert Material
4	2-3	Infill Area 2: Field to the North East
5	3-4	Infill Area 3: Northern part of Pit Workings
6	5	Site Landscaping And Restoration

Whilst the phased works are indicated to take place over a 5 year programme, this duration is based on an average importation rate of 300,000 tonnes per annum. However, the proposal refers to a completion of the recovery facility within 8 years in the scenario that if the rate of filling is less than anticipated.

The former pit on the site will be restored to its previous landform working upwards from the existing floor level of c. 116mOD, with final formation levels on completion of the filling and restoration works varying on account of the sloped nature of the restored landform, from approximately 122mOD to 128mOD. Existing ground levels in the adjacent field to the north-east range from 118mOD to 124mOD, with final formation levels on completion of the filling and restoration works to vary from 119mOD to 125mOD.

The final restoration scheme will seek the placement of a cover layer comprising 150mm of topsoil and approximately 300mm of subsoil over the inert filled materials which will then be seeded with grass with woodland planting proposed for a number of areas across the site. On completion, the application lands will be returned to use as natural grassland for use as agricultural land or to be naturally recolonised by natural vegetation.

The proposed development is expected to coincide with the existing concrete manufacturing processes on site, with the majority of these processes occurring northwest of the application site boundary but within the overall landholding of the applicant. The proposed inert waste recovery facility will share the use of the existing Kilsaran concrete manufacturing and waste facilities and infrastructure including site office, staff welfare facilities, weighbridge (with dedicated office), wheelwash, hardstand areas, fuel storage tanks and site access. This includes proposed use of the existing concrete block curing shed as a waste inspection and quarantine facility for imported inert materials.

Environmental controls are proposed in relation to: Noise generation and control; Landscape and boundary treatment; Bird control; Dust control; Litter control; Odour control; Invasive Species; Vermin Control; Fire Control. Safeguards to ensure that only suitable material is received and handled on site include:

- All material arriving on site is subject to a visual inspection on site prior to and during unloading;
- Any unacceptable materials identified at the facility at the time of delivery are immediately returned to the source site or forwarded to an authorised waste disposal or recovery facility;
- Any Contractor who persistently carries unacceptable waste to the recovery facility will be denied further use of the facility.

Environmental monitoring is proposed in relation to dust; ecological; groundwater; leachate and landfill gas; meteorological; noise; odour; surface water; and stability and settlement monitoring.

### 3.3 Alternatives Considered

The issue of alternatives considered is addressed in Chapter 3 of the EIAR. No alternative locations were considered on the basis that the proposed intensification of waste recovery activities at the subject site are essentially similar to those arising from existing land use within the landholding, which principally comprise of:

- Production of construction materials (concrete blocks); and
- Waste recovery activities.

Accordingly, it is considered that the subject site provides clear environmental and economic advantages relative to other locations and/or greenfield sites, with the proposed development compatible with established on-site production activities.

In relation to alternative designs, the EIAR states that alternative layouts within the subject site were considered, with particular attention paid to the phased infilling of the development. The EIAR states that the design and phased layout chosen is considered to best minimise the potential impacts on the environment from noise, dust, visual and landscaping impacts. In this regard, the EIAR states that consideration was given to proximity of neighbouring residential properties, as well as ecological, landscape and visual considerations.

Overall, the Planning Authority is satisfied that the issue of reasonable alternatives has been adequately addressed in the EIAR.

### **3.4 Population and Human Health**

Chapter 4 of the EIAR relates to population and human beings. It considers the impact of the proposed development under the following headings:

#### Employment

The proposed development will provide employment to machinery operators during the initial phase and would be undertaken by Kilsaran employees leading to a short-term, direct, temporary and positive effect. During the operational stage, the EIAR states that the proposed development will require at least one individual to be present on site, principally to operate a dozer and excavator and to monitor and inspect the quality and sustainability of inert waste being brought to the facility. The EIAR states that the proposal will also indirectly support hauliers, sub-contractors and maintenance contractors, as well as contributing indirectly to sustaining and developing the local and regional economy through the provision of a suitable location for the recovery of inert stone and soil. The EIAR states that the proposed development will lead to a medium-term temporary, direct and positive effect. Following the completion of the project, this would result in the loss of jobs related to the restoration of the site, however, employment in relation to other operations at the site would be unaffected by the cessation of restoration operations.

