

KILDARE COUNTY COUNCIL
PLANNING DEPARTMENT

Planning Report



Pl. Ref No: 15/189

Name of Applicant	Kilsaran Concrete
Address of Development	Halverstown, Kilcullen, Co. Kildare
Type of Development	Waste recovery facility
Type of Permission	Permission
Due Date	13/10/2015

Note on Revised Public Notices:

- The Further Information response received on the 6th August 2015 was deemed to constitute "significant Further Information".
- The applicant was requested to re-advertise accordingly.
- Revised public notices were received on the 16th September 2015.
- It should be noted that the Planning Authority require that any new notice reference back:
 - (i) Quantity and type of material for filling of the site and for C&D facility
 - (ii) Life/duration of the permission being sought

It is noted that the revised notices mention that the lifetime of the development is for a 6 year period but the Additional details have not been included in the notices.

Description of Proposed Development

Permission is sought an inert soil & stone / construction and demolition waste recovery facility. The proposed development involves:

- The importation and recovery of inert soil and stone/construction and demolition waste to partially restore the former extraction and silt settlement

lagoon in the southern part of the Kilsaran landholding (up to 90,000 tonnes in total (approximately 15,000 tonnes per annum for a 6 year period) .

- The importation, crushing and recycling of up to a maximum of 10,000 tonnes of inert construction and demolition waste per annum (principally concrete, block, brick, paving stones, granular fill, ceramics etc) for sale and re-use as secondary aggregate on off-site development projects
- The establishment of a hard-standing area for waste stockpiling and recycling activities.
- The construction of a waste quarantine and inspection facility.

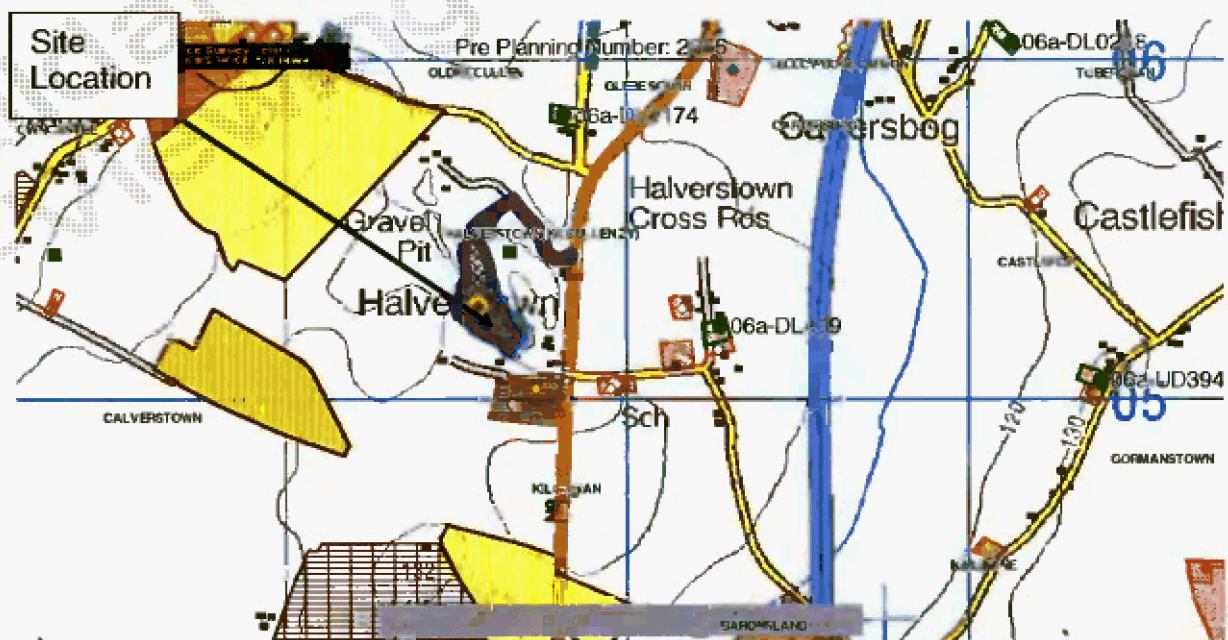
It is stated that the inert materials to be imported for recovery at this facility will be sourced from sites where inspection and/or construction and demolition waste ^{arise}. The inert waste materials will be imported by permitted waste contractors.

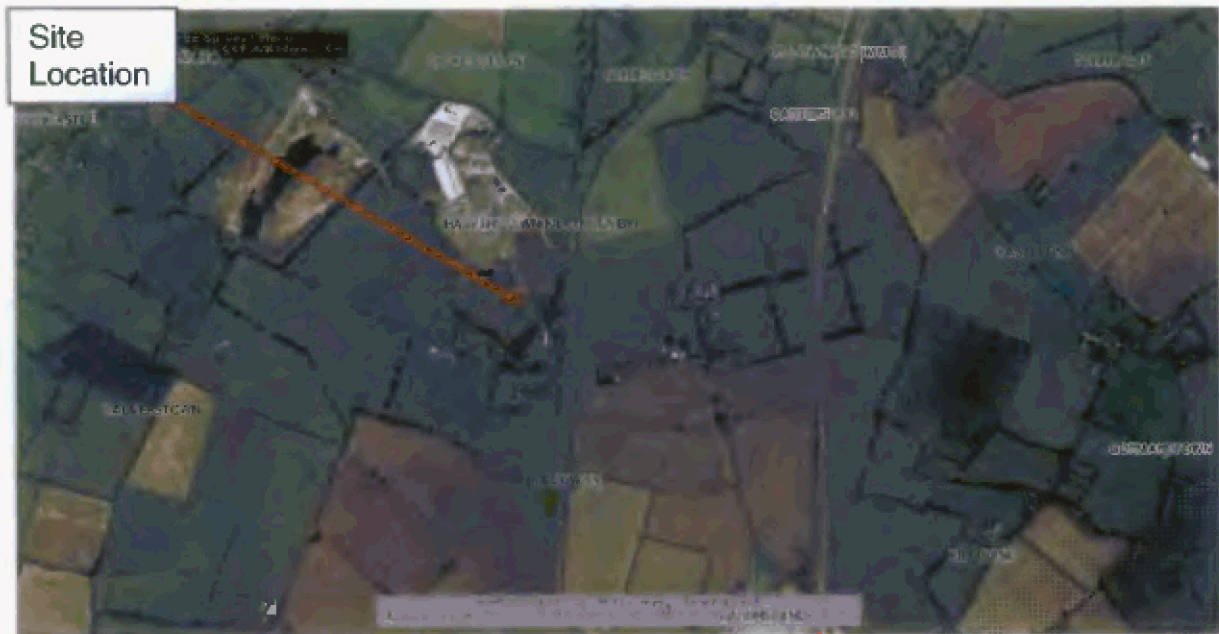
It is stated that the partial restoration of the former extraction and silt settlement lagoon area in the southern part of the Kilsaran landholding will reduce the overall development footprint of the sand pit.

Site Location / Context

The subject site measures 3.34Ha and is located in the townland of Halverstown, approximately 4km to the south of Kilcullen. The subject site lies to the south of an established quarrying facility. The site is accessed through the existing Kilsaran facility located to the west of the R448 Regional Road- (former N9). There are a number of one-off dwellings in this rural area and the dominant land use is agriculture.

Figs 1-3 Site Location and Context





Note; Refer to Appendix II for site photographs.

