

IN THE MATTER OF AN APPLICATION TO  
AN BORD PLEANALA

FOR APPROVAL OF (1) THE N6 GALWAY CITY RING ROAD  
PURSUANT TO SECTION 51 OF THE ROADS ACT 1993 (AS  
AMENDED); (11) THE N6 GALWAY CITY RING ROAD  
MOTORWAY SCHEME 2018; and (111) THE N6 GALWAY  
CITY  
RING ROAD PROTECTED ROAD SCHEME 2018

ABP Ref. ABP-302848-18 and ABP-302885-18

ORAL HEARING

Statement of Evidence  
Responses to Equine Issues  
Objections/Submissions  
by

**Michael P Sadlier**  
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**EVC**

**19 February 2020**



## 1. Qualifications and Experience

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- 1.1. My name is Michael Sadlier and I graduated from the Veterinary College of Ireland in Dublin in 1983. Since graduation, I have spent the last 35 years in veterinary practice in Ireland, England, Australia, New Zealand, France, USA and Japan. I am now the principal of a veterinary practice in Dublin and a consultant on equine issues at Equine and Veterinary Consultancy (EVC).
- 1.2. I have acted as a consultant on equine related issues on major and minor infrastructural projects over the past 14 years. These projects include road development schemes such as N8 Cashel/Mitchelstown Road Improvement Scheme; N17 Galway/Tuam Road Improvement Scheme; N11 Gorey to Enniscorthy Road Improvement Scheme; gas pipelines (Bord Gáis – Pipeline from Cuffesgrange to Great Island), water and drainage schemes (Ervia – Greater Dublin Drainage Scheme, OPW – Clonakilty Flood Relief Scheme), electricity transmission lines (Eirgrid – 440kV Transmission Line from Cork to Kilcullen; Eirgrid – North/South Interconnector) and industrial developments such as College Proteins Biomass Plant, Nobber, Co. Meath.

## 2. Role in Proposed Road Development

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- 2.1. My role in the N6 Galway City Ring Road project was to examine, assess and report on the potential impacts that the proposed road development would have on equine enterprises along the route in general and on Galway Racecourse in particular and to advise on the potential impacts identified and recommend mitigation measures to minimise any impact identified.
- 2.2. On 20 July 2017, I spent the day with Mr. Con Curtin, of Curtin Agricultural Consultants Ltd and we travelled the route of the proposed road development, paying particular emphasis on the other equine enterprises enroute. Mr Curtin explained the nature of each equine enterprise along the proposed road development and the methodology he used to assess the potential impact on these enterprises. I have read Section 4.7 of his Statement of Evidence and am full agreement with his findings. I also visited Galway Racecourse on 6 July 2017 in the company of Ms Mary Hurley, Arup and Mr Gerard O’Dea, Arup and met with the general manager.

## 3. Key Issues in Relation to Equine Issues

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- 3.1. Chapter 14 of the EIAR is to be taken as read in its entirety and is not replicated here. To assist the Board in its consideration of the applications for approval and for the convenience of all participants at this hearing and to put some context to the responses to objections/submissions, the key items pertaining to the equine assessment of the road development detailed in Chapter 14 of the EIAR are summarised briefly below.

3.2 Section 14.3.1 of Chapter 14 of the EIAR describes the enterprise mix as 16% of land parcels with equine as the main enterprise i.e. 31 land parcels. Appendix A.14.1 shows that a further 8% of land parcels as having equine as a secondary enterprise i.e. a further 15 land parcels. Therefore, the equine enterprise is present in 46 land parcels or 24% of land parcels along the proposed road development.

