



An
Coimisiún
Pleanála

Inspector's Report – Addendum Report

ABP-321832A-25

Development	Construction of pet crematorium, installation of wastewater treatment and all associated site works.
Location	Barneygole, Edgeworthstown, Co. Longford.
Planning Authority	Longford County Council
Planning Authority Reg. Ref.	2460119
Applicants	Brenda Mc Namee
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellants	Barneygole Residents
Inspector	Darragh Ryan

1.0 Background to Addendum Report

This addendum report is required, in response of the Coimisiún Direction of 26th of June 2025 which sought further information for the development in accordance with Section 132 of the Planning and Development Act 2000 (as amended).

The request for additional information sought the following:

A screening/desktop air dispersion analysis/model arising from the installation of a proposed incinerator within the proposed building on site.

The assessment shall evaluate the potential impact of the proposal on surrounding residential receptors in terms of odour and air pollution. The following air pollution parameters were required to be assessed:

- Odour
- Particulate Matter (PM10 and PM 2.5)
- Nitrogen Oxides
- Sulphur Oxides
- Carbon Monoxide
- Volatile Organic Compounds
- Hydrogen Chloride
- Heavy Metals.

On the 20th of August 2025 the applicant submitted a “Dispersion Modelling Assessment” to determine emissions arising from the proposed pet crematorium. A full assessment of submitted information shall be provided under Section ... of this report.

2.0 Further Responses

2.1 Planning Authority Response

The planning authority submitted a response to the further information request on the 6th of October. The planning authority raised no objection to the proposed development subject to recommended conditions with respect to allowed volumes of emissions and to provide a report detailing no of animal of treatment or tonnages, tonnages of ash disposed and details of how disposed.

2.2 Third Party

A submission has been received from the agent for the appellants (Barnegoyle Residents) on the 9th of October that outlines the following:

- Meteorological Data

There are concerns in relation to the age of the data sets used from the meteorological data from Mount Dillion weather station from 2016 – 2020. It is set out that more up to date weather data should have been used from Mount Dillion. Since 2020 more severe weather patterns have occurred throughout Ireland and it is critical that the assessment take into account the most recent weather data.

- Zone of Significant Impact

The submitted report includes 18 no models of predicted emission concentration of each chemical compound assessed. The appellants home is within the zone of impact for over half of the dispersion models indicated. While living within the zone of negative impact for one of the named chemicals is concerning, the cumulative impact of living in the zone of so many chemicals is of concern.

- Odour

The report states that odour from the development would not extend beyond 10 meters from the site boundary. The appellants property is within 4m of the boundary therefore resulting in a significant reduction in air quality within their private open space. This will severely negatively impact the enjoyment of private amenity space within the home.

- Benzene

Model 15 of the submitted report assesses the concentration impact of Total Organic Carbon (Benzene) resulting from site operations. It concludes that the impact area shall be just within the curtilage of appellants property. Benzene is classified as a carcinogenic to humans – this means every time the appellant leaves their home they are potentially exposed to carcinogenic chemicals as well as any other chemicals that are dispersed over the property. It is not acceptable to permit development in this instance.

- Expansion

The modelling takes no account of potential expansion. Where expansion were to occur or numbers increased the negative impact on the existing residents would be further exasperated.

- Lack of data on impacts

The appellants set out that the applicants report states that the Environmental Quality Standards have not been defined for many of the substances. This raises concerns in relation to the true extent of negative impact as a result of chemical use within the crematorium. Given the lack of complete data in relation to the potential for long term health impacts the conclusion presented within the response documentation that there will be no impact cannot logically be accepted.

2.3 **Applicant Response**

The applicant has submitted a response to the recommendations of Longford County Council on the 15th of October 2025. The applicant is satisfied and content with the recommendations by Longford County Council attached to final grant of permission.

The applicant has not provided a response to the submission of third parties.