Natural Heritage- Appropriate Assessment

There is no designated site located in the vicinity of the subject site. An AA Screening was carried out and submitted with the application. The Screening report submitted finds that there will be no significant effect in the integrity of the Natura 2000 network. The findings of the AA Screening report are noted and correlate with

KCC AA Screening (attached). I also note that the Heritage Officer has no objection subject to conditions.

Built Heritage

There are no protected structures in the vicinity of the site. The nearest recorded monument is KD028-054- Burial approximately 450 metres to the north of the site and another recorded moment KD028-055- Cist to the south of the site.

Internal Reports

This application was referred to the following, reports received as indicated below. Please refer to the specific report on file should further details be required.

Area Engineer: No objection subject to conditions

Transportation: CFI requested

NRO: It is stated that if the traffic increase due to this development is spread out over the year there is no impact.

Water Services: No conditions

Environment: CFI requested

Heritage Officer: No objection subject to conditions

EHO: No updated report received to date

Prescribed Bodies

Irish Water: No objection subject to conditions

Submissions & Observations / Representations

A number of initial submissions have been received. These should be read in conjunction with this planning report. The following provides a summary only:

Fergus and Gabrielle Aspell:

- It is stated that they live 600metres from the facility and that the application plays down the impact on residential properties in the area, almost ignoring the Old Kilcullen Road and the dwellings at that location. There is little activity at the pit but there is noise from the few plant in operation.
- EIA Screening: Uncertainly as to how many vehicles will be entering the facility each day. Is there a finish date?
- Noise: Crushing machines should not be allowed operate at the weekend. Screen planting should be erected.

- It is stated that the proposed development is contrary to CDP policy on economic development as the majority of waste is coming and going from Dublin
- Air pollution: the quality of the air must be reduced- respiratory diseases.
- Traffic: Junction of R418 and R448 is a serious problem, and there have been several accidents. No mention of local school which is 500m from the site.

Pat Griffin:

- Development is for a change of use of existing sand, gravel and concrete operation which was first established in the 1940's.
- The site is located close to heritage sites of Old Kilcullen and Knockaulin. Halverstown national school and a national reservoir of water are located in close proximity.
- Concerns regarding the HGV routes.
- Concern regarding traffic movements in and out of the site.
- No scientific information to show the sites capacity to handle any further material without impacting the long term water quality of groundwater.
- Stage 1 Screening Assessment is inadequate.

Matthew Jennings:

- Development will increase the HGV traffic on small, narrow, country roads which will expose residents to danger, dust, pollution and noise
- Facility will give rise directly to dust and noise.

Martin Whyte:

- Concerns regarding the impact of dust, noise and additional traffic.

Mart Howard:

- Health concerns regarding the recycling process will lead to even more dust cloud and that the material will be drawn in from other sites and therefore it will be impossible to assure that materials will not contain toxic materials.
- Corners regarding noise impacts
- Concerns regarding traffic implications.

Kevin and Victoria O' Brien:

- Concerns regarding exposure to cement fibres that will be released from the plant when the crushing activity occurs.
- Concerns regarding noise and pollution.
- Concerns regarding potential increase in traffic.

Thomas Howard:

- Concerns regarding impact of dust.
- Concerns regarding noise impacts.
- Concerns regarding traffic implications.

Sean and Anne Candy:

- Concerns regarding noise impacts.

Christine and Eileen Howard:

- The existing facility is pre- 1964 and the local residents never have the opportunity to comment on the development.
- EIS: It is not clear if the application is on a permanent basis or for a period of time to fill the lagoon for 6 years. There is confusion regarding the volumes of materials to be trafficked to and from the site, sections 1.1 and 1.2 give different quantities.
- Important that EIS is carried out for the new development of waste recovery
- Hedgerows and woodland is insignificant on all boundaries to the site. Clear visual exposure.
- Concerns regarding dust and noise.
- The impact on the surrounding area- planning report states there are 9 houses but does not mention the school, if extend the area to 750m there are 30 dwellings.

Board of Management- St. Josephs National School

- Major concerns for the pupils and staff on health issues arising from the proposed development- noise pollution, increase in traffic and air pollution from dust.

Ciaran O'Donnell:

- Concerns regarding noise levels
- Concerns regarding traffic
- Opening hours noted but concern regarding traffic movements outside those hours.
- Concerns regarding dust
- County Kildare has broad range of waste facilities already in operation- employment will be minimal

Note: The content of the submissions have been taken into consideration in the assessment of this application.

Since the revised notices, an additional submission has been received from Pat Griffin in which the following was stated:

- It is stated that page 2 and 3 of the August submissions section 16.1.1 shows clear contradiction between the previous paragraphs and that no capacity analysis has been provided. The response fails to provide any actual real evidence of the need for this facility at this location.
- The proposed development has no association with the previous use of the site as a quarry or with the rural area. There is no justification for another C&D facility.
- Traffic: Given the nature of the proposed use not just back filling of a quarry, the impact of the new traffic generated by processing and sale of 10,000 tonnes of C&D waste per year.
- The findings of the EIS screening do not include sufficient findings on the import and processing sale of 10,000 of C&d waste on site and surrounding rural area.
- The EIS screening fails to provide information on the actual current seepage of pollution if any to the underground aquifer at present.

Note: The comments raised in the above submission are noted and taken into consideration.

Pre-Planning

A pre-planning meeting took place in relation to the proposal. (PP2899)

Relevant Planning History

There is no recent planning history traced to the subject site.

The following relates to the adjoining lands to the north of the subject site:

02/850: Permission **granted** to Kilsaran Concrete for sand & gravel development and associated processing on 32.4 hectares.
(Appealed to ABP: Pl. 09.203493 and upheld)

Section 261 and 261A

The adjoining sand and gravel site was subject to the S261 process. Under S.261a the overall quarry was registered to Kilsaran Concrete. The information submitted at that time indicated that the quarry commenced operation in the early 1900s. The Planning Authority, in its determination under Section 261 indicated that the quarry commenced operation before 1st October 1964.

Under S. 261A Kilsaran registered the landholding/ Quarry under QRA-28-012 Under this file, it was further determined that the quarry commenced prior to 1964. The

Planning Authority determined that the applicant should seek a substitute consent form an Bord Pleanala on the basis of Appropriate Assessment. ABP set aside the Council's determination. No further action required.

The following relates to previous use on the landholding:

79/1453: Permission **granted** to Spollen Concrete (Naas) Ltd. for an extension to existing washing Plant.

Note: It is noted that there are other uses on site such as on-going concrete block making facility which has not been subject to planning permission.

Policy Context

The National Development Plan

The National Development Plan promotes the development of recycling and recovery through the Waste Management Sub-Programme and the development of alternative sources of energy such as biomass through the Sustainable Energy Sub-Programme. Emphasis is placed on reducing the extent of waste generation, maximizing recycling and recovery of waste and minimizing the environmental impacts of final disposal, particularly through reducing reliance on landfill.

National Waste Policy Documents

There are three national policy documents relevant to waste management in Ireland, with the most recent "Waste Management - Taking Stock and Moving Forward" (2004) joining the earlier publications "Waste Management – Changing Our Ways" (1998) and "Preventing and Recycling Waste – Delivering Change" (2002). In addition a Draft National Strategy for Biodegradable Waste reiterates the objective of a minimum reduction of 65% of biodegradable waste going to landfill by 2013.

