

File With _____

SECTION 131 FORM

Appeal NO: ABP 322336-25

Defer Re O/H

Having considered the contents of the submission dated/ received 19/5/25
from

Applicant I recommend that section 131 of the Planning and Development Act, 2000
be not be invoked at this stage for the following reason(s): No new issues raised

E.O.: Gathy Carleton

Date: 22/5/25

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage.

Section 131 to be invoked – allow 2/4 weeks for reply.

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

From: Peter Kinghan <pkinghan@quarryconsulting.ie>
Sent: Monday 19 May 2025 10:21
To: Appeals2
Subject: ABP-322336-25
Attachments: 250519.65.01.MCGRATHS LIMESTONE.ABP LETTER FINAL.pdf

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir / Madam

Refer to correspondence attached.

Regards
Peter

Peter Kinghan
Chartered Mineral Surveyor
Chartered Geomatics Surveyor
Registered Valuer (MCSI MRICS)



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PLANNING SUBMISSION

19th May 2025

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Our Ref: McGraths Limestone Works Ltd.

Dear Sir / Madam,

RE: RESPONSE TO THIRD-PARTY APPEAL ABP-322336-25

We act on behalf of McGraths Limestone Works Limited in relation to Mayo Co Co: Plan File Ref. No. 2560055 & ABP-322336-25. In response to the third party appeal accompanying your letter dated the 29th April 2025 we acknowledge the concerns raised by the appellant and would like to address them directly, providing clarification on the key points:

1. Storm and Application Notice

The application was submitted on **31 January 2025** and the public submission deadline was set for **6 March 2025**, which is within the usual timeframe for public consultation. The storm (Storm Eowyn) occurred on the **24 January 2025** and affected the area for a period of time. It is understood that some delays were caused by local power outages, but these were of limited duration and did not extend beyond a few weeks. A Public Notice was placed at the quarry entrance, and local newspaper notices were published as required by planning regulations. The application was also available on the local authority's planning website. The applicant received no indications that the public was unaware of the application, especially given McGraths' longstanding relationship with the community.

2. Health and Safety (Fine Dust Exposure and Radon)

Concerns regarding fine dust exposure, radon, and health impacts on nearby households have been addressed in the *Population and Human Health* chapter of the submitted EIAR. This includes an assessment of dust emissions from quarry operations and a review of available radon data in the region. Mitigation measures have been established, including dust suppression techniques (e.g.,

water sprays, wheel washes) and regular monitoring. Francisa et al. (2023) investigated radon concentrations in open cast mining environments and concluded that “in outdoor workplaces, radon can be considered a low risk to employees’ health. The average exposure to radon gas, even in cases where exposure to mineral dust is continuous, did not exceed unsafe values considered by international standards during the measurements.” Radon is a gas that disperses quickly in outdoor environments, and outdoor concentrations are not considered to pose a significant health risk¹.

3. Expansion of the Quarry

There is no proposal to expand the quarry footprint or increase its production capacity. The planning application solely pertains to deepening part of the existing permitted quarry footprint, from 5 mOD to -12 mOD, within the 19-hectare area that is already approved for extraction. Therefore, there is no increase in output or changes to the current operational setup.

4. Dust Suppression and Control Measures

Concerns regarding dust suppression are addressed in the Air Quality Chapter of the EIAR. The quarry employs multiple dust control methods, including the use of water sprays, wheel washes, and regular monitoring of dust levels at the site boundary. The monitoring results demonstrate that dust emissions are well within acceptable limits, and any potential impacts on surrounding properties are minimal. Furthermore, it is important to note that the proposed development involves deepening within an existing quarry void, meaning that as extraction progresses further below surrounding ground levels, the potential for dust emissions to disperse beyond the site boundaries will significantly decrease due to natural enclosure and increased shielding from surrounding landform.

Environmental Monitoring (Existing and Proposed)

The site is already subject to ongoing environmental monitoring in compliance with industry standards. The conditions of the Section 4 Licence for discharge monitoring (W/391/05_R1, 2019)

¹ Reference

[1] World Health Organization (WHO). *WHO Handbook on Indoor Radon: A Public Health Perspective*. WHO Press, 2009.

specify continuous monitoring for key parameters, including pH, temperature, and turbidity. Furthermore, the quarry has a well-established monitoring program for dust, air quality, and groundwater. The Environmental Monitoring Plan is regularly reviewed and updated to ensure it remains in line with industry guidelines.

5. New Road and Traffic

There is no intensification of quarry operations proposed, and therefore, no increased traffic volumes associated with this application. The concern regarding a proposed new road is unrelated to the quarry application; the new road development is a separate issue that is part of the local infrastructure planning process, aimed at addressing general traffic concerns in Cong. The quarry has been operating without significant traffic-related issues, and the proposed deepening of the quarry will not result in an increase in vehicle movements or HGV traffic.

6. Saturday Working and Blasting Times

The application proposes that no blasting occur on Saturdays. The quarry operates between 07:00 and 18:00, Monday to Saturday, with blasting strictly controlled and conditioned. The hours for blasting and operational activity are consistent with industry guidelines and local authority requirements, ensuring minimal disturbance to the surrounding community. The proposal includes measures to minimise noise and dust on weekends, and we believe the proposed working hours are reasonable and appropriate.

7. Contrary to Climate Act

We respectfully disagree with the assertion that the proposed development contradicts the Climate Action and Low Carbon Development (Amendment) Act 2021. Limestone and aggregates are essential materials for building infrastructure, including roads, buildings, and utilities, which are necessary to meet Ireland's climate and development goals. Quarries play a crucial role in providing these materials, which are integral to sustainable construction and the development of green infrastructure. The use of recycled materials as a substitute for limestone aggregates is not currently feasible on the scale required for national infrastructure projects, as detailed in the Alternatives Chapter of the EIAR.

8. Recycling Alternatives for Limestone

While the application acknowledges the potential benefits of using recycled materials, it is important to note that the demand for limestone and aggregates remains high. Replacing all limestone with recycled alternatives, such as crushed concrete or rubber tyres, is currently not feasible due to quality limitations and the scale of production required. The Alternatives Chapter in the EIAR details the challenges associated with replacing limestone aggregates with recycled materials, highlighting that such alternatives cannot meet the necessary standards for many construction applications.

Conclusion

In summary, the proposed development seeks to deepen the existing quarry floor *within the already permitted and operational footprint of the quarry*. It does not involve any expansion of the site boundaries, nor does it propose any increase in extraction output, vehicle movements, or intensification of activity.

As the quarry floor is deepened further below existing ground levels, the potential for environmental impacts such as noise, dust, and vibration will decrease due to increased physical screening, vertical distance from receptors, and the continued use of best practice mitigation and monitoring measures.

All relevant environmental effects – including those related to population and human health, dust, noise, vibration, water, and traffic – have been fully assessed in the EIAR. The assessments were carried out in accordance with established Irish and EU guidance and regulations, and reflect the current, detailed understanding of operations on-site.

The development has already been granted permission by Mayo County Council following a thorough assessment process. We respectfully submit that the concerns raised in the appeal have either been addressed in the planning application documentation or are not supported by the evidence. We therefore request that An Bord Pleanála uphold the grant of permission.

Yours sincerely



Peter Kinghan

Chartered Mineral Surveyor

Quarry Consulting