



An
Coimisiún
Pleanála

Inspector's Report ACP 323695-25

Development	Construction of a rotary milking parlour, dairy, etc. (See notices)
Location	Rathcoffey Demesne, Rathcoffey, Co. Kildare.
Planning Authority	Kildare County Council
Planning Authority Reg. Ref.	25/60744
Applicant	Vanessa Donovan
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant	Vanessa Donovan
Observer(s)	An Taisce Friends of the Irish Environment Adrian and Imelda Morgan
Date of Site Inspection	7 th January 2025
Inspector	Emer Doyle

1.0 Site Location and Description

- 1.1. The address of the appeal site is Rathcoffey Demesne, Rathcoffey, Co. Kildare. The site comprises a portion of an agricultural field which forms part of Rathcoffey Demesne. The site has a stated area of c. 4.288ha. The site has two access routes at present with the main access from the R408 and an additional entrance on the L5046. Rathcoffey National School is located in close proximity to the existing access from the R408.
- 1.2. The site is located within a sensitive archaeological and architectural heritage setting including Rathcoffey Castle, which is a designated Protected Structure (RPS Ref. B10-02) under the current County Development Plan. There are also a number of archaeological features of interest within close proximity of the appeal site. The lands are currently in use for dairy farming although the past use appears to have been tillage farming. There is an existing agricultural shed located to the north of the main access route to the site in close proximity to Rathcoffey Castle, walled garden and mansion.

2.0 Proposed Development

- 2.1. The proposed development seeks planning consent for works on the appeal site, comprising the construction of a:
- Rotary milking parlour,
 - Dairy,
 - Plant room,
 - Collecting yard,
 - Drafting facilities,
 - Cubicle shed,
 - Roofless cubicles,
 - Underground slatted tank, and,
 - Silage pit and lined slurry lagoon

- 2.2. The proposed development also includes the erection of external milk tank, meal bins, water storage tank and all associated site works necessary to facilitate the proposed development.
- 2.3. The rotary milking parlour, cubicle shed and roofless cubicles will occupy the north-western portion of site with the slurry lagoon and silage pit occupying its south-eastern end. The various structures range in height from c. 7.2m to 9.65m and the area of buildings have a combined floor area of c. 3,909sq.m.
- 2.4. The application provides for roadway linking at existing access on the local road L5046 to the proposed farm buildings.
- 2.5. The proposal also includes the provision of an earthen bank, 1.2m wide and 1.5m high along the site's south-eastern and north-eastern boundary which is to be planted with 50% whitethorn/blackthorn hedge.
- 2.6. The application falls within the curtilage of a protected structure- Rathcoffey Castle RPS No. B10-02 and the application is accompanied by an archaeological testing report and a cultural heritage impact assessment.
- 2.7. The application is accompanied by a traffic count survey, a traffic management plan, a fertilizer plan including details of livestock, and details of additional lands in the ownership of others for land spreading.

3.0 Planning Authority Decision

3.1. Decision

Kildare County Council refused permission for one reason as follows:

The subject site lies within the curtilage of Rathcoffey Demesne, a site of significant architectural and archaeological significance, containing a Protected Structure (RPS Ref. B10-02) and a number of Recorded Monuments (KD010-01801-, KD010-01802-

, KD010-01803- & KD010-016). The proposed development is reliant on access to the site via the L5046 to the east. This would require the construction of an internal road measuring a total length of approx. 1.2km through lands which are highly sensitive. The Planning Authority consider that any route from this entrance would be highly visible in the foreground of the Protected Structure and Monuments when viewed from the L5046. Having regard to the overall length of the road and its siting and visibility in the context of the features of architectural and archaeological significance, and in the absence of satisfactory mitigation measures preventing visual impacts on the attendant grounds, it is considered that the proposed development would be contrary to Objective AH O5 and AH O21 of the Kildare County Development Plan 2023-2029 and therefore the proposed development would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Report

The planner's report considers that the proposed structures alone, would not adversely impact on the setting and attendant grounds of the Protected Structure, however there are still significant concerns regarding the visual impact arising from the proposed access route on the Protected Structure.

3.2.2. Other Technical Reports

Municipal District Engineer: Report received stating no objection subject to compliance with conditions.

Roads & Transportation Department: Report received stating no objection subject to compliance with conditions.

Environment Department: Further Information required.

Water Services: Report received stating no objection subject to compliance with conditions.

Environmental Health Officer: Report received stating no objection subject to a condition requiring all buildings to be constructed in accordance with current Department of Agriculture, Food and The Marine specifications.

3.2.3. **Prescribed Bodies**

Department of Housing, Local Government and Heritage, Development Applications Unit

The Department concurs with the recommendation outlined in the Archaeological Assessment Report submitted with the application and has no objection subject to conditions.

An Taisce

Concerns are raised regarding the following:

- Impact on Architectural and Archaeological heritage
- Impact on Appropriate Assessment
- Impact on Water Quality
- Impact on Climate Change
- Impact on Nitrates

3.2.4. **Third Party Observations**

Two no. submissions were received by the Planning Authority. The issues raised are similar to those raised in the observations received by the Commission as summarised below.

4.0 Relevant Planning History

4.1. **Appeal Site**

PA Reg. Ref. 22/5/ ABP 315780-23

Permission granted by PA and refused on appeal to ACP for construction of a rotary

milking parlour, dairy, plant room, collecting yard, drafting facilities, cubicle shed, roofless cubicles, underground slatted tank, silage pit and lined slurry lagoon. The reason for refusal related to the impact of the road on archaeology and architectural heritage.

