CONTENTS

	` ()
INTRODUCTION	1-1
THE SITE	1-1
INTRODUCTION	21-1
Site Description	1-2
Site Access	1-2
Surrounding Land-Use	1-2
THE APPLICANT	1-3
DEVELOPMENT HISTORY	1-3
EIA SCREENING	1-5
EIA SCOPING	1-5
Scoping Methodology	1-5
DIFFICULTIES ENCOUNTERED WITH EIAR COMPILATION	1-6
ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)	1-6
Format of the Environmental Impact Assessment Report (EIAR)	1-6
CONTRIBUTORS	
TABLES	
Table 1-1 List of Contributors	1-8

FIGURES

Figure 1-1 Site Location Map

Figure 1-2 Site Location Plan

Figure 1-3 Existing Site Layout

Figure 1-4 Surrounding Land Use

INTRODUCTION

- 1.1 This Environmental Impact Assessment Report (EIAR) provides supporting information to accompany a Planning Application to Kildare County Council and a Waste Licence Review Application to the Environmental Protection Agency (EPA) by Kilsaran Concrete Unlimited Company (hereafter 'Kilsaran') in respect of a proposal to
 - (i) increase the permitted total intake of soil and stone and broken rock to its existing licensed soil recovery facility at Halverstown, Kilcullen, Co. Kildare (Planning Ref 18/453), from 1.2 million tonnes to 2.06million tonnes and
 - (ii) extend the life of the existing facility by 3 years (to December 2029) in order to accommodate the additional soil and stone intake.
- 1.2 In view of recent policy changes around the circular economy which seek to promote
 - the re-purposing of waste as a resource which remains in circulation and/or in productive use for longer,
 - an increase in waste avoidance and prevention (the most favourable option or outcome at the top of the waste hierarchy);
 - an increase in the re-use of excess or previously unwanted materials for productive purposes and preferably at earlier stages in the production cycle;

and more specifically,

• the recent publication by the EPA of criteria which permit excess soil and stone from greenfield construction and development sites to be re-classified and managed as a non-waste resource (or 'by-product'),

the proposed additional soil and stone (and broken rock) intake to the facility will comprise a mix of materials managed as both waste (as heretofore) and as non-waste (by-product).

- 1.3 The application site extends to c.18.0 hectares and comprises existing backfilling areas and previously approved site and services infrastructure including the site office, staff welfare facilities, weighbridge (with dedicated office), wheelwash, hardstand areas, fuel storage tanks, waste inspection and quarantine facility, covered shed and access road.
- 1.4 The planning application is made in accordance with the requirements of the Planning and Development Regulations 2001-2023 (as amended) and the Waste Management Acts 1996–2023 (as amended).

THE SITE

Site Location

- 1.5 The application area is located immediately west of the R448 Regional Road (the former N9 National Primary Road), approximately 800m west of the M9 motorway between Kilcullen and Waterford, approximately 4.5 km south of Kilcullen and just over 2km northeast of Calverstown village.
- 1.6 The site location is shown on an extract from the 1:50,000 Discovery Series Map of the area reproduced in Figure 1-1 and on a 1:10,000 scale Ordnance Survey map of the area in Figure 1-2.
- 1.7 The overall Kilsaran land ownership area at Halverstown extends to c.26.3 ha (65.0 acres), while the planning application site covers approximately 18.0ha (44.5acres). The Applicant's landholding is shown edged blue in Figure 1-2, while the extent of the application area is shown edged red on the same figure.



For the avoidance of doubt, any reference within this EIAR to 'site' or 'application site' 1.8 should be taken to refer to the application area shown in Figure 1-2, while the wider property landholding (within the blue line boundary) is identified as 'Halverstown Pit' or 'the overall landholding'.

Site Description

- 1.9 The application site comprises lands originally developed as a sand and gravel pit to the western part of the application area) and lands previously only ever used for agricultural use, principally grassland (in the north-eastern part of the application area). More recently the site has been developed as a soil waste recovery facility, principally to facilitate the backfill and restoration of the worked-out sand and gravel pit to former / surrounding ground level. The existing site layout is shown in Figure 1-3.
- 1.10 The application site adjoins Kilsaran's existing concrete block manufacturing facility immediately to the north which has continued in service since sand and gravel extraction ceased and the ongoing backfilling / soil waste recovery first activities commenced around 2016.

