

14 September 2026

Submission by Hand

An Coimisiún Pleanála
64 Marlborough Street
Dublin1
D01 V902

SLR Project No.: 501.00180.065512

Planning Reference No.: **PD/25/60577** (Roscommon County Council)

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
14 SEP 2026	
Fee: €	3000 Type: <u>CARD</u>
Time: 14:46	By: <u>Hand</u>

RE: 1st Party Appeal of Decision to Refuse Permission

Roadstone Limited:

Continued Use of Existing Permitted Quarry Development, Cam Quarry, Curry & Cloonacaltry Townlands, Brideswell, Co. Roscommon,

Notification of Planning Permission Refusal: PD/25/60577

1.0 Introduction

This first party appeal is made by SLR Consulting Ireland, Unit 7, Dundrum Business Park, Windy Arbour, Dublin, D14 N2Y7, as agent acting on behalf of the appellant, **Roadstone Limited**, Fortunestown, Tallaght, Dublin 24, D24 PKK2.

All correspondence relating to this appeal should be directed to the agent, SLR Consulting Ireland, at the above address.

We refer to the Notification of Decision to refuse permission by the Planning Authority, **Roscommon County Council**, Plan. Ref. No. **PD/25/60577** dated 17th August 2026; copy attached.

The applicant is appealing the notification decision by the Planning Authority to refuse permission, and accordingly, we request An Coimisiún Pleanála to consider this appeal under the provisions set out in Section 37 of the Planning & Development Act, 2000 (as amended).

The appropriate fee for the appeal is **€3,000**; being an appeal that does not include retention; does relate to commercial development; and does include an EIAR and NIS.

The refusal decision would appear not to be based on any identified adverse effect arising from discharge to ground. Rather, it is based on residual uncertainty regarding dewatering requirements and on concerns originally framed around a proposed discharge to the Ballyglass River that had been removed from the development proposal during the Further Information process. Accordingly, the refusal should be set aside and a fresh assessment undertaken having regard to the amended water management strategy before the Coimisiún, as presented below.

We would respectfully request that An Coimisiún Pleanála expedite the decision making process in relation to this appeal owing to the current planning permission expiring in May 2027 and the importance of the quarry as a strategically important supply of aggregates to the whole of Athlone town and the wider area, and as a significant source of employment.

2.0 Reasons for Refusal

Two reasons for refusal were attached to the Roscommon Co. Council Notification of Decision to Refuse to Grant Permission dated 17th August 2026 as follows:

2.1 Reason No. 1

The Planning Authority in consultation with Roscommon County Councils Environment Department is not satisfied based on submissions received that it has been satisfactorily evidenced that dewatering will not be required to facilitate the proposed development and that satisfactory proposals for and assessment of dewatering arrangements have been provided. It is considered therefore that based on the information submitted in the Environmental Impact Assessment Report (as updated) and as identified in the Environmental Impact Assessment carried out by the Planning Authority, a sufficient level of information and assessment has not been provided in relation to impacts on Water and Biodiversity (with particular attention to Habitats and Birds Directives).

Having regard to the foregoing, it is therefore concluded that there is insufficient information and insufficient mitigation measures provided for the competent authority to make an EIA determination that there is an acceptably low likelihood of environmental effects of a magnitude which would give rise to a significant effect on sensitive environmental receptors as a result of the proposed development proceeding. Therefore, if permitted, the proposed development would be contrary to the provisions of policy objectives ED 6.17 and ED 6.18 set out in the Roscommon County Development Plan 2022-2028 and would be contrary to the proper planning and sustainable development of the area.

2.2 Reason No. 2

The site of the proposed development is potentially hydrologically connected to 7 no. designated European sites (listed below) for rare and threatened flora and fauna across the European Union (i.e. Natura 2000 network of sites), which are protected under the EU Habitats Directive (92/43/EEC). The protection of these European sites is further reinforced in the 2022 – 2028 Roscommon County Development Plan under Policy Objectives NH 10.8, NH 10.9 and ED 6.18.

Based on the deficiency in information included with the planning application including, inter alia, the absence of detailed evidence to substantiate that dewatering is not required to facilitate the proposed development and/or detailed proposals to manage dewatering in the quarry, and the concerns identified by the Planning Authority in relation to the robustness of the mitigation measures proposed, deficiencies in the information contained in the NIS concerning potential impacts of the project on qualifying interests of the European Sites, the Planning Authority in conjunction with the application of the precautionary principle, consider that adverse effects on the integrity and conservation objectives of the European sites in the vicinity, cannot be ruled out, as a result of the proposed project.

Therefore, the Planning Authority is not satisfied that the development, if permitted, would not potentially adversely affect the integrity of Lough Croan Turlough SAC (site code 000610), Castlesampson Esker SAC (site code 001625), Four Roads Turlough (site code 001637), Lisduff Turlough (site code 000609), Lough Croan Turlough SPA (site code 004139), River Suck Callows SPA (site code 004097) and Four Roads Turlough SPA (site code 004140), having regard to their conservation objectives. Therefore, if permitted, the proposed development would be contrary to the above referenced policy objectives contained in the current Roscommon County Development Plan, and would be contrary to the proper planning and sustainable development of the area.



3.0 Existing Quarry Development

The limestone quarry at Cam has been in continuous operation by Roadstone since planning permission was granted in 2006 by Roscommon County Council (and subsequently upheld by An Bord Pleanála (ABP) following a third party appeal): P. Ref, PD/04/1479 (ABP PL 20.215417).

The permitted development consisted of:

- *development of a quarry on c.68 hectares of lands, of which c.23.7 hectares is the extraction area.*
- *The proposed development is for extraction of limestone using conventional blasting techniques and processing of rock using crushing and screening plant.*
- *The proposal also includes for provision of:*
 1. *a concrete block making facility and concrete batching plant,*
 2. *a truck washdown facility with wash water recycled via a closed settlement tank system,*
 3. *the storage of aggregates, ESB substation (26m²),*
 4. *portacabin office facilities including canteen and washroom facilities (91m²),*
 5. *a workshop including storage room, canteen and washroom (485m²),*
 6. *septic tank and percolation area,*
 7. *bunded fuel storage area,*
 8. *vehicle circulation/access including wheelwash and weighbridge, settlement tanks/hydrocarbon interceptors for treatment of water,*
 9. *construction of overburden and screening mounds, all other associated site works and ancillary activities.*

The existing quarry is considered strategically important at a regional level (Midlands / Athlone), owing to:

- **Construction materials supply:** The quarry provides limestone aggregate used in roads, housing, commercial construction, and infrastructure projects across the Midlands and western regions.

Local quarries are **strategically valuable** because aggregate is expensive to transport long distances and the quarry is one of the last operational sites that is in close proximity to Athlone town.

Retaining local aggregate production reduces dependence on imports or material hauled from distant quarries, helping control project costs and supply risks to local projects in Athlone.

- **Employment and economic activity:** The existing operation supports around **30 full-time jobs**, including direct employees, sub-contractors (e.g. drilling and blasting), contract hauliers, maintenance contractors, material suppliers, etc.

It is envisaged that this level of employment will be maintained going forward as long as the site remains operational.



4.0 Proposed Development

4.1 Original Application Details

A planning application with an accompanying Environmental Impact Assessment Report (EIAR) and Appropriate Assessment (AA) Screening & NIS report, were submitted to Roscommon County Council in December 2025 to **effectively continue the development of the quarry in line with that previously granted** in 2006. The proposed development was to consist of:

- *Permission for continued use of the existing quarry development currently permitted by P. Ref. 04/1479 and ABP PL20.215417 for a further period of 25 years, within an application area of c. 66.3 hectares, with an extraction area of c. 17.1 hectares and permanent overburden storage area of c. 3.9 hectares;*
- *Permission for continued use of the permitted facilities consisting of: ESB substation (26m²), portacabin office facilities including canteen and washroom facilities (91m²), bunded fuel storage, vehicle circulation/access including wheelwash and weighbridge, settlement tanks/hydrocarbon interceptors for treatment of water, construction of overburden and screening mounds, all other associated site works and ancillary activities;*
- *Permission for continued extraction of limestone using conventional blasting techniques and processing of rock using crushing and screening plant;*
- *Upgrade of the existing WWTS and percolation area to new Secondary WWTS and constructed soil polishing filter area;*
- *Provision of the permitted concrete block making facility and concrete batching plant, truck washdown facility with wash water recycled via a closed settlement tank system, the storage of aggregates; and workshop including storage room, canteen and washroom facilities (485m²); and*
- *Restoration of the overall application site to a natural habitat including a permanent waterbody.*

4.2 Further Information Request from Planning Authority

A detailed Further Information (FI) request was issued by Roscommon County in February 2026. Having reviewed the FI request, the water-related concerns were overwhelmingly focused on **discharge to the surface watercourse**, namely the Ballyglass River/Stream, rather than discharge to ground.

No specific Further Information question appeared to raise concerns about a proposed discharge of quarry water to ground.

The key concerns were in Items 8, 13 and 14 of the FI Request, all of which focused on the proposed dewatering discharge to the Ballyglass River and its downstream effects. Specifically, the Planning Authority sought:

- Justification for not managing water within the site instead of discharging off-site to the Ballyglass River;
- Details of the discharge outfall, headwall, and discharge infrastructure to the Ballyglass River;
- Measures to control discharge to the river;
- Detailed assessment of impacts on the receiving waterbody including;
 1. water quality,



2. turbidity,
 3. sedimentation,
 4. riverbank scour,
 5. hydromorphological change,
 6. contaminants,
 7. Water Framework Directive (WFD) status.
- Assessment of impacts on the hydrologically connected River Suck Callows SPA;
 - An Assimilative Capacity Study for the Ballyglass River;
 - Updated hydrology modelling assessing impacts on the Ballyglass River;
 - Flood risk impacts on the Ballyglass River;
 - Demonstration that the outfall pipe can accommodate the proposed discharge volume.