3.0 **Policy Context**

Planning and Development Act 2000 (as amended)

“light industrial building” means an industrial building in which the processes carried on or the plant or machinery installed are such as could be carried on or installed in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

3.1 **Development Plan**

Longford County Development Plan 2021 – 2027

At the June Council meeting, held on Wednesday 10 June 2026, the Elected Members of Longford County Council resolved to made a Variation to Longford County Development Plan 2021 – 2027. Variation no. 1 consists of the amendment to

the *Strategic Residential Reserve Zoning Objective* text contained in Volume 2: Appendices. This variation is not directly relevant to the development proposal.

The Longford County Development Plan 2021 – 2027 is the relevant Development Plan for the subject site. The subject site is located within the open countryside as per the settlement hierarchy tier as per 4.8.5 of the Plan. The open countryside provides for rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise. This should be facilitated while avoiding over-spill development from urban areas and urban generated housing. The sustainable development of the open countryside will be supported.

9.3.1 Rural Enterprise and Economy

The Council is committed to promoting balanced and inclusive rural communities, to achieving an appropriate scale of development supporting rural-based economic activity.

It is acknowledged that some enterprise and employment uses may not always be appropriately located on Enterprise and Employment Zoned lands. In this regard, some new enterprise and employment projects may require sites outside settlements because of their size, type or specific site requirements.

Key considerations for rural enterprise will be:

- Existing commercial or industrial activities in towns or villages, unencumbered by their location and nature of their business, will be generally discouraged in relocating to unserviced rural areas.
- Horticulture, forestry, tourism, energy production and rural resource-based enterprises will be facilitated in the rural areas, subject to proper planning considerations.
- Where established authorised rural based enterprises seek to expand beyond their existing capacity and, in the opinion of the Planning Authority, the expansion proposed would seriously affect the rural nature or amenity of the rural areas and surrounding countryside, they will generally be encouraged to locate in serviced zoned lands.

- One-off enterprises in the rural area may be located in the open countryside only where the Council is satisfied that:
 - the enterprise is suitable for that location in the first place;
 - it will enhance the local rural economy;
 - there is a social and economic benefit to being located within a rural area;
 - the proposal will not adversely affect the character and appearance of the landscape or the amenity of neighbouring properties;
 - the local road network and other essential infrastructure can accommodate extra demand generated by the proposal; and
 - all advertising should be kept to a minimum and be suitable in design and scale to serve the business.
- Commercial / industrial developments in rural areas may be acceptable subject to proper planning considerations, where the Council is satisfied that the proposed development is required to be located in the rural area, due to its dependence on an existing local resource or source material that is required for the carrying out of the industrial process / commercial activity / service. The local resource or source of material shall be in close proximity to the location of the proposed development.
- Where an area is not within an identifiable settlement and is not otherwise zoned as part of this Plan, the use of such land shall be deemed to be primarily agricultural. However apart from rural housing, there are other land-uses which may be considered in the rural countryside subject to the proper planning and sustainable development of the area.

3.2 Irish Air Quality Standards Regulations 2022 (S.I. No. 739 of 2022), Directive 2008/50/EC

The Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/50/EC) was published in May 2008. It replaced the Framework Directive and the first, second and third Daughter Directives. The fourth Daughter Directive (2004/107/EC) will be included in CAFE at a later stage. The limit and target values for both Directives are outlined below.

The CAFE Directive was transposed into Irish legislation by the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011). It replaces the Air Quality

Standards Regulations 2002 (S.I. No. 271 of 2002), the Ozone in Ambient Air Regulations 2004 (S.I. No. 53 of 2004) and S.I. No. 33 of 1999. Since the transposition, Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011) has been replaced and revoked by S.I. No. 739/2022 - Ambient Air Quality Standards Regulations 2022.

The standards sets out the limit or target values specified by the five published directives that set down limits for specific air pollutants. The directives cover:

- Sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter (PM10 and PM2.5) and lead
- Carbon monoxide and benzene
- Ozone
- Arsenic, Cadmium, Nickel and Benzo(a)pyrene

4.0 Assessment

It should be noted this report is to be read in conjunction with original planning inspectors report dated 19/05/2025. My assessment is confined to the issues raised in the request for further information and subsequent submissions. There has been no change to Development Plan Policy or National Policy with regard to the proposed development type in the intervening period.