Eastern-Midlands Regional Waste Plan (May 2015)

The Plan sets out a clear strategy, policies and actions for the prevention and management of wastes in a safe and sustainable manner. The scope of the waste plan is broad and ultimately it needs to provide policy direction, setting out a roadmap of actions. The waste management plan is a statutory document prepared by the local authorities in the region, including Kildare. The plan covers a period from 2015 to 2021.

Kildare County Development Plan 2011-2017

Chapter 5 – Economic Strategy
Chapter 6 – Movement & Transport

Chapter 7 –	Water, Drainage & Environmental Services
Chapter 8 –	Energy & Communications
Chapter 10 –	Rural Development
Chapter 13 –	Natural Heritage & Biodiversity
Chapter 14-	Landscape, Recreation and Amenities (scenic viewpoints nearby site)
Chapter 19 –	Development Management Standards.

Current Planning Status

- Please refer to the previous planning report on file for the initial assessment and recommendation.
- The following further information was requested:
 1. While the adjoining land use and history of the landholding for concrete production is noted, it is considered that further justification for an additional waste recovery facility is required, given the quantity of similar facilities throughout County Kildare. Please provide a capacity analysis to determine the need for another such facility.

Reply: *It is stated that the Eastern-Midlands Regional Waste Management Plan 2015-2021 has been finalised since the application was lodged. It is stated that there are difficulties in establishing the available capacity at various waste treatment and disposal sites across the Eastern Midlands Region. Parts of the waste management plan are quoted and it is stated that there are difficulties in tracking data for waste storage. It is submitted that the region appears to have significant available capacity however the capacity authorised for a facility does not necessarily represent the current operational or available capacity for a facility. Details in relation the capacity in the region are provided. Waste facilities within 30km of Halverstown are submitted. It is stated that the proposed development can be justified on the uncertainty and unreliability in respect of statistics pertaining to the available operating capacity of soil and stones waste recovery facilities.*

Assessment:

The applicant's response is noted. It is acknowledged that ^{Item 1} may be a requirement for additional waste facilities in the Eastern-Midlands area but it is not considered that the response to Item 1 adequately addresses the existing facilities' in Co. Kildare or the need or appropriateness for the subject site in question. It is also not considered that sufficient information has been provided in relation to where the waste will be sourced etc or the haulage routes to be used therefore it is not clear if the proposed site is the optimum location for such a facility.

2. Please note that the volume of materials is not clear and it is noted that Section 1.1 and Section 1.2 of the Environmental Report appear to provide differing quantities. The applicant is therefore requested to state the precise volume of intake material.

Reply:

It is stated that up to 90,000 tonnes in total (approx 15,000 tonnes per annum for a 6 year period) for the importation and recovery of inert soil and stone/construction and demolition waste to partially restore the former extraction and silt settlement lagoon in the southern part of the Kilsaran landholding and the importation, crushing and recycling of up to a maximum of 10,000 tonnes of inert construction and demolition waste per annum for sale and re-use as secondary aggregate on of-site development projects.

Assessment: Applicant's response is noted.

3. It is noted that the application does not seek 6 year permission, however it is stated that it is intended to import material over a 6 year period. Please clarify this matter and specify the exact timeframes proposed.

Reply: It is stated that planning permission is sought for a period of 6 years.

Assessment: Noted.

4. The applicant is requested to submit a detailed Landscaping Plan, prepared by a suitably qualified person for the entire perimeter of the site. Please provide details of the number and species of planting and note that mounding or other visual buffers may be required to reduce the potential visual impact of the development.

Reply: A landscaping plan has been provided.

Assessment: Response is generally acceptable.

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1. Please submit a revised Site Layout Plan showing the following:
 - (a) boundaries showing where the filling of the site is proposed to take place and where the recycling operation is proposed to operate on the site.
 - (b) waste storage areas for:
 - (i) waste arriving at the site,
 - (ii) the treatment areas for each waste type and
 - (iii) designated storage bays for each waste type that have been recycled on site
 - (c) site drainage for the recycling area of the site
 - (d) quarantine area
 - (e) nature of surfacing within the recycling area of the site
 - (f) noise monitoring locations at the nearest noise sensitive locations surrounding the site.
 - (g) location of the weigh bridge and site office.
2. Please submit the proposed tonnage per annum for the following EWC Codes: 17 05 06, 17 01 01, 17 01 02, 17 01 03, 17 01 06 and 17 09 04.
3. Please submit a detailed noise report, with recommendations, from a competent environmental consultant, which assesses the impact of the proposed development on noise levels. The report shall also include proposed mitigation measures to reduce noise levels from the proposed waste activities.
4. Please submit drainage details on how any run off generated at the site will be collected, treated and disposed of. The information shall include the proposed location of a silt trap(s) and petrol oil interceptor(s).
5. Please submit full design details and capacity of the petrol oil interceptor (s) that you intend to install at the site.
6. Waste metal, tyres and plastic piping were observed on site. It is necessary to remove the above wastes from the site and bring them to an authorised facility. Please submit receipts showing proof of disposal/recovery.

Reply to Environmental Requests:

It is stated that revised drawings have been submitted addressing which areas it is proposed to fill the site and where recycling will take place. It is stated that no site office is required as the proposed facility will utilise existing infrastructure at the adjoining concrete manufacturing facility.

Details of the tonnage per annum have been submitted detailing the tonnage over the 6 years.

A noise report has been submitted. The report concludes that "the worst case assessment" has shown that in accordance with the scale in the Guidelines for

Noise Impact Assessment the cumulative long-term impact from plant associated with the development at particular receptors will be negligible.

It is submitted that there will be no off-site discharge of water from the application area to a surface water course. It is proposed to provide a petrol interceptor and it is stated that any required fuel will be stored in bunded tanks at the existing concrete production facility.

Assessment:

The applicant's response to the Environmental Issues are noted. However, it is not considered that sufficient details have been submitted to resolve concerns of the Environment Section.

It is noted that the Environment Section recommend that CFI be requested in relation to the waste types. Detailed cross sections are required through the site. Reference is made to the EWC Code and one is asked to be removed as it is hazardous waste and not an acceptable waste type. Size and capacity details of the oil interceptor are required. It is also stated that waste metal and plastic piping from the site were visible on site on 27/08/2015 and should be removed from the site and brought to an authorised facility.

Transportation FI request

- 1. The applicant is requested to submit details of the haul roads currently used and the haul roads proposed to be used as part of this development.**
- 2. The applicant is requested to submit details of the total number and type of vehicle using this site.**
- 3. The applicant is to show on a drawing that sightlines at the entrance are in accordance with the Design Manual for Roads and Bridges. The set back x distance is to be measured back along the centreline of the access from the continuation of the line of the nearside edge of the surfaced road (including hard strip or hard shoulder) of the major road.**

Reply to Transportation FI:

It is stated that details of the haul road currently used and the haul roads proposed to be used as part of the development are shown on submitted drawings.

It is stated that all materials to be transported to and from the proposed recovery facility using HGVs this assumes the expected maximum annual intake of imported soil waste (24, 500 tonnes) is sourced from external sites working over 48 working weeks.

It is stated that details of the sightlines have been provided.

Assessment:

I note that the Transportation Department seek CFI. The Transportation Dept report states that the applicant has only shown internal haul routes and is requested to submit details of proposed haul routes on public roads to/from the site for the existing and proposed uses on site. It is stated that the sightline drawing is not of a suitable scale to adequately assess the information submitted and the Transportation Department has concerns regarding the visibility available at the entrance. The applicant is also requested to submit further details in relation to the set back distances and land ownership.