4.3 Further Information Response to Planning Authority

To alleviate the concerns raised by the Planning Authority regarding off site discharge to the Ballyglass River, the applicant revised the development scheme.

The following amendments are proposed to the original planning application details submitted under planning ref. 25/60577. These consist primarily of a reduced quarry extraction design (in surface area and depth) and the omission of several previously permitted elements. The proposed amendments were shown on Drawing FI-1 submitted with the FI response. A copy of Drawing FI-1 is included with this appeal submission.

- **Reduction in Overall Depth of Extraction**

It is proposed to reduce the depth of extraction by **25 metres**, changing the previously permitted depth from **40m AOD** to **65m AOD**.

This reduction will eliminate the requirement to dewater and discharge water off-site to the Ballyglass River.

- **Reduction in Quarry Extraction Footprint**

It is proposed to reduce the proposed quarry extraction footprint area from c. **17.1 hectares** to c. **12.9 hectares**.

This reduction will eliminate the development from encroaching any further into existing grassland areas within the site over the life of the planning permission (i.e. all development will be carried out within existing areas of disturbed ground where topsoils have already been removed).

Accordingly, **no Annex I grassland habitat** will be affected.

- **Reduction in Proposed Development Life**

The reduced quarry extraction area (in both area and depth) will consequently shorten the overall development life.

Planning permission is now sought for a **10-year timeframe**, reflecting the revised scale of the scheme.

- **Removal of Proposed Water Management System for Discharge of Waters to Ballyglass River**

As the revised extraction depth removes the need for any dewatering and off-site water discharge, the previously proposed **Water Management System**, including the



hydrocarbon interceptor and all associated **discharge pipework along the public road** to the Ballyglass River, is no longer included within this planning application.

As a result, **no Annex I grassland habitat** will be disturbed in this area.

- **Removal of Proposed Block Yard Area**

The previously permitted **block yard area** for the manufacture and storage of blocks is no longer included within this planning application.

Accordingly, **no Annex I grassland habitat** within this area will be affected.

The installation of the previously permitted **concrete batching plant** remains part of the proposal. This will be located on **existing disturbed ground**, ensuring **no impact** on Annex I grassland habitat.

- **Removal of Proposed Workshop building**

The previously permitted **workshop building** has been removed from the current application.

As with other omitted elements, **no Annex I grassland habitat** will be disturbed in this location.

These amendments are illustrated in the updated EIAR Chapter 2 Figures and corresponding Planning Drawings:

- EIAR Chapter 2 - **Figure 2-3 R1 Proposed Layout** / **Planning Dwg-6 R1**
- EIAR Chapter 2 - **Figure 2-4 R1 Cross Sections** / **Planning Dwg-7 R1**
- EIAR Chapter 2 - **Figure 2-5 R1 Restoration Plan** / **Planning Dwg-8 R1**
- EIAR Chapter 2 - **Figure 2-6 R1 Restoration Sections** / **Planning Dwg-9 R1**

4.3.1 Annex 1 Habitat

The proposed reduced quarry extraction footprint and omission of the various development items highlighted above **will result in the containment of all development** to the existing disturbed footprint over the life of the planning permission.

There will be **no impact / disturbance** to any existing **in-situ grasslands or Annex I grassland habitat** over the life of the planning permission.

4.3.2 EIAR / NIS Updates

The information contained in the Further Information response was considered not to introduce any new proposals. All changes related solely to the removal of previously permitted development that already has previously been assessed. Nonetheless, updated EIAR chapters and NIS (provided under separate cover) were prepared to reflect these amendments and submitted with the Further Information response, specifically:

- EIAR Chapter 2: Project Description
- EIAR Chapter 5: Biodiversity
- EIAR Chapter 7: Water
- EIAR Chapter 8: Air Quality
- EIAR Chapter 10: Noise
- EIAR Non-Technical Summary
- Natura Impact Statement (NIS)



5.0 Existing Quarry - Water Management

5.1 Water Management

Surface water run-off within the quarry is currently managed entirely on-site by Roadstone. The quarry is operated without the requirement to pump or discharge water off-site to any surface watercourse.

Surface water run-off from rainfall within the quarry extraction area is managed within the quarry footprint. Water naturally accumulates at the lowest point of the excavation in the southwestern corner of the quarry (hereafter referred to as the Sump / Infiltration Area) and infiltrates naturally to ground, as illustrated on **Drawing ACP-1**. Ground levels within this area range from approximately 62m AOD to 65m AOD.

The extent of surface water run-off accumulation / infiltration within the Sump / Infiltration Area is seasonal and varies throughout the year in response to prevailing weather conditions. During the late autumn, winter and spring months, water is typically present within the Sump Area / Infiltration, whereas conditions can be substantially drier during the summer and early autumn months. This seasonal variation is demonstrated in **Plates 1 and 2** below, which show water present within the sump / infiltration area in April 2025 and the absence of any water in August 2026.

The absence of standing water within the Sump / Infiltration Area during the August 2026 site inspection confirmed the transient nature of surface water run-off water accumulation in this area and demonstrates the natural infiltration operates effectively at this location.

The collection and infiltration of surface water runoff within the Sump Area / Infiltration enables extraction activities to continue in dry working conditions throughout the quarry extraction area. The active extraction areas are currently located at elevations ranging from approximately 70m AOD to 85m AOD and are therefore situated above the area where water naturally accumulates.

Where water is present within the quarry void, it is utilised on-site for dust suppression purposes as required. During periods when insufficient water is available within the quarry, dust suppression requirements are met through the site's existing mains water supply.

Accordingly, the existing quarry operates as a self-contained water management system, with surface water and groundwater ingress retained and managed within the quarry void. No routine discharge of water from the quarry to any surface waterbody currently occurs. This demonstrates that the existing operation has been successfully managed without adverse impact on surrounding watercourses (refer to the Quarry Void Water Quality Monitoring section below) and provides the basis for the enhanced mitigation measures proposed as part of this appeal.



Plate 1: April 2025 - Southwest Corner (Lowest Point) of Quarry – Sump / Infiltration Area showing surface water run-off

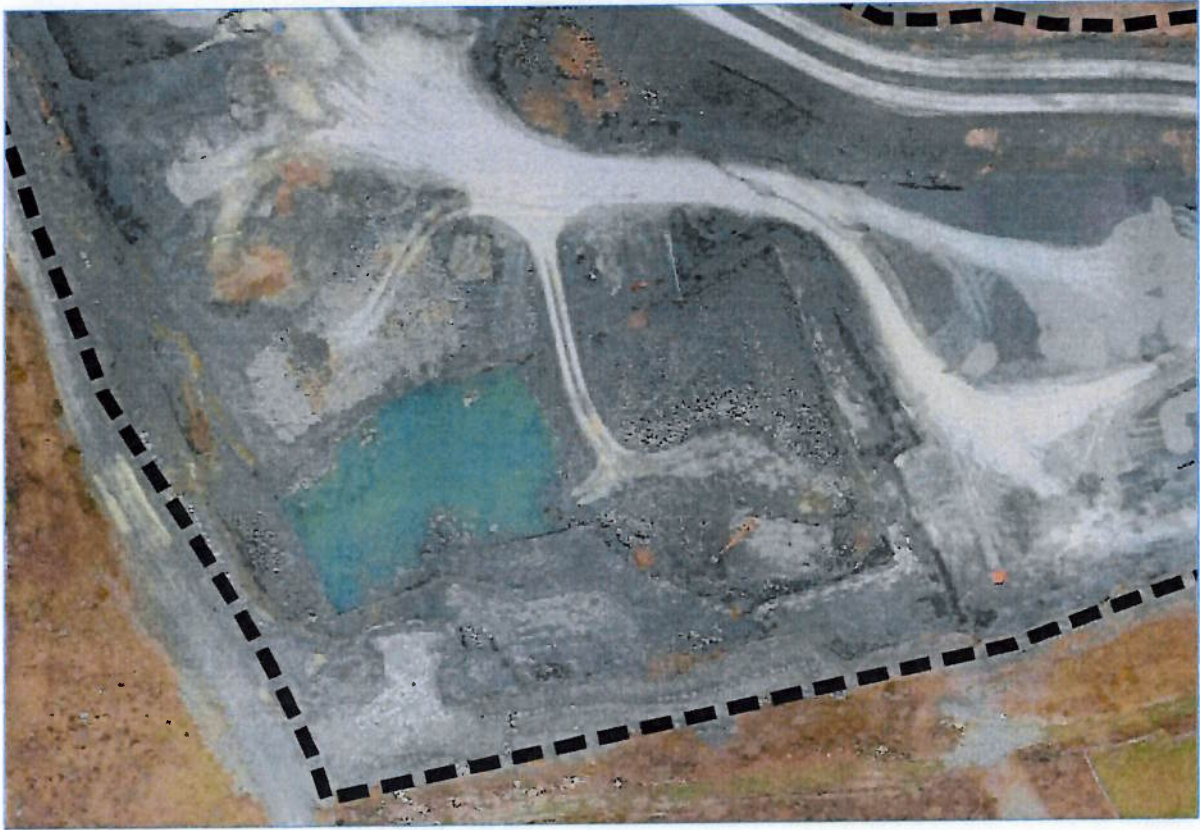


Plate 2: August 2026 - Southwest Corner (Lowest Point) of Quarry – Sump / Infiltration Area showing no water (dry)



5.2 Sump / Infiltration Area - Water Quality Monitoring

As part of the Further Information response submitted to the Planning Authority, a programme of water quality sampling was undertaken in September 2025 within the Ballyglass River. In addition, an extra water quality sample was collected from the Sump / Infiltration Area within the south-western corner of the quarry void.

The purpose of sampling within the quarry void was to establish baseline water quality conditions associated with the infiltration of water from the quarry floor to the underlying groundwater system. The sample is considered representative of the water present within the quarry void and reflects the influence of the site's geological conditions, together with the natural interaction between surface water and groundwater within the infiltration area.