- 4.1.1 The applicant has submitted an Air Dispersion Modelling Assessment prepared by Odour Monitoring Ireland Ltd in response to the Further Information request. The assessment examines the potential air quality impacts associated with emissions from the proposed pet crematorium using the recognised atmospheric dispersion model AERMOD, in accordance with EPA Air Guidance AG4. The modelling considers emissions of carbon monoxide, nitrogen dioxide, sulphur dioxide, particulate matter (PM10 and PM2.5), hydrogen chloride, hydrogen fluoride, total organic carbon, metals and odour. The predicted concentrations are compared against the applicable Irish Air Quality Standards Regulations 2022 (S.I. No. 739 of 2022), Directive 2008/50/EC and relevant Environmental Assessment Levels.
- 4.1.2 For context, the air quality standards used within the assessment represent conservative limits established to protect human health, including sensitive groups

such as children, the elderly and persons with respiratory illnesses. These standards are intentionally precautionary and incorporate significant safety margins. By way of example, the statutory annual limit value for nitrogen dioxide (NO_2) is $40 \mu\text{g}/\text{m}^3$, equivalent to 40 millionths of a gram dispersed within one cubic metre of air. The dispersion modelling predicts a maximum annual concentration of $18.22 \mu\text{g}/\text{m}^3$ at the worst-case sensitive receptor, representing approximately 45.6% of the applicable air quality standard. Similarly, the predicted annual concentration of particulate matter (PM_{10}) is $18.33 \mu\text{g}/\text{m}^3$, compared to the statutory limit of $40 \mu\text{g}/\text{m}^3$, while $\text{PM}_{2.5}$ is predicted at $13.93 \mu\text{g}/\text{m}^3$ compared to the applicable limit of $25 \mu\text{g}/\text{m}^3$.

- 4.1.3 It is also important to note that these predicted concentrations are not guaranteed emissions that will occur in practice. Rather, they represent the output of a predictive atmospheric dispersion model based upon a series of deliberately conservative assumptions. These assumptions include operation of the cremator 24 hours per day, 365 days per year at maximum permitted emission concentrations, notwithstanding that the report states the facility is expected to operate for less than 2,500 hours annually. Consequently, the assessment models an operating scenario that is considerably more onerous than would reasonably be expected during normal operation. Furthermore, pollutants emitted from the flue are discharged at height (4.7m) and are subject to continuous atmospheric dilution through wind, turbulence and natural dispersion processes. The modelling assessment states that the emission temperature is calculated at 850 degrees. The objective of the dispersion modelling is to predict the concentration of pollutants after this atmospheric mixing has occurred at locations where people may be exposed. The resulting concentrations therefore represent the predicted pollutant levels in the ambient air at ground level, rather than the concentrations leaving the flue itself. Accordingly, while the assessment as provided by the applicant predicts measurable concentrations of pollutants at nearby receptors, these concentrations remain well below the relevant statutory air quality standards and Environmental Assessment Levels established for the protection of human health.

4.1.4 Carbon Monoxide

Carbon monoxide is produced through combustion processes and can affect oxygen transport within the bloodstream at elevated concentrations. The modelling predicts a maximum combined ground level concentration of 842 $\mu\text{g}/\text{m}^3$, representing 8.42% of the applicable air quality limit of 10,000 $\mu\text{g}/\text{m}^3$ (8-hour average).

Accordingly, predicted concentrations remain significantly below the statutory limit and provide a substantial margin of safety. From a planning perspective, I am satisfied that emissions of carbon monoxide would not be likely to adversely affect residential amenity or human health as the levels of carbon monoxide associated with the development is within the bounds of applicable air quality limit as set out within the Irish Air Quality Standards Regulations 2022

4.1.5 Nitrogen Dioxide (NO_2)

Nitrogen dioxide is one of the principal pollutants associated with combustion processes and prolonged exposure may adversely affect respiratory health.