4.2. Surrounding Lands

PA Reg. Ref. 13/310: Retention permission granted by the Planning Authority for (Ref. No. 07/2619) an existing 18m high telecommunications support structure with antennas, equipment container and associated equipment within a fenced compound and access track. The development forms part of Vodafone Ireland Limited's existing GSM and 3G Broadband telecommunications network.

PA Reg. Ref. 12/552: Permission granted by the Planning Authority for continuance of use of an existing 25m high monopole support structure carrying radio antennas (total height including antennas 27m) palisade perimeter fencing and equipment containers as previously granted under local authority reference 07/2649. This forms part of their cellular digital and broadband communications network.

07/2649: Permission granted by the Planning Authority for to retain a 25m high monopole support structure carrying radio antennas for mobile telephone (full height with antennas 26.4m), palisade perimeter fencing and equipment containers etc.

10/425: Permission refused by the Planning Authority for the erection of an agricultural shed for grain storage and all associated site development. The proposed shed was located within the 'Walled Garden' to the east of the application site and the development was refused for 3 no. interrelated reasons regarding the adverse impact of the proposal on the amenity, setting and views of historic monuments.

5.0 Policy and Context

Kildare County Development Plan 2023-2029

The site is located outside a designated settlement boundary and within the rural area of the county Kildare. In terms of Agriculture, Section 4.19 of the current Plan includes

the following relevant policies and objectives:

- **RE P13** Support and facilitate sustainable agriculture, horticulture, forestry and other rural enterprises at suitable locations in the County where there will be no potential for likely significant effects on a European Site or on a site that shares a hydrological connection to a European Site.
- **RE O89** Protect agriculture and traditional rural enterprises from haphazard and/or incompatible development.
- **RE O90** Promote the ‘Smart Farming’ initiative, the ‘Kildare Climate Change Adaptation Strategy (2019)’ and the ‘National Climate Action Plan 2021’ to farmers across Kildare to inform them of environmental sustainability and resource management, so as to reduce CO2 production on farms in accordance with the National Climate Action Plan 2021.

In terms of ‘Rural Economy & Rural Enterprise’, it is an objective (RD O5) under Section 9.3 of the Plan to require new buildings and structures:

- To be sited as unobtrusively as possible.
- To be clustered to form a distinct and unified feature in the landscape.
- To utilise suitable materials and colours.
- To utilise native species in screen planting to integrate development into the landscape.

The appeal site is located within Rathcoffey Demesne which includes a designated Protected Structure and there are a number of Recorded Monuments within the demesne lands. It is an aim under Chapter 11 (Built and Cultural Heritage) of the Plan ‘To protect, conserve and sensitively manage the built and cultural heritage of County Kildare and to encourage sensitive sustainable development so as to ensure its survival and maintenance for future generations. Policies and objectives of note include:

- **AH P1:** Recognise the value and opportunity of Kildare’s unique heritage resource and to manage, conserve, promote and protect it, for present and future generations.
- **AH O2:** Manage development in a manner that protects and conserves the

archaeological heritage of County Kildare, avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest and secures the preservation in-situ or by record of all sites and features of historical and archaeological interest, including underwater cultural heritage. The Council will favour preservation in – situ in accordance with the recommendation of the Framework and Principles for the Protection of Archaeological Heritage (1999) and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.

- **AH O5:** Require the preservation of the context, amenity, visual integrity and connection of the setting of archaeological monuments. As a general principle, views to and from archaeological monuments shall not be obscured by inappropriate development. Where appropriate, archaeological visual impact assessments will be required to demonstrate the continued preservation of an archaeological monument's siting and context.
- **AH P2:** Protect and enhance archaeological sites, monuments and where appropriate and following detailed assessment, their setting, including those that are listed in the Record of Monuments and Places (RMP) or newly discovered archaeological sites and/or subsurface and underwater archaeological remains.
- **AH P5:** Secure the identification, protection and conservation of historic items and features of interest throughout the county including street furniture, surface finishes, roadside installations, items of industrial heritage, riverine heritage, and other stand-alone features of interest (items not listed on the RMP or RPS).
- **AH P7:** Promote appreciation of the landscape and historical importance of traditional and historic gardens, demesnes and parks within County Kildare and particularly where they constitute an important and intrinsic value to the setting of a protected structure.
- **AH P8:** Preserve and protect the historic gardens and designed landscapes identified in the National Inventory of Architectural Heritage Survey of Historic Gardens and Designed Landscapes.
- **AH O21:** Protect the curtilage of protected structures or proposed protected

structures and to refuse planning permission for inappropriate development that would adversely impact on the setting, curtilage, or attendant grounds of a protected structure, cause loss of or damage to the special character of the protected structure and/or any structures of architectural heritage value within its curtilage. Any proposed development within the curtilage and/or attendant grounds must demonstrate that it is part of an overall strategy for the future conservation of the entire built heritage complex and contributes positively to that aim.

- **AH O19:** Ensure that development within the county including Council development retains, refurbishes and incorporates features of historical interest, as deemed appropriate in each instance.
- **AH O50:** Require where appropriate that an Architectural Heritage Impact Assessment report is prepared in accordance with DHLGH Guidelines and conservation best practice to inform visual or physical impacts of a proposed development on a demesne, designed landscape, or park, that is associated with a protected structure or located within an Architectural Conservation Area.
- **AH O52:** Designate and protect historic landscape areas including demesnes and ensure that new development enhances the special character and visual setting of these historic landscapes and to prevent development that would have a negative impact on the character of the lands within these historic landscape areas.