5. The applicant is requested to conduct Environmental Impact Assessment screening in accordance with Schedule 7 of the Planning & Development Regulations 2001-2013.

Reply: A Screening Report has been carried out and submitted with the FI response. In the conclusion, a checklist of the criteria has been included. The following is stated:

Table 2 Checklist of Criteria

No	Question	Response
1	Will there be a large change in environmental conditions?	NO - The site is a redundant sand and gravel pit and the purpose of the development is to restore it to agriculture / wildlife habitat. The impacts of proposed development will be no greater in many respects (and probably less, due to mitigation and monitoring) than those generated by the former sand and gravel extraction activities.
2	Will new features be out-of-scale with the existing environment?	NO - The proposed development provides for the restoration of a sand and gravel pit. Any structures on site will be relatively small, will result in no significant visual impact and will be removed at the end of the operations.
3	Will the effect be particularly complex?	NO - The proposed development is relatively simple and the impacts will be monitored and managed. The potential impacts of noise, dust, traffic and the potential impacts on the water environment due to spills will cease on completion of the operations.
4	Will the effect extend over a large area?	NO - The overall area of the application site is approx 3.34 hectares which is relatively small for such a facility. Furthermore the site is relatively contained and much of the on site will take place within the former extraction void. The potential impacts of the development on groundwater will be avoided through the provision of sumps, the placement of inert material and careful management of fuels and other potentially polluting liquids.
5	Will there be any potential for transboundary impact?	NO - The subject site is located some distance from both national and international administrative boundaries.

No	Question	Response
6	Will many people be affected?	NO - The subject site is located in a rural area and there are approx 9 no dwellings within 500 metres of the proposed development area with the majority being located to the east and south. With implementation of the proposed mitigation measures detailed in the Environmental Report submitted with the Planning Application, it is anticipated that the operation of the proposed construction and demolition waste recovery facility will not have any significant adverse impact on surrounding development or residential amenity.
7	Will many receptors of other types (fauna and flora, businesses, facilities) be affected?	NO - The subject site consists of disturbed ground which was previously used for sand and gravel extraction. The impacts of the development will be mitigated and monitored and, in any event, on site operations will be temporary.
8	Will valuable or scarce heritage or resources be affected?	NO - Soil and stones are non-renewable but ubiquitous resources. The soil and stone waste generated by other local development will be recovered in the remediation works at this former sand and gravel pit. The recycling of C&D waste for re-use at developments off site as secondary aggregate will reduce demand for virgin aggregate thereby helping to conserve natural resources for future generations.
9	Is there a risk that environmental standards will be breached?	NO - The subject site will be operated in accordance with relevant standards. Dust and noise emissions will be monitored to ensure compliance.
10	Is there a risk that protected sites, areas, features will be affected?	NO - There are no designated sites in the immediate vicinity of the subject site. The restoration of the site and the removal of all plant and machinery will improve the condition of the habitat in the long term.
11	Is there a high probability of the effect occurring?	NO - The probability that the proposed development will have a significant effect on the environment is very low being to the nature of the proposed operations and the planned ongoing monitoring and mitigation of impacts.
12	Will the effect continue for a long time?	NO - The development will be completed within 6 years.

No	Question	Response
13	Will the effect be permanent rather than temporary?	NO – Although the beneficial impact of the site remediation / backfilling works will be permanent, the potential adverse impacts relating to the operations will cease upon completion. The imported material will be subject to waste acceptance procedures to ensure there will be no permanent adverse impacts.
14	Will the impact be continuous rather than intermittent?	NO – Any noise, dust and traffic impacts (however minor) will occur primarily during operating hours. Other impacts associated with the development are likely to cease upon the closure of the facility.
15	If it is intermittent will it be frequent rather than rare?	Potential intermittent impacts will be subject to mitigation and monitoring. It is considered that the potential impacts are likely, at worst, to be rare.
16	Will the impact be irreversible?	NO – The placement of unsuitable material has the potential for serious impacts, but waste acceptance procedures will ensure that such materials are not accepted at the site. In the unlikely event that such materials are placed on the site, these will be removed off-site to authorised waste disposal or recovery facilities.
17	Will it be difficult to avoid, or reduce or repair or compensate for the effect?	NO – Any impacts will be reduced by the adoption of best practice mitigation measures and operational practices and the subject site will be restored to agricultural or habitat.

The submitted EIA Screening states that the restoration of a redundant sand and gravel pit on site with recovered inert soil, stones and construction and demolition waste will be unlikely to result in significant, adverse impacts on the environment. The report concludes that there is no requirement to prepare and submit and EIS.

Assessment:

Section 172 of the Planning and Development Act 2000 (as amended) requires the preparation of an Environmental Impact Assessment in respect of an application for consent for development specified in Schedule 5 of the Planning and Development Regulations 2001 (as amended) which exceeds a quantity, area or other limit specified in that Schedule (Section 172 (1)(a) refers). Part 2, Section 11 of the aforementioned Schedule 5 references the 'installations for the disposal of waste with an annual intake greater than 25,000 tonnes not included in Part 1 of this Schedule'.

It is not considered that the EIA Screening exercise carried out on behalf of the applicant is satisfactory. In particular, it is not considered that the cumulative impact of the existing concrete manufacturing facility and the proposed new waste facility has been accurately assessed by the applicant's submission.

The absence of information relating to on-going activities at the landholding is noted and has not been addressed in details submitted. EIS Screening, as part of this planning report has been included Appendix A of this planning report.

6. Please note that concerns are raised by third party submissions regarding the impacts of the proposed development, particular concerns related to additional traffic and noise and dust impact arising from the proposed development. The applicant is invited to comment on the content of all submission received.

Reply:

The agent has responded to each submission.

It is stated that crushing/screening of material will take place at intermittent basis only.

It is stated that the proposed works allows for the restoration of a previously worked out area and is a natural continuance of the long term development that has existed at the site for decades.

It is stated that there is no mandatory requirement for an EIS in respect of the proposed development.

It is submitted that there are sufficient mitigation measures included with the application in terms of safety and that the proposed waste recovery facility is located over 300 meters from the national school on the opposite side of the R448, the external boundaries of the proposed facility are fenced and have established hedgerows preventing any unauthorised third party access to the lands.

It is stated that there will be no huge increase in traffic as all materials will be transported to and from the proposed facility using HGVs.

Working hours: The movement of vehicles on/off the site outside the proposed operating hours will be minimal e.g. 5-10 minutes before/after operational hours. It is stated that the current operational hours are not relevant to this application as the current operations at the site are not the subject of this application.

Assessment: Comments noted.

Summary of Key Planning Issues and Assessment

Proposed Development

Permission is sought for an inert soil & stone / construction and demolition waste recovery facility. The proposed development involves:

- The importation and recovery of inert soil and stone/construction and demolition waste to partially restore the former extraction and silt settlement lagoon in the southern part of the Kilsaran landholding (up to 90,000 tonnes in total (approximately 15,000 tonnes per annum for a 6 year period).
- The importation, crushing and recycling of up to a maximum of 10,000 tonnes of inert construction and demolition waste per annum (principally concrete, block, brick, paving stones, granular fill, ceramics etc) for sale and re-use as secondary aggregate on off-site development projects
- The establishment of a hard-standing area for waste stockpiling and recycling activities.
- The construction of a waste quarantine and inspection facility.

