

# MARTIN & REA

Member of **Rea Group**

CONSULTANTS IN AGRICULTURE, BUSINESS,  
VALUATIONS & MEDIATION



V.A.T. No. 4728720F

Our Ref:

Your Ref:

**8 GRATTAN ST., TIPPERARY.  
E34 FH01**

Telephone

Fax No.

E-mail:

Web:

(062) 52166 / 52271

(062) 52685

info@reagroup.ie

www.reagroup.ie

Sub. Offices:

Castlebaldwin,  
Co. Sligo F52 TX62  
087-1254100

22 Ridgepool,  
Ballina,  
Co. Mayo F26 PA44  
086-6070686

Reply to Tipperary Office

N24/MR/Mar

<b>AN BORD PLEANÁLA</b>	
LDG-	<u>060655-23</u>
ABP-	<u>315197-22</u>
19 JAN 2023	
Fee: € <u>50</u>	Type: <u>cheque</u>
Time: <u>11.22</u>	By: <u>hand</u>

January 18<sup>th</sup>, 2023.

The Secretary  
An Bord Pleanála  
64 Marlborough St,  
Rotunda,  
Dublin 1, D01 V902

**Re: N24 Carrick Road Improvement Scheme (Clonmore to Mooncoin)  
Kilkenny Co. Council  
Compulsory Purchase Order No. 5 of 2022  
Objection on behalf of People Before Bats Ltd. Registered No. 61458.**

Dear Sir/Madam,

We act for People before Bats Ltd. This Company have no legal interest in the lands but as a matter of principle they are objecting on the following basis:

1. There is no financial or safety justification for this proposed development.
2. The C.P.O. procedure is contrary to the principles of fairness and equity.
3. The process & provision is contrary to EU Law.

I enclose a cheque for €50 made payable to An Bord Pleanála as this company is not subject to a C.P.O. Cheque of €50 will be delivered by hand tomorrow.

We reserve the right to add to this objection prior to or at Oral Hearing.

Yours sincerely,

**RICHARD J. REA B.Agr.Sc., Dip.E.I.A., Mgmt., MACA., A.M.**

Consultants: Richard J. Rea B.Agr.Sc., Dip.E.I.A., Mgmt., MACA., A.M.; Anne-Marie Clarke M.Agr.Sc., R.A.C.; Tom Dawson B.Agr.Sc., Dip. FM ACCA, R.A.C.; Shane Hennessy P.G. Dip. Org. Farming; Joe Henry B.Agr.Sc. M.A.C.A.A.

Associates: Jerry O'Shea, B.Agr.Sc. M.Sc., PhD; Pat O'Donnell B.Sc. Eng., C. Eng. Dip. Eng., M.A.E.I.; Pádraig Dolan B.Agr.Sc. (Fort)

Martin & Rea (Tipperary) Ltd. Reg Office: 8 Grattan Street, Tipperary. Reg. No. 100599.

Directors: Richard J. Rea, B. Agr. Sc., M.A.C.A.A. (Managing); Mrs. Josephine Rea.