The appeal site is located within the Liffey Valley and Plains Landscape Character Area. This is a recently adopted variation to the Development Plan under Variation No. 4.

Section 13.3 (Landscape Character Assessment) of the CDP include:

- **LR P1** Protect and enhance the county's landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the existing local landscape.
- **LR O4** Ensure that local landscape features, including historic features and buildings, hedgerows, shelter belts and stone walls, are retained, protected and enhanced where appropriate, so as to preserve the local landscape and

character of an area.

- **LR O5** Preserve, where appropriate, the open character of commonage.

Section 15.9.8 of the CDP provides specific policy with respect to 'Agricultural Developments' and notes that the traditional form of agricultural buildings is disappearing with the onset of advanced construction methods and a wider range of materials. Some new farm buildings have the appearance of industrial buildings and, due to their scale and mass can have serious visual impacts. The following policies apply to applications for agricultural buildings:

- In the construction and layout of agricultural buildings, the Council will require that buildings be sited as unobtrusively as possible, working with the contours of the land and that the finishes and colours used blend into the surroundings. The Council accepts the need for agricultural buildings and associated works (walls, fences, gates, entrances, yards etc.) to be functional, but they will be required to be sympathetic to their surroundings in scale, materials, and finishes.
- Appropriate roof colours are dark grey, dark reddish brown or a very dark green. Where cladding is used on the exterior of farm buildings, dark colours (preferably dark green, red, or grey) with matt finishes will normally be required.
- New agricultural buildings shall be located within or adjacent to existing farm buildings, unless it has been demonstrated, to the satisfaction of the Planning Authority, that the building must be located elsewhere for essential operational reasons. The grouping of agricultural buildings will be encouraged in order to reduce their overall impact in the interests of amenity.
- The removal of hedges to accommodate agricultural developments shall only be permitted with the written agreement of the Planning Authority and shall only be considered as a last resort. It is important that hedgerows are retained in order to maintain and enhance existing green infrastructure networks in the interests of biodiversity. When retaining boundary hedgerows, the council requires suitably sized infill planting where possible. A landscaping plan is required as part of an application for agricultural development and should include screening and shelterbelt planting, composed principally of native

species as listed in section 15.2.4 Chapter 15, Development Management Standards.

- Other considerations which will arise in agricultural developments will be traffic safety, pollution control, and the satisfactory treatment of effluents, smells and noise. Proper provision for disposal of liquid and solid wastes must be made. In addition, the size and form of buildings and the extent to which they can be integrated into the landscape will be factors which will govern the acceptability or otherwise of such development.
- Agricultural developments shall also demonstrate that the proposal does not impact significantly upon Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Areas of High Amenity, Landscape Sensitivity Areas, Key Scenic Views and Prospects and Key Amenity Routes, sites of heritage or cultural value, or areas at risk of flooding.
- Proposals for preventing surface water run-off onto the public road shall be included with planning applications.

5.1. European Union, Good Agricultural Practice for the Protection of Waters Regulations 2025 (S.I. No. 588/2025)

The European Union (Good Agricultural Practice for Protection of Waters) Regulations 2025 set parameters for farmyard and nutrient management and the distances for spreading fertiliser from water sources to prevent water pollution.

5.2. Natural Heritage Designations

- 5.2.1. The site is not located within or contiguous to a Natura 2000 site. The nearest designated sites are the Ballynafagh Lake Special Area of Conservation (SAC) (Site Code: 001387) and the Ballynafagh Bog SAC (Site Code: 000391), which are located c. 7.3km to the south-west of the site. The Rye Water Valley/Carton SAC (Site Code: 001398) is also located c.8.9km to the north-east of the site.

5.3. EIA Screening

- 5.3.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1. The grounds of the First Party appeal can be summarised as follows:

- The reason for refusal is flawed as it fails to recognise the importance of avenues in the design of country houses in Ireland.
- The design of such avenues was sited to maximise their visual impact and to provide for a show of wealth, importance and good taste.
- There are many examples of these avenues with a significant visual impact including Powerscourt, Castletown, Russborough and Carton.
- In some instances, they also had a secondary service avenue but in the case of Rathcoffey, the applicant is precluded from utilising the western entrance from the R408 due to traffic safety.
- The applicant undertakes to plant two rows of suitable native species hedges and to maintain them for the duration of the operation of the proposed dairy farm. Where the avenue crosses the frontage of the house, the surface, as seen from the house could be screened by using a gentle bank with a low hedge, if deemed necessary.
- A more extreme solution would be to partially sink the road concealing with it a ha-ha or a double ha-ha, as at Powerscourt, but it is considered that this is unnecessarily invasive.

- Traffic generation is expected to be one truck movement every 2 days.

6.2. **Planning Authority Response**

- 6.2.1. A response has been received from the Planning Authority confirming its decision and indicating that they have no additional comments. The Commission is referred to the Planning Authority's Planning Reports and reports of the various technical departments referred to during the assessment of the application.

6.3. **Observations**

- 6.3.1. Observations have been submitted from the following parties:

- An Taisce
- Adrian and Imelda Morgan
- Friends of the Irish Environment

The main issues raised can be summarised as follows:

- The revised application does not address the reasons for refusal.
- The proposal represents a significant intensification of agricultural activity and in the absence of proper environmental screening, the Commission is requested to refuse permission.
- The combined impact of the proposed farm structures, heavy vehicle movements, and loss of open demesne character would irreversibly transform the historic landscape. It would disrupt established sightlines, introduce incongruous materials and lighting, and undermine opportunities for conservation led use or restoration.

