

File With _____

SECTION 131 FORM

Appeal NO: ABP 315700-24

Defer Re O/H

Having considered the contents of the submission dated/ received 29/05/24

from An Taisce I recommend that section 131 of the Planning and Development Act, 2000

be not invoked at this stage for the following reason(s): Partial Review by Inspector and Board

E.O.: Laura Grady Dowling

Date: 07/06/24

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: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 315700-28

M _____

Please treat correspondence received on 29/05/24 as follows:

1. Update database with new agent for Applicant/Appellant _____	
2. Acknowledge with BP <u>25</u>	1. RETURN TO SENDER with BP _____
3. Keep copy of Board's Letter <input type="checkbox"/>	2. Keep Envelope: <input type="checkbox"/>
	3. Keep Copy of Board's letter <input type="checkbox"/>

Amendments/Comments

An Taisce response to S.131.

4. Attach to file (a) R/S <input type="checkbox"/> (d) Screening <input type="checkbox"/> (b) GIS Processing <input type="checkbox"/> (e) Inspectorate <input type="checkbox"/> (c) Processing <input type="checkbox"/>	RETURN TO EO <input checked="" type="checkbox"/> <u>L. Grady/Lawlor</u>
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	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>Als [Signature]</u>	AA: <u>[Signature]</u>
Date: <u>30/05/24</u>	Date: <u>30/05/2024</u>

Faolán Bashford

From: Bord
Sent: Wednesday 29 May 2024 15:04
To: Appeals2
Subject: FW: Ref. 315708
Attachments: 20240529-ABP-315708.pdf

From: Sean O'Callaghan <socallaghan@antaisce.org>
Sent: Wednesday, May 29, 2024 2:49 PM
To: Bord <bord@pleanala.ie>
Subject: Ref. 315708

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.

A Chara,

Please find enclosed An Taisce's letter in response to our request for further information regarding ref. 315708.

Is mise le meas,

Ian Lumley
Heritage Officer
An Taisce – The National Trust for Ireland



An Taisce

The National Trust for Ireland
5 Foster Place
Dublin 2, Ireland
D02 V0P9

20240529-ABP-315708

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

Sent by email to bord@pleanala.ie

29th May 2024

RE: Response to request for submission on further information; Patrick Bonar Quarry application; Raphoe, Co. Donegal

Ref: ABP-315708

App: Patrick Bonar

For: Demolition of existing concrete structure and the quarrying of 5.37 hectares which will be subject to extraction and processing of rock through drilling, blasting, crushing and screening and all associated ancillary facilities/works over a 25 year period. An Environmental Impact Assessment Report and Natura Impact Statement accompanies this application.

Site: Magherasolis and Craigs, Raphoe, Lifford PO, Co. Donegal.

Dear Sir/Madam,

Thank you for the letter of 9 May attaching the submission from Genesis Planning Consultants and Michael Friel and the response to queries from An Bord Pleanála.

It is a matter of concern that these queries do not address the fundamental issue of the suitability of the location for quarrying in the first instance. Previous historic quarrying on the site does not justify its renewal and the environs and housing spread generated by the development of Raphoe means the site is not suitable for renewed quarrying.

1. Waste Dumping

Information is noted.

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Directors: Stuart McCaul (Chair),

Trish O'Connell (Vice Chair), John Conroy (Treasurer), Olivia Rogers, Rónán O'Brien, Finbarr Murray

2. Drainage Groundwater Flow

This does not address the reference to the previous grounds of refusal. The photographs from Greentrac show that the floor of the existing abandoned quarry is already waterlogged. No information is provided as to the date of these photographs and whether or not it represents the situation after high rainfall conditions.

The deepening of the excavation from the existing level has serious implications. The Greentrac report seeks to address the impact of storm surges from a worst case scenario by "creating temporary sumps near the working quarry deck ". This would be part of a three-phase process of periodic pumping from the temporary sumps to the main quarry sump and then "onwards for settlement treatment and attenuation".

It is submitted that the proposed complex three-stage process has not been demonstrated to be compatible with the ongoing excavation envisaged or having capacity to address extreme rainfall events on a site which has a significant gradient, as shown in general arrangement drawing no. 09 by Michael Friel.

3. Site Access

The proposal now being advanced for the creation of 4 lay byes and placing of rock armour in gabion cages confirms the lack of proper consideration given to access by the applicant and the Council in the first instance.

4. Operational Issues

Hiving off and seeking to resolve individual issues for consideration on a one-by-one basis does not properly address interactions and the cumulative effect of creating a large scale quarry in proximity to an urban area and residential dwellings with blasting of rock, heavy machinery use and HGV traffic generation.

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

Yours sincerely,

Ian Lumley
Heritage Officer
An Taisce – The National Trust for Ireland