The analytical results demonstrated that all measured parameters complied with the relevant Environmental Quality Standards (EQS), with no exceedances recorded. A summary of the results is presented in **Table 1** below. These results indicate that the water in the sump / infiltration area infiltrating to ground is of good water quality with very low suspended solids levels and no hydrocarbons.

A follow-up site visit was undertaken on 28 August 2026 with the intention of obtaining a repeat sample from the quarry void. However, at the time of the visit, the quarry void was dry and no standing water was present. Consequently, it was not possible to collect a further sample for analysis.

Table 1: Sump / Infiltration Area Water Quality Results (16/09/2025)

Parameter	Units	EQS Inland Surface Waters (MACs)	Sump / Infiltration Area
Inorganics			
Suspended solids	mg/l		7.75
BOD	mg/l	High status ≤ 1.3 (mean) or ≤ 2.2 (95%ile) Good status ≤ 1.5 (mean) or ≤ 2.6 (95%ile)"	<1
COD	mg/l		<7
pH	pH Units	Soft water (<100mg/l CaCO_3): 4.5-9.0. Hard water (>100mg/l CaCO_3): 6.0-9.0	8.11
Phosphate (Ortho as PO_4)	mg/l		<0.02
Alkalinity, as CaCO_3	mg/l		112
Total Oxidised Nitrogen as N	mg/l		9.02
Filtered (Dissolved) Metals			
Aluminium	$\mu\text{g/l}$		<10
Arsenic	$\mu\text{g/l}$	25	<0.5
Barium	$\mu\text{g/l}$		7.75
Boron	$\mu\text{g/l}$		24.2
Cadmium	$\mu\text{g/l}$	0.45 - 1.5	<0.08
Calcium	$\mu\text{g/l}$		80.8
Chromium	$\mu\text{g/l}$	32	<1
Copper	$\mu\text{g/l}$	5	0.375
Iron	$\mu\text{g/l}$		<0.019



Parameter	Units	EQS Inland Surface Waters (MACs)	Sump / Infiltration Area
Lead	µg/l	7.2	<0.2
Mercury	µg/l	0.07	<0.01
Nickel	µg/l	20	8.58
Phosphorus	µg/l	High status ≤ 10 (mean). Good status ≤ 25(mean)	<10
Potassium	µg/l		0.823
Selenium	µg/l		2.54
Sodium	µg/l		10.8
Vanadium	µg/l		<1
Zinc	µg/l		2.81
Unfiltered (Total) Metals			
Aluminium	µg/l		<10
Magnesium	mg/l		10.7
Manganese	µg/l		<3
Hydrocarbons			
Mineral oil >C10 C40 (aq)	µg/l		<100
Exceedances in bold			



6.0 Grounds of Appeal

The planning authority's notification of decision identifies environmental concerns relating primarily to water management and the potential for impacts on nearby European sites. In particular, Roscommon County Council expressed concerns regarding the robustness and adequacy of the mitigation measures proposed and concluded that deficiencies remained within the Natura Impact Statement (NIS) concerning the assessment of potential impacts on the qualifying interests of the relevant European sites. Consequently, the Council stated it applied the precautionary principle in reaching its decision.

The Council's decision appears to be based on the following key concerns:

- The Council is not satisfied that significant dewatering of the quarry will not be required; and
- There is an absence of sufficiently detailed proposals for the management of any dewatering activities within the quarry, together with concerns regarding the effectiveness and robustness of the mitigation measures proposed.

The two reasons for refusal, refer to **Section 2.0** above, are based on the recommendations of the Environment Section to the Planner as set out below:

"The Environment Dept. recommend the refusal of this planning application due to the following:

- 1. The Applicant has failed to demonstrate that the proposed exaction depth of 65m AOD is above the water table in the site. The evidence provided shows that dewatering may be required and no provision for its discharge has been submitted as part of the FI.*
- 2. The Applicant's the current surface water management system does not have any control measures in place to control the discharge of sediment from quarry floor to the groundwater. The combination of sediment and surface water is deemed trade effluent and there requires S4 discharge licencing and controls in place prior to discharge. The applicant has failed to address this issue following the proposed charges to excavation depth in FI and continued use of same surface water management system.*
- 3. The Environment Dept. have concerns regarding the impact of the above on the two public drinking water sources nearby."*

While discharge to ground was not specifically identified as an issue in the Further Information Request, this appeal submission addresses the concerns of the Roscommon County Council Environment Dept. and the two reasons for refusal, for consideration by An Coimisiún Pleanála in determining the case.

This additional material focuses specifically on the protection of the underlying groundwater pathway and its connectivity to the relevant European sites. The above items (1-3) are addressed below in sub-sections **6.1 - 6.4**.

Accordingly, Roadstone proposes to implement a series of additional mitigation measures at the site. These measures are intended to demonstrate that the continued operation of the quarry, will not give rise to adverse effects on the integrity of any European site, either alone or in combination with other plans or projects, and will not result in any risk of likely significant effects arising from the discharge of water to groundwater.

Supporting information and assessments are enclosed are referenced in the Grounds of Appeal.:

- EIAR Addendum Chapter 7 Water
- Updated AA Stage 2 Natura Impact Statement (NIS)



- Updated Water Framework Directive (WFD) Report
- Updated and additional **Drawings ACP1 to ACP6**

In addition, Roadstone is currently preparing an **application for a Discharge Licence**, which will be submitted to the Environment Section of Roscommon County Council in respect of the proposed discharge to ground associated with the quarry operations.

6.1 Groundwater Levels Update

The Applicant has failed to demonstrate that the proposed exaction depth of 65m AOD is above the water table in the site. The evidence provided shows that dewatering may be required and no provision for its discharge has been submitted as part of the FI.

The revised EIAR Chapter 7 submitted as part of the Further Information response to the Planning Authority provided a summary of groundwater logger data from the 4 no. on-site monitoring boreholes MW3, MW4, MW5 and MW6 for the period August 2023 – April 2025 in Table 7-7, and Table 7-8 provided a summary of manual groundwater levels over the same period. For ease of reference these Tables are reproduced in **Tables 1 & 2** of the EIAR Addendum Chapter 7 enclosed.

Refer to **Drawing ACP-4** in the EIAR Addendum Chapter 7 for monitoring boreholes locations.

(Note: the 2003-2004 boreholes shown on Drawing ACP-4 are decommissioned and not accessible for monitoring).

6.1.1 Additional Groundwater Level data

Table 2 below from the EIAR Addendum Chapter 7, provides a summary of additional monitoring carried out at the site from April to September 2025, providing complete monitoring over an extended 2-year period. **Table 3** provides a summary of the manual groundwater levels at the site from August 2026.

Please note Tables 2 & 3 show new data that did not form part of the original application assessment.

Table 2: Summary of groundwater level logger data (April 2025 – September 2025)

		MW3	MW4	MW5	MW6
Strata			Limestone	Limestone	Limestone
mAOD	Minimum	49.65	57.64	52.75	64.90
	Average	51.54	60.60	54.99	69.76
	Maximum	59.22	62.35	58.11	74.27
m	Range	9.56	4.71	5.36	9.37

Table 3: Summary of manual groundwater levels (28th August 2026)

		MW3	MW4	MW5	MW6
Strata			Limestone	Limestone	Limestone
mAOD		54.98	55.27	53.81	61.90

Both the Applicant's on-site observations and the findings of the on-site groundwater monitoring programme indicate that water accumulation within the quarry is seasonal in nature and varies throughout the year in response to prevailing weather conditions. During the late



autumn, winter and spring months, water run-off is typically present within the low-lying area (sump / infiltration area) of the quarry, whereas conditions can be substantially drier during the summer and early autumn months:

6.1.2 Overview of Groundwater Level Data (April 2023 – September 2025)

Charts 1 to 4 below show the logger data for the on-site borehole ground water levels and on-site rainfall for the years August 2023 to September 2025 (c. 2 year period). The proposed quarry floor level of 65mOD is shown in the charts for reference.

Please note Chart 4 shows new data that did not form part of the original application assessment.



Chart 1: 2023 (August – December) Groundwater levels at on-site boreholes and on-site rainfall