- Impact on traffic safety having regard to significant vehicular traffic. The Traffic Management Plan estimates 390 heavy vehicles and 1,460 light vehicle movements annually, contrary to the claims of minimal traffic.
- The appellant's comparisons with avenues at Powerscourt, Castlestown, Russborough, Carton, and Strokestown House are not valid. None of these estates operates, or proposes to operate an intensive dairy industry.
- It is considered that environmental concerns were not adequately addressed in the applicant's documentation or in the grounds of appeal.
- The proposed development would be contrary to Objectives AH05 and AH021 of the Kildare County Development Plan having regard to the length, alignment and visibility of the proposed road. The proposed intensive dairy operation conflicts with these objectives by introducing intrusive industrial shed and other structures into a visually sensitive environment.
- The Commission should review the screening out of a full EIA as the proposal falls into the category of Schedule 5 Part 2 Class 1(e).
- Concerns regarding slurry spreading, ammonia emissions, impact on water quality and appropriate assessment.
- Lands indicated for slurry spreading are high risk for nitrogen loss according to the EPA Pollution Impact Potential maps.

6.4. Further Responses

None.

7.0 Assessment

Having regard to the planning documentation submitted, and having conducted a site inspection, I consider that the main issues are those raised within the planning report, the observations submitted, and the first party appeal. The issues can be dealt with under the following headings:

- Principle of Development

- Architectural & Archaeological Heritage
- Traffic Safety
- Environmental Issues

7.1. Principle of Development

- 7.1.1. Section 4.19 (Agriculture) of the current Plan acknowledges that there is a need to recognise the economic value of agriculture and to protect productive agricultural land from inappropriate industrial, commercial or residential development. I also note that there is policy support within the current Plan for agricultural development, whereby RE P13 seeks to 'support and facilitate sustainable agriculture, horticulture, forestry and other rural enterprises at suitable locations in the County where there will be no potential for likely significant effects on a European Site or on a site that shares a hydrological connection to a European Site. In addition, RE O89 of the Plan seeks to 'Protect agriculture and traditional rural enterprises from haphazard and/or incompatible development'.
- 7.1.2. Having regard to the context for this development, including the historical tillage farming practices carried out on site, the predominance of agriculture in the wider area, and as agricultural operations are constantly transforming and adapting, I am satisfied that the principle of the proposed development of facilitating a dairy farm operation at this location would be acceptable, subject to more detailed consideration of the planning and environmental impacts addressed below.

7.2. Architectural & Archaeological Heritage

- 7.2.1. The main grounds of the observations submitted are that the Commission previously refused permission for a very similar proposal and the impacts of the proposed access road would be contrary to Objectives AH05 and AH021 of the Kildare County Development Plan in relation to protecting the context and visual integrity of archaeological monuments and sites and ensuring that development within the curtilage of protected structures is appropriate in scale and character and contributes positively to its conservation and setting.
- 7.2.2. Under the previous application on the site, PA Reg. Ref. 22/5/ ABP Ref. 315780-23,

permission was granted by the Planning Authority and refused by the Commission on appeal. The reason for refusal related to the impact on architectural and archaeological heritage in the absence of an indicative internal route.

- 7.2.3. The main difference between the previous application and the current application is that under the previous application an indicative route to the proposed development had not been identified and the Commission had concerns regarding the absence of same and potential impact on the archaeological and architectural heritage.
- 7.2.4. The Planning Authority refused permission for the current application for one reason in relation to the impact of the road construction and the absence of satisfactory mitigation measures preventing visual impacts on the curtilage of Rathcoffey Demesne.
- 7.2.5. The first party appeal considers that the reason for refusal is flawed in that it fails to recognise the importance of avenues in the design of country houses. It is stated that the applicant can only use this access for traffic safety reasons and the proposed access is a partial restoration of the landscape design as it was indicated on the First Edition of the Ordnance Survey c. 1837. It is stated that the applicant intends to plant two rows of suitable native species trees and to maintain them for the duration of operation of the proposed dairy farm. In addition, where the avenue crosses the frontage of the house, the surface, as seen from the house could be screened, by using a gentle bank with a low hedge.
- 7.2.6. The appeal site lies within the curtilage of Rathcoffey Demesne, a site of significant architectural and archaeological significance. As per Appendix 5 (Record of Monuments and Places) of the current Plan, there are a total of 4 no. recorded monuments within the demesne, which include the:
- Castle - KD010-01801-,
 - Gatehouse - KD010-01802-, and,
 - Landscape Formal Garden - KD010-01803-.

These monuments are located to the east of the proposed development and are positioned centrally within the demesne lands. There is also a Ringfort (KD010-016) located further to the north-east of the demesne, proximate to the boundary with the L5046. Section 11.10.2 (Monuments in the ownership/guardianship of the

State/subject of preservation orders) of the current Plan notes that there a number of monuments that are further protected by being in the ownership or guardianship of the State or the subject of preservation orders (National Monuments). I note that Table 11.2 of the Plan identifies Rathcoffey Castle (KD010-01801) as a National Monument in State Ownership. The Historic Environment Viewer for Archaeological and Architectural Heritage also identifies a number of additional features of archaeological significance that have been recorded across Rathcoffey Demesne. Further to this, Appendix 6 (Record of Protected Structures) of the current Plan designates Rathcoffey Castle as a Protected Structure (Ref. B10-02).