#### Human Health

During the construction stage, the EIAR states that the proposed development has the potential to generate dust and noise and the spillage of materials such as fuel to soil and ultimately groundwater. The EIAR references a number of mitigation measures to be employed in this regard which are considered to be acceptable. The EIAR identifies a number of potential impacts on air, noise, water and soils during the operational stage. Similarly, mitigation measures to be employed are identified in the EIAR in this regard which are also considered acceptable. The potential effects on air and noise are stated to cease at post-operational stage. Effects on water and soils may occur if non-inert materials are placed during the operational phase, however, given the proposed inspection procedures for imported materials, this is unlikely to occur.

The Planning Authority concurs with the EIAR wherein it is considered that there would be no likely significant or permanent effects on human health during the construction, operational and post-operational stages of the proposed development.

#### Amenity

Key matters relating to amenity identified in the EIAR are air, noise, landscape and traffic. The EIAR has stated that the construction phase has the potential to cause nuisance (through noise and dust generation), however, mitigation measures are identified to render the potential for residual impacts to be low. Similar potential impacts are identified in the operational stage, including ongoing changes to visual amenity as the inert spoil is placed

and the generation of traffic by the importation of material. Similarly, mitigation measures to be employed are identified in the EIAR in this regard which are also considered acceptable.

In terms of the post-operational stage, the EIAR states that the effects of the development would be ultimately beneficial owing to the removal of a detracting element in the landscape.

The Planning Authority concurs with the EIAR wherein it is considered that there would be no likely significant or permanent effects on amenity during the construction, operational and post-operational stages of the proposed development following implementation of the proposed mitigation measures to minimise impacts.

Overall, the Planning Authority considers that the EIAR has adequately identified and assessed the potential environmental impacts on Population and Human Beings arising from the proposed development.

### **3.5 Biodiversity**

Chapter 5 of the EIAR addresses the potential ecological impacts of the proposed development. The biodiversity assessment was informed by an ecological impact assessment of the proposed development using available existing ecological information on the site and a site inspection conducted on the 11<sup>th</sup> October 2017 to determine the ecological value of the site. The submitted EIAR states that the proposed development will not result in the loss of any important habitats and specifies a number of mitigation measures to be implemented to ensure the protection of breeding birds, common frog and smooth newt, Further mitigation measures in relation to habitats features such as trees and hedgerows, which if implemented, will not give rise to any significant impacts.

There are no designated sites located within the study area, with the closest designated site (Dunlavin Marshes pNHA (Site Code 001772) located c. 2.3km southeast of the site.

It is noted that the submitted EIAR refers to the presence of Japanese Knotweed on the site but does not provide any detailed management plan for this invasive species, although it is noted that reference is made to the preparation of a dedicated invasive species management plan in the proposed environmental controls outlined in Chapter 2 of the EIAR. Further Information was requested in relation to this matter. A Site Management Plan produced by Knotwood Control Ireland was received in response to these issues. The Site Manage Plan outlines the proposed treatment measures to be taken to eradicate the presence of Japanese Knotwood on site and also the appropriate bio-security measures required to prevent the spread of invasive species.

The report of Knotwood Control Ireland and the proposals therein have been reviewed by the Heritage Officer and are considered acceptable. It is considered that the EIAR, with the addition of the report of Knotwood Control Ireland does fully address the potential impacts of the proposed development on Biodiversity.

### **3.6 Land, Soils and Geology**

Chapter 6 of the EIAR addresses the potential impacts on land, soils and geology as a result of the proposed development. The EIAR provides a description of the soils and geology underlying the proposal site based on a desktop study and supplemented by a site walkover, trial pitting, and borehole surveys in December 2015 and April 2017. There are no sites designated County Geological Status within, or immediately adjacent to, the proposed development site. The submitted EIAR has identified the sensitive receptors as being both land and soils which are both of agricultural value. In this regard, the proposed development will give rise to a short to medium term negative impact through the temporary loss of a small area of agricultural land during the works. The Planning Authority concurs with the findings of the EIAR in relation to the long term impacts of the proposed development

wherein the restoration of soils suitable for higher value tillage use is predicted to give rise to long term positive impacts. No impact is predicted on subsoils or the bedrock geology.