2023

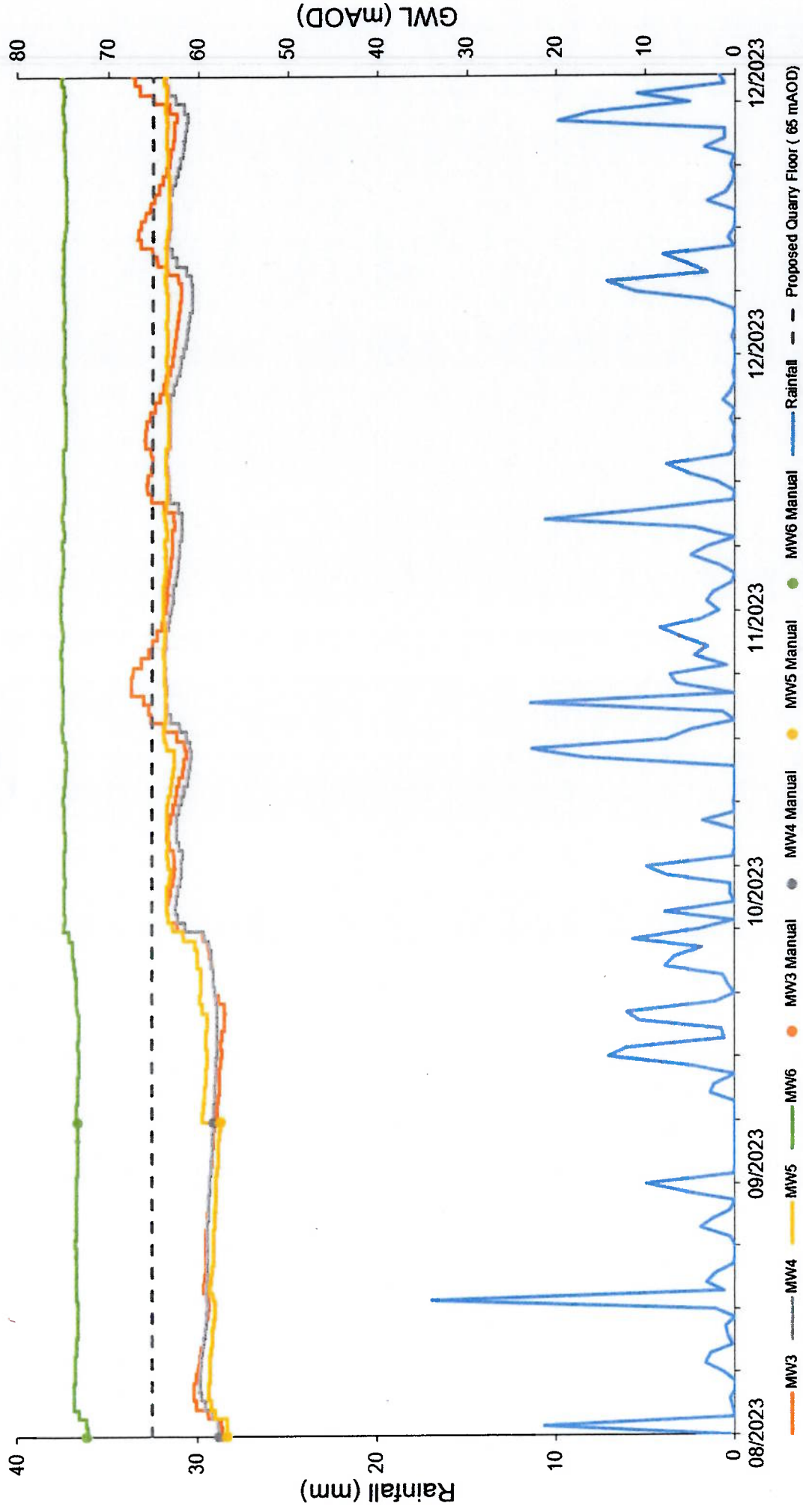


Chart 2: 2024 (January – December) Groundwater levels at on-site boreholes and on-site rainfall



Chart 3: 2025 (January – April) Groundwater levels at on-site boreholes and on-site rainfall

2025

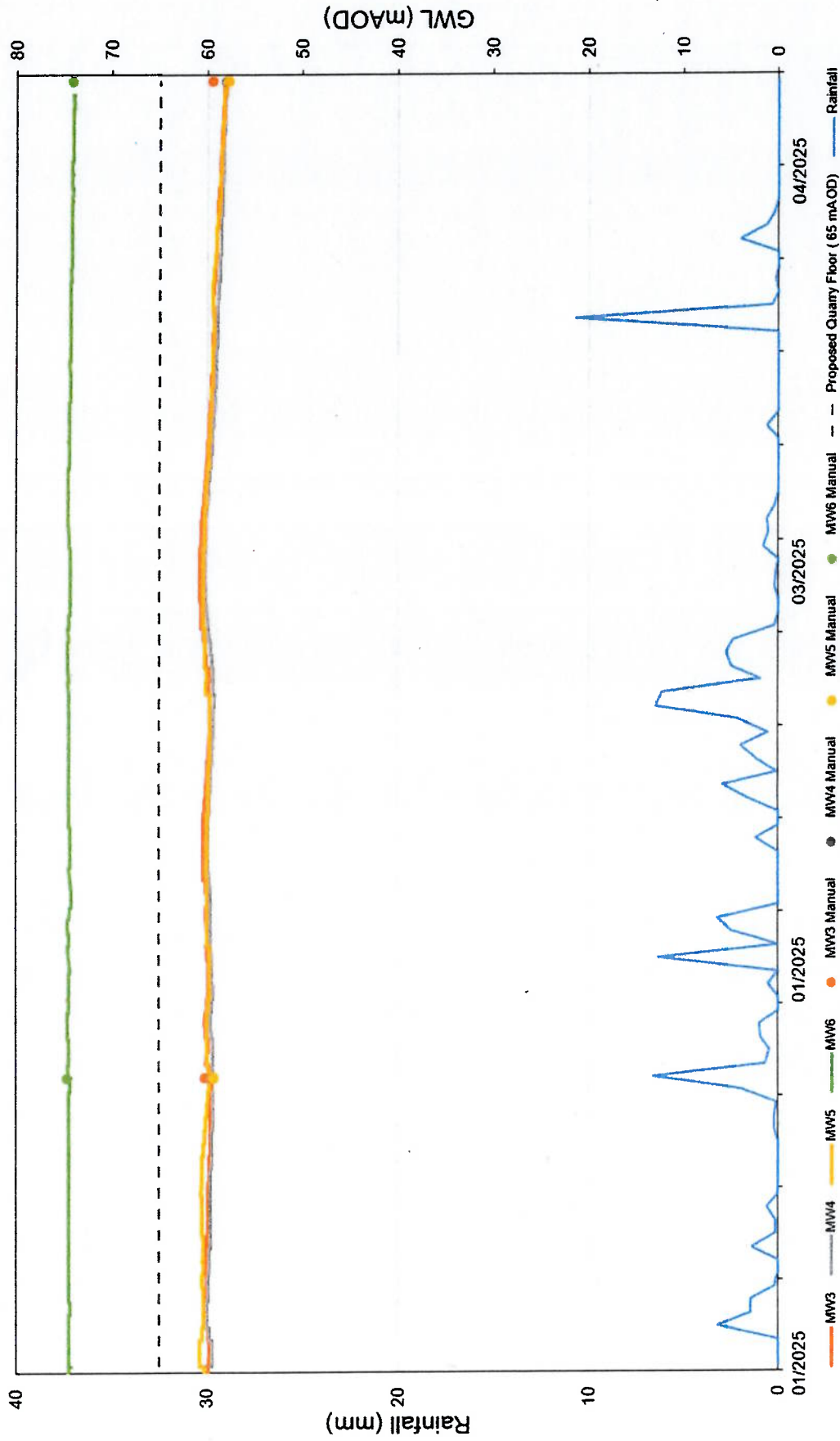
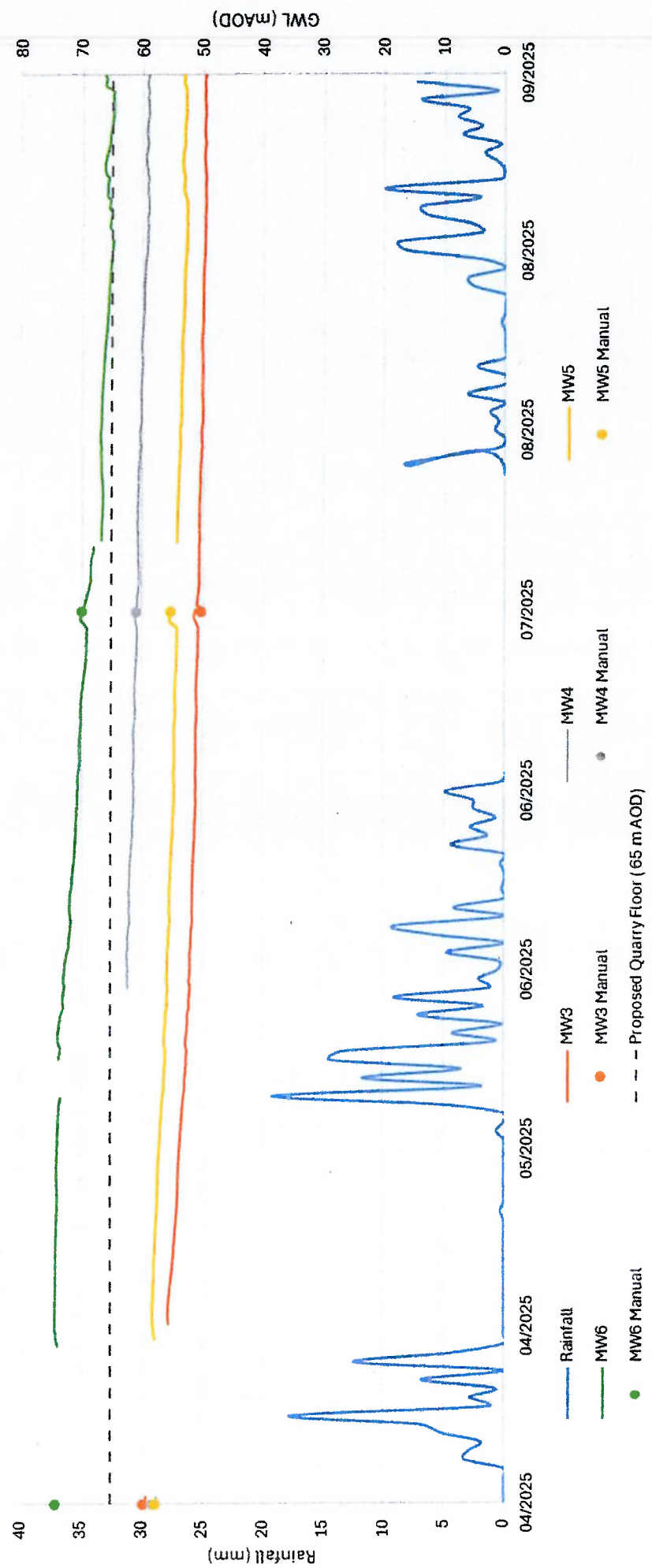


Chart 4: 2025 (April – September) Groundwater levels at on-site monitoring boreholes and on-site rainfall

Cam Quarry GWLs April - Sept 2025



6.1.3 Conclusion

The recorded groundwater levels (up to 75mOD) in monitoring borehole MW6 located at the northern boundary of the overall site are an outlier showing water levels c. 10 metres above the other three monitoring boreholes MW3, MW4 and MW5. It should be noted that no groundwater inflows have been observed in the vicinity of the current quarry floor level at 70mOD in the north of the extraction area closest to monitoring borehole MW6, some 5 metres below the recorded groundwater level of 75mOD.