3.3 The equine enterprises were further identified as:

- 21 were classified as Horses – These farms were primarily farms where horses were the main animal on the land – High to Medium Sensitivity (plot references 115, 116, 117, 146, 160, 167, 169, 194, 209, 210, 481, 505, 506, 507, 560, 578, 583, 632, 660-661, 718, 760)
- 8 were classified as Horses and Beef – These enterprises had some horses on the farm grazing along with beef cattle – Medium to Low Sensitivity (plot references 489, 496, 508, 509, 513, 649, 690, 751)
- 15 were classified as Beef and Horses – These enterprises were primarily beef producing farms with the occasional horse – Low to Very Low Sensitivity (plot references 101, 153, 211, 216, 250-466, 498, 570, 572-592, 580, 581, 623, 627, 648, 750, 765)
- 1 had donkeys grazing – Low Sensitivity (plot reference 154)
- 1 had Horses and Sheep – This was Galway Racecourse, where sheep were used to graze the land – High Sensitivity (plot reference 691)

3.4 An initial assessment of the equine enterprise was made based on the principle of intensive and extensive equine management. Intensive equine management was defined as the close interaction between man and horse such as riding, breaking, race training, yearling preparation, mare and foal management. Health and safety issues for the horse handlers are important considerations in intensive equine management. Extensive management was defined as horses at pasture that required minimal interaction between man and horse.

3.5 As noted earlier by Mr. Con Curtin in his response to submissions/objections, 46 land parcels or 24% of the total number have equine enterprises along the proposed road development compared to 12% of all farms nationally and 16% of all farms in County Galway which have horses – this is based on the CSO Agricultural Census data<sup>1</sup>. The high number of equine enterprises is primarily due to many of the small land parcels being used only to keep ponies and horses for leisure purposes. Only three of these equine land parcels are considered to be high or very high sensitivity.

- 1 Very High Sensitivity Equine Enterprises – (These are classified as areas of intense equine activity with significant human interaction such as race meetings, horse shows and equestrian events). Galway Racecourse (plot reference 691)

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<sup>1</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-fss/farmstructuresurvey2016/da/fs/> - Table 2.2

- 2 High Sensitivity – (These are classified as areas of intense equine activity with reduced human interaction such as stud farms, racing yards, riding schools, show-jumping yard with significant equine orientated infrastructure). These are 2 typical stud farms (plot references 751 and 760)
- 14 Medium Sensitivity – These are less intensive equine activities such as small riding schools, small stud farms with specific adjunctive facilities such as stables, exercise arena, dedicated gallops/cross country course, foaling boxes (plot references 115, 116, 117, 146, 489, 496, 505, 506, 507, 509, 513, 632, 649, 660/661)
- 29 Low and Very Low sensitivity – These are extensively managed equine activities with no specific ancillary facilities but which may (in the case of low sensitivity) or may not (in the case of very low sensitivity) have occasional stable and non-dedicated exercise area

3.6 The impacts on equine enterprises are detailed on a farm by farm basis in Appendix A. 14.1 of the EIAR.

3.7 The negative stimuli (sound and visual) associated with the construction of the proposed road development was carefully considered in my assessment. The building of the proposed road development has the potential to create a significant amount of abnormal noise and visual stimuli that may be quite intrusive to horses in the immediate vicinity. Horses are sentient animals and when confronted with an exposure to unfamiliar stimuli (noise, movement, sights or a combination of these) can either remain to assess the perceived threats (fight) or run away to escape the threat (flight). Therefore, the introduction of horses into an area where there are extensive stimuli associated with road construction, can result in horses running away blindly from the stimuli or remaining unperturbed. Horses, bolting in fright, can injure themselves running into obstruction or even other horses. However, more disturbingly, they can injure their riders and/or other personnel.

3.8 The noises and visual stimuli associated with the operational traffic can be a cause of some concern. However, horses are normally very adaptive to environmental changes and become very quickly receptive to the aural and visual stimuli associated with normal traffic flow.

3.9 I assessed the Parkmore Link Road Modification to determine the potential impacts on Galway Racecourse. Between the 5 furlong and the 3 furlong poles the proposed noise barrier and the continuous bunding will provide adequate visual and auditory shielding for the racing horses. In my opinion, this modification is more than adequate to provide a safe environment for the racehorse.