- 7.2.7. I consider that the key consideration is that any development should be sensitively integrated with the existing heritage fabric so as to retain its unique and sensitive setting. There are two main elements in my view- the proposed access route and the proposed farm buildings. As previously pointed out, the previous application did not indicate the proposed 1.2km access route and it was proposed that this could be addressed by condition by the Planning Authority. The current application addresses this and revised archaeological testing reports and cultural heritage impact assessment reports are included which provide for an assessment of same.
- 7.2.8. In terms of archaeology, the Archaeological Testing Report concludes that there would be little, or more probably, no direct impact to the archaeological heritage within the proposed site. A report on file from the DAU notes this report and has no objection subject to the inclusion of a standard condition.
- 7.2.9. In terms of the impact on architectural heritage, the applicant submitted a Cultural Heritage Impact Assessment to address the concerns of Commission. Parts of this are similar to the Architectural Heritage Impact Assessment submitted to the Planning Authority in the previous application. New sections relevant to the current application include Sections 2.4 and 4.5.5 which deal with the proposed farm roadway, together with Section 5 which highlights cultural heritage impact assessment and mitigation. The case made by the applicant in Sections 2.4 and 4.5.5 is that there was a former carriage route at this location and the proposed road will restore much of this feature. It is stated that the former road would have been historically visible within the former demesne landscape and would have provided both access and egress from the mansion. It is proposed that 850m of the road

would follow the route of the historic carriage road through the demesne lands from the L5406 to the southwestern corner of the walled garden. I am satisfied that the route of the proposed road has now been indicated in the current application. I walked this route on the site inspection and can confirm that the route was visible in wet and muddy conditions and is currently in use for the existing farm access. The cultural heritage report confirms this and states that the only trace of the former carriage road is a cut stone bridge of early 19th century date (Plate 9). I noted that this cut stone bridge was visible on the site inspection.

7.2.10. Having inspected the site and surrounds and examined the plans and particulars, I am generally satisfied that the proposed farm structures by themselves would not adversely impact on the setting, curtilage, or attendant grounds of the Protected Structure owing to their overall scale, their siting within the demesne and the separation distances provided from the existing built heritage fabric. I note that mitigation measures set out in Section 5.3.2.2 include their siting, their location behind a windbreak of conifer trees, together with pre-painted green sheeting, and landscaping consisting of an earthen bank, 1.2m wide and 1.5m high on the southeastern and northeastern sides of the proposed farm buildings to be planted with 50% whitethorn and blackthorn hedged.

7.2.11. The roadway itself will be visible, and in my view, the main visual impact would be from the L5406. This is a local road and the landscape in the area is designated as LCA3 in Variation No. 4 of the Kildare County Development Plan. This landscape is named as River Liffey Valley and Plains and the key characteristics include historical associations and surviving built heritage and predominantly pasture on fertile farmland. The most important element of the road from a visual and cultural heritage perspective is located close to the Rathcoffey complex comprising the gatehouse, mansion and walled garden. The proposed road would be in very close proximity to these features. I note however that the closest point to the road would be the walled garden which is also the lowest point of the historical complex. The final c. 300m of the road serving the milking parlour, cubicles, and slurry lagoon would not be unduly visible either from the L5406 or the R408 due to existing topography and existing tree coverage.

- 7.2.12. I note that the appeal considers that the reason for refusal is flawed in that it fails to recognise the importance of avenues in the design of country houses in Ireland, both large and small where the avenue had an intended visual impact. The appeal includes a copy of a First Edition OS Map dating to c.1837 which shows that what is proposed is in fact a partial restoration of the original design and a road was partially located at this location previously. The applicant proposes to plant two rows of suitable native species trees from the site entrance to the eastern side of the house. It is also stated that where the avenue crosses the frontage of the house, the surface, as seen from the house, could be screened by using a gentle bank with a low hedge if deemed necessary. An illustration of landscaping is included in the appeal documentation. If the Commission requires the applicant to partially sink the road concealing it with a ha-ha or a double ha-ha, this can also be carried out.
- 7.2.13. I am satisfied that the use of the proposed access on the local road is preferable in road safety terms to the entrance on the regional road. The landscape in this area is more open and exposed than from the regional road, however I consider that the landscape has the capacity to accommodate the proposed development. I note that the applicant intends to reinstate a former road as it was indicated on the First Edition of the Ordnance Survey c. 1837. I consider that this will enhance and protect the built heritage of the area.
- 7.2.14. I consider that the applicant has addressed the concerns regarding the visual impact of the proposed road and that the landscaping proposed both within the Cultural Heritage Assessment and within the First Party Appeal will enhance the built heritage without detracting from the architectural heritage of the area. I consider that sinking the road and concealing it with a ha-ha or a double ha-ha as set out in the appeal would be unnecessarily invasive. Having regard to all the information before me, I am generally satisfied that the proposal would not detract from the setting or character of the Protected Structure and Monuments in the vicinity to such a degree that would warrant a refusal. A balance needs to be achieved between protecting the character and setting of our historic structures whilst at the same time permitting sensitive development that meets the current demands of society. I am satisfied that this balance has been achieved in this instance, taking account of the proposed

mitigation measures including landscaping and use of green colour for the farm buildings, and the reformalisation of a former route. I am satisfied that the design of the road now included in the current application has addressed the previous reason for refusal will not detract from the historic features or the sensitive historic landscape.