The long term groundwater levels recorded in monitoring boreholes MW3, MW4 and MW5 over a two year monitoring period (August 2023 to September 2025) are below 65 mOD, except for some short periods at borehole MW3 (located over c. 468 metres south of the quarry extraction area) where the levels rise 1 - 2 metres in response to rainfall. The average groundwater level in these monitoring boreholes is below c. 61mOD. There is a seasonal fluctuation in groundwater levels of up to c. 13 metres, with the lowest groundwater level of c. 50mOD being recorded.

On this basis, the proposed quarry floor level of 65mOD will not require dewatering operations within the quarry extraction area.

6.2 Proposed Quarry Floor Level & Dewatering Considerations

6.2.1 Existing Quarry Floor Level

The existing floor level ranges from c. 62 to 65 mOD in the sump / infiltration area; c. 70 mOD in the northern extraction area and c. 85 mOD in the southern extraction area, refer to **Drawings ACP-1** Existing Site Layout (August 2026) and **ACP-3** Existing & Proposed Cross Sections.

Roadstone have not observed any groundwater inflows within the existing quarry extraction area and there are no dewatering operations. Surface water run-off is captured in the existing sump / infiltration area and infiltrates naturally to ground.

6.2.2 Proposed Quarry Floor Level

Based on the assessment of groundwater levels in **Section 6.1** above the proposed quarry floor level has been raised from its original level of 40 mOD to 65 mOD to eliminate the need for dewatering operations.

The proposed quarry floor level and water management infrastructure (refer to **Section 6.3** below) are shown on **Drawings ACP-2** Proposed Site Layout and **ACP-3** Existing & Proposed Cross Sections.

6.2.3 Quarry Dewatering (Worst Case Precautionary Assessment)

The proposed quarry floor level of 65 mOD has been assessed to eliminate the need for quarry dewatering.

However, to address the concerns raised by Roscommon County Council, reason 1 for refusal and on a worst case precautionary basis, the potential impact of dewatering assuming long term groundwater levels at 67.5 mOD and 75.5 mOD, and using the proposed quarry floor level of 65 mOD has been assessed, refer to Section 3.3 of the EIA Addendum Chapter 7 enclosed.

On this precautionary basis, the zone of influence for any potential dewatering associated with extraction to 65 mOD is estimated to range from c. 19 to 78 metres from the quarry extraction boundary. The extent of these estimated Zones of Influence (Zoi) associated with the potential drawdown are very small, effectively contained within the overall site boundary.

The area within the potential zone of influence, Zol for $R = c. 80 \text{ m}$ worst case from the quarry extraction area boundary, for extraction to a level 65mOD, is c. 0.31km² including the quarry area. This is shown on **EIAR Figure 7.7 Rev A** Source Protection Areas of the EIAR Addendum enclosed.

In context of the Suck groundwater body (c. 1,099 km²), the potential Zol area equates to less than 0.03% of the overall groundwater body. The potential impact on the groundwater body (bedrock aquifer) is insignificant.

The potential zone of influence would not impact on any private water supply; public water supplies (including the source protection area for the Killeglan PWS Tobermore Spring, refer to **Figure 7-7 Rev A**); or any European site.

6.3 Proposed Quarry Water Management Infrastructure & Mitigation Measures

The Applicant's the current surface water management system does not have any control measures in place to control the discharge of sediment from quarry floor to the groundwater. The combination of sediment and surface water is deemed trade effluent and there requires S4 discharge licencing and controls in place prior to discharge. The applicant has failed to address this issue following the proposed charges to excavation depth in Fl and continued use of same surface water management system.

The Applicant proposes to upgrade the quarry water management infrastructure and mitigation measures to control the discharge of sediment from the quarry floor to groundwater. The design and details of this infrastructure and mitigation measures are described in **EIAR Addendum Chapter 7 Section 4.0** and on **Drawings ACP-2 to ACP-6**.

6.3.1 Proposed Water Management Overview

It is proposed to implement the following quarry water management as part of the current planning application (refer to **Drawings ACP-2** Proposed Site Layout and **ACP-3** Cross Sections):

1. Construction of a Barrier Berm

A barrier berm will be constructed at the base of the access ramp leading to the lowest extraction bench, adjacent to the groundwater discharge area in the south-western corner of the quarry.

The purpose of the berm is to prevent surface water runoff potentially containing suspended solids from entering the sump / infiltration area directly.

Similarly, a 20 m-wide block of in situ rock will be retained along the northern boundary of the sump / infiltration area to provide an additional barrier against surface water runoff entering the area during quarry extraction at the proposed final level of 65 m AOD.

These design measures will create a dedicated enclosure around the groundwater discharge area, effectively separating it from the operational quarry. As a result, only treated, clean water will be permitted to enter the sump / infiltration area.

2. Collection of Runoff in Lagoon 1

Surface water runoff generated within the active extraction area will be directed to Lagoon 1, which will function as the primary collection and containment pond. Lagoon 1 will be lined, refer to sections below and **Drawing ACP-5 / ACP-6** for detailed design.



The lagoon will allow the initial settlement of coarse suspended solids and provide temporary storage of runoff generated within the quarry workings before being pumped to Lagoon 2 for treatment.

3. Transfer to Lagoon 2 for Secondary Treatment

Water collected within Lagoon 1 will be pumped via pipeline to Lagoon 2, located at surface level. Two pumps will be employed at Lagoon 1, one acting as the duty pump and one as a stand-by. The pumps, along with the associated generator and bunded fuel storage tank will be housed on a sealed concrete pad with bunded kerb to direct any rainfall over the pad to the lined Lagoon 1.

Lagoon 2 will be lined, and function as a secondary settlement lagoon and will provide additional retention time to facilitate the removal of sediment prior to reuse or discharge, refer to sections below and **Drawings ACP-5 / ACP-6** for detailed design.

4. Water Reuse within Quarry Operations

Lagoon 2 will serve as the principal water storage reservoir for the quarry. Stored water will be reused within site operations for the following purposes:

a. Wheelwash Supply

Water stored within Lagoon 2 will be used to supply the existing wheelwash facility. This will minimise the requirement to use water from the mains supply for wheelwash operations.

b. Dust Suppression

Stored water will provide a reliable year-round source of water for dust suppression activities throughout the quarry. This will minimise the requirement to use water from the mains supply during periods of dry weather when water is not naturally available within the quarry void.

5. Controlled Discharge of Treated Water

A water level monitoring system and automated control valve will be installed within **Lagoon 2**. When water levels exceed a predefined operational threshold, surplus water will be discharged under controlled conditions (using a hydrobrake) via a gravity-fed pipeline to the existing Sump / Infiltration Area in the south-western corner of the quarry.

Prior to discharge, the water will pass through a Class 1 hydrocarbon interceptor to ensure the removal of any residual hydrocarbons.

This system **will ensure that only clean, treated water is discharged to ground** in the sump / infiltration area and will provide an additional robust level of environmental protection for the underlying groundwater and any related pathways to European sites.

The proposed water management infrastructure is well established and proven practice / technology implemented by Roadstone at other locations.

Whilst it is demonstrated that the quarry has residual storage capacity with respect to storm events, should it be deemed necessary by the Competent Authority and as an additional layer of precaution, a condition on any grant of permission could be applied that pumping will stop into the discharge point during red and amber rain weather event warnings.



6.3.2 Water Management Infrastructure Design & Mitigation Measures

6.3.2.1 Rainfall & Climate Change Allowance

The design is based on rainfall data obtained from the Met Eireann information online calculator, from this the design rainfall data used is:-

- M5-60 = 15.2
- M5 2 day = 56.2
- Ratio R = 0.270

The design has been tested for a 1 in 1, 30 and 100 year storm events with 20% allowance for climate change included for the 1:100 year event.

6.3.2.2 Runoff areas and coefficients

The total areas input into the design are:-

- 11.424 ha for the quarry base
- 0.427 ha into Lagoon 2
- 1.456 ha into the infiltration area

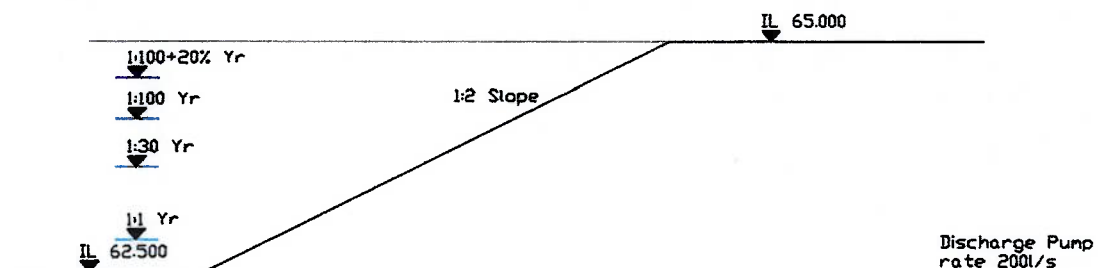
On a precautionary basis an additional 10% has been added to all areas.

The runoff coefficients (Cv) used for the design are 0.75 and 0.84 for summer and winter storms respectively.

6.3.2.3 Collection - Lagoon 1

Lagoon 1 has been modelled as a 2.5m deep lagoon with 1:2 side slopes, the base area is 1,660m² and the top of bank area is 2,400m², refer to planning / design **Drawings ACP-5** and **ACP-6**. The lagoon footprint is 60m by 40m. The discharge from the lagoon is via pumps set at 200l/s. The lagoon has a freeboard of c. 0.4 metre during a 1:100 +climate change (CC) storm event.