Mitigation measures identified during the site preparation stage consist of stockpiling techniques/measures and the minimal re-handling of soil material in order to preserve the integrity of the topsoil material. No mitigation measures are proposed in respect of the operational stage of the development as the imported inert material does not have the potential to adversely impact on land, soil and geology.

Overall, the Planning Authority considers that the EIAR has adequately identified and assessed the potential environmental impacts on Land, Soils and Geology arising from the proposed development.

### **3.7 Water**

Chapter 7 of the EIAR addresses the potential impacts on water as a result of the proposed development and provides a description of the existing hydrological (surface water) and hydrogeological (groundwater) setting at the regional and local scale. The assessment was based on available desktop information, monthly groundwater monitoring undertaken at the site by the applicant since April 2017 and a field visit in which aspects of the surface water management at the site and the site's hydrology and hydrogeology were examined. The applicant has also undertaken a survey of local residences and septic tank treatment systems at residences adjoining their lands.

It is noted that there are no surface water courses at the site or adjacent to the site, with the nearest surface water course located approximately 1.5km south of the site which is the headwaters of a small stream which flows in a south westerly direction towards the River Barrow. Similarly, there is no surface water drainage infrastructure at the site. Surface water across the application site percolates down through the existing ground surface as recharge to groundwater.

The site is located on the Usk groundwater body, which is classified as a Locally Important Sand/Gravel aquifer. It is also noted that groundwater vulnerability maps have indicated that the groundwater vulnerability is classified as being 'High' with a significant thickness (>3m) of unsaturated sand and gravel material above the groundwater table.

In terms of potential construction stage impacts, the EIAR states that there will be no discharge from the site to surface watercourses and therefore there are no direct impacts on surface water quality or quantity during this stage. The EIAR has identified potential impacts on groundwater quality during the construction (site preparation) stage and operational stage relating to accidental spillages of fuel, release of suspended solids from soil and subsoil stripping and the accidental importation of non-inert material to the site. In this regard, a number of appropriate mitigation measures are identified to be employed at the construction and operational stages to reduce the potential impact on the Locally Important Sand/Gravel aquifer from 'medium' to 'low'.

It is noted that there is an existing septic tank located to the west of the existing site office, with effluent from the tank discharged to ground via a percolation area. No details are provided in the EIAR in relation to the performance of this existing wastewater treatment system. Further information was requested in relation to this matter. A certification report produced by Trinity Green Environmental Consultants in relation to the existing Wastewater Treatment System was received on 03/09/18. The report indicates that the on-site wastewater treatment system (septic tank) on site has a capacity of 4.32m<sup>3</sup> and is more than adequate to cater for the additional loading. The report also states that there is no evidence of any malfunction of the percolation area or indeed the septic tank. The report of

Trinity Green Environmental Consultants has been reviewed by the Environment Section, who subject to conditions has no objection to the proposed development.

The Planning Authority considers that the EIAR has adequately identified and assessed the potential environmental impacts on Population and Human Beings arising from the proposed development.

### **3.8 Air Quality**

Chapter 8 of the submitted EIAR addresses the potential impacts of the proposed development in respect of Air Quality.

The assessment was informed by available desktop information and supplemented by site specific dust monitoring at the existing waste recovery facility in compliance with Condition no. 23 of Pl. Ref. 15/189 and WFP-KE-16-0085-01.

The assessment provided in Chapter 8 identified 32 sensitive receptors within the 1km study area around the application site and 17 sensitive receptors within 500m of the application area. The EIAR states that the potential impact on sensitive receptors from fugitive dust emissions arises from the following activities:

- Trafficking by HGVs over unpaved surfaces;
- Stockpiling, handling and compaction of inert soil and stone material; and
- Placement of inert materials.