It is stated that the subject site was previously in use as a sand and gravel pit with stock piles and silt storage areas. It is now proposed to locate the waste recovery facility entirely within the void created by the former sand and gravel extraction.

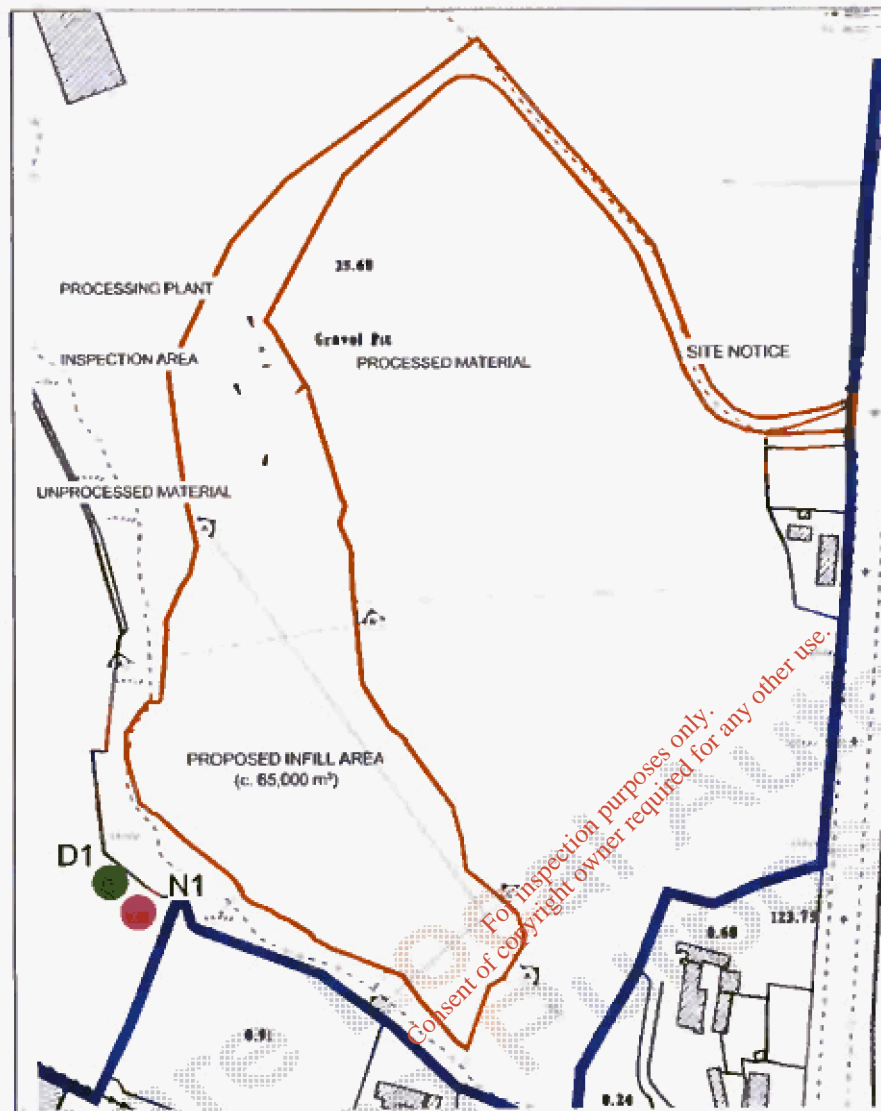
It is stated that working hours will be 08.00 to 18.00 hrs Monday to Friday and on Saturday from 08.00 to 13.00 hrs. The proposed development will provide for 2 full time employees. Existing staff facilities will be used at the adjoining concrete plant to the north of the site.

An Environmental Report submitted with the application and includes topics such as:

- Description of Development
- Planning Considerations
- Description of the Existing Environment (ecology, geology, dust, noise, water, landscape, traffic and material assets)

While it is noted that there is an adjoining existing use for concrete production and a history to the overall landholding, it is considered that the proposed development is introducing a new construction and demolition land use- waste recovery.

Proposed Site layout:



History of Landholding

It is important to understand the history and various activities of the overall landholding and not just the subject site of this application. It is noted from An Bord Pleanála Inspector report for quarry registration under S.361 of the P&D Act (ABP. QV02-71, KCC QRA-28-012), which relates to lands to the northwest of the subject site that:

The quarry in question is an excavation of approximately 17.2 hectares within a 30 hectare landholding. It is a sand and gravel quarry located in a slight depression between two shallow ridges, to the east and west of the site, with a further slight drop in levels towards the south. It consists of two sections, the southern of which has been largely quarried down to a depth of around 3-5 metres, the other has been partially worked but is still largely grassland. The lands formerly consisted apparently of a network of about six fields, with some agricultural buildings (still in use) and a dwelling at

the northern end. The worked areas are active – both processing and restoration works were on-going during my site visit. (Sept 2013)

It would appear that the quarrying permitted under Ref. No. 02/850 (PL. 09.203493) (which was a for a period of ten years has now ceased).

The only two other previous planning permissions on the landholding were Ref. Nos. 79/1453 which was for an extension to a wheel-wash and 77/270 which was for a sub-station. There does not seem to be a separate, post 1964 permission for the concrete block manufacturing facility towards the northern part of the site.

Throughout the planning reports for Ref. No. 02/850 and during the S.261 process, reference is made to the on-going block manufacturing facility at this location. The on-going facility is referred to again throughout the FI response in this application. However, the extent of this facility, including quantities of production, hours of operation, vehicles numbers, haulage routes, and potential environmental impacts are not known. It is therefore not possible for the Planning Authority to assess the cumulative impact of the proposed development.

Visual Impact and Landscaping

There appears to be a lack of landscaping at the perimeter of the site. It is noted from OS mapping that the levels increase from the adjoining roadside thereby increasing the visibility of the site. The landscaping plan submitted as part of the FI response is noted and is generally acceptable.

Residential Amenities

It is noted that there are 9 residential properties in close proximity to the subject site which are discussed in the documentation submitted. Notwithstanding the FI response, it is still considered that there is a lack of detail in relation to the potential impacts on surrounding receptors such as residential properties and the national school.

Environmental Issues

It is noted that some of the third party submissions have expressed concern regarding the noise and dust impacts arising from the development in combination with the existing noise associated with the adjoining gravel pit. A noise impact assessment is submitted but it is noted that the Environment Section are not satisfied with the level of detail provided and have recommended clarification of further information. It is noted from the Environment report that a hazardous waste is included in the documentation submitted in response to the FI which is deemed to be unacceptable.

Water Services Issues

It is noted that the Water Services section have no comment and refer matters to the Environment Section. In this regard it is noted that Environment are seeking further drainage details on how run off generated at the site will be collected, treated and disposed of.

Transportation Issues

It is considered that a lack of information has been submitted in relation to traffic movements in the area arising from the proposed development. It is noted that the information submitted as part of further information response is not acceptable to the Transportation Department and Clarification of Further Information is requested.

Environmental Impact Assessment

Environmental Impact Assessment (EIA) Screening has been carried out for the proposed development (Refer to attached EIA Screening Report- Appendix I). The proposed development would involve the importation of fill onto the site at an amount close to the mandatory EIA threshold of 25,000 tonnes per year. It should be noted that there are contradictions in the amount per annum in the submitted documentation with this application. In the original submission it was stated up to 15,000 tonnes per annum would be imported and in the response to the further information and EIS Screening submitted on the 06/08/2015, it is stated that there will be up to 24,500 tonnes imported per annum.