## 4. Responses to Submissions/Objections

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### 4.1 Overview

4.1.1 Seven of the 296 submissions/objections made to An Bórd Pleanála (ABP) in respect of the N6 Galway City Ring Road (GCRR) Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Motorway Scheme (MS) and Protected Road Scheme (PRS) include observations relevant to equine. I confirm that none of the 17 submissions/objections received in relation to the Request for Further Information Response related to equine matters.

The issues raised in these submissions/observations are:

- 2 raised an issue in respect of adequacy of the assessment of impacts relating to equine (submission/observation Ob\_505 and Ob\_507)
- 2 raised issues of potential impacts on equine enterprise (submission/observation Ob\_572\_574\_591 and Ob\_751)
- 3 raised issues in respect of potential impacts on Galway Racecourse (submissions/observation Ob\_691, Ob\_691\_713, and Ob\_713)

4.1.2 I will address each submission/objection separately in the following sections.

### 4.2 Adequacy of assessment of impacts relating to equine

#### Issue

4.2.1 It is suggested that the assessment is inadequate in two submissions/objections, Ob\_505 and Ob\_507.

#### Response

4.2.2 Con Curtin addresses the adequacy of the agricultural assessment in his responses to submissions/objections. As these two properties engage in equine enterprise I will also address these submissions/objections in terms of the assessment of equine impacts on these two properties.

#### *Submission/Objection Ob\_505*

4.2.3 I was informed by the person farming this land that the land, 5.4 hectares in total, was in two parcels – one of 2.4 hectares beside the dwelling house and the other of 3 hectares, of which 1.1 acres are included within the proposed development boundary in the most south easterly aspect of that land parcel. There was no evidence of intensive equine use and I concluded that the land was used to graze the horses only (extensive use). The land was rough grazing and was used to farm horses.

4.2.4 The proposed road development will cause no new severance and the total proposed landtake is 1.1 hectares or approximately 19% of the land holding. In my

opinion, the impact of the proposed road development on this equine enterprise is moderate (due to the amount of land loss primarily).

***Submission/Objection Ob\_507***

4.2.5 The holding consists of 3.1 hectares. I visited the property on 17 December 2019 and met with those farming the lands, who also use neighboring lands. There were approximately 18 Connemara horses running on both farms – four mares and foals (8), stallion (1), two yearlings (2), 2 two year olds (2), 2 three year olds (2), 1 four year old (1), 1 five year old gelding (1) and a 16 year old gelding (1). There were two stables on the land, one occupied by the stallion. These stables were to the north of the proposed road development and shielded by a small hill. There was no evidence of intensive equine use and I concluded that the land was used to graze the horses only (extensive use). The land was rough grazing. I saw where the proposed road development would impinge on the land. There was no land separation (severance) and the total proposed land take is 0.06 hectares or approximately 2% of the land.

4.2.6 In my opinion, the impact of the proposed road development on this equine enterprise was slight.

## **4.3 Potential Impacts on Equine Enterprise**

### **Issue**

4.3.1 Ob\_572 raises concerns about the viability of their equine enterprise post construction of the proposed road development due to the extent of land take and disturbance for moving horses within the remaining lands and other retained lands.

*Ob\_572 “It will also mean it being almost impossible for us to maintain the current equine farming operation. What is being proposed is unfair on the basis that extensive frontage and access to our clients’ lands are being taken away and the land used to provide access for other property owners. The result is huge disturbance for moving horse within the subject lands and to other owned retained lands.*

*We would need extra access gates to mitigate but this would still be very unsatisfactory and costly and will involve moving horses along a much more difficult and extensive access.”*

4.3.2 Ob\_751 also raises concerns about the viability of their equine enterprise, adequacy of boundary treatment and noise impacts.