The applicant's assessment predicts: maximum hourly concentration of 102 $\mu\text{g}/\text{m}^3$, representing 50.79% of the statutory hourly limit (200 $\mu\text{g}/\text{m}^3$); and annual average concentration of 18.22 $\mu\text{g}/\text{m}^3$, representing 45.57% of the annual limit value of 40 $\mu\text{g}/\text{m}^3$.

While these represent the highest proportion of any regulated combustion pollutant assessed, predicted concentrations (102t $\mu\text{g}/\text{m}^3$) remain comfortably below the applicable limit values of 200 $\mu\text{g}/\text{m}^3$. Consequently, I am satisfied that the proposal complies with the requirements of the Air Quality Standards Regulations 2022.

4.1.6 Sulphur Dioxide (SO_2)

Sulphur dioxide has the potential to cause respiratory irritation, particularly amongst sensitive individuals. Predicted concentrations are: 75.89 $\mu\text{g}/\text{m}^3$ (1-hour average) representing 21.68% of the statutory limit; 34.60 $\mu\text{g}/\text{m}^3$ (24-hour average) representing 27.68% of the statutory limit; 7.07 $\mu\text{g}/\text{m}^3$ annual average representing 35.39% of the relevant criterion. These concentrations remain substantially below the applicable standards. I therefore consider the predicted impact from sulphur dioxide emissions to be acceptable and in compliance with the Air Quality Standards Regulations 2022.

4.1.7 Particulate Matter (PM10 and PM2.5)

Particulate matter generally represents one of the more significant pollutants associated with crematoria because fine particles are capable of penetrating deeply into the respiratory system. The modelling predicts annual concentrations of:

PM10 = 18.33 $\mu\text{g}/\text{m}^3$, PM2.5 = 13.93 $\mu\text{g}/\text{m}^3$

These represent:

45.83% of the annual PM10 objective (40 $\mu\text{g}/\text{m}^3$)

55.73% of the annual PM2.5 objective (25 $\mu\text{g}/\text{m}^3$)

Accordingly, predicted concentrations remain below the applicable Air Quality Standards Regulations 2022. Nevertheless, PM2.5 represents the highest proportion of the applicable assessment criterion of all pollutants assessed.

Although compliance with statutory standards has been demonstrated, I note the increasing emphasis placed by the World Health Organisation on reducing long-term exposure to PM2.5 due to emerging evidence regarding cardiovascular and respiratory health effects. While the proposal complies with the applicable regulatory standards referenced within the assessment, PM2.5 remains one of the pollutants requiring the greatest consideration owing to its known health implications. I am satisfied based on the level of details provided that the levels of PM2.5 are within the acceptable limits (13.93 $\mu\text{g}/\text{m}^3$ of an allowable 25 $\mu\text{g}/\text{m}^3$) as set out in the Air Quality Standards Regulations 2022.

4.1.8 Hydrogen Chloride

Hydrogen chloride concentrations are predicted to be: 1.33 $\mu\text{g}/\text{m}^3$ (hourly) of a maximum allowable of 160 $\mu\text{g}/\text{m}^3$, 0.62 $\mu\text{g}/\text{m}^3$ (annual) of a maximum allowable of 750 $\mu\text{g}/\text{m}^3$. These represent only 0.18% and 0.39% respectively of the Environmental Assessment Levels. Accordingly, impacts are negligible.

4.1.9 Hydrogen Fluoride

Hydrogen fluoride concentrations remain extremely low:

0.91 $\mu\text{g}/\text{m}^3$ hourly of a maximum allowable of 160 $\mu\text{g}/\text{m}^3$, 0.57 $\mu\text{g}/\text{m}^3$ daily, 0.12 $\mu\text{g}/\text{m}^3$ annually of a maximum allowable of 16 $\mu\text{g}/\text{m}^3$.

These represent between 0.57% and 20.63% of the relevant assessment criteria.