7.3. Traffic Safety

- 7.3.1. Concerns are raised in the observations submitted in relation to traffic levels associated with the proposed development.
- 7.3.2. I note that a report on the previous application from the Area Engineer states that there were significant concerns with regard to road safety at the junction with the School Road and the R408. This appears to be the rationale as to why the access route located along the L5046 has been proposed.
- 7.3.3. I parked at the existing gateway on the R408 during the school pick up time and I share the concerns of the Area Engineer in this regard. The R408 is a busy regional road connecting large towns in the area and the access is near a sharp bend with a local road connecting to Rathcoffey National School. Parking for the school is very limited and appears to overflow from School Road onto the R408 near this bend.
- 7.3.4. Whilst the applicant did not provide any additional information in this application in relation to this access, I am satisfied that from a road safety point of view, the access off the L5406 is preferable. I note from the traffic counts carried out previously and resubmitted as part of this application, that the main impacts of traffic will be from a milk lorry every 3 days during the milking season of 300 days, together with a tractor and slurry tanker with a maximum of 10 movements in a 24 hour period and 240 visits per year. Cars will visit the site daily with a maximum of 5 vehicles in a 24 hour period and generally 2-3 vehicles per day. The appeal response states that the likely truck movement is one truck every two days. The observations submitted consider that this does not reflect the traffic movements set out above. I have examined the figures set out in the Traffic Report and consider that the main truck movement is likely to be the milk truck every 3 days. Whilst there will be certain periods during the year where there is additional traffic on the site, this would not be likely to be the normal activity on a daily basis.

7.3.5. I consider that the traffic levels associated with the proposed development are relatively modest and I note that neither the Area Engineer or Transport Sections have raised any objections in relation to traffic safety or capacity of the local road network. There will be a minimal increase in traffic in both the construction and operational periods, and I am satisfied that the traffic generated by the proposed development would not have a significant effect on the capacity of the surrounding road network.

7.4. **Environmental Issues**

7.4.1. The observations submitted to the Commission references a number of environmental issues including impact on nitrates, slurry spreading and impact on water quality. It is stated that the lands indicated for slurry spreading are high risk for nitrogen loss according to the EPA Pollution Impact Potential maps. Concern is also sought that the applicant did not address the Planning Authority's Further Information Request in relation to site investigations, groundwater protection and distances from public and domestic water supplies. Further it is considered that an ammonia impact assessment should be sought in relation to the proposal.

7.4.2. At the outset, for the purposes of clarity, the Commission should note that land spreading does not form part of this application and such process is regulated under the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2025. The regulations contain specific measures to protect surface waters and groundwater from nutrient pollution arising from agricultural sources. This includes, inter alia, no land spreading within 5-10 metres of a watercourse following the opening of the spreading period. I note that an Appropriate Assessment was completed as part of Ireland's fifth Nitrates Action Programme (NAP) 2022-2025, which is given effect by the European Communities (Good Agricultural Practice for Protection of Waters) Regulations, and concluded that the programme would not adversely affect the integrity of any European Site.

7.4.3. I note the applicant proposes to spread slurry on other landholdings in the vicinity of the site. As stated above, slurry spreading does not form part of this application. The

planning documentation submitted includes details of animal stocking numbers and a Fertiliser Plan prepared by an agricultural advisor together with maps of the landholdings outlined for slurry spreading in the area. I have no objection to the slurry spreading proposals once the spreading of slurry and manure is managed in accordance with EU Good Agricultural Practice for Protection of Water Regulations 2025. I recommend that if the Commission is minded to grant permission, appropriate conditions are attached in this regard.

8.0 AA Screening

8.1. See Appendix 3 of this report for Appropriate Assessment Screening Determination. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on any European Site in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

8.2. This determination is based on:

- The nature and extent of the subject development;
- The distance from European Sites;
- The weakness of connectivity between the development and European Sites, and;
- Standard pollution controls that would be employed regardless of proximity to a European site and effectiveness of same.

9.0 Water Framework Directive

9.1. Concerns are raised by the observers in relation to impacts on water quality. I have examined these concerns and consider that the concerns raised relate to land spreading. It should be noted that land spreading is regulated under the European

Union (Good Agricultural Practice for Protection of Waters) Regulations 2025. These regulations contain specific measures to protect surface waters from nutrient pollution arising from agricultural sources. Given the nature and extent of works proposed and in noting to the Commission that land spreading does not form part of this application, I am satisfied that the proposal will not pose a risk to ground or surface waters.

- 9.2. The European Union Water Framework Directive (WFD) aims to improve water quality and applies to all water bodies. The Directive runs in six-year cycles and is currently in its third cycle 2022 to 2027. Member States are required to achieve 'good' status in all waters and must ensure that status does not deteriorate. The Directive has been given effect by the Surface Water and Groundwater Regulations.
- 9.3. The proposed development comprises of the construction of farm buildings within an existing farm. The land was historically associated with tillage farming however, the proposed development provides for a large dairy farm with c. 660 cows.

I have assessed the proposed development and have considered the objectives as set out in Article 4 of the WFD which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

The reason for this conclusion is based on:

- The scale of works and nature of the development within existing farmyard.
- Objective Information presented in case documentation.
- Hydrological and hydrogeological characteristics of proximate waterbodies.

Conclusion: I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a

temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment. (Refer to Appendix 4 for screening matrix).

10.0 Recommendation

I recommend a grant of permission as follows:

11.0 Reasons and Considerations

Having regard to the nature and scale of the development, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the visual amenity of the area, in particular the adjoining Protected Structure (Rathcoffey Castle) and Recorded Monuments within the vicinity, and would be acceptable in terms of public health, traffic and environmental sustainability, would be in accordance with the relevant provisions of the Kildare County Development Plan 2023-2028. The development would, therefore, be in accordance with the proper planning and sustainable development of the area.