*Ob\_751 “The acquisition at this property is so extreme that it removes its viability as a standalone unit.*

*The property owner operates a stud farm at this location and stallions, mares and foals are kept on the lands so suitable fencing for this use will be required.*

*The noise mitigation proposals at this location are insufficient allowing for the proximity of the dwelling house and the yard to the proposed road scheme and the nature of the equine enterprise carried out on the lands.”*

## **Response**

4.3.3 The justification for the land take is addressed by Ms. Eileen McCarthy in her responses to submissions/objections. The suitability of boundary treatment for agricultural lands are addressed in Mr. Con Curtin’s responses to submissions/objections. I will summarise the equine enterprise at these properties and the potential impact due to the proposed road development.

### ***Ob\_572***

4.3.4 This property is currently being farmed by the owner. I visited the farm on 17 December 2019 and met with the owner. The land consists of 5.8 hectares, with two small fields used to grow haylage (approximately 50 bales annually) and the rest of the land was relatively rough grazing on hilly slopes. The owner informed me that he used the land to outwinter his horses – he had three mares in foal and six two and three year olds (9 in total). There was also an open shed, approximately 18 by 40 feet in the southern end of the farm that provided excellent shelter for the horses when required. There was no evidence of intensive equine use and I concluded that the land was used to graze the horses only (extensive use). The owner informed me that he was losing 2.16 hectares containing the two paddocks that were used for forage and the sheltered area with the shed. There will be some land separation (severance) due to the proposed road development and the proposed landtake is 37% of the farm.

4.3.5 In my opinion, the impact of the proposed road development on this equine enterprise is significant due to the amount of land loss and land separation.

### ***Ob\_751***

4.3.6 The negative stimuli (sound and visual) associated with the construction of the proposed road development was carefully considered in my assessment. The building of the proposed road development has the potential to create a significant amount of abnormal noise and visual stimuli that may be quite intrusive to horses in the immediate vicinity. Horses are sentient animals and when confronted with an exposure to unfamiliar stimuli (noise, movement, sights or a combination of these) can either remain to assess the perceived threats (fight) or run away to escape the threat (flight). Therefore, the introduction of horses into an area where there are extensive stimuli associated with road construction, can result in horses running away blindly from the stimuli or remaining unperturbed. Galway County Council has committed to employ a veterinary specialist to liaise with landowners to ensure that equine welfare is adequately addressed.

4.3.7 The noises and visual stimuli associated with the operational traffic can be a cause of some concern. However, horses are normally very adaptive to environmental changes and become very quickly receptive to the aural and visual stimuli associated with normal traffic flow.

- 4.3.8 This property is currently being farmed by the owner. I visited the farm on 17 December 2019 and met with the owner. The land consists of 9.1 hectares with significant farm buildings. There was a stable yard on the northern edge of the farm, beside the dwelling house. This yard had 8 stables in two separate buildings, a covered area with stocks used to handle his mares and a well appointed lunge ring. There was a laneway running down the middle of the farm and there was a large forage barn on the eastern side of this laneway. The owner informed me that he had 10 pure bred Irish Draught mares and he sold their progeny normally as foals. The owner also had a two year old colt that he was planning to get approved as a registered Irish Draught stallion for his own use. The owner also had between 10-20 cattle for pasture management primarily. There was evidence of intensive equine use around the stable yard and I concluded that the land was used to graze the horses only (extensive use) but the yard was used for intensive interaction between man and horse. The land was of good quality. The owner showed me where the proposed road development would impinge on his land. There was no land separation and the total proposed land take is 6.28 hectares or approximately 69% of the land.
- 4.3.9 In my opinion, the impact of the proposed road development on this equine enterprise was profound due primarily to the degree of land loss.