In the absence of any mitigation measures, the EIAR states that the risk of impact from dust emissions varies from insignificant to acceptable at assessed receptors within 500m of the dust generating activities. Risk of impact from dust emissions at receptors R1, R5, R6 and R7 was assessed to be moderate adverse without the proposed mitigation measures.

The EIAR also states that the proposed development will have an insignificant dust deposition impact on ecological receptors.

In terms of traffic emissions, the EIAR states that the projected additional traffic movements associated with the proposed development is predicted to be 55AADT HGVs, with no significant changes to either road alignment or speed. In this regard, the EIAR considers that the proposed intensification in recovery activity and HGV traffic movement is considered to be 'negligible' in terms of local air quality and no further air quality assessment is required.

The EIAR has proposed a sufficient suite of mitigation measures to render any potential residential Air Quality impact 'insignificant' or 'acceptable'. Overall, it is considered that the EIAR has adequately identified and assessed the potential environmental impacts on Air Quality arising from the proposed development.

### **3.9 Climate**

Chapter 9 of the EIAR addresses the potential impacts of the proposed development in respect of Climate.

The assessment in the EIAR provided an analysis of the following:

- Likelihood analysis of climate hazards (e.g. extreme rainfall, flooding, heat, drought, wildlife fires, storms, landslides, cold weather, freeze-thaw damage and rising sea-levels);
- Climate hazard impact analysis;
- Sensitivity of project to climate hazards;
- Exposure of the project to current and future climate hazards; and



- Vulnerability analysis of project to climate hazards.

The project vulnerability assessment of the proposed development considered that measures to improve the resilience of the project to extreme rainfall, flood, flash flood, storms and winds are required.

Proposed mitigation includes measures to increase adaptive capacity of the site and the development of disaster risk strategies with a view to reducing vulnerability and increasing resilience of the development. Significant climate change incidents that affect operations at the site will be recorded for future analysis. The developer also intends to adopt GHG monitoring programmes at the site upon which short, medium and long-term objectives and targets for a GHG reduction programme are to be developed.

Having assessed the potential impact, mitigation measures, predicted impacts and monitoring, it is considered that the potential impacts of the proposed development in respect of Climate have been adequately addressed in the EIAR

### 3.10 Noise

Chapter 10 of the EIAR addresses the potential impacts of the proposed development in respect of Noise and provides details of the noise impact assessment undertaken, the anticipated effects of the proposed development and a description of the mitigation measures to be employed.

The noise impact assessment undertaken in respect of the proposed development is based on guidance provided by the EPA Noise Guidance for Scheduled Activities (NG4) and the Institute of Environmental Management and Assessment (IEMA). The assessment was informed through a combination of desk-based study, site visit and technical assessments consistent with current standard methodologies and published best practice guidelines. The assessment was based on a noise prediction assessment, whereby the levels of noise were calculated (using the methodology set out in BS 5228:2009+A1:2014) at the nearest noise sensitive receptors to the subject site, as derived from 4 no. baseline noise monitoring locations considered to be representative of the nearest noise sensitive locations.

The principal noise source within the site is stated to be machinery (dozer, hydraulic excavator and HGV).

The EIAR states that a number of assumptions have been factored into the predicted noise impact assessment including:

- That all of the noise sources are active and arise continuously and simultaneously during the assessment hours;
- A reduction of -10 dB(A) has been assumed for partial noise screening as the attenuation path difference arising (between the noise source and receptors);
- That all noise sources are active for 20% of the time at the application site.

It is also stated that the soil deposition activity by the HGV will not occur at the site boundary and the soil excavator and dozer will not be working simultaneously.

The predicted operational noise levels at each receptor location arising from the proposed recovery facility are stated to be less than the EPA NG4 daytime noise criterion limits. Furthermore, cumulative operational noise levels have been compared to existing ambient noise levels at each of the noise sensitive locations, with the cumulative noise impact stated to be 'negligible' with reference to the 'Guidelines for Noise Impact Assessment' produced by the IEMA. The EIAR states that in view of the predicted operational noise levels arising from the proposed development, mitigation measures are not strictly necessary.

In respect of noise exposure and potential health effects, the EIAR states that the predicted operational noise levels of the facility are comfortably below the Reported Health Effects Threshold at all nearby noise sensitive locations.