Site Access

- 1.11 The application site at Halverstown is accessed through the pre-existing entrance to the Kilsaran concrete manufacturing plant and soil recovery facility (SRF), located on the western side of the R448 Regional Road (the old N9 National Primary Road).
- 1.12 The M9 motorway runs to the east of the application site between Kilcullen and Waterford. A grade separated interchange (Junction 2) providing full access to, and egress from, the M9 motorway to the regional road network is located approximately 3 km to the north of the application site.
- 1.13 The R448, the former N9 National Primary Road, is a Regional Road connecting Naas to Waterford. In the vicinity of the application site, the road has a carriageway width of approximately 9.0m and hard shoulders on both sides of the road which are approximately 1.5m wide. It has good horizontal and vertical alignment and is sufficiently wide to allow two HGV's pass comfortably, without impediment. The road pavement is in good condition and is well maintained in the vicinity of the site.

Surrounding Land-Use

- 1.14 The application site is located in a rural area with residential development generally consisting of isolated rural housing and other intermittent development along the local road network. Land-use in the area is tied to a range of agricultural activities and enterprises, primarily dairy, tillage and horse breeding. The application site adjoins Kilsaran's existing concrete manufacturing facility, located immediately to the north and within the same landholding.
- 1.15 A restored sand and gravel pit, previously operated by Kilsaran, is located to the northwest of the application site (Kildare Co. Co. Planning Ref. No. 02/850 and ABP Ref. PL09/203493) and is identified on the surrounding land use plan in Figure 1-4. There is a scattering of historic and/or active sand and gravel pits located at a greater distance, particularly to the south-east of the site.
- 1.16 In the immediate vicinity of the site, St Joseph's National School is located approximately 300m to the east (at its closest point), on the eastern side of the R448 Regional Road. The M9 Kilcullen Service Area is located approximately 650m to the east of the site, on the western side of the M9 motorway. Casey Group operates a construction plant / equipment sales and hire business from a premises located in Hacklow townland,



- approximately 800m to the north-west of the site. Each of these sites is also identified in Figure 1-4.
- 1.17 At a greater distance, the ancient ceremonial site at Dun Ailline is located approximately 2km to the north of the site, while there are a number of stud farms in Gilltown and New Abbey townlands, approximately 3km to 4km to the north-east. The Curragh Camp army base and military college is located approximately 5.5km to the north-west.

THE APPLICANT

- 1.18 This EIAR and accompanying supporting documentation has been prepared by SLR Consulting Ireland (SLR) on behalf of Kilsaran.
- 1.19 Kilsaran was founded in 1964 and is a wholly Irish-owned company, whose principal business is the production of materials for the construction industry. The company manufactures paving and walling, pre-mixed dry products, ready-mix concrete, concrete blocks, trowel-ready mortar, aggregates, asphalt and macadam, hard core and fill materials for the Irish and UK markets. It also undertakes surfacing contracts for road construction, building and civil engineering works.
- 1.20 The company employs over 900 people directly. It operates twelve hard rock quarries and a similar number of sand and gravel pits. Kilsaran manufactures concrete construction products at 20 locations, principally in the east, midlands and south of the country. The company also has three asphalt plants, strategically located at quarry sites throughout its operational area.
- 1.21 In recent years Kilsaran has focused on a substantial expansion programme to its Paving and Walling division and Pre-mixed Dry Products facilities. The company has also expanded into the UK market with a Supply and Distribution depot added in Manchester to serve the North West of England and the wider UK market.
- 1.22 Although Kilsaran's principal business interest is in mineral extraction and manufacture of building materials and products, in recent years, it has made beneficial use of excess soil and stone waste generated by construction and development activity to backfill and restore a number of its larger worked-out pits and quarries under the EPA waste licencing regime. The company has also established a number of construction and demolition (C&D) waste recycling facilities, principally to manage concrete wastes, under the Local Authority waste facility permitting regime.
- 1.23 At the present time, in addition to the existing EPA licensed soil waste recovery facility at Halverstown, (Waste Licence Ref. No. W0300-01), Kilsaran also operates another EPA licenced soil waste recovery facility at Kilmessan in Co. Meath (Waste Licence Ref. No W0296-01).
- 1.24 Kilsaran operates all its quarries in accordance with the environmental guidelines of the Irish Concrete Federation (ICF) and current best practice for the quarrying industry, as set out in the publication Guidelines on Environmental Management in the Extractive Industries published by the Environmental Protection Agency (EPA, 2006).

