27 August 2026

AN COIMISIÚN PLEANÁLA
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Time: 11:43 By: Courier

Ms. Cathy Carleton,
Executive Officer,
An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

Re: Drimoleague Concrete Works Ltd.
Ummera Gravel Pit, Ummera, Macroom, County Cork
Application for Further Development
Case Number: ABP-308194-20

Dear Ms. Carleton,

I refer to your letter of 01 October 2025 and subsequent correspondence dated 12 February 2026, in which additional information is requested to enable An Coimisiún Pleanála (the Commission) to determine the above-referenced live application which was submitted to the Commission (the then An Bord Pleanála) in September 2020. The Commission's request are set out below.

Item 1 - Appropriate Assessment: *In accordance with the requirements of Article 6(3) as related to screening the need for appropriate assessment of a project under part XAB, section 177U and 177V of the Planning and Development Act 2000 (as amended), you are required to submit an Appropriate Assessment Screening Report, and if deemed necessary, a Natura Impact Assessment, so as to enable An Coimisiún Pleanála, as competent authority, to determine that the proposed further development alone or in combination with other plans and projects will not result in likely significant effects on any designated site(s). You may wish to have regard to the OPR Practice Note PN01 Appropriate Assessment Screening for Development Management in this regard.*

RESPONSE
Please find attached two copies of the Appropriate Assessment Screening Report prepared by JWK Environmental Ltd.

Item 2 - Water Framework Directive: *In order to determine that the subject development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives, you are required to submit a Water Status Impact Assessment which adequately addresses this matter.*

RESPONSE
Please find attached two copies of the Water Framework Directive Compliance Report prepared by Keohane Geological & Environmental Consultancy.

Keohane Geological & Environmental Consultancy
Ivy House, Clash, Carrigrohane, Cork
Phone 086-8289167; email dankeohaneivyclash@hotmail.com
VAT Registration No. 9739495G. Company Registration No. 278742

Item 3 - Clarity regarding extent of proposal: *You are required to submit updated information including information contained in the submitted EIAR, which clearly differentiates between the works included in the Substitute Consent application (ABP-308036-20) and those proposed in this current s37L application.*

RESPONSE

Please find attached the updated site layout plan (Drawing No. 04) which shows the Substitute Consent application boundary and the additional further development extraction area. Part of the landholding are included in the further development application which provide screening and biodiversity – no works as such are proposed in those areas.

Item 4 - Report of DAU relating to freshwater pearl mussel: *You are required to address the following comments of the DAU and submit revised proposals, if deemed necessary. `The River Laney contains a very small population of the freshwater pearl mussel, a species listed in the Second Schedule of the Wildlife Acts 1976-2018 and protected under Section 23 of that Act. There are recent records of mussels in the stretch between the confluence of the Clashavoon stream and the Laney River. As a consequence, all necessary measures should be taken to avoid release of sediment and hydrocarbons from the operating quarry (including allowance of sufficient land area for settlement ponds to operate at an effective scale) and the stream monitored regularly'.*

RESPONSE

The presence of freshwater pearl mussel in the Laney River is noted. Chapter 7 (Water – Hydrology & Hydrogeology) of the EIAR details the measures (currently implemented and proposed) to protect the surface and ground water environments. As set out in the EIAR and in summary:

- A closed-loop recirculation system for wash water is used. In this regard, the on-site silt ponds have been enlarged over the operational period of the gravel pit, most recently in early 2020.
- Runoff water is directed to the settlement ponds to keep them topped up. Excess runoff water is directed to a large settlement pond to remove fines before discharging from site or percolating into the gravel. This pond is dry for most of the year. Smaller ponds are located around the pit to intercept overland flows to remove fines and promote percolation.
- The application includes for improvements to fuel storage and dispensing.
- A surface water quality programme is in place, monitoring the Clashavoon Stream and Laney River.

Item 5 - EIAR (General): *In addressing the following items set out below, you should have regard to the information contained within the Guidelines on the Information to be contained in Environmental Impact Statements' EPA (2022) with regards to the general approach/structure, preparation of EIAR and presenting of information. The environmental impact assessment should identify, describe and assess in an appropriate manner, in the light of each individual topic, the direct and indirect significant effects of the project. You should have regard to the criteria for assessment of effects, as set out in these aforementioned Guidelines, including the language/terminology required. You are also required to provide a summary table after the impact assessment in each chapter which sets out each potential impacts assessed, the significance of the effect and the post mitigation residual impact of each to ensure each has been correctly taken through the process and assessed in the EIAR chapter. The structure and information to be contained in the Non-Technical Summary should also follow the guidance contained in the aforementioned Guidelines.*

RESPONSE

The EIAR has been updated having regard to the 2022 EIAR guidelines. Two copies of the updated EIAR (3 volumes) are attached. The EIAR is track-changed to highlight updates.

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Item 6 - EIAR-Surveys and Assessments: *You are required to:*

1. *Update all surveys, assessments and data included in the submitted EIAR including all ecological surveys, traffic surveys, CSO data.*
2. *Outline the quality, significance and duration of identified effects, together with an assessment of the cumulative effects, including the effects of other projects as relevant, which would include the existing quarry operations should be undertaken.*
3. *An assessment on Major Accidents and Natural Disasters as required by the Act.*

RESPONSE

1. Surveys have been carried out again, include ecological surveys, surface water quality surveys and traffic counts. On-going dust monitoring and surface water quality data is presented and CSO data from the 2022 census is presented.
2. Effects of the proposed development are described and assessed following the 2022 EPA's EIAR Guidelines, including cumulative effects with other projects.
3. An assessment of major accidents and natural disasters is included for each aspect of the environment assessed.