RP	Max Water Level
1	62.851
30	63.643
100	64.166
100 +20%	64.609

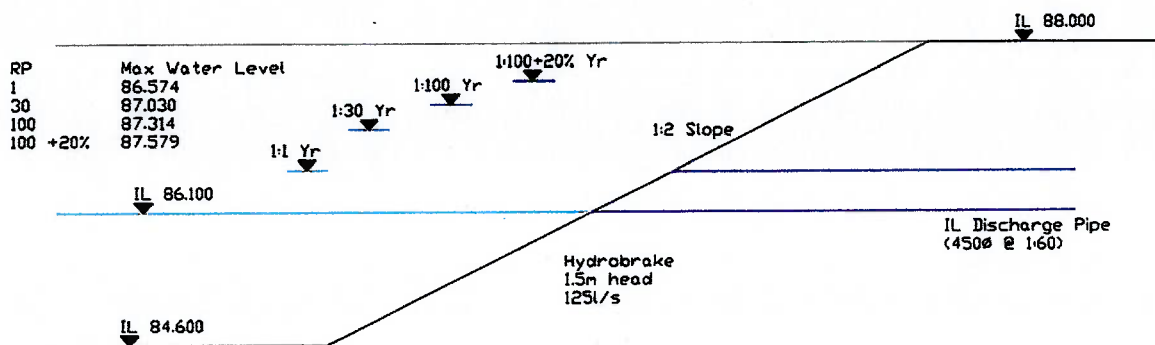
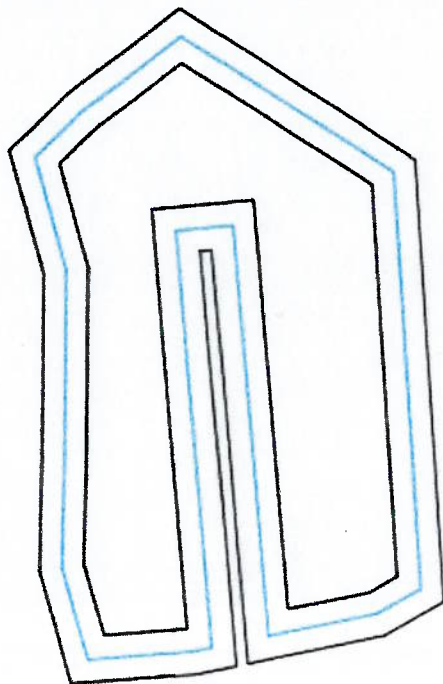


6.3.2.4 Settlement Treatment & Attenuation – Lagoon 2

Lagoon 2 has been modelled as a 3.4m deep lagoon with 1:2 side slopes, the base area is 2,885m² and the top of bank area is 3,930m², refer to planning /design **Drawings ACP-5** and **ACP-6**. The discharge from the lagoon is via a hydrobrake set for 125l/s at 1.5m head.



It is proposed to provide a further 1.5m depth below the outlet to allow for water storage for use on site.



6.3.2.5 Hydrocarbon Interceptor

The discharge from the site will be via a 450mm diameter pipe to a Class 1 full retention hydrocarbon separator sized for a flow rate of 125l/s (SPEL Ref: P125 1CSC, Diameter 2.7m, Length 8.58m or similar). The discharge from the separator will flow by gravity to the existing infiltration area in the southwest corner of the site.

6.3.2.6 Settlement Treatment (Removal of Sediment)

The collection lagoon (Lagoon 1) has a base area of c. 1,660m² and the settlement lagoon (Lagoon 2) has a base area of c. 2,885 m² giving a total surface area of 4,545 m².

The required lagoon surface area to settle out sediment / silt size particles (greater than diameter 0.01 mm) based on a discharge of 125 litres / second is 812 m², based on National Coal Board Guidance.



On this basis the proposed settlement lagoon (Lagoon 2) has more than sufficient treatment capacity to remove / settle out silt size particles prior to being piped via a Class 1 hydrocarbon separator to the infiltration area for discharge to ground.

6.3.2.7 Infiltration Area

The Causeway Flow models show that the infiltration area at the site has sufficient storage to deal with a 1:100 year storm event with 20% allowance for climate change followed 24 hrs later by a 1:30 year storm event (refer to EIAR Chapter 7 Water Addendum **Appendix A**).

The existing sump / infiltration area covers an area of 6,000 square metres and has a volume of c. 16,000 cubic metres. A smaller sump / infiltration area and volume of c. 4,900 m² and 14,700 m³ has been modelled on a conservative basis.

Sump / Infiltration Area - Storage Requirement: Overall Water Balance

A simple water balance model has been constructed using rainfall and evaporation data from a nearby meteorological station (Mt Dillion) and site specific data (quarry extraction area, rock mass bulk hydraulic conductivity / permeability and quarry sump / infiltration area geometry).

The model uses average annual rainfall and evaporation data to assess the likely variation in water storage required in the quarry sump / infiltration area. The requirements for storm events are set out in Section 4.3.6.2 below.

The following input data are used:

- Quarry Area : 129,000 (m²) (the proposed maximum quarry extent);
- Monthly rainfall / runoff coefficient : 0.55 (dim);
- Average Annual Rainfall (1981 – 2010) : 1,047 mm/yr;
- Average Annual Evaporation (2023 – 2026) : 703.6 mm/yr;
- Bulk hydraulic conductivity / infiltration rate: 6.1×10^{-6} m/sec

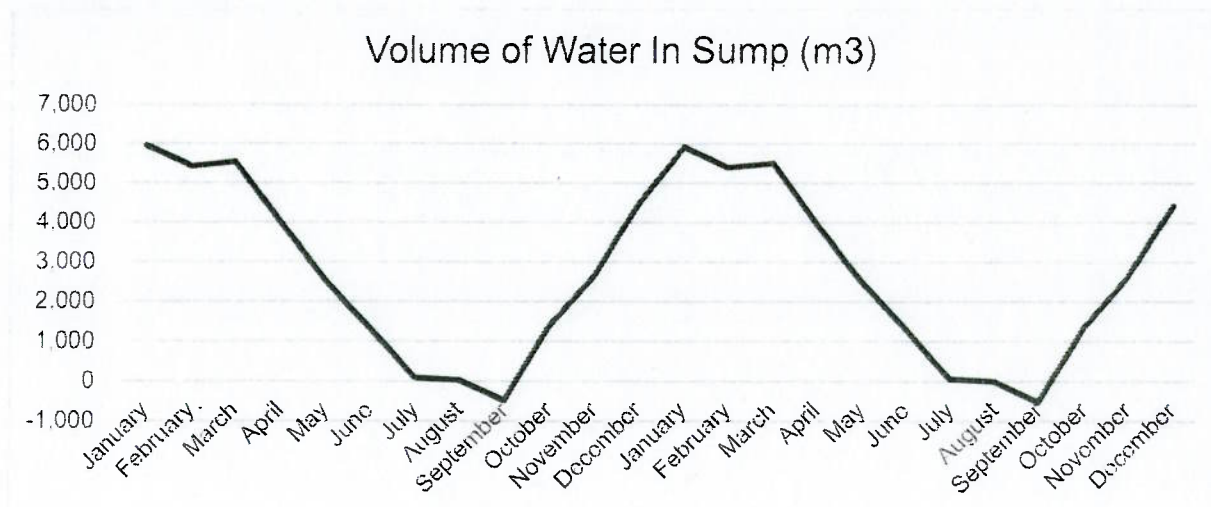
The model has been run monthly for a period of 2 years. Steady state conditions are reached within this period.

The model shows the average annual volume of water derived from incident rainfall onto the quarry and to be managed in the quarry water management infrastructure area is of the order of 74,000m³. The same volume of water is discharged over the course of one year via infiltration to groundwater (71,000m³) or lost to evaporation from the sump (3,000m³). Given the small area of the sump / infiltration area compared to the extent of the bedrock aquifer unit beneath the site the loss to evaporation is insignificant and will have no effect on local or regional groundwater levels, yield or flow direction.

The modelling shows that in the winter months excess runoff is generated and water needs to be stored in the sump / infiltration area. The water level falls in the sump / infiltration area during the drier summer months before the volume of water storage then increases again. This is consistent with observations in the existing quarry. In the winter months approximately 6,000m³ of water storage is required to contain excess winter rainfall. This is well within the sump / infiltration area volume of c. 16,000 m³. **Diagram 1** shows the annual water storage requirements.



Diagram 1 – Water Balance Output : Water Storage Required in Quarry Sump / Infiltration Area



As the water balance model has been constructed using a monthly timestep and using average rainfall and evaporation values there will be variation from the model results presented from year-to-year. For example, in a particularly wet year slightly more water storage will be required, and conversely, in a drier than average year less water storage will be required.

The water balance model does however confirm that compared to the extent of the quarry and the depth of the proposed quarry floor at 65 mOD that there is ample space / volume within the sump / infiltration area to manage water within the quarry.

Sump / Infiltration Area Storage Requirement - Storm Events

The infiltration area capacity has been checked for the various storm events, using an infiltration rate of 6.1×10^{-6} m/sec (rock mass bulk hydraulic conductivity, refer to Section 3.3.1 of EIAR Chapter 7 Addendum. The estimated water depth and infiltration volume are summarised in **Table 4** below:

Table 4: Sump / Infiltration area Storage Requirements – Storm Events

Return Period (1:x)	Infiltration Area Water Depth (m)	Infiltration Volume (m3)	Infiltration rate (l/s)
1	0.520	2,549	20.5
30	1.404	6,882	21.5
100	1.873	9,180	22.0
100+20%	2.402	11,772	22.7

The existing sump / infiltration area (c. 16,000 m3) has sufficient capacity to accommodate these storm volumes.

6.3.3 Section 4 Discharge Licence

Roadstone Ltd. are in the process of submitting a Section 4 discharge licence application to Roscommon County Council based on the water management infrastructure design described above.