DEVELOPMENT HISTORY

- 1.25 Sand and gravel extraction first commenced at the application site at Halverstown in the early 1940's, pre-dating the enactment of the first Planning and Development Act (and associated regulations) in 1964.
- 1.26 The development area which was extant prior to 1964 has been fully exhausted of sand and gravel reserves for many years. The northern area of the company's landholding continues to be used for concrete block manufacturing activities to the present day. The



- area to the south of the existing site access road, where backfilling and soil recovery activities are ongoing, was previously used for sand and gravel extraction, aggregate / materials storage and settlement of silt arisings (from aggregate washing) in a number of ponds (which have now been backfilled over).
- 1.27 The lands which are currently being raised / backfilled to the north of the site access road were never excavated and had previously only ever been used for agricultural purposes.
- In September 2016, Kildare County Council granted planning permission for a small-scale 1.28 soil recovery facility at Halverstown (Planning Ref. No. 15/189) which provided for partial backfilling and restoration of the lands previously used for sand and gravel extraction. The relatively modest scale of the scheme, involving the importation and placement of less than 100,000 tonnes of excess soil and/or rock waste, meant that the recovery activity could be regulated under waste management legislation in force at that time by way of a waste facility permit (WFP). The original waste facility permit in respect of the facility was issued by Kildare County Council in August 2016 (WFP Ref. No. WFP KE 16 0085 01).
- 1.29 In 2018, planning permission was subsequently sought for the establishment and operation of a larger scale soil recovery facility at Halverstown which provided for larger scale backfilling of the worked-out pit closer to former / surrounding ground level and the restoration of the subject lands to grassland / long-term agricultural use. The nature and increased scale of this activity, which provided for the importation of up to 1,200,000 tonnes of natural materials, principally excess soil, stone and/or broken rock generated by construction and development activities in the surrounding (eastern) region, required that the application be accompanied by an Environmental Impact Assessment Report (EIAR).
- 1.30 Planning permission in respect of the larger scale soil recovery facility was granted by Kildare County Council on the 4th of December 2018 (Planning Ref. 18/453) and limits the annual soil importation rate to a maximum of 300,000 tonnes per annum over a 8-year period (up to 4th December 2026). It also provided for pre-existing, co-located site facilities, structures and services infrastructure (including the site access road) to be shared with the adjoining concrete manufacturing plant, located to the north of the site.
- 1.31 As the excess soil and stone imported and used for landfilling and restoration purposes at the worked out pit was classified as waste and the total intake exceeded 100,000 tonnes. the nature and scale of the activity was such that it also required a waste licence from the Environmental Protection Agency (EPA). Following grant of planning permission by Kildare County Council, a waste licence application was duly submitted to the EPA in February 2019. The Agency issued a waste licence in July 2020 and after making a number of required pre-development submissions, waste recovery activities resumed under licence at Halverstown in late 2020.
- 1.32 Since recovery activities resumed under EPA licence, the level of demand for recovery capacity generated by ongoing construction and development activity in the surrounding region has been such that the rate of soil waste intake has been at or close to the maximum permitted rate of 300,000 tonnes per annum.
- 1.33 Total soil and stone intake to the existing facility up to the end of 2023 is estimated to be approximately 820,000 tonnes, meaning that the permitted remaining intake at the start of 2024 was around 380,000 tonnes. It is currently envisaged that the remaining soil and stone will be imported at a rate of approximately 190,000 tonnes per annum over each of 2024 and 2025. Total intake in either year could however be higher in the event of an early grant of planning permission for additional soil intake.
- To date, no environmental incidents have occurred or been reported to EPA and no non-1.34 compliances have been raised by any external EPA site audits.



EIA SCREENING

- 1.35 The start of the EIA process involves deciding whether an EIA needs to be undertaken in respect of the proposed development or not. An initial determination establishes whether the proposal is a project as understood by the EPA Guidelines or not, i.e. does it comprise development, works or activity, as defined in the relevant national legislation¹.
- 1.36 The decision-making process then proceeds by examining the relevant legislation which transposes Annexes I and II of the amended Directive². If this does not provide a clear screening outcome then the nature and extent of the project and the site and of the types of potential effects are examined. The totality of the project is considered, including off-site and secondary projects as well as indirect, secondary and cumulative impacts.
- 1.37 Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended) set out the forms of development that require an Environmental Impact Assessment Report (EIAR). Paragraph 11 of Part 2 of Schedule 5 states that the following form of development requires an EIA.
 - (b) Installations for the disposal of waste with an annual intake greater than 25,000 tonnes not included in Part 1 of this Schedule.
- 1.38 In light of recent developments around the circular economy and the recent publication of criteria permitting some soil and stone to be managed as a non-waste resource (or 'by-product'), there has been a change to the additional soil and stone intake to make explicit provision for a mix of soil and stone *waste* and greenfield soil and stone *by-product* intake for backfilling and restoration purposes.
- 1.39 The proposed increase in total soil intake capacity at the existing facility by c. 850,000 tonnes (from 1.2 million tonnes to 2.06 million tonnes) will
 - not give rise to any increase in the rate of soil importation to the existing facility the maximum intake rate will remain at 300,000 tonnes / year;
 - not require any new physical infrastructure the operational life of established site infrastructure will be extended; and
 - extend the duration of ongoing backfilling / restoration activities and the life of the existing facility by 3 years (out to the end of 2029).
- 1.40 Under this proposal, the total volume of soil and stone imported to the existing site / facility will not exceed 95,000 tonnes in any one year and the balance of the intake will comprise (non-waste) soil and stone by-product material from greenfield sites comply with the national criteria recently published by the EPA.
- 1.41 As the waste intake rate will continue to exceed the 25,000 tonnes threshold limit for EIA, there is therefore a requirement for an accompanying EIA in respect of this development under Part 2 of Schedule 5.

