



An
Coimisiún
Pleanála

Inspector's Addendum Report ABP-322407-25

Type of Appeal	Dispose of materials and raise ground level with all associated site works
Location	Lettergullion , Drumlish , Co. Longford
Applicant	Blessington Stone & Concrete Limited
Planning Authority	Longford County Council
Planning Authority Ref	2460077
Appellant	Eammon Brady
Planning Authority Decision	Grant of Planning Permission.
Inspector	Darragh Ryan

1.0 Preliminary

1.1. This report has been prepared pursuant to a Coimisiun request (Coimisiun Direction number CD-020450-25) which seeks the preparation of an addendum report. The Coimisiun decided to defer consideration of this case and issue a Section 132 notice to the applicant regarding a request for additional information.

1.2. The file has been referred back to the inspectorate to address the additional information sought by the Coimisiun as follows:

- Submit details of the rationale for placing /deposition of the inert materials on site
- Provide details regarding the source of inert materials specifically whether or not all the inert material to be deposited on the subject site is associated with the adjacent quarry or whether material may be sourced from other locations
- Indicate the approximate number of trees to be felled in order to accommodate the deposition of materials and impact on traffic generation as a result of the development
- State the duration of the period under which it is proposed to deposit the inert materials
- Comment on whether it is considered the proposed development falls within the provisions of Class 11(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 as amended.

2.0 Assessment

2.1. Introduction

2.1.1. In this, my addendum report, I have confined myself to the matters set out within the Commission direction, namely further details in relation to nature and source of inert materials and numbers of trees to be felled. Further consideration of requirement for EIAR will be addressed and assessment of the Schedule 7A documentation provided by the applicant shall be carried out.

2.2. Rationale for Development/ Source of Inert materials (Items A – D of Coimisiun Direction)

2.2.1 The purpose of the deposition of inert material is to screen off a section of the extracted quarry via the creation of a berm which shall be suitably landscaped. It is

stated that the creation a berm will create both a visual and a noise barrier to the surrounding area. I note response of the third-party appellant to the submitted information states that the provision of a berm will not provide any screening or sound barrier from the quarry itself.

2.2.1. Under the terms of permission Ref: 19/197, development was approved for blasting, crushing, screening, and washing of material across a 26-hectare site. The current red line boundary, measuring 1.98 hectares, lies within the previously permitted extraction area. The current application seeks permission for the removal of existing coniferous trees, infill of the site using inert material and subsequent replanting with coniferous species. Approximately 50,000 tonnes of inert material will be imported, resulting in a maximum change in ground level from 127m OD to 134m OD—a differential of approximately 7 metres.

2.2.2 Having reviewed the information supplied in this regard, I note the stated purpose of the inert deposition is to provide a berm for visual screening and to provide a noise barrier. I note no further detail has been provided with regard to the level of visual screening or noise reduction. It is stated the material is to come from the site itself and from other building sites where there is inert material available. A berm is proposed along the northern and eastern boundaries to protect the retained mature treeline and assist in landscape integration. While the land is designated “Agricultural,” under the Longford County Development Plan 2021 to 2027 the Plan does not preclude the filling of land with inert material. This practice is consistent with recognised land management techniques within agricultural settings and is acceptable in principle. I consider the filling of land with inert materials for the purposes of visual screening to be an acceptable intervention of lands that are already heavily modified.

2.2.2. The inert material will be transported to the site via the same trucks that remove quarry product from the site to the various building sites. The applicant states that this practice will have no material change on traffic levels as the material that will be brought to the site will be the same trucks that will be removing quarried stone from the site. The total tonnage of inert material to be deposited will be approximately 50,000 tonnes over a 5-year period. The applicant has stated that the total annual tonnage will not exceed 10,000 tonnes per year. The proposed development is located off local road L- L0223 which is a well-maintained local road. While the traffic

entering and leaving the site will vary throughout the course of the year, I do not consider it to be detrimental to local traffic conditions as the dispositioning of material will occur over a 5 year period.