12.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further details submitted on the 19th of September 2025, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. The slatted shed shall be used only in strict accordance with a management schedule which shall be submitted to and agreed in writing with the planning

authority, prior to commencement of development. The management schedule shall be in accordance with the European Union (Good Agricultural Practice for Protection of Waters) Regulations, 2025 (S.I. No. 588/2025), and shall provide at least for the following:

(a) Details of the number and types of animals to be housed.

(b) The arrangements for the collection and storage of slurry.

(c) Arrangements for the cleansing of the buildings and structures (including the public road, where relevant).

Reason: In order to avoid pollution and in the interest of residential amenity.

3. All oxidisable and galvanised surfaces of the proposed development shall be painted a dark green matt colour or similar dark matt colour and shall be maintained in perpetuity.

Reason: In the interest of visual amenity.

4. Water supply and drainage arrangements for the site, including the disposal of surface and soiled water, shall comply with the requirements of the planning authority for such works and services. In this regard- (a) uncontaminated surface water run-off shall be disposed of directly in a sealed system, and (b) all soiled waters shall be directed to a storage tank. Drainage details shall be submitted to and agreed in writing with the planning authority, prior to commencement of development.

Reason: In the interest of environmental protection and public health.

5. All foul effluent and slurry generated by the proposed development and in the farmyard shall be conveyed through properly constructed channels to the proposed

storage facilities and no effluent or slurry shall discharge or be allowed to discharge to any stream, river or watercourse, or to the public road.

Reason: In the interest of public health.

6. All uncontaminated roof water from buildings and clean yard water shall be separately collected and discharged in a sealed system to existing drains, streams or adequate soakpits and shall not discharge or be allowed to discharge to the foul effluent drains, foul effluent and slurry storage tanks or to the public road.

Reason: In order to ensure that the capacity of effluent and storage tanks is reserved for their specific purposes.

7. A minimum of 16 weeks storage shall be provided in the underground storage tank. Prior to commencement of development, details showing how it is intended to comply with this requirement shall be submitted to and agreed in writing with the planning authority.

Reason: In the interest of environmental protection and public health.

8. All landscaping details shall comply the details set out in Section 5.3.2.2 of the Cultural Heritage Assessment Report together with the additional details submitted to the Commission in the appeal documentation submitted dated the 19th day of September 2025. The proposal to partially sink the road and conceal it with a ha ha shall as set out in the appeal shall be omitted as this is considered to be unnecessarily invasive.

Reason: In the interest of the protection of architectural heritage and visual amenity.

9. (a) The developer shall engage a suitably qualified (licensed eligible) archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works and topsoil stripping and groundworks associated with the development. Prior to the commencement of such works, the archaeologist shall consult with, and forward to, the Local Authority archaeologist or the National

Monuments Service, as appropriate, a method statement for written agreement. The use of appropriate tools and/or machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the National Monuments Service, regarding appropriate mitigation.

(b) The developer shall facilitate the archaeologist in recording any remains identified. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service, shall be complied with by the developer.

(c) Following the completion of all archaeological work on site and any necessary post-excavation specialist analysis, the planning authority and the National Monuments Service shall be furnished with a final archaeological report describing the results of the monitoring and any subsequent required archaeological investigative work/excavation required. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation of places, caves, sites, features or other objects of archaeological interest.

10. Prior to the commencement of development, a Resource Waste Management Plan (RWMP), as set out in the Environmental Protection Agency's Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects (2021), shall be prepared and submitted to the planning authority for written agreement. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records

(including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

Reason: In the interest of sustainable waste management

11. The removal of organic water material and its spreading on land by the applicant or third parties shall be undertaken in accordance with the systems of regulatory control implemented by the competent authorities in relation to natural regulations pursuant to Council Directive 91/676/EEC (the Nitrates Directive) concerning the protection of waters against pollution caused by nitrates from agricultural sources.

Reason: In the interests of environmental protection.

12. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Emer Doyle

Planning Inspector

05/06/2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	ABP 323695-25
Proposed Development Summary	Milking parlour, dairy, plant room, alterations to existing farm entrance and associated site works.
Development Address	Rathcoffey Demesne, Rathcoffey, Co. Kildare.
IN ALL CASES CHECK BOX / OR LEAVE BLANK	
1. Does the proposed development come within the definition of a 'Project' for the purposes of EIA?	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q.2.
	<input type="checkbox"/> No, No further action required.
(For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	

<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
<input type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2)	All private roads which would exceed 2000m in length Class 10 (dd)

OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	Screening Determination required (Complete Form 3)
No <input type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____

Date:

Appendix 2: Form 2 - EIA Preliminary Examination

Case Reference	ABP 323695-25
Proposed Development Summary	Milking parlour, dairy, plant room, alterations to existing farm entrance and associated site works.
Development Address	Rathcoffey Demense, Rathcoffey, Co. Kildare.
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
<p>Characteristics of proposed development</p> <p>(In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).</p>	<p>The proposed development seeks planning permission for the construction of a rotary milking parlour and associated works. It is proposed to construct a road measuring 1.2km to access the site from an adjoining local road. The size of the development is not considered to be exceptional in the context of the existing environment.</p> <p>The construction of the access road would not result in the production of significant waste, emissions or pollutants.</p>
<p>Location of development</p> <p>(The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use,</p>	<p>The development is located in a rural area in landscape designated River Liffey Valley and Plains in the Kildare County Council Development Plan (Variation No. 4). It is removed from sensitive natural habitats, centres of population and designated sites and landscapes of identified significance in the County Development Plan.</p>

<p>abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p>	
<p>Types and characteristics of potential impacts</p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>Having regard to the modest nature of the proposed development, its location removed from sensitive habitats/ features, likely limited magnitude and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act.</p>
<p>Conclusion</p>	
<p>Likelihood of Significant Effects</p>	<p>Conclusion in respect of EIA</p>
<p>There is no real likelihood of significant</p>	<p>EIA is not required.</p>

effects on the environment.	
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Inspector: _____ **Date:**

DP/ADP: _____ **Date:**

(only where Schedule 7A information or EIAR required)

Appendix 3: Standard AA Screening Determination

Test for likely significant effects

Case Reference Number: ABP 323695-25

Step 1: Description of the project and local site characteristics

Milking parlour, dairy, plant room, alterations to existing farm entrance and associated site works.