EIA SCOPING

Scoping Methodology

1.42 In preparing this Environmental Impact Assessment Report an initial pre-planning consultation meeting was held between officials of Kildare County Council and the Applicant on the 23rd June 2023 (Ref. No. PP5660). Following the change in the waste policy framework which arose following publication of the draft by-product criteria for



¹ Planning and Development Acts 2000-2023 (as amended) and Planning and Development Regulations 2001-2023 (as amended)

² Environmental Impact Assessment (EIA) Directive 2011/92/EU (as amended by 2014/52/EU)

- greenfield soil and stone in October 2023, the original development scheme was modified, in line with the overall direction of public policy, to reduce the additional waste intake to the site and to make provision for future (non-waste) by-product intake. Indight of this, a further consultation meeting was held between officials of Kildare County Council and the Applicant on the 15th January 2024 (Ref. No. PP5660).
- 1.43 Other consultations and informal discussion held by specialist contributors in undertaking their environmental impact assessments are detailed in the relevant environmental 0 chapters of this EIAR, together with details of related archives and documentation held by state agencies and organisations.
- This planning application provides for an increase in the total permitted soil and stone 1.44 intake to the established soil recovery facility at Halverstown, where direct, relevant experience of the impacts arising from this particular type of development has already been gained by the Applicant and personnel employed by it. This experience has been applied in the collation and assessment of the information presented herein.

DIFFICULTIES ENCOUNTERED WITH EIAR COMPILATION

1.45 This Environmental Impact Assessment Report was compiled on the basis of published regional and local data, experience of operating the existing facility and site-specific field surveys. No difficulties were encountered in compiling the required information.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)

- 1.46 An Environmental Impact Assessment Report (EIAR) "means a statement of the effects, if any, which the proposed development, if carried out, would have on the environment". As such, it is a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment.
- 1.47 The principal objectives of an Environmental Impact Assessment Report are to:
 - Identify and / or predict the significant impacts of a development.
 - Identify what mitigation measures should be incorporated into the development to eliminate or reduce the perceived impacts.
 - Interpret and communicate the above information on the impact of the proposed development, in both technical and non-technical terms.
 - Assist the Local Planning Authority in the decision-making process with respect to the associated planning application.

Format of the Environmental Impact Assessment Report (EIAR)

- 1.48 To facilitate clarity, this EIAR has been prepared in accordance with the 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' published by the Environmental Protection Agency (EPA) in 2022. The EIAR is sub divided into two volumes. Volume 1 is the Non-Technical Summary and Volume 2 is the Environmental Impact Assessment Report itself subdivided into fifteen chapters, as described below. Any associated appendices and supporting information are provided at the end of each chapter of the EIAR where relevant.
- 1.49 Volume 2: The Environmental Impact Assessment Report is sub-divided as follows:

Chapter 1: Introduction / Screening / Scoping

1.50 An introduction to the proposed development and applications site and a brief explanation of the aims and format of the EIAR. It also identifies the various professional consultants



who have contributed to the EIAR and the extent of any screening rocess undertaken.

Chapter 2: Project Description

- 1.51 Chapter 2 provides:
 - details of the physical characteristics of the whole project, including, where relevant, land-use requirements during construction and operation, site clearance or demolition works, as well as other works that may be integral to the project;
 - the main characteristics of the operational phase of the project e.g. site activities, nature and quantity of materials and natural resources managed and/or handled;
 - an estimate, by type and quantity, of the expected residues and emissions produced during the construction, operational and restoration phases of the proposed development.