6.4 Proposed Discharge Water Quality Monitoring

As outlined in the Mitigation and Monitoring Measures (EIAR Chapter 16), the following water monitoring schedule is proposed for the site as outlined in **Table 5**. However, the previously proposed surface water monitoring at the discharge point to the Ballyglass River will be replaced by monitoring of treated water at the discharge point to the quarry sump / infiltration area, following treatment through Lagoons 1 and 2 and the hydrocarbon interceptor.

Table 5: Indicative Schedule of Environmental Monitoring for Water

Activity (Responsibility)	Q1			Q2			Q3			Q4		
	J	F	M	A	M	J	J	A	S	O	N	D
Continual Groundwater Level in 4 boreholes MW3, MW4, MW5, MW6 with loggers (Contracted Consultant)	logger	logger	logger	logger	logger	logger	logger	logger	logger	logger	logger	Logge
Quarterly Groundwater Quality in 4 boreholes MW3, MW4, MW5, MW6 (Contracted Consultant)												
Monthly surface water run-off quality at location between hydrocarbon interceptor and water entering the infiltration area in the SE corner of quarry – location of discharge to ground (Contracted Consultant) Note - only when discharge water off-site is occurring												

6.5 Impact on Two Public Drinking Water Sources

The Environment Dept. have concerns regarding the impact of the above on the two public drinking water sources nearby."

EIAR Chapter 7 / **Figure 7-7**, 'Source Protection Areas', submitted as part of the planning appeal documentation, identify the location of the nearest source protection area, namely the Killeglan PWS (Tobermore Spring).

For clarification, while the overall landholding and red line planning application boundary partially overlap this source protection area, the quarry extraction area and all associated development works are located approximately 300 m from its Source Protection Area boundary – as shown on EIAR Chapter 7 Water Addendum (**Figure 7-7 Rev A**).

The next nearest source protection area is that associated with the Mount Talbot PWS (Cloonlaughnan Springs), situated approximately 6.5 km northwest of the quarry site and hydraulically upgradient of the proposed development.

Implementation of the proposed quarry void water management infrastructure will ensure only treated clean water will be discharged to ground. Consequently, no adverse impacts are anticipated on the Killeglan PWS (Tobermore Spring), the Mount Talbot PWS (Cloonlaughnan Springs), or any associated water supplies and source protection areas.

Accordingly, and based on the existing quarry operations that have been in place for over 20 years, the proposed development will not impact on the "two public drinking water supplies".



6.6 Additional Items from Planners Report

The following comments are noted from the Final Assessment section of the Planners Report which state:

'While it is noted that there are other deficiencies in the application with particular reference to the height and depth of the berms and the requirement for additional noise monitoring along the R363, this are not considered significant to warrant inclusion in the reasons for refusal.'

For completeness, and for the Commission's information, these comments are addressed below.

6.6.1 Additional "Noise" (Dust ?) Monitoring

The Appellant seeks clarification regarding the reference in the Planner's Report to an alleged deficiency in relation to **"noise" (should have referred to Dust) monitoring** along the R363. This matter did not form part of the Planning Authority's Further Information request and appears to arise from a misunderstanding of Further Information Item 1(a), which stated:

'Please provide a revised dust assessment which:

Provides additional dust monitoring points along the R363 particularly towards Athlone and submit records of base line data collected ...'

The Planner's report further notes in respect of this issue¹

'... However, notwithstanding the applicants' resistance to having additional monitoring stations along the R363 it is noted in the third party submissions that there is an issue regarding dust along this route from HGVs in particular in the Athlone direction and in this regard in the event planning permission is granted a condition should be applied to ensure additional monitoring points are established along this route to determine when there are exceedance of dust emission limits and thus mitigation measures applied and enforced.'

As outlined in the Further Information response, the Applicant is not resistant to the installation of dust monitoring stations along the R363. Rather, the Applicant's position is that it is not appropriate to locate dust monitoring stands beyond the application site boundary, as doing so would not accord with the recognised industry standards for the gravimetric assessment of dust deposition from extractive industries in Ireland.

The relevant guidance, including the Department of the Environment, Heritage and Local Government's **Guidelines for Planning Authorities: Quarries and Ancillary Activities (2004)** and the EPA **Environmental Management Guidelines (2006)**, recommends the use of the **Bergerhoff method** for measuring dust deposition. These guidelines further recommend that compliance with dust deposition criteria be assessed at the **site boundary**, rather than at remote locations along the public road network.

In accordance with these established standards, the applicable dust deposition limit value is **350 mg/m²/day**, expressed as total dust deposition averaged over a 30-day period and measured at the site boundary. The Applicant's response was therefore based on compliance with recognised national guidance and monitoring methodologies, rather than any opposition to additional monitoring.

1. **DoEHLG 2004 Guidelines for Planning Authorities: Quarries and Ancillary Activities** / Section 4.7(e) states:

"Control of dust: There are currently no Irish statutory standards or EPA

¹ Planners report – page 5



guidelines relating specifically to dust deposition thresholds for inert mineral/aggregate dust. (See, however, the Air Quality Standards Regulations 2002 for measurement standards). There are a number of methods to measure dust deposition (such as the Frisbee method) but only the German TA Luft Air Quality Standard relates a specific method (i.e. Bergerhoff) of measuring dust deposition with dust nuisance. On this basis it is recommended that the following TA Luft dust deposition limit value be adopted at site boundaries near quarry developments:

Total dust deposition (soluble and insoluble): 350 milligram per square metre per day (when averaged over a 30-day period)."

2. EPA 2006 Environmental Management in the Extractive Industry (Non-Scheduled Minerals): Environmental Management Guidelines / Section 3.4.2 states:

"The impact of dust is usually monitored by measuring rates of dust deposition (DoE, 1995). There are currently no Irish statutory standards or EPA guidelines relating specifically to dust deposition thresholds for inert mineral dust. There are a number of methods to measure dust deposition but only the German TA Luft Air Quality Standards (TA Luft, 1986) specify a method of measuring dust deposition – The Bergerhoff Method (German Standard VDI 2119, 1972) – with dust nuisance. It is the only enforceable method available. Where this method is deemed unsuitable for use, and only in these circumstances, an alternative method may be agreed with the local authority.

On this basis, it is recommended that the following TA Luft dust deposition limit value be adopted at site boundaries associated with quarry developments – total dust deposition (soluble and insoluble): 350 mg/m²/day (when averaged over a 30-day period)."

The Appellant submits that the Planner's characterisation of the Applicant as being 'resistant' to additional monitoring is incorrect. The issue in question concerns the appropriate location and methodology for monitoring, consistent with accepted guidance and industry practice, rather than any unwillingness to undertake environmental monitoring.

Notwithstanding the above, the Applicant has agreed to establish an additional dust monitoring location (D5) on the eastern boundary of the site. This location has been selected to further assess any potential impacts on receptors to the east of the site, including the nearest sensitive receptors in the direction of Athlone.

The inclusion of monitoring location D5 will result in two dust monitoring stations being located along the eastern site boundary, thereby providing enhanced monitoring coverage in the area identified by the Planning Authority and third-party observers as being of particular concern. The location of D5 is illustrated on **Figure 8-2 R1** of the updated EIAR Chapter 8: Air Quality, submitted as part of the Further Information response to the Planning Authority.

Furthermore, the Applicant has committed to the immediate installation of a spray bar on the existing wheel wash facility. This measure will ensure that all HGVs exiting the site are effectively dampened prior to entering the public road network. The purpose of this enhancement is to minimise any potential dust entrainment from vehicle loads and prevent dust blow associated with site traffic.

These commitments will provide a robust mechanism for the ongoing assessment and control of dust emissions, while ensuring that any potential effects on residential properties along the R363, particularly in the direction of Athlone, are effectively avoided and mitigated.

In these circumstances, the Appellant submits that the concerns raised regarding dust impacts along the R363 have been appropriately addressed through both enhanced monitoring and



strengthened operational controls, and that the planning application should be assessed on that basis.

6.6.2 Screening Berms

The Planning Authority's assessment of Further Information Item 6 appears to be based on an incorrect understanding of the information submitted by the applicant.

Further Information Item 6 requested:

'With respect to the noise mitigation measures, reference is made to screening and berms in the EIAR and layout plan. Please provide detailed specifications of height and depth of berms relative to existing ground levels around the perimeter of the site.'

In its report, the Planner subsequently stated that:

'Cross sections through the quarry and site have been submitted, depicting existing and proposed levels however, no sections through the screen berms around the perimeter of the site which provide details of the specifications of height and depth of berms relative to existing ground levels have been submitted.'

The Planning Authority notes that screen berms are in place and it appears from the site layout plans and the EIAR submitted, that there are additional screen berms under construction. In addition to this the formal development description includes the construction of 'screen mounds' however no specific details have been provided regarding height and depth of same other than the indicative location of the same on a map.

Having regard to the fact that the EIAR refers to embedded measures such as berms to mitigate against impacts from dust and noise additional details/ sections through the berms would be required to determine what the height and extent of existing berms and proposed 'screen mounds'.

This conclusion is factually incorrect. In direct response to Item 6 of the Further Information request, the applicant submitted **Drawing FI-2**, which was prepared specifically to address the issue of screening berms.

Drawing FI-2 provides:

- A detailed plan showing the location and extent of the perimeter screening berms;
- 11 no. cross-sections through the berms;
- Detailed information on the height, width and profile of the berms relative to existing ground levels.