I am satisfied that emissions of hydrogen fluoride would not give rise to significant impacts.

4.1.10 Total Organic Carbon

The predicted annual concentration is $0.24 \mu\text{g}/\text{m}^3$, equivalent to $4.75 \mu\text{g}/\text{m}^3$ of the applicable limit. This indicates a negligible environmental impact.

4.1.11 Metals

The predicted grouped metal concentrations are: $0.61 \mu\text{g}/\text{m}^3$ hourly, $0.022 \mu\text{g}/\text{m}^3$ annually. The assessment concludes that these remain well below the relevant Environmental Assessment Levels. I consider this to comply Air Quality Standards 2022

4.1.12 Odour Assessment

From a planning perspective, odour frequently represents the principal concern associated with crematorium. The applicant has modelled odour emissions using recognised odour dispersion criteria – 98th percentile of hourly averages. The assessment concludes that odour dispersion extends approximately 10 metres beyond the operational boundary;

no sensitive receptor exceeds the accepted odour criterion of $1.5 \text{ ouE}/\text{m}^3$ at the 98th percentile of hourly averages. The adopted criterion of $1.5 \text{ ouE}/\text{m}^3$ (98th percentile) is consistent with recognised Irish EPA guidance and is generally accepted as representing a level at which odour should not cause significant annoyance for residential receptors. On that basis, the assessment concludes that significant odour impacts are unlikely.

However, I note that the nearest residential receptor is located approximately 4 metres from the site boundary. While the modelling predicts compliance with the applicable odour criterion, the close proximity of residential receptors inevitably reduces the margin for uncertainty inherent in any dispersion model. Atmospheric dispersion models are predictive tools based upon assumed emission characteristics and meteorological conditions rather than measured operational performance.

Consequently, although I accept that the modelling demonstrates compliance with recognised guidance, the proximity of the adjoining residential property means that any exceedance arising from operational circumstances outside those modelled

could be readily perceptible. I consider that the issue of odour in isolation is not a substantive reason for refusal. The modelling has demonstrated that significant odour impacts are unlikely. However, there are concerns regarding the proximity to residential development and the meteorological data sets used in the Modelling assessment, which requires further analysis.

4.1.15 Meteorological Dataset

Third parties have expressed concern regarding the use of meteorological data covering the period 2016–2020. The report states that this dataset was selected in accordance with EPA Guidance AG4, which recommends the use of five years of representative meteorological data. From a technical perspective, the use of five consecutive years of meteorological observations is consistent with accepted dispersion modelling practice. I therefore do not consider that the use of this dataset, in itself, renders the modelling methodology invalid.

However, compliance with the prescribed modelling methodology does not, in my view, remove the requirement to consider whether the results provide a sufficiently robust basis upon which to conclude that the proposed development would not adversely affect residential amenity at this particular location. The meteorological dataset is an important component of dispersion modelling, as wind speed, wind direction, atmospheric stability and other meteorological conditions directly influence the dispersion and concentration of emissions at receptor locations.

4.1.16 In this case, I consider the age of the meteorological dataset to be a material consideration when assessing the weight that can reasonably be attached to the modelling conclusions. The data relied upon predates the application by a number of years and does not reflect more recent meteorological conditions. I acknowledge that climatic conditions vary from year to year and that a historic dataset may be appropriately representative for regulatory modelling purposes. Nevertheless, where a sensitive residential receptor is located approximately 4 metres from the site boundary, I consider that the degree of uncertainty associated with the meteorological input data assumes greater significance.

4.1.17 This is particularly relevant where the assessment is being relied upon to demonstrate that emissions from a crematorium, including potential odour and other combustion-related pollutants, would not result in an unacceptable impact on the adjoining residential environment. At such a short separation distance, relatively small variations in the meteorological conditions influencing plume dispersion could affect the predicted concentration and direction of the plume at the nearest receptor. The modelling therefore needs to provide a sufficiently robust basis for concluding that the development would be acceptable not merely under the modelled conditions but having regard to the range of reasonably foreseeable conditions that may occur during the operation of the facility.