Notwithstanding the results of the noise impact assessment, a suite of mitigation measures are provided on page 10-18 of the EIAR which include:

- the use of existing screening berms and planting as acoustic barriers;
- plant and machinery on site to have noise emission levels compliant with limiting levels defined in EC Directive 86/662/EEC and any subsequent amendments;
- traffic management in relation to delivery times, unloading procedures, maintenance of access/internal haul roads, and engine management.

Notwithstanding the submitted results of the predicted noise impact assessment, it is noted that the Environment Section queried the rationale for the application of an assumed reduction of -10 dB(A) in respect of receptors R1, R2, R3 and R32 given the close proximity of these receptors to the proposal site.

Furthermore, the Environment Section made referenced to paragraph 10.60 of the EIAR wherein it is stated that the assumption that all noise sources will be active 20% of the time at the application site has been factored into the predicted noise impact assessment. The rationale behind this assumption is also queried, with further clarification required as to why it is assumed all noise sources will only be active 20% of the time when there will be 59 no. HGV trips a day. (Time to drive in, deposit load, drive back out of site could take up to 5 minutes). Also it is necessary to take into account the time taken for machinery spreading the waste at the proposed site.

Further Information was requested in relation to the issues outlined above. The applicant in their response indicates that a reduction of -10dB (A) has been assumed for R1, R2, R3 & R32 as there is no direct view from the receptors to the site. Dense vegetation surrounding the receptors and partial banks / berms / pit faces are situated between the site and the receptors. A number of the residential houses are further screened by other buildings such as agricultural sheds and outhouses. There is also attenuation path difference arising between the noise source and receptors.

The applicant indicates that 59 trips a day are assumed for the entire site. The noise assessment has been carried out for the closest activity location to the receptor i.e. worst-case scenario. It is indicated that it is unlikely that all 59 loads in one day will be deposited in the same location at the boundary at the closest distance to the receptors. On that basis it is assumed that only 20% of the daily activity will be carried out at the location closest to the receptors.

The applicant indicates that in light of the response to the further information request in relation to noise, an amended noise impact assessment is not warranted and considers that the information already submitted in the EIAR is reasonable and accurate in accessing the potential noise impacts of the proposed development.

The applicant's response has been reviewed by the Environment Section, who subject to conditions have no objection to the proposed development. It is considered that the EIAR adequately addresses the potential impacts of the proposed development on Noise and Vibrations.

### 3.11 Material Assets

Chapter 10 of the EIAR addresses the potential impacts of the proposed development in respect of Material Assets. For the purposes of this assessment, Material Assets in respect of the proposed development are considered to be built services and waste management.

In relation to built services, electricity to the site is supplied via mains power, with electricity the principal source of energy for office lighting and heating. Phone, email and broadband connections to the site will be provided via a mobile (4G) network. As outlined previously, an existing septic tank is located on the landholding and outside of the application area, with effluent from the tank discharged to ground via a percolation area. Potable water is provided to the site via an existing groundwater supply well in the block yard, again located outside the application area. Residences in the vicinity of the site are stated to be on the mains water supply.

In relation to general waste management, waste oils, batteries, tyres, domestic waste and scrap metal are stated to be stored on site in designated areas and collected and recycled or disposed of by an authorised waste contractor. In respect of inert waste management, it is stated that all imported inert waste is subject to a visual inspection by the applicant's site staff. Where inspection or testing of suspect soil waste occur, it is segregated and temporarily stockpiled (quarantined) pending removal off-site by permitted waste collectors to an authorised waste disposal or recovery facility.

In terms of construction and operational stage impacts on built services, the EIAR determines that there will be no effects on the septic tank and percolation area and the water supply which are located outside the application area. Overhead power lines traversing the application site will need to be relocated in consultation with the ESB, with the effects of this considered to be short-term, temporary and slight.