Brief description of project

The proposed development comprises the construction of a milking parlour, dairy, plant room, and alterations to an existing far entrance. See Section 2 of report for detailed description.

Brief description of development site characteristics and potential impact mechanisms

In my view, the Rye River Valley/ Carton is the only designated site considered to be within the projects zone of influence having regard to the separation distances and the lack of hydrological connections to other European Sites.

The Lyreen River 010 which runs to the east and south of the site has a weak hydrological connection with the Rye River and River Valley SAC.

Screening report

Kildare Co. Co. carried out Appropriate Assessment Screening and concluded that there were no significant effects and Appropriate Assessment was not required.

Natura Impact Statement

N

Relevant submissions

See Section 3.5 of report.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model				
European Site (code)	Qualifying interests¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections²	Consider further in screening³ Y/N
Rye Water Valley/ Carton SAC (001398)	Narrow-mouthed Whorl Snail Desmoulin's Whorl Snail Cratoneurion /www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001398.pdf	8.9km	Yes	Y

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites
AA Screening matrix

Site name Qualifying interests	Impacts	
Rye Water Valley/ Carton SAC	Direct: None. Indirect None.	Effects Having regard to the nature, extent, and scale of the proposed development, the established farm practices at this location, the implementation of standard construction management techniques and the distance from the SAC make it highly unlikely that the proposed development could generate impacts of a

		magnitude that could affect QI's within the SAC. Conservation Objectives would not be undermined.
	Likelihood of significant effects from proposed development (alone): No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
	Possibility of significant effects (alone) in view of the conservation objectives of the site: No	
<p>Further Commentary</p> <p>The applicant has submitted a fertilizer plan and information regarding adequate storage capacity for slurry. Additionally, I note that the application of fertilisers is regulated under the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2025. These regulations contain specific measures to protect surface and groundwater from nutrient pollution arising from agricultural sources. In any case, as pointed out at the outset, the carrying out of landspreading does not form part of this application.</p>		
<p>Step 4: Conclude if the proposed development could result in likely significant effects on a European site</p>		
<p>I conclude that the proposed development (alone) would not result in likely significant effects on the Rye Water Valley/ Carton SAC (site code 001398). The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). No further assessment is required for the project.</p> <p>No mitigation measures are required to come to these conclusions.</p>		

Screening Determination

Finding of no likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on any European Site in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The nature and extent of the subject development;
- The distance from European Sites;
- The weakness of connectivity between the development and European Sites; and,
- Standard pollution controls that would be employed regardless of proximity to a European site and effectiveness of same.

Appendix 4 WFD IMPACT ASSESSMENT STAGE 1: SCREENING

Step 1: Nature of the Project, the Site and Locality

An Bord Pleanála ref. no.	ABP-323965-25	Townland, address	Rathcoffey Demense, Rathcoffey, Co. Kildare.
Description of project		Construction of a milking parlour, dairy, plant room, alterations to existing farm entrance and associated site works.	
Brief site description, relevant to WFD Screening,		The application site includes an existing farm landholding which is bordered by the Lyreen River 010. The groundwater body is Dublin IE_EA_G_008.	
Proposed surface water details		Clean roofwater to soakaways. All slurry and soiled water to slurry tank or open slurry tank.	
Proposed water supply source & available capacity		Existing on-site well.	
Proposed wastewater treatment system & available capacity, other issues		None. Slurry and effluent to be stored on site and then removed off-site for land spreading in compliance with S.I. No. 588/2025 - European Union (Good Agricultural Practice for Protection of Waters) Regulations 2025 which give effect to the Nitrates Action Programme concerning the protection of water against pollution caused by nitrates from agricultural sources.	

Others?			N/A			
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
River waterbody	Adjacent	Lyreen_10 IE_EA_09L02 0035	Poor	At risk	Agriculture Domestic Waste Water	Theoretical due to terrain and distance from watercourse
Groundwater waterbody	Underlying the site	Dublin IE_EA_G_00 8	Good	Not at risk		Potential due to well draining soils
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.						
CONSTRUCTION PHASE						

No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Surface	Lyreen_10 IE_EA_09 L020035	Run off	Water pollution from construction run off (silt, concrete, oil spillages)	Use of standard construction practices	No	Screen out
2.	Ground	Dublin	Underground	Water pollution from construction run off (silt, concrete, oil spillages)	Use of standard construction practices	No	Screen out
OPERATIONAL PHASE							

3.	Surface	Lyreen_10 IE_EA_09 L020035	Run off	none	none	No	Screen out
4.	Ground	Dublin	Underground	Leaks from tanks	Use of standard constructi on practices	No	Screen out
DECOMMISSIONING PHASE							
5.	N/A	N/A	N/A	N/A	N/A	N/A	N/A