4.1.18 I am not satisfied that the information submitted adequately addresses this uncertainty. In particular, the applicant has not provided a sensitivity assessment demonstrating the extent to which the predicted concentrations at the nearest residential receptor may vary under different or more recent meteorological conditions. Nor has the applicant demonstrated that the conclusions reached in the modelling remain robust when account is taken of the particularly close relationship between the proposed emission source and the adjoining residential property.

4.1.19 Furthermore, having regard to the definition of a light industrial building under the Planning and Development Regulations 2001 (as amended), and the previous Inspector's Report dated 19/05/2025 I agree with the conclusions reached therein regarding the principle of development. In particular, Section 9.3.1 of the Longford County Development Plan 2021–2027 supports appropriately scaled rural enterprise subject to the suitability of the use to the location, protection of residential amenity, adequate infrastructure and the demonstration of a clear rural locational requirement. I am satisfied that the proposed pet crematorium is not dependent on any local natural resource or raw material and that the applicant has not demonstrated a specific locational requirement for this rural site. I therefore agree that insufficient justification has been provided as to why the proposed use could not be accommodated on appropriately zoned and serviced lands within an established urban area, consistent with the Development Plan's objective of promoting sustainable settlement patterns and consolidating industrial activity within serviced locations.

4.1.20 Conclusion

I consider that the assessment of the proposed development must be considered having regard to the specific characteristics of the site and its relationship with adjoining residential development. In particular, the exceptionally close proximity of a sensitive residential receptor, located approximately 4 metres from the site boundary, reduces the margin for uncertainty inherent in predictive atmospheric dispersion modelling. While I acknowledge that the use of meteorological data for the period 2016–2020 is consistent with EPA Guidance AG4, I consider that the absence of more recent meteorological data, together with the proximity of the sensitive receptor and the inherent uncertainties associated with predictive modelling, limits the degree of certainty that can reasonably be attached to the conclusions of the submitted assessment in this particular site context. In this regard, I am not satisfied that the proposed development has sufficient regard to rural residential amenity as required under Section 9.3.1 of the Longford County Development 2021 – 2027. Furthermore, as noted in the original inspector report dated 19/05/2025 having regard to the nature of the proposed pet crematorium and the provisions of Section 9.3.1 of the Longford County Development Plan 2021–2027, I am not satisfied that a clear rural locational requirement for the development has been demonstrated, nor that the applicant has adequately established why the proposed use could not be accommodated on appropriately zoned and serviced lands within an established urban area. I therefore consider that the proposed development would be contrary to the objectives of Section 9.3.1, which seek to support sustainable patterns of development and the consolidation of industrial activity within appropriate and serviced locations, while protecting residential amenity. Having regard to the foregoing, I consider that permission should be refused.

5.0 **Recommendation**

I refer to the previous Inspector's Report and recommendation on this application (dated 19/05/2025) which should be read on conjunction with this report having regard to the Commission Direction (dated 26/06/2025). There is no change to the original Inspector's recommendation and I recommend that permission should be refused for the following reason.

6.0 Reasons and Considerations

The proposed development, by reason of its location within a rural area, the absence of a demonstrated rural locational requirement for the proposed pet crematorium, and the failure to demonstrate why the use could not reasonably be accommodated on appropriately zoned and serviced lands within an established urban area, would be contrary to Section 9.3.1 *Rural Enterprise and Economy* of the Longford County Development Plan 2021–2027, which seeks to ensure that rural enterprise is appropriately located and supports sustainable patterns of development and the consolidation of industrial activity within serviced locations. Furthermore, having regard to the exceptionally close proximity of an existing sensitive residential receptor, approximately 4 metres from the site boundary, and the inherent uncertainty associated with the predictive atmospheric dispersion modelling, including the reliance on meteorological data from 2016–2020 without a more recent or sensitivity-based assessment, the Commission is not satisfied that the proposed development would not adversely affect the residential amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Darragh Ryan

Planning Inspector
19th of August 2026