Having assessed the potential impact mitigation measures, predicted impacts and monitoring, it is considered that the potential impacts of the proposed development in respect of Material Assets have been adequately addressed in the EIAR

### 3.12 Cultural Heritage

Chapter 12 of the submitted EIAR addresses cultural heritage issues in respect of the proposed development. The assessment provided in the submitted EIAR was informed by a desk-top study using information obtained from the Record of Monuments and Places of County Kildare, The Kildare County Development Plan 2017-2023, the Topographical files and finds list of the National Museum of Ireland, list of previous excavations and cartographic and documentary sources. Field assessments of the application area were also carried out on the 9<sup>th</sup> May 2016 and 5<sup>th</sup> February 2018 to identify and assess any known archaeological sites and previously unrecorded features and possible finds within the area.

Examination of the Record of Monuments and Places indicates that the proposal site intrudes into the zones of notification of two recorded monuments that no longer exist:

- KD028-054---- (three crouched inhumation burials located in the north-western section of the site near existing site office and staff welfare facilities); and
- KD028-055---- (a Bronze Age cist located near the southern boundary of the proposal site).

Both of these recorded monuments are cited in the submitted planning application documentation as being removed during quarrying of the sites in 1938 and 1939. Other remaining recorded monuments in the wider area are considered to be too far distant to be directly or indirectly impacted by the proposed development.

In relation to designated structures, there are no protected structures or buildings listed on the National Inventory of Architectural Heritage (NIAH) list within, or in close proximity to, the proposal site.

Proposed mitigation measures are outlined in the EIAR in the form of archaeological monitoring of soil-stripping in Area 1 of the application site owing to the possibility of the survival of previously unknown subsurface archaeological deposits.

Having assessed the potential impact, mitigation measures, predicted impacts and monitoring, it is considered that the potential impacts of the proposed development in respect of Cultural Heritage have been adequately addressed in the EIAR.

### 3.13 Landscape

Chapter 13 of the EIAR addresses landscape issues in respect of the proposed development. The assessment provided in the submitted EIAR was informed by a desk-top study and a site survey undertaken on the 25<sup>th</sup> July 2017 in bright conditions with good visibility.

The site is located in the 'Eastern Transition' Landscape Character Area as identified in Map 14.1 of the Kildare County Development Plan 2017-2023. This Landscape Character Area is characterised as a Class 2 'Medium Sensitivity' landscape *"with the capacity to accommodate a range of uses without significant adverse effects on the appearance or character of the landscape having regards to localised sensitivity factors."* (Chapter 14 Landscape Recreation and Amenity, Kildare County Development Plan 2017-2023). The Plan considers such Class 2 sensitivity classes as being of a 'high' compatibility with extractive processes such as sand and gravel extraction.

It is noted that there are no designated views and prospects within the immediate vicinity of the application site, however, there are three designated scenic routes in close proximity to the site:

1. Scenic Route 1 – views of Old Kilcullen from the R418 Motorway Interchange to South of Moortown House – a section of this route comprises of a narrow laneway which runs north of the application site which runs from the R418 to the R448 although this laneway is blocked by debris approximately halfway along this route.
2. Scenic Route 2 – views of Yellowbogcommon from the M9 Motorway Interchange to Halverstown Cross Roads – a section of this route runs along the R448 road to the north-east of the application site.
3. Scenic Route 35 – views of Dun Ailinne from the R418 north-west of the application site.

The EIAR provides a visual impact assessment of the proposed development accompanied by a series of photomontages which provide a detailed analysis of the visual impact of the development on the receiving environment.

In terms of construction stage impacts, the EIAR states that the proposed development will give rise to effects from the clearance of vegetation and stripping and storage of topsoil on the site in advance of filling operations. The EIAR states that these direct changes are considered to result in very minor changes to key landscape characteristics, namely loss of pastoral land cover and woodland vegetation in the context of the existing exhausted sand and gravel pit facility. The planning Authority concurs with the view presented in the EIAR that due to the short term duration of the proposed vegetation clearance and topsoil stripping and storage, as well as the relatively small scale nature of the site within a landscape setting, the character of the 'Eastern Transition' Landscape Character Area would not be altered to the extent that would result in significant effects on character.

In relation to visual effects during the construction stage, activities associated with vegetation removal and topsoil stripping in the northern infill area would be visible by road users on the R448 and by residents/road users along the local road which runs to the north of the site and connects the he R418 to the R448. The EIAR states that significant visual effects are not predicted to arise during the construction stage, taking into account the short term nature of these activities (i.e. vegetation clearance and topsoil stripping and storage).