## **4.6 Potential Impacts on Galway Racecourse**

### **Issue**

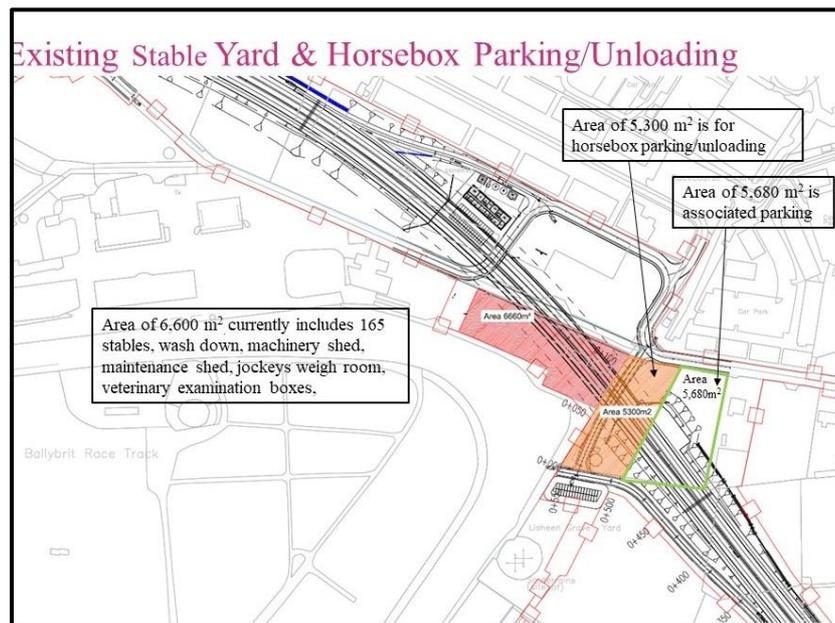
- 4.6.1 The adequacy of the assessment on the construction and operation of the proposed road development on Galway Racecourse is questioned in submission/objection Ob\_691.
- 4.6.2 The adequacy of the assessment of alternatives in the context of the overall assessment matrix is raised in Ob\_691\_713 due to the significant impacts on this business which is a lessee on lands acquired for mitigation purposes for Galway Racecourse. The property owner of these lands acquired is also raising an issue with the justification for their acquisition in Ob\_713.

### **Response**

- 4.6.3 Galway Racecourse is owned and operated by the Galway Racecourse Committee. As noted earlier, I visited Galway Racecourse on 6 July 2017 and met with the general manager. I toured the racecourse with the general manager and he explained in detail how the racecourse operated, with particular emphasis on race day operations. The general manager then outlined how Galway Racecourse felt the proposed road development would impact on their racecourse. My assessment of the potential impacts on Galway Racecourse is based on the information gained from my discussion with the general manager, observations I made during my visit to the racecourse, my understanding of the works involved in the proposed road development, the impact the proposed road development could have on the health

and welfare of the horses involved, the mitigation measures proposed and the overall impact that the proposed road development would have on Galway Racecourse.

- 4.6.4 Arup has had extensive meetings with the Galway Racecourse Committee between 2014 and 2018, to best understand how Galway Racecourse operates and the potential impacts both the construction and operation of the proposed road development would have on their enterprise. The sequencing of the construction works was detailed and agreed with Galway Racecourse to ensure the race meetings, in particular the main race meeting in July every year could proceed during the construction of the proposed road development. The details of this construction sequencing are presented in Appendix A.7.4 of the EIAR.
- 4.6.5 To mitigate the loss of the existing stables temporary stables will be constructed for use until new permanent stables, as shown on Figure 5.1.10 of the EIAR and detailed in Appendix A.15.2 of the EIAR, are constructed.
- 4.6.6 The current site of the racecourse stables, loading/unloading zone and horse transport parking is located on a 17,580 square metre block of land at the south eastern side of the public area of the racecourse, to the north of the racetrack. This location is important as it connects directly with the parade ring and from the parade ring the horses enter onto and exit from the racetrack. The horses come and go from this stable block without interfering with the racetrack itself nor the public areas, which is an ideal arrangement for equine welfare.
- 4.6.7 The proposed road development is routed directly through the current stabling area. Galway County Council have proposed to remove the stables, excavate a tunnel and then cover back over the tunnel. The resultant issues for the racecourse are as follows:-
- 1) Land Take – The racecourse will lose 10,980 square metres of land, currently used for loading/unloading racehorses and horse transport parking. The remaining 6,600 square metres will be acquired from the racecourse for the purposes of installing Galway Racecourse Tunnel, and essentially will be land predominantly situated over the tunnel in the final scenario. There is a 9m buffer/restriction either side of the tunnel within which the zone of influence of any load bearing structure is not allowed as shown in Section 3.0 of Appendix A.15.2 of the EIAR. This results in a net reduction in area available to Galway Racecourse in the north-eastern corner of the land holding, i.e. stables area (6,600m<sup>2</sup>), horsebox parking/unloading area (6,600m<sup>2</sup>) and horsebox parking area (5,680m<sup>2</sup>) as shown in Figure 1.