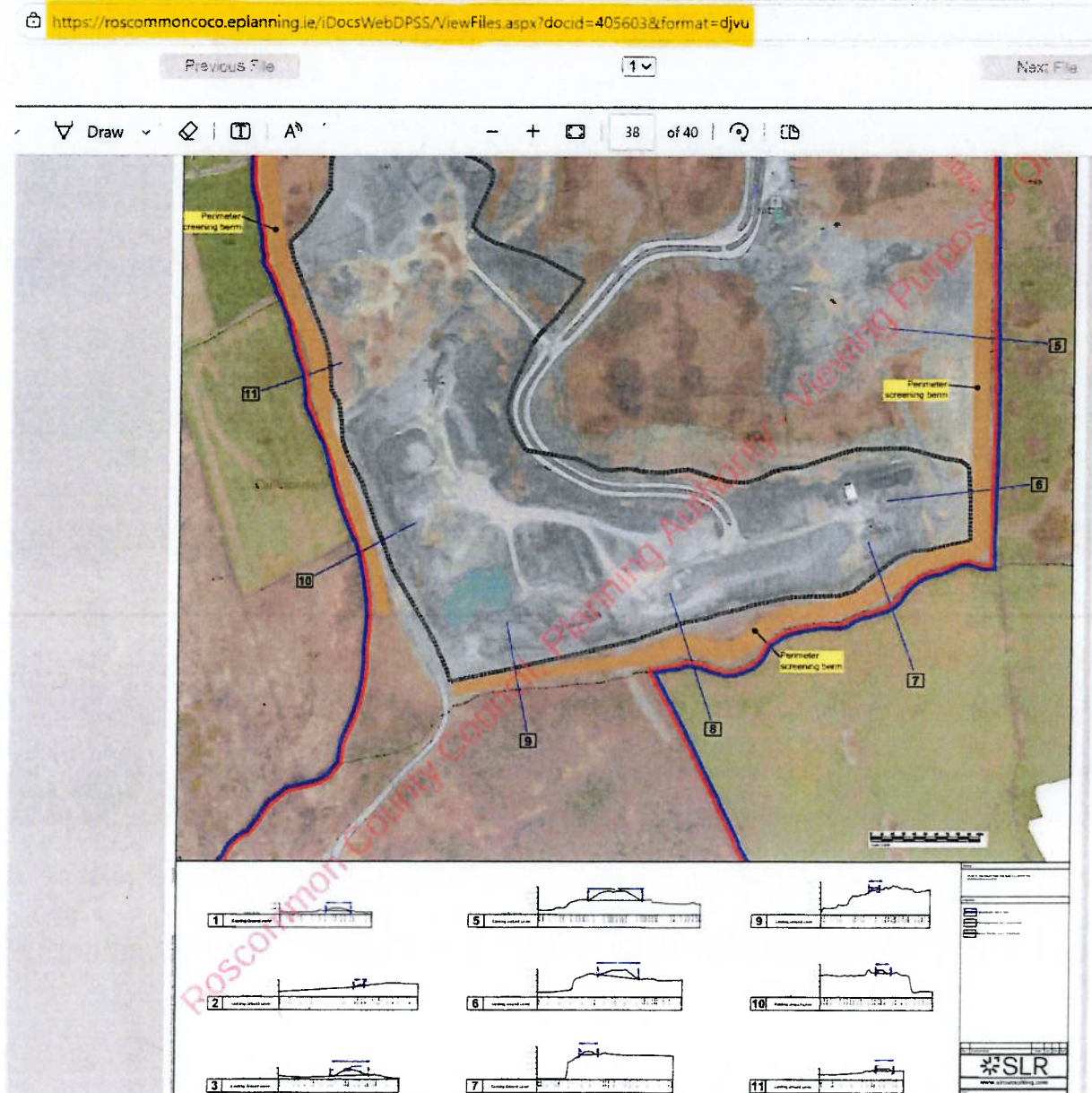
Accordingly, the information requested by the Planning Authority was supplied in full as part of the Further Information response as is evidenced in **Plate 3** below.

The Planning Authority further states that no specific details were provided regarding the height and depth of the screening berms and screen mounds. This assertion is similarly incorrect, as the dimensions and profiles of the berms were clearly illustrated on **Drawing FI-2** through the submitted cross-sections. These drawings provided the precise details necessary to understand the existing screening berms.

A copy of **Drawing FI-2** is included with this appeal for ease of reference and demonstrates that the height, width and extent of the screening berms were clearly documented.



Plate 3: Extract of Roscommon Co. Co. Planning Portal² showing Drawing FI-2 - Details of the Perimeter Screening Berms



² <https://roscommoncoco.eplanning.ie/iDocsWebDPSS/ViewFiles.aspx?docid=405603&format=djvu>



7.0 Conclusion

The proposed reduction in extraction depth from 40m AOD to 65m AOD; reduction in the extraction footprint; shorter operational life; and removal of the previously proposed off-site water discharge infrastructure collectively result in a materially reduced development with significantly lower environmental risk than that originally assessed and previously granted planning permission by Roscommon Co. Council / An Bord Pleanála.

The appeal documentation demonstrates that the quarry has operated successfully for almost two decades without quarry dewatering; without discharge of water to adjacent surface watercourses and without any evidence of significant adverse environmental effects.

Water quality monitoring undertaken within the quarry void indicates compliance with relevant environmental standards, while the seasonal nature of groundwater and surface water accumulation confirms that water management can continue to be undertaken within the quarry footprint. Notwithstanding this, the Applicant proposes a significantly enhanced water management system incorporating lined settlement lagoons; controlled treatment and recirculation measures; hydrocarbon interception; groundwater protection infrastructure; environmental monitoring and the pursuit of a discharge licence to ensure a robust framework for future operations.

The proposed mitigation strategy will ensure that only treated and monitored water is permitted to infiltrate to ground, thereby protecting groundwater quality, public water supplies and downstream sensitive receptors. The EIAR Addendum chapter 7 Water; the updated Natura Impact Statement and updated Water Framework Directive Report further demonstrate that, with these measures in place, the continued operation of the quarry will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

Furthermore, the appeal has addressed ancillary matters raised within the Planner's Report relating to dust monitoring and screening berms. The Applicant has committed to additional dust monitoring provisions and enhanced operational controls, while also demonstrating that detailed berm specifications requested by the Planning Authority were already supplied as part of the Further Information response.

Having regard to the significant revisions made to the proposed development, the comprehensive additional information submitted, and the enhanced mitigation and monitoring measures now proposed, it is respectfully submitted that the grounds upon which Roscommon County Council refused permission have been comprehensively addressed.

The proposed development as outlined eliminates the requirement for off-site dewatering discharge, substantially reduces the extent and duration of extraction activities, confines development to previously disturbed areas, avoids impacts on Annex I habitats, and introduces a robust water management and environmental monitoring framework capable of protecting groundwater resources, public water supplies and downstream ecological receptors and demonstrates that there is no credible scientific or technical basis to conclude that the proposed development would result in significant adverse effects on the environment or on the integrity of any European site.

The quarry is an established, long-standing and strategically important regional resource that supplies essential construction materials to Athlone, Roscommon and the wider Midlands region, while supporting direct and indirect employment and contributing significantly to the local economy.

Refusal of this application would unnecessarily constrain the continued operation of a proven and well-managed site that has been serving the region for almost twenty years without any evidence of significant environmental harm.



Having regard to:

- The established use and operation of the permitted quarry for over twenty years with proven limestone reserves;
- The strategic importance of the quarry in providing a long-term secure supply of essential construction aggregates to Athlone and the wider mid-west region.
- The continuance of use of the quarry operations within the previously permitted extraction area;
- The amendments to the originally permitted quarry scheme to reduce the footprint of the quarry extraction area and raise the level of the original permitted quarry floor;
- The additional information and assessments submitted with this appeal addressing the reasons for refusal and concerns raised by Roscommon County Council including assessment of dewatering requirements and proposed water management infrastructure and mitigation measures to ensure sediment removal from surface water run-off within the quarry;
- Updated Stage 2 Natura Impact Statement;
- Updated Water Framework Directive Report;
- Environmental management and mitigation measure set out in the EIAR for the proposed development;
- The acceptably low likelihood of environmental effects of a magnitude which would give rise to a significant effect on sensitive receptors.

It is respectfully submitted that the proposed development:

1. Satisfies the requirements of proper planning and sustainable development; is consistent with the relevant objectives of the Roscommon County Development Plan (including the provisions of policy objectives ED 6.17, ED 6.18, NH 10.8 and NH 10.9);
2. Would not potentially adversely affect the integrity of any European sites having regard to their conservation objectives and qualifying interests; and
3. Aligns with national policy supporting the sustainable development of local mineral resources; and can be permitted without risk of significant adverse environmental effects.

The Appellant therefore respectfully requests An Coimisiún Pleanála **to set aside the decision of Roscommon County Council and grant planning permission for the development.**

Any residual matters raised by the Planning Authority can, if considered necessary, be appropriately addressed through planning conditions relating to water management, environmental monitoring, reporting requirements and regulatory compliance, rather than through refusal of permission.

Please direct all related correspondence to SLR Consulting Ireland, 7 Dundrum Business Park, Windy Arbour, Dublin 14 N2Y7, who act as agents on behalf of Roadstone Limited.



Yours Faithfully,

SLR Environmental Consulting (Ireland) Ltd

Shane McDermott

Shane McDermott

Technical Director

smcdermott@slrconsulting.com

Attachments

1. Roscommon County Council Notification of Decision to Refuse Permission, Plan. Ref. No. PD/25/60577 dated 17th August 2026
2. Drawing FI-1 Proposed Development Changes – submitted as part of the Further Information Response to Roscommon County Council in February 2026
3. Drawing FI-2 Perimeter Berm Cross Section Details

New Drawings (in support of Appeal)

1. Drawing ACP-1: Existing Site Layout (August 2026)
2. Drawing ACP-2: Proposed Site Layout showing Proposed New Water Management Infrastructure
3. Drawing ACP-3: Existing / Proposed Cross Sections
4. Drawing ACP-4: Borehole Locations
5. Drawing ACP-5: Proposed Lagoon Design Lagoon 1 & Lagoon 2
6. Drawing ACP-6: Proposed Lagoon Details

Additional Information / Assessments

1. EIA Addendum Chapter 7 Water
2. Updated AA Stage 2 NIS Report
3. Updated WFD Report

Cc. + Att. John Glynn (Roadstone Limited)