In this regard I would refer to Class (b) in Paragraph 11 of Part 2 in Schedule 5 of the Regulations, which relates to an installation involving:

"the disposal of waste with an annual intake of greater than 25,000 tonnes not included in part 1 of this schedule".

The character of the site, the existing uses, the rural area, and the proximity of dwellings has been considered as part of the screening process.

The conclusion of the KCC EIA Screening Report is that significant impacts cannot be excluded.

Taking account of the above, it is considered that the applicant should be requested to submit an Environmental Impact Statement (EIS) in accordance with the provisions of Article 103(1) of the Planning and Development Regulations 2001 (as amended), and to comply with the requirements of Article 105.

Conclusions

- The applicant's response to the FI request is noted but it is not considered to adequately address the issues raised.
- Please also refer to Appendix I of this planning report which contains the KCC EIA Screening Report. The report concludes that those significant impacts cannot be excluded.
- The Transportation Section has a number of concerns in relation to the development as it has not been demonstrated that traffic generated as a result of the development can be accommodated safely on the local roads network in the area. Details of the haulage routes are indicate and do not specify the public roads to/from the site for the existing and proposed uses of the site. The Transportation Department cannot assess the sight visibility at the entrance to the site due to inadequate information.
- The Environment Section has a number of concerns in relation to the types of waste identified in the response to further information and in relation to the non-inert wastes on site.
- Other issues such as odour, dust etc have not been fully addressed in the details submitted.
- As it has been established by the Environmental Screening Assessment that significant effects on the environment cannot be excluded as a result of the development proposed the applicants should be advised by notice in writing, that they are required to submit an EIS and to comply with the requirements of article 105 of the Planning & Development Regulations 2001 (as amended).
- It is therefore recommended that a notice is issued to the applicant as set out below.

Recommendation

It is recommended that a **notice is issued** to the applicant as follows:

Schedule 1: Reasons and Considerations

Having regard to the:

- (i) Quantum of material proposed in the EIA Screening Report (up to 24,500 tonnes per annum) which is marginally below the threshold for mandatory EIA.
- (ii) Nature of material to be imported on site (code EWC Code 17 01 06).
- (iii) Nature and extent of the existing and on-going uses on the landholding.
- (iv) Potential cumulative impact with existing uses on the landholding.
- (v) Proximity to residential/community properties i.e. school population

It is recommended that a **notice is issued** to the applicant as follows:

The proposed development, while below the mandatory threshold for an EIS, has been subject to an Environmental Screening Assessment by Kildare County Council. Significant effects on the environment cannot be excluded by the Planning Authority. It is recommended that a determination be made that the development would be likely to have significant effects on the environment. Therefore in accordance with Article 103 (1) of the Planning & Development Regulations 2001 – 2015, the applicant should be required to submit an EIS, and to comply with the requirements of Article 105 of the Planning & Development Regulations 2001 – 2015.

Note to applicant

A notice served under Article 103 shall cease to have effect where an exemption is granted under Section 172(3) of the Planning and Development Act 2000 (as amended).

Note: Request for exemption from requirement to prepare an EIS

Please be advised that in accordance with the provisions of Section 172(3) of the Planning and Development Act 2000 (as amended), where An Bord Pleanála is satisfied that exceptional circumstances so warrant, grant in respect of a proposed development an exemption from a requirement to prepare an environmental impact statement.

A notice served under Article 103 of the Planning and Development Regulations 2001 (as amended) shall cease to have effect where an exemption is granted under Section 172(3).

A request for such an exemption must be made to An Bord Pleanála under Section 172(3) as referred to above. Please contact An Bord Pleanála for further details.

Signed: 
Executive Planner

Date: 13/10/2015

Signed: 
Senior Executive Planner

Date: 13/10/15

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Kildare Planning Authority
Planning Committee Only

APPENDIX I

KILDARE COUNTY COUNCIL Planning Department



EIA Screening Report for Reg. Ref. 15/189

Introduction

This report is informed by:

- Schedule 7 of the 'Planning and Development Regulations 2001 (as amended)' - *Criteria for determining whether a development would or would not be likely to have significant effects on the environment;*
- Article 103 of the Planning and Development Regulations 2001 (as amended) – *Requirement to submit EIS with sub-threshold planning application;*
- 'Guidelines for Planning Authorities and an An Bord Pleanála on carrying out Environment Impact Assessment', issued by the DECLG (2013);
- Environmental Impact Assessment (EIA) - Guidance for Consent Authorities regarding Sub-threshold Development issued by the DEHLG (2003);
- Guidelines on the information to be contained in Environmental Impact Statements, issued by the EPA (2002).

Legislative Basis for EIA

EIA screening can be defined as the process of assessing the requirement of a project to be subject to Environmental Impact Assessment based on the project type and scale and on the significance of the receiving environmental.

Mandatory EIA

In the case of the proposed development, it is evident that it would not fall under a category of development which would automatically require an EIA as per Schedule 5 of the Planning and Development Regulations 2001 (as amended). In this regard I would refer to Class (b) in Paragraph 11 of Part 2 in Schedule 5 of the Regulations, which relates to an installation involving:

"the disposal of waste with an annual intake of greater than 25,000 tonnes not included in part 1 of this schedule".

There are contradictions in the quantity of importation per annum in the submitted documents. It is stated that there will be up to 15,000 tonnes per annum imported and later in the response to the further information, the documentation states that there will be "up to 24,500 tonnes per year" imported. The said figure of 24,500 tonnes per annum is just below the above noted threshold of 25,000 tonnes.

Sub-threshold EIA

The key issue with regard to the possible need for EIA of sub-threshold development is whether the development would or would not be likely to have significant effects on the environment.

The proposed development would involve the importation of fill onto the site at an amount close to the mandatory EIA threshold of 25,000 tonnes per year.

Due to the nature and extent of the development proposed in the planning application, the activities to be undertaken on the site, existing development/activities on the adjoining sites (within Kilsaran landholding), the environment in the vicinity including the existence of a number of residential properties, it is mandatory to screen for EIA and to assess whether the proposed development requires the preparation of an EIS. This screening exercise reviews the development under three main criteria:

1. Characteristics of the Proposed Development
2. Location of Proposed Development
3. Characteristics of the Potential Impact

Characteristics of Development

Size of the Proposed Development

The application site has a stated area of 3.34Ha. The stated quantity of materials to be imported per annum differs throughout various parts of the application. It is stated that the importation and recovery of inert soil and stone/construction and demolition waste to partially restore the former extraction site is the southern part of the Kilsaran landholding is "up to 90,000

in total over a 6 year period". It is proposed to import, crush and recycle "up to a maximum of 10,000 tonnes" of inert C&D waste per annum for sale and re-sale.

It is later stated in the EIS Screening that up to 24, 500 tonnes will be imported per year.

It should be noted that mandatory EIA threshold is 25,000 tonnes per annum.

The Cumulation with other Proposed Development

Impacts caused by one project, which may be considered minor and insignificant, can combine with other environmental impacts already present or planned in the project area. Together, these impacts may become significant and adverse. The consideration of these "cumulative" effects is therefore discussed below.

The site is located in the rural area of Halverstown, approximately 4km south of Kilcullen. There are 9 one-off dwellings within close proximity to the subject site. One dwelling is approximately 140 metres to the south of the site and the remaining 8 are within 500-600 metres to the north and east of the site.