**Figure 1: Existing Stable Yard**

- 2) New Stable Block – There are currently 165 stables, machinery sheds, wash bays, veterinary examination boxes and ancillary buildings in the current stable block, all contained within 6,600 square metres. The number of stables currently present on this site is facilitated by the small size of the current stables. Current best practice requires stables for adult horses to be a minimum of 3.65 x 3.65 metres. As a result, to replace the existing stable facilities within the current stable yard will require significantly more land than currently being used.
- 3) Location – The current location of the stable yard and ancillary facilities in relation to the entry to the pre-parade ring and onwards through the sequence of activities to the start of the race is essential for the smooth operation of the racecourse for the following reasons:
  - a. they are located after the finishing line so that horses can exit the track as soon as they pull up
  - b. they are adjacent to the paddock where they parade pre-race and where the winners are greeted post-race
  - c. easy accessibility yet distant from the public car parks allowing fast entry and exit from the racecourse for horse transporters

4.6.8 Ob\_ 691\_713 and Ob\_713: As Galway Racecourse is a key constraint in the assessment matrix, then the impacts on it were assessed as part of the matrix and various alternatives for mitigation were assessed. Alternative layouts and arrangements for provision of mitigation for the primary impact which is the demolition of the stables were investigated as follows:

- The first option investigated was relocating the stable yard exactly as it is in the existing location, which would mean that it would sit on top of the tunnel.

Some racecourses have tunnels under local roads and grandstands linking the stable yard to the parade ring and the racecourse such as the Curragh, Longchamps in Paris and Royal Ascot. However, in my experience to date, I am not aware of any racecourse stables situated directly over a road tunnel in Ireland, the UK or in continental Europe. In the newly renovated Royal Ascot racecourse, for example, there are some short tunnels under the stands for racehorse access to the course, some road tunnels under the course itself for vehicles to access in field car parks, but the stable yard was deliberately located ¼ mile away from the track in a quiet and calm environment. Furthermore, the space required to provide a stable block to current building requirements in this exact location will impact and impinge on the track itself, plus there is still the issue of finding a location for the horsebox parking which must be connected as closely as possible to the stables. Furthermore, the 9m buffer/restriction either side of the tunnel within which the zone of influence of any load bearing structure is not allowed pushes the construction zone further into the running track area.