Operational stage impacts identified in the EIAR relate to direct impacts on the landscape through the introduction of fill material which will result in changes to the existing landform. Indirect effects on landscape character identified in the EIAR concern short to medium term effects on the character of the surrounding landscape. However, the EIAR refers to the influence of existing mature hedgerow vegetation and scattered mature trees, as well as the rolling terrain of the surrounding landscape and changes in its topography provide existing mitigating circumstances which limit the potential effects on landscape character to an acceptable level.

It is noted from the visual impact assessment provided in the submitted EIAR, that the views which were the subject of the designations for Scenic Routes 1 and 2 are directed away from the application site with no effects predicted to arise. Scenic Route 35 provides an overall view direction extending from the north to the east and includes the application site, however, the proposed development is considered not to be visible from this scenic route due to screening provided by intervening vegetation, topography and structures.

It is acknowledged that the application site is bounded by extensive mature hedgerow and tree vegetation, most of which are to be retained, which provide effective screening mitigation of the proposal site. Further mitigation measures are provided in the EIAR consisting of the implementation of measures outlined in BS 5837 Trees and further planting of the site. The submitted restoration plan contains details on further screening and landscaping measures to be employed featuring farmland, shrub and hedgerow planting.

Overall, it is considered that the proposal site is accompanied by adequate screening in the form of existing mature hedgerows and trees along its boundaries and the boundaries of the overall landholding of the applicant. Existing significant vegetation and changes of topography within the wider landscape setting also provides for effective screening mitigation of the proposal site. Moreover, given the nature of the proposed development, i.e. the restoration of a disused pre-1964 quarry to backfill the pit void to former ground level and improve lands currently in agricultural use, it is considered that the proposed development will give rise to positive impacts on the landscape and visual amenity as well as the enhancement of local ecological habitats.

Having assessed the potential impact, mitigation measures, predicted impacts and monitoring, it is considered that the potential impacts of the proposed development in respect of Landscape have been adequately addressed in the EIAR.

### **3.14 Roads and Traffic**

Chapter 14 of the EIAR addresses roads and traffic issues in respect of the proposed development. This section of the EIAR was prepared by Trafficwise Ltd., specialist traffic and transportation planning consultants. The EIAR provides a description of the existing site access and receiving road network and includes a review of traffic characteristics of the existing facility together with detailed turning count surveys of the receiving local road network.

The assessment provided in the EIAR is informed by current Transport Infrastructure Ireland (TII) and Chartered Institution of Highways and Transportation (CIHT) guidance.

The EIAR states that based on the proposed total import of 300,000t of material per annum and based upon 5½ working days per week and 46 working weeks and assuming the lower value payload of 20t per vehicle, the proposed waste recovery operation is considered likely to give rise to a total of 59 No. HGV trips per day. Accounting for the current 4-5No. HGV trips per day associated with the permitted waste importation the proposed development is forecast as likely to give rise to an additional 55 HGV trips per day.

The forecast increase in traffic equates to an average of approximately 5-7 HGVs per hour. In the context of the ultimate carrying capacity of the receiving R448, the forecast traffic presented in the EIAR equates to an uplift in total traffic flow in the order of 2.34%. The EIAR further states that the two-way HGV traffic flow north of the existing site access is forecast to increase by an average of 87 HGV movements from 467 to 554 HGV per day which is an increase in HGV traffic in the order of 18.6%. The assessment provided in the EIAR concludes by stating that the forecast traffic arising from the development is unlikely, under normal traffic flow conditions, to give rise to significant increases in delay on the receiving road network.

Further Information in relation to the above matters was requested by the Transportation Section of Kildare County Council, in its assessment of the proposed development. In response a report compiled by Trafficwise Ltd, stated engineering specialists in traffic and transportation planning and geometric road design on behalf of the applicant was received on 03/09/18 to address the concerns of the Transportation Section. The Transportation Section have reviewed the report and its content and subject to compliance with stated conditions are satisfied with the proposed development. It is therefore considered that the potential impacts of the proposed development on Roads and Traffic have been adequately addressed in the EIAR.