Item 7 - Population and Human Health (EIAR): *You are required to submit an assessment of the impacts on population and human health for the entire operational phase.*

RESPONSE

Chapter 3 – Population & Human Health has been updated. Aspects of the environment that could affect human health, i.e., traffic, noise, air quality, and water quality, have also been updated in Chapters 4, 5, 6 and 7, respectively.

Item 8 - Material Assets (EIAR):

1. *The Material Assets chapter should also include the impacts on other material assets where applicable, including, inter alia, built services and waste management.*
2. *You are required to submit updated traffic counts noting that the opening of the Macroom bypass has occurred since previous counts were carried out. An updated Traffic and Transport Assessment should be completed using this new data which should assess the traffic impact from what will be a revised commencement year post 2025 and an assessment of a future year forecast that takes account changes in road use patterns. This should also consider growth factors as provided by TII. This Traffic and Transport Assessment should be a standalone document.*
3. *You should explore of all available options to provide the visibility splays of 160m in both directions of entrance, together with outlining any constraints to provision of same. If the required sight line visibility splay of 160m cannot be achieved, justification for proposing a shorter visibility splay should be provided which may include consideration of the actual operational speed on the road network.*

RESPONSE

1. The potential impacts on other material assets (including utilities and waste management) are discussed in the introduction section of Chapter 4.
2. Traffic counts have been updated, as has Chapter 4 of the EIAR. MHL Consulting Engineers prepared the stand-alone TTA, which in included in Appendix 4-2 of the EIAR.
3. The gravel pit entrance is from a local road with a posted 60kph speed limited. Speed limits on local rural roads were reduced nationally from 80kph to 60kph in February 2025. The required sightline distance for this road is now 120m – not 160m. This sightline distance is available to the north of the pit entrance. The sightline distance of 120m to the south of the entrance is not currently available. Proposals to increase the sightlines distances for passenger vehicles are set out in Chapter 4 of the EIAR.

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Item 9 - Biodiversity (EIAR): *You are required to submit an Ecological Impact Assessment. This should be presented as a stand-alone document*

RESPONSE
Please find attached two copies of the Ecological Impact Assessment Report prepared by JWK Environmental Ltd.

Item 10 - Air and climate (EIAR): *You are required to submit a more considered assessment of the impacts that the further development of the quarry will have on climate in light of current legislation. This should consider the various emissions associated with the development particularly with regard to greenhouse gas emissions.*

RESPONSE
The Air Quality, Climate & Climate Change Chapter of the EIAR has been updated to take account of the various emissions associated with the further development of the gravel pit, including impacts associated with greenhouse gas emissions. The assessment of air quality impacts follows the IAQM 2024 guidelines.

Item 11 - Landscape and Visual (EIAR):

1. *In relation to Chapter 11, Section 11.3, You are required to provide clarity in relation to the rating for visual intrusion (Little/None, Low, Moderate and High), in particular the term Slight has been included in Table 11-1 but in this context has not been qualified. You are required to provide clarify on this and ensure the methodology for assessing visual impacts is clearly outlined.*
2. *You are required to update the landscape and visual impact assessment with the benefit of more accurate visual aids of the restored quarry, which may be provided by way of a photomontage or an appropriate visual aid.*
3. *You are required to submit a detailed Site Restoration Plan for the quarry, which should include the timing and phases of restoration. The timing is key to demonstrating that the necessary protection of the underlying aquifer has been restored and thus reduce vulnerability post works. The details of the materials, plant and equipment that will be utilised during these restoration works should also be provided. The plan should provide proposals intended to restore habitats on site and to improve its biodiversity value.*

RESPONSE

1. The landscape and visual chapter of the EIAR has been updated.
2. Photomontage images have been included in the landscape chapter.
3. A phasing plan is included in the Landscape chapter. Restoration of the gravel pit will follow this phasing. Each phase will be approximately 2 years. The material used will include the silt from the settlement ponds, inert greenfield soil & stone and topsoil previously stripped. The plant used will include excavators, Volvo dumpers and possibly a bulldozer. Most of the site will be returned to agricultural use but elements will be retained to improve biodiversity including the old settlement pond, a working face for sand martin nesting and board leave woodland around the site perimeter. Protection od the aquifer is discussed in Chapter 7.

Item 12 - Hydrology:

1. *You are required to submit details of proposed water supply to the site welfare facilities.*
2. *The proposal includes for the decommissioning of an on-site septic tank and percolation area and replacing it with a sealed 2.2m^3 underground tank. You are required to submit details in relation to this underground tank in terms of its location and function. Furthermore, you are required to submit details regarding the operation of this underground tank and its intended function, namely shall it be used as a holding tank which will be emptied regularly or if it is intended to operate in connection with the existing percolation area.*

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RESPONSE

1. The water supply to the welfare facilities is an offtake from the supply to the wash plant.
2. The proposed sealed tank will be located to the west of the new site office / welfare facility. The tank will be used only as a holding tank and will be emptied regularly by a licenced waste contractor.

Note: *It is required that all changes/updates are clearly identified for the purpose of third-party involvement. In this regard, please submit two hard copies and one electronic copy of the above information.*

RESPONSE

Changes and updated to the EIAR are clearly identified using the track-change tool.

Yours sincerely,

Dan Keohane

Encl.

1. Appropriate Assessment Screening Report.
2. Water Framework Directive Compliance Report.
3. Updated Site Layout Plan – Drawing 004.
4. Environmental Impact Assessment Report – 3 Volumes.
5. Ecological Impact Assessment Report.
6. A CD with PDFs of the reports.

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