- The stable yard cannot be moved onto the infield (inside the race track) of the track as there is no access for horseboxes to the infield currently and there is no tunnel for horses to cross beneath the track to the saddling area and pre-parade ring. This would require two large tunnels to be built under the track – one to allow horse transporters to get to and from the stable yard and the second tunnel to bring the racehorses to and from the paddock. This construction activity would result in closure of the racetrack for 2-3 years which would impact enormously on its viability. In addition, the equine movements during festival week particularly are enormous and would create severe logistical issues to running the race meeting if the horses are stabled in the infield
- I have also considered moving the stable yard to the western end of the grandstand, but the proposed road development would encroach on any of the suitable sites
- Moving the stable yard to the other side of the public area would also require inverting the current location of the paddock and grandstand and if in this location, the race horses would have to travel back over the finishing straight to return to the stable yard – which would have a further negative impact on the operation of Galway Racecourse
- Therefore, in my opinion, the only suitable lands on which Galway County Council could relocate the stables is the block of land consisting of 8,670 square metres to the north-east of the proposed road development. This land is already required to enable construction of the tunnel. The stable block can be built on this land and the horsebox parking can be located over the tunnel, immediately adjacent to the new stables. This arrangement will allow the racehorses optimal entry to the parade ring pre-race and exit from the racecourse post-race. Due to the building requirements mentioned above, the stable yard will have 7 fewer stables, and these stables will have to be slightly smaller than the recommend size (3.4 x 3.4 metres v 3.65 x 3.65 metres). This minor reduction in

recommended stable size should have no adverse impact on the racehorses stabled in these stables

- 4.6.9 Confining the construction to the north-east corner of Galway Racecourse is the optimum solution as it keeps the stables in the same location *vis-à-vis* the other racecourse operations.
- 4.6.10 It is noted that the key concern raised in their submission/objection relate to the impacts during construction and how this may impact on the operation of the racecourse. As noted above, a detailed construction sequencing was discussed and agreed with Galway Racecourse and is presented in Appendix A.7.4 of the EIAR.
- 4.6.11 The operational impact of a road tunnel to the north of the racetrack did not appear to be of great concern. This is understandable as the equine industry already successfully accommodates road tunnels in close proximity to racecourses. For example, there is a road tunnel (A330) under the Straight Mile Course and another longer road tunnel under both the A330 and the Round Course at Royal Ascot, one of the world's leading racecourses.
- 4.6.12 It must be reassuring for the Galway Racecourse Committee to note that the Curragh Racecourse replaced its grandstand, parade ring and all other amenities in a two-year period recently with little impact on the racing at the course. It was proposed initially to close the racecourse for 2 years and move all the race meetings to Leopardstown due to the potential impacts of the construction activity on racegoers and racecourse alike. However, suitable arrangements were made between the contractor and racecourse management that allowed racing to continue during the construction process.

## 5. Conclusion

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- 5.1 The majority of equine enterprises along the proposed road development are medium and low sensitivity. These are categorised as medium and low sensitivity enterprises due the lack of facilities normally associated with high sensitivity farms (stud farms, racing stables, riding stables or equestrian centres) such as gallops, stable yards, indoor schools, all weather arenas, post and railed paddocks, etc., the type of horses being kept which are mainly ponies for leisure purposes, the low numbers of horses on each holding, the small size of the holdings and the poor quality of the land.
- 5.2 The equine assessment considered the types of farms, the farming operations, mitigation measures and all potential impacts, including direct, indirect and cumulative impacts and potential interactions with other environmental topics. The issues raised in the submissions and objections in relation to potential impacts on equine enterprises have been fully considered, and having considered those issues, the conclusions of the equine impact appraisal remain as set out in the application documentation. The results of the equine assessments are that one holding is profoundly affected, 1 holding very significantly affected, 9 holdings are significantly affected, 8 moderately affected, 4 slightly affected and 23 holding with no significant impact. These impacts are typical of other major road infrastructural projects and are acceptable when the wider societal benefits are taken into account.
- 5.3 In recognition of the level of equine enterprises across the proposed road development, Galway County Council has made a further commitment to make it a requirement for the Contractor to employ a veterinary specialist to liaise with landowners to ensure that equine welfare is adequately addressed during construction and this will be contained in the Schedule of Environmental Commitments.
- 5.4 In conclusion, having assessed the objections/submissions made to An Bord Pleanála regarding Equine issues, I concur with the assessment of impacts of these equine enterprises in Appendix A.14.1 of Volume 4 of the EIAR.