It appears that the sand and gravel extraction facility to the north of the subject site has ceased activity, however there is an on-going concrete block manufacturing facility to the northeast of the site. It appears that this manufacturing facility has been in operation on site for a considerable time. There is a lack of detail submitted in relation to the existing concrete block manufacturing facility on the landholding but from site inspection, it appears to be an extensive operation.

The proposed development, when taken into conjunction other existing developments in the area, it is considered that the development may have significant effects on the environment.

The Nature of any Associated Demolition Works

It does not appear that there is any demolition works proposed as part of this application.

The Use of Natural Resources

Appropriate Assessment under Article 6 of the Habitats Directive has been carried out to determine whether the development is likely to have significant effect on the any SAC and accompanies this assessment. It is stated that naturally occurring soil and stone and inset C&D material will be imported as construction waste from external sites and used in backfilling and restoration of the former sand and gravel.

The Production of Waste

The proposal to restore the quarry site will involve the importation of a waste from other locations, in the form of inert soil and subsoil. There is a potential for the soil and subsoil to be contaminated.

Pollution and Nuisances

The proposed development has the potential to result in pollution and nuisances in the area. There are 9 no. dwellings in close proximity to the subject site, one approximately 144metres to the south and the remaining 8 within 500-600 metres of the site.

The proposed development would result in an increased level of traffic on the road network in the rural area from truck movements travelling to and from the site. Noise, vibration and dust emissions from such truck movements would have the potential to disturb the existing amenity of dwellings located along the road network in the area.

The potential exists for the existing amenity of dwellings in proximity to the site to be negatively impacted on by the proposed filling/contouring activities on the site i.e. noise, vibration and dust emissions from plant/machinery operating on the site.

There is a potential risk of pollution to surface waters from the proposed development.

There is a potential risk of pollution to groundwaters from the proposed development, which would include well water supplies for dwellings in the area.

The Risk of Accidents

In terms of risk of accidents having regard to substances, and technology used, it is noted in this case that it cannot be discounted that there is not a risk to the environment as a result of the deposition of contaminated substances which may be contained within both the fill material and, once operational, imported materials.

There is also a risk of fuel spillage from vehicles on site. The creation of an known quantity of lechate on the site as a result of both the washing down of vehicles and from soiled water has the potential to have a significant negative impact on waters, particularly ground waters.

A risk of accidents is also relevant in terms of traffic safety, particularly with regard to potential haul routes for heavy truck loads on the surrounding rural road network.

Location of Development

In addition to the text below please also refer to the site inspection photographs included with the attached planning report.

The Existing Land Use

There is an existing concrete block manufacturing facility to the north of the site. A quarry site permitted under Ref. No. 02/850 is located further to the northwest of the site, quarrying of this area appears to have ceased. There is an access road of approximately 1 km and ancillary buildings/sheds located further north of the site.

Abundance, Quality and Regenerative Capacity of Natural Resources in the Area.

Appropriate Assessment under article 6 of the Habitats Directive has been carried out to determine whether the proposed development is likely to have significant effect on Natura 2000 sites. It is found that the proposed development would not have a significant effect on any Natura 2000 site. I note that the Heritage Officer has no objections to the proposed development.

The site itself is a part of a former quarry and with adjoining hedgerows and vegetative growth. It is considered that the removal of some of this vegetation may result in permanent and significant effects on ecology and wildlife.

It is stated that it is only intended to use imported waste soil and stone, generated by others on local developments to backfill the site.

It is considered that there is a risk of pollution to ground-waters from the proposed development, which would include well water supplies for dwellings in the surrounding area.

The Absorption Capacity of the Natural Environment

It is noted that there are no watercourses, wetlands or waterbodies or designated sites within the site or immediately adjacent to the site

Characteristics of the Potential Impacts

The extent of the Impact

Noise and vibration impacts from the filling/contouring activities and the recycling facility combined with the existing activity to the north of the site would likely to be localised in extent.

The proposed development does not identify haul routes for the importation of fill into the site. Where fill is not locally sourced the proposed development has the potential to impact the wider geographical area i.e. utilising road networks at greater distances from the site.

There is also a potential for impacts on a wider geographical area from a risk of pollution/contamination to ground and surface waters.

The proposed development would be carried out at a sustained level for a period of 6 years.

There are a substantial number of residential dwellings in the immediate rural vicinity of the proposed development. Having regard to the number of loads of materials to be deposited on site per week the existing processes on the adjoining site, and the process to be undertaken on site, and the nature of the development it is considered that the amenities of the area may be negatively impacted by the proposal.

The Transfrontier Nature of the Impact

The site is fully within the functional area of Kildare County Council. No indication of the source of waste which could be imported.

Magnitude and complexity of the impact

The filling of the site and the activities to be undertaken on site could have a negative long term impact on the area where contaminated materials disposed on site or pollution through accidental spill or incorrect workings on the site or during transportation of material to the site.

The probability of the Impact

It is probable that impacts will arise from noise, vibrations, dust and associated nuisances and disturbances from on-site operations and from trucks travelling to and from the site.

It is probable that the structural integrity of public roads serving as haul routes for heavy truck loads travelling to and from the site would be negatively impacted upon.

There are well water supplies located in the surrounding area and it is probable that the importation of fill onto the site would present a risk of pollution to the wells.

It is likely that the proposed development will affect the existing established hydrology and hydrogeology of the site.

The Duration, Frequency and Reversibility of the Impact

The effects of the filling of the site are irreversible unless all materials deposited are at some time in the future removed. Such further works would also give rise to other difficulties and long terms impacts on the area.

Conclusion

It is considered that the proposed development would be likely to have significant effects on the environment. The applicant should therefore be requested to submit an EIS in accordance with the provisions of Article 103(1) of the Planning and Development Regulations 2001 (as amended), and to comply with the requirements of Article 105.

Elaine Donohoe

Elaine Donohoe
Executive Planner
13/10/2015

A.S.

Seq
13/10/15

A. Klammer
Senior Planner

15.10.15

Noted EIS to be requested

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Ok
13th Dec 2015



APPROPRIATE ASSESSMENT SCREENING REPORT AND CONCLUSION STATEMENT

(A) Project Details	
Planning File Ref	15/189
Applicant name	Kilsaran COConcrete
Development Location	Halverstown, Kilcullen
Site size	3.34ha
Application accompanied by an EIS (Yes/NO)	No
Distance from Natura 2000 site in km	There are 7 Natura 2000 sites within a 15km radius of the application site. River Barrow and River Nore SAC (9.2km from site), Pollardstown Fen SAC (10.1km from site) Poulaphouca Reservoir SPA (12.5km from site), Mouds Bog SAC 12.7km from site)
Description of the project/proposed development	
The applicant is seeking permission for an inert soil & stone / construction and demolition waste recovery facility	