Chapter 3: Reasonable Alternatives

1.52 Chapter 3 provides a description of the reasonable alternatives studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

Chapters 4 to 16

- 1.53 These Chapters provide detailed information on all aspects of the existing (baseline) environment, identifies, describes and presents and assessment of the likely significant impacts of the proposed project on the environment, recommends mitigation and monitoring measures to reduce or alleviate these impacts and describes the residual impacts and conclusions. They are grouped under the following Chapters:
 - Chapter 4: Population and Human Health
 - Chapter 5: Biodiversity
 - Chapter 6: Land, Soils and Geology
 - Chapter 7: Water
 - Chapter 8: Air Quality
 - Chapter 9: Climate
 - Chapter 10: Noise and Vibration
 - Chapter 11: Material Assets
 - Chapter 12: Cultural Heritage
 - Chapter 13: Landscape
 - Chapter 14: Roads and Traffic
 - Chapter 15: Interactions
 - Chapter 16: Schedule of Commitments
- The associated references, plates, figures and appendices are provided at the end of 1.54 each Chapter 1 through to 16.

Non-Technical Summary

1.55 A "Non-Technical Summary of the Environmental Impact Statement", presenting the principal details and findings of each EIAR Chapter in less technical, easy to understand language is provided as a separate, stand-alone document.



CONTRIBUTORS

- 1.56 Kilsaran appointed SLR Consulting Ireland to prepare this Environmental impact Assessment Report (EIAR) in support of its planning application for the proposed increase in total soil and stone intake and 3-year extension to the existing permitted life of its existing soil recovery facility at Halverstown, Kilcullen, Co. Kildare.
- 1.57 SLR Consulting Ireland (SLR) is a constituent company of SLR Group, a leading global environmental and advisory services consultancy. The company provides a full range of planning, EIA and environmental advisory services across 30 in-house specialist technical disciplines and operates a network of offices in Ireland, UK, Asia-Pacific, Africa and North America.
- 1.58 SLR Consulting Ireland (formerly John Barnett and Associates) has been carrying out Environmental Impact Assessments relating to extractive and waste development in Ireland since the EIA Directive was first transposed into national legislation in 1990.
- 1.59 The contributors who have assisted in the preparation of this EIAR are identified in Table 1-1 below:

Table 1-1
List of Contributors

Торіс	Contributor	Company
Introduction	Derek Luby BE MSc DIC MIEI	SLR Consulting Ireland
Description of Development	Derek Luby BE MSc DIC MIEI	SLR Consulting Ireland
Alternatives	Derek Luby BE MSc DIC MIEI	SLR Consulting Ireland
Population and Human Health	Lynn Hassett BSc(Hons), MSc, PIEMA	SLR Consulting Ireland
Biodiversity	Michael Bailey MCIEEM, CEcol. Jake Matthews BSc (Hons) MSc. Brogan Costello BSc. MSc.	SLR Consulting Ireland
Land, Soils and Geology	Peter Glanville BA, MSc, PhD, IQUA, IRLOGI, IGI	SLR Consulting Ireland
Water	Peter Glanville BA, MSc, PhD, IQUA, IRLOGI, IGI	SLR Consulting Ireland
Air Quality	Conor Hughes BSc. MSc.MIEMA	SLR Consulting Ireland
Climate	Conor Hughes BSc. MSc.MIEMA	SLR Consulting Ireland
Noise and Vibration	Conor Hughes BSc. MSc.MIEMA Claire Bye BSc AMIOA Michelle Dawson BSc MIOA	SLR Consulting Ireland



Торіс	Contributor	Company
Material Assets	Lynn Hassett BSc(Hons), MSc, PIEMA	SLR Consulting Ireland
Cultural Heritage	Dr. Charles Mount MA PhD. Dip. EIA & SEA Mgmt., MIAI	Consultant Archaeologist
Landscape	Anne Merkle Dipl. Ing (FH) MILI	SLR Consulting Ireland
Roads and Traffic	Julian Keenan BE (Civil) MIEI MCHIT	Trafficwise
Interactions	Lynn Hassett BSc(Hons), MSc, PIEMA	SLR Consulting Ireland
Co-ordination of EIA	Derek Luby BE MSc DIC MIEI	SLR Consulting Ireland

- 1.60 Each contributor has been fully briefed about the development proposal and the background to it. They have visited and inspected the application site and surrounding area and have familiarised themselves with the local environment. Each contributor is considered to have the necessary competence, experience, expertise and knowledge required to prepare the EIAR chapter in respect of their specialist topic.
- 1.61 Kilsaran Concrete has also provided detailed background knowledge of the site, details of ongoing site operations and records of ongoing environmental and waste licence compliance monitoring. Company representatives have also undertaken a review of this EIAR.



PRICEINED: 28/03/2024

FIGURES

Figure 1-1
Site Location Map

Figure 1-2 Site Layout Map

Figure 1-3
Existing Site Layout

Figure 1-4
Surrounding Land Use







