

The Secretary,
An Bord Pleanála,
64 Malborough Street
Dublin 1

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
14 MAY 2024	
Fee: €	_____ Type: _____
Time: 9.00am	By: Post

12th May 2024

SUBMISSION RE: APPLICATION REF: SU17.319397

Reference: ABP: SU17.319397
URL: <https://www.pleanala.ie/en-ie/case/319397>
Application Lodged: 20th March 2024
Appeal Deadline: 15th May 2024
Dev. Address: Tromman Quarry, Tromman, Rathmolyon Co. Meath
Applicant: Keegan Quarries Limited
Description: **Substitute Consent** for quarry and ancillary precast concrete manufacturing yard.

Dear Sir/s and Madam/s,

As local residents to Rathmolyon Co. Meath we are writing to place an objection to the substitute consent application SU.17.319397 which has been submitted by Keegan Quarries Limited.

As stated in the application the following have been built and are operating without authorisation or consent.

- Unauthorised construction of an electrical substation,
- A concrete batching plant with technical land and associated lagoon system,
- Additional settlement facilities,
- A Limestone Powder plant, comprising of feed hopper, crushing and screening plant, dispatch point, drying plant, storage sheds and gas tank fuel storage,
- The unauthorised construction of a precast concrete manufacturing industrial unit,

All the above is in addition to the unauthorised continuation of extraction and associated mineral processing activities (as stated below) which should have ceased on 5th August 2018.

- A block yard,
- Office,
- Canteen,
- Weighbridge
- Wheelwash
- A precast manufacturing facility,
- Associated batching plant and fuel storage,
- An administrative office,
- Septic Tank,
- Workshop,

- Pump house
- Steam Cleaner

The above list is extensive and the fact that the original quarrying activity has been continuing unauthorised since 2018 (5 ½ years) is concerning, let alone the fact that since 2018 Keegan Quarries have **blatantly** disregarded the formal planning processes and developed the quarry further for their own financial benefit without any thought or respect to the local residents (human and wildlife).

Due to this we respectfully ask An Bord Pleanála to issue an cessation notice whilst this application is assessed. Whilst Keegan Quarries Limited have submitted a range of reports and surveys to support this application these were prepared in 2023 by companies hired by Keegan Quarries Limited to prepare them. For the scale and environmental impact of such a large quarry we believe these reports should be conducted again by an independent organisation appointed by An Bord Pleanála.

As An Bord Pleanála assess this application we would request they consider the following:

- Keegan Quarries Limited have a long history of exceeding the boundaries of applications:
 - Ref. TA/900976 [PL 17.235960]
 - Condition 2 - they were granted consent to extend the quarry as long as there was a 60 metre wide buffer zone along the frontage with the regional road On the 22nd March 2018 Keegan Quarries Limited were issued a warning letter unauthorised development may or was being carried out on the lands of Tromman, Rathmolyon in breach of this condition.
 - Condition 3 – there shall be no excavation below a level of 50 metres OD... The quarry appears to be well below 50 OD.
- Keegan Quarries Limited has not just flouted the planning process for this quarry, but across 3 counties – Meath, Westmeath and