### **3.15 Interaction of the Foregoing**

Chapter 15 of the EIAR outlines the interactions of the various potential impacts and mitigation measures in the form of a matrix table of each issue considered in the EIAR and identify where there is a potential for significant interaction with other disciplines. These interactions are set out clearly and concisely. All of the interactions identified are deemed acceptable. No negative impacts are expected to arise as a result of interactions between different environmental disciplines.

## **4. Reasoned Conclusion on the Significant Effects**

Having regard to the examination of environmental information contained above, and to the EIAR and other information provided by the developer, the internal departments of Kildare County Council, prescribed bodies, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows;

No likely significant or permanent effects on human health during the construction, operational and post-operational stages of the proposed development.

Biodiversity impacts, which will be mitigated by site management plan / measures, protection of habitat features i.e. hedgerows and trees, invasive species management, measures for the protection of breeding birds, common frog and smooth newt.

Land, soil and geology impacts which will be mitigated by measures identified during the site preparation stage and consist of stockpiling techniques/measures and the minimal re-handling of soil material in order to preserve the integrity of the topsoil material.

Water impacts; no discharge from site to surface watercourses and therefore no direct impacts on surface water quality or quantity. Potential impacts on groundwater relate to accidental spillages of fuel, release of suspended solids from soil and subsoil stripping and

the accidental importation of non-inert material to the site. Mitigation measures proposed include managed surface water runoff, restrictions on refuelling / machinery maintenance, use of spill kits and drip trays.

Air Quality which will be mitigated by site management plan, minimising drop heights of materials, protection from wind, use of watersprays, restriction of vehicle speeds, retention of hedgerows etc. Envisaged that given the mitigation measures to be implemented and design measures proposed will render any potential residential Air Quality impact 'insignificant' or 'acceptable'.

Climate which will be mitigated by increased adaptive capacity of the site and the development of disaster risk strategies with a view to reducing vulnerability and increasing resilience of the development.

Noise which will be mitigated by screening berms and planting as acoustic barriers, plant and machinery on site to have noise emission levels compliant with limiting levels defined in EC Directive 86/662/EEC and any subsequent amendments; traffic management in relation to delivery times, unloading procedures, maintenance of access/internal haul roads, and engine management.

A positive impact expected with regard to the material asset, due to the restoration and improvement of disturbed landform, created by previous extraction of sand and gravel.

Cultural Heritage which will be mitigated by archaeological monitoring of soil-stripping.

Landscape given the nature of the proposed development, i.e. the restoration of a disused pre-1964 quarry to backfill the pit void to former ground level and improve lands currently in agricultural use, it is considered that the proposed development will give rise to positive impacts on the landscape and visual amenity as well as the enhancement of local ecological habitats.

Roads and Traffic which will be mitigated by advance signing, maintenance of sightlines at entrance.

Interaction of the foregoing, while potential for significant interaction with other disciplines, all identified interactions are considered acceptable with no negative impacts expected to arise as a result of interactions between different environmental disciplines.

Having regard to the above, the likely significant environmental effects arising as a consequence of the proposed development have been satisfactorily identified, described and assessed. They do not require or justify refusing permission for the proposed development or requiring substantial amendments. It is considered that the EIAR is compliant with Article 94 of the Planning and Development Regulations 2001 as amended.

## **5. Conclusion**

This report comprises an Environmental Impact Assessment of the development proposed under planning applications Reg. Ref.18/453.

The aim of the EIA Report is to identify and assess effects of the proposed development on various environmental factors, in order to assist in considering whether the proposed developments are consistent with the proper planning and sustainable development of the area.

It is considered that the EIAR in addition to the response to the further information request has adequately identified and assessed the effects of the proposed development on various

environmental factors. The EIAR submitted together with the information and the various reports received following the further information request with this application, is deemed to adequately describe the direct and indirect effects on the environment of the proposed development.

\_\_\_\_\_  
John O' Hara  
Assistant Planner

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Date

\_\_\_\_\_  
Liam McGree  
Senior Planner

\_\_\_\_\_  
Date

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