2.2.3. The applicant states that there will be no deciduous trees felled as part of the proposed development. The existing mature deciduous treeline, including oak trees are to be retained in full. Approximately 500 non-native coniferous (forestry) trees are to be felled. The existing trees to be removed are approximately 7 years old and 4–5 metres in height. The third party states the stated number of trees to be felled cannot be accurate as the usual stocking density is typically 2500 trees per ha. Further reference is made to the climate action plan leading from the Paris agreement of 2015 for the reduction of global carbon footprint.

2.2.4. The applicant has submitted an “Ecological Impact Assessment (EclA)”, prepared by Coyle Environmental, as part of their further information submission to the planning authority. This report forms the basis for assessing the proposal in light of biodiversity concerns and relevant planning policy including climate action policies. The applicant confirms that the existing mature deciduous treeline, including oak trees, are to be retained in full, and that existing bee hives on site will also be retained in situ and later relocated at an appropriate time. These measures directly respond to the issues raised by the appellant and reflect best practice in biodiversity conservation within a working landscape.

2.2.5. Chapter 12 of the Longford County Development Plan 2021–2027 sets out clear objectives for the protection and enhancement of biodiversity and landscape features. In particular, Policy Objective CPO 12.78 seeks to protect existing mature deciduous trees, woodlands and groups of trees, especially native and broadleaf species, where they are of amenity or ecological value.

The findings of the EclA are summarised as follows:

- The dominant habitat on site is Conifer Plantation , which is assessed as having low ecological value.
- No evidence of protected species was recorded. Nine common bird species were observed on site, none of which are listed as protected under relevant legislation.

- Mammal runs were observed on boundary banks, though no evidence of burrows or scat was found. These areas are noted on the habitat map (Figure 6 of the report).
- A bat habitat assessment was undertaken, concluding low roost potential and limited foraging potential within the site. No evidence of bats was recorded.
- A number of mature oak trees along the site boundaries were identified as having local biodiversity value, and their retention is recommended.

Section 6.2 of the EclA outlines key ecological mitigation and protection measures, including:

- Retention of the mature treeline (see Figure 7 of the report), in accordance with the proposed layout.
- Implementation of a root protection buffer zone between the berm and retained trees, extending beyond the crown of the largest specimen.
- Pre-felling bat inspections by a qualified ecologist, should any mature tree require removal.
- All scrub, tree, and hedgerow removal to occur outside the bird nesting season (1st March–31st August), in accordance with Section 22 of the Wildlife Act 1976 (as amended).
- Adherence to Inland Fisheries Ireland (2016) best practice for works near watercourses, including use of silt fencing and buffer zones along drainage ditches.
- Invasive species survey to be undertaken during the growing season (May–August) prior to commencement of works.

Having regard to the above, I am satisfied that the applicant has adequately addressed biodiversity concerns through both the retention of valuable habitats and the adoption of best practice ecological safeguards. The site, while partially vegetated, is a previously disturbed area within a permitted quarry complex, and the overall ecological value is low.

2.2.3 Regarding the level of tree loss on site and Climate Action Plan 2025, I note that all trees to be felled are non-native coniferous trees. These trees are part of a crop cycle and are effectively managed through continuous felling and replanting.

Although the felling in this cycle would be earlier than what is originally desired, the trees still have a commercial and viable use as a renewable resource out of the ground. The applicant has clearly stated intention to replant, to ensure the renewability of the resource. I am satisfied that the felling of trees in this instance does not negatively impact upon the aims and objectives of the Climate Action Plan as referenced by the appellant in this instance.

2.2.4 The proposal demonstrates consistency with the objectives of the Longford County Development Plan, particularly Policy Objective CPO 12.78, by retaining existing mature deciduous trees and implementing measures to mitigate potential biodiversity impacts. The proposed development does not conflict with the plan's stated aims to protect natural heritage. In conclusion, I do not consider biodiversity impacts to constitute a significant or determining issue in this case. The applicant's measures are proportionate and appropriate to the site context. Subject to adherence with the mitigation recommendations set out in the EclA, I am satisfied that the proposed development will not give rise to significant negative ecological effects.

2.3 Schedule 7A information provided – (Item E of An Coimisiun Pleanála Direction)

2.3.1 As part of response to the request of An Comisiun Plenala the applicant has submitted Schedule 7A information. The applicant states that the proposed development is sub threshold as the total annual tonnage of inert material brought to site will be below the 25,000 tonnes (annually) as set out within Class 11 (b) of Schedule 5, Parts 1 and 2 of the EIAR Directive.

2.3.2 Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended (2001 Regulations), and section 172(1)(a) of the Planning and Development Act 2000, as amended (2000 Act), identify classes of development with specified thresholds for which EIA is required.

2.3.3 I identify the following classes of development in the 2001 Regulations as being of relevance to the proposal:

- Class 11(b) relates to infrastructure projects that involve:

“Installations for the disposal of waste (unless included in Part 1 of this Schedule) with a capacity exceeding 25,000 tonnes per annum involving landfilling, reclamation or other deposit of waste.”

- 2.3.4 As such, the criteria in Schedule 7 of the 2001 Regulations are relevant to the question as to whether the proposed sub-threshold development would be likely to have significant effects on the environment and should be the subject of EIA. The criteria include the characteristics of the project, the location of the site, and any other factors leading to an environmental impact. Screening Determination for Environmental Impact Assessment.
- 2.3.5 The applicant has submitted an Environmental Impact Assessment screening report (EIASR) with the application addressing issues which are included for in Schedule 7A of the 2001 Regulations.
- 2.2.6. Based on the criteria in Schedule 7 of the 2001 Regulations, I have carried out an EIA screening determination of the project (included in Appendix 1 below of this report). I have had regard to the information provided in the applicant’s EIASR and other related assessments and reports included in the case file. I concur with the nature and scale of the impacts identified by the applicant and note the range of mitigation measures proposed. I am satisfied that the submitted EIASR identifies and describes adequately the effects of the proposed development on the environment.
- 2.2.7. I have concluded that the proposed development would not be likely to have significant effects (in terms of extent, magnitude, complexity, probability, duration, frequency, or reversibility) on the environment and that the preparation and submission of an environmental impact assessment report is not therefore required.

This conclusion is based on regard being had to:

- a) The nature and scale of the project, which is below the thresholds in respect of Class 11(b) in terms of annual tonnage transported to the site.
- b) The location of the site on modified lands where there is an existing working quarry.
- c) The nature of the deposition of inert material.

f) The guidance set out in the 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development', issued by the Department of the Environment, Heritage, and Local Government (2003).

g) The criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended.

h) The available results, where relevant, of preliminary verifications or assessments of the effects on the environment carried out pursuant to European Union legislation other than the EIA Directive.

5.0 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 plans and particulars received by the planning authority on the 13th day of March 2025 and An Coimisiun Pleanála on the 3rd of October 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 recommendations contained in section 5.2 of the Ecological Impact Assessment, shall be implemented in full.

Reason: To protect local biodiversity.

3. The volume of inert material imported and deposited on the site shall not exceed 10,000 tonnes in any calendar year.

Reason: To ensure compliance with the Planning and Development Regulations

4. No part of the site shall be raised by more than the finished levels shown in the revised site layout received by way of further information on 13th March 2025.

Reason: In the interests of clarity

5. The disposal of surface water shall comply with the requirements of the planning authority for such works and services. Prior to the commencement of development, the developer shall submit details for the disposal of surface water from the site for the written agreement of the planning authority.

Reason: To prevent flooding and in the interests of sustainable drainage

6. 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 Coimisiún 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.

Darragh Ryan

Planning Inspector

12th of January 2026