



An Taisce

The National Trust for Ireland

5 Foster Place

Dublin 2, Ireland

D02 V0P9

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An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

Sent by email to bord@pleanala.ie

23rd July 2024

Ref: ABP-319612-24

App: Scotshouse Quarries

For: Application for Prospective Development Consent by Scotshouse Quarries, Aghnaskew, Scotshouse, Co. Monaghan under Section 37L to be assessed in parallel with Section 177E Substitute Consent Application (ABP-316144-23). The development concerns an extension of Scotshouse Quarry (per Planning Reference 83/09) and the site covers an area of 14.6 hectares.

Site: Aghnaskew, Scotshouse, Co. Monaghan

A Chara,

We thank you for referring the above application to An Taisce for comment.

Impacts to Water Quality

We note a letter sent from Monaghan County Council to the Board, dated the 7th of June 2023, which identifies that, "*Scotshouse Quarries is located within the Gortnana_010 Waterbody. This waterbody is at Moderate Status (2013-2018). The site lies on a poor aquifer on an area of extreme groundwater vulnerability.*" Therefore, the requirements of assessment under the Water Framework Directive (WFD) should be adhered to. This requires assessment against *Article 4* of the WFD to determine whether the project may cause a deterioration of the status of a surface or ground water body or if it may jeopardise the attainment of good surface or ground water status or of good ecological potential and good surface or ground water chemical status.

In order to determine whether any contamination of the waterbody was evident, "*The watercourse at the discharge point and further downstream was inspected and no visual evidence of contamination was noted. The site continues to operate in accordance with their Licence to Discharge Trade Effluent to Waters under Local Government (Water Pollution) Act 1977 as amended*". However, we note that the Council only carried out a visual inspection of the watercourse at the discharge point which is insufficient with regard to determining the full environmental impact. We submit that a water sample should be collected and scientifically evaluated to determine whether contamination has occurred. A survey of suspended solid and hydrocarbon concentrations would be particularly important.

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Olivia Rogers, Rónán O'Brien, Finbarr Murray, Helen Shaw, Terri Morrissey, Sinead Mercler, Phil Doyle

We would also note a concerning observation made during a survey referenced by the applicant of water outflow from the outfall pipe in which algae was observed on large cobbles within a stream and the water discharge was of a grey colour (EIA Vol 2, p.80). We submit that Monaghan County Council immediately engages in a monitoring exercise to confirm that this discharge is not exceeding the parameters contained in the Trade Effluent Discharge Licence (WP26/15); temperature, pH, Biological Oxygen Demand, Suspended Solids, Molybdate reactive phosphate (P), ammonia (N). Grey water and algae are indicators of potential degradation which needs to be assessed as a preliminary matter. Furthermore, the Council should project the changes which the subject proposal's activity will bring with regard to the aforementioned parameters.

Presence of Archaeological Feature

We note that there may be a ringfort present to the west of the quarry area. According to the Historic Environment Viewer map, this monument was described c. 1940 as a subcircular area defined by a stony bank and hedge, with no visible fosse. Therefore, there is a need to ensure that a robust Archaeological Impact Assessment has been conducted, particularly to verify the applicant's claim that *"there is some skepticism as to whether the purported monument was ever actually present", "the evidence on site is unconvincing and inconsistent with the nature of the monument as recorded"*.

Operational Timeframe

The applicant states that *"the appropriate term for the development is 35 years"* which is excessive and does not allow for review of quarrying operations after a 10-year period, which would be prudent in terms of assessing compliance with planning conditions.

Vegetation Removal

It appears that the applicant will engage in removal of hedgerow, treelines and scrub habitats to facilitate the proposed development, which act as nesting, foraging and commuting ground for bats, mammals and birds. We submit that these require replacement if they cannot be retained in the first instance. The applicant acknowledges that there will be a *"Short-term negative impact on local bird populations. There are suitable habitats in the immediate area that can be utilised in the long-term by displaced birds"*. Rather than reliance on these alternative habitats, we submit that supplementary planting is carried out to ensure no net loss of biodiversity value from vegetation removal. We would query the planting proposed by the applicant, *"The overburden removed during the expansion work will be used to create berms at the Site boundaries, which will be planted with native species"*. We advise that assessment is made of how effectively plants can colonise these berms as the rocky subsurface could impact the ability of the root systems to operate properly.

Supplementary Planting

The amount of hedgerow and other vegetation removal is significant and requires a management plan for supplementary planting of an equivalent length. This should be clarified in a further information request or instated as a planning condition, should development consent be granted. This will ensure no net biodiversity loss for the area. Waiting until implementation of the restoration plan (at least 35 years) would be too late.

The applicant states that, *"The planted trees will be inspected by a suitably qualified arborist two years after initial planting and then as necessary until 5 years after the cessation of operations. This action is to ensure they are growing as expected and to determine if the existing hedgerows require supplemental planting"*. We submit that a Biodiversity Management Plan would be useful for ensuring a more continuous monitoring of biodiversity features, rather than the proposed 2 years, as well as planning for the planting of native species of Irish provenance and avoiding the import of species which carries a disease threat such as the Hawthorn Fireblight disease. We also note the presence of mature ash within the site, an increasing rarity in the country due to Ash Die-back Disease, and submit that preserving this species is desirable.

Trade Effluent

We note that a Trade Effluent Discharge Licence was granted by Monaghan County Council under ref. 14/124. This is collected and held within a pit containing 4 x linked settlement tanks. Water goes through the four tanks before discharging at the southeast of the site via a hydrocarbon class interceptor. Then it flows via a pipe to an open roadside drain which flows to the northwest through agricultural land before discharging to a wetland area downstream of Dunsrim Lough.

We submit that there is a need to give close consideration to the quality of the effluent which discharges downstream of Dunsrim Lough. This discharge could act as a potential pathway for suspended solids from on-site activities to enter into the connected drainage network which joins the Gortnana river for example. This is particularly important given that the Gortnana river, which is hydrologically connected to the Lough, is at risk of not achieving good water quality status under the WFD by 2027. It appears to be a wetland area of ecological value with shrubs visible via satellite imagery and the presence of cut over raised peat which is a wetland indicating sediment, as identified by a Wetlands Survey Ireland map¹. These could be indicators of flora and fauna ecological receptors which are likely to contain birds and plants.



EPA ArcGIS Map

Please acknowledge our submission and advise us of any decision made.

Is mise le meas,

Seán O'Callaghan

Planning Officer

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¹ <https://www.arcgis.com/apps/View/index.html?appid=e13b75c3bcab4932b992aa0169aa4a32&extent=-8.2467,53.7516,-7.7533,53.9208>