(B) Identification of Natura 2000 sites which may be impacted by the proposed development		
		Yes/No
		If answer is yes, identify list name of Natura 2000 site likely to be impacted.
1	Impacts on sites designated for freshwater habitats or species. <u>Sites to consider:</u> River Barrow and Nore, Rye Water/Carton Valley, Pollardstown Fen, Ballynafagh lake	<i>Is the development within a Special Area of Conservation whose qualifying interests include freshwater habitats and/or species, or in the catchment (upstream or downstream) of same?</i> <div style="text-align: center;">NO</div>
2	Impacts on sites designated for wetland habitats - bogs, fens, marshes and heath. <u>Sites to consider:</u> River Barrow and Nore, Rye Water/Carton Valley, Pollardstown Fen, Mouds Bog, Ballynafagh Bog, Red Bog, Ballynafagh Lake	<i>Is the development within a Special Area of Conservation whose qualifying interests include wetland habitats (bog, marsh, fen or heath), or within 1 km of same?</i> <div style="text-align: center;">NO</div>
3	Impacts on designated terrestrial habitats. <u>Sites to consider:</u> River Barrow and	<i>Is the development within a Special Area of Conservation whose qualifying interests include woodlands, dunes or grasslands,</i> <div style="text-align: center;">NO</div>

	Nore, Rye Water/Carnton Valley, Pollardstown Fen, Ballynafagh Lake	<i>or within 100m of same?</i>	
4	Impacts on birds in SPAs <u>Sites to consider:</u> Poulaphouca Reservoir	<i>Is the development within a Special Protection Area, or within 5 km of same?</i>	

Conclusion:

If the answer to all of the above is **No**, significant impacts can be ruled out for habitats and bird species.

No further assessment in relation to habitats or birds is required.

If the answer is **Yes** refer to the relevant sections of **C**.

(C) Identification of Potential Impacts on Habitats and Birds.

1	Impacts on designated rivers, streams, lakes and fresh water dependant habitats and species.	
	<i>Answer the following if the answer to question 1 in table B was YES</i>	
	<i>Does the development involve any of the following:</i>	
1.1	Works within the boundary of a Special Area of Conservation excluding small extensions/alterations to existing buildings.	NO
1.2	Discharge to surface water or groundwater within 5km of SAC.	NO
1.3	Abstraction from surface water or groundwater within 5km of SAC.	NO
1.4	Removal of topsoil within 500m of watercourses	NO
1.5	Infilling or raising of ground levels within 100m of watercourses	NO
1.6	Construction of drainage ditches within 1km of SAC.	NO
1.7	Installation of waste water treatment systems; percolation areas; septic tanks within 500 m of watercourses	NO
1.8	Construction within a floodplain or within an area liable to flood	NO
1.9	Crossing or culverting of rivers or streams within 5km of SAC	NO
1.10	Storage of chemicals, hydrocarbons or organic wastes within 1km of a watercourse	NO
1.11	Development of a large scale which involves the production of an EIS	YES
1.12	Development of quarries/mines	YES
1.13	Development of windfarms	NO
1.14	Development of pumped hydro electric stations	NO
1.15	Construction of roads or other infrastructure on peat habitats within 1km rivers, streams, lakes and fresh water dependant habitats	NO
2	Impacts on designated wetlands - bogs, fens, marshes and heath.	
	<i>Answer the following if the answer to question 2 in table B was YES</i>	

	<i>Does the development involve any of the following:</i>	
2.1	Works within the boundary of a Special Area of Conservation excluding small extensions/alterations to existing buildings.	
2.2	Construction of roads or other infrastructure on peat habitats within 1km of bog, marsh, fen or heath habitat within a Natura 2000 site	
2.3	Development of a large scale within 1km of bog, marsh, fen or heath habitat within a Natura 2000 site which involves the production of an EIS	
3	Impacts on other designated terrestrial habitats (woodland, grasslands) <i>Please answer the following if the answer to question 3 in table B YES</i> <i>Does the development involve any of the following:</i>	
3.1	Works within the boundary of a Special Area of Conservation.	
3.2	Development within 200m of Natura 2000 site with woodland, grassland or coastal habitats.	
3.3	Development of a large scale within 1km of Natura 2000 site with woodland, grassland or coastal habitats which involves the production of an EIS.	
4	Impacts on birds in SPAs <i>Answer the following if the answer to question 4 in table B was YES</i> <i>Does the development involve any of the following:</i>	
4.1	Works within the boundary of a Special Protection Area excluding small extensions/alterations to existing buildings.	
4.2	Erection of wind turbines within 5km of an SPA.	
4.3	Proposed discharges directly to SPA	
4.4	Development of cycleways or walking routes within 100m of SPA	

Conclusion:

If the answer to all of the above is **No**, significant impacts on habitats within Natura 2000 sites can be ruled out. No further assessment is required in relation to habitats.

If the answer is **Yes**, you will require further information, which should be provided in the form of a Natura Impact Statement which should address the particular issues of concern as identified through the above.

Consideration of potential impacts on protected species within SACs

Many of our Special Areas of Conservation are designated for species as well as for habitats. These are listed below, alongside the sites for which they are designated. Included is a short list of the types of activities which could have an impact on these species. Please tick if you are concerned that the proposed development could have an impact on these species.

Species	Relevant Sites	Activities which could have impacts on species	Possible Impacts Identified Yes/No
Otter	River Barrow and Nore, Pollardstown Fen	Activities that interferes with river banks.	NO
Atlantic Salmon	River Barrow and Nore, Rye Water /Carton Valley	Activities that interfere with water quality, levels or the river bed;	NO
River Lamprey	River Barrow and Nore	Activities that interfere with water quality, levels or the river bed;	NO
Brook Lamprey	River Barrow and Nore, Pollardstown Fen	Activities that interfere with water quality, levels or the river bed;	NO
White-clawed Crayfish	River Barrow and Nore, Rye Water /Carton Valley	Activities that interfere with water quality or the river bed;	NO
Freshwater Pearl Mussel	River Barrow and Nore	Activities that interfere with water quality, levels or the river bed ;	NO
Whorled Snail	River Barrow and Nore, Rye Water /Carton Valley, Pollardstown Fen, Ballynafagh Lake	Activities that result in loss of fen, marsh or wet grassland habitat within or close to the SAC.	NO
Marsh Fritillary	Ballynafagh Lake	Activities that result in loss of heath/grassland habitat within or close to the SAC.	NO

Conclusion:

If the answer to all of the above is **No**, significant impacts on species can be ruled out.

If the answer to any of the above is **Yes**, then further information is likely to be required in relation to potential for impact on that particular species.

(D) SUMMARY OF IMPACTS

Natura 2000 sites within impact zone
(from above)

Qualifying features of Natura 2000 site within impact zone
From spread sheet (Attach site synopsis)

(E) ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS (from tables above)

Describe how the project or plan (alone or in combination) could affect the Natura 2000 site(s).

If there are potential impacts, explain whether you consider if these are likely to be significant.

(F) RELEVANT ADVICE RECEIVED

Documentation reviewed for making of this statement. Attached

Persons/Bodies consulted with for the making of this statement.

(G) SCREENING CONCLUSION STATEMENT

Selected relevant category for project assessed by ticking box.

1	AA is not required because the project is directly connected with/necessary to the conservation management of the site	
2	No potential significant affects/AA is not required	X
3	Significant effects are certain, likely or uncertain. Seek a Natura Impact Statement Reject proposal. (Reject if potentially damaging/inappropriate)	

Justify why it falls into relevant category above (based on information in above tables)

Having regard to the proximity of the nearest Natura 2000 sites, as well as the location and nature and extent of the proposed development, it is considered there is no potential for significant effects on the Natura 2000 network. It has also been noted that the Council's Heritage Officer has raised no

concerns regarding potential impacts from the proposed development on Natura 2000 sites.

Name:	Elaine Donohoe
Position:	Executive Planner
Date:	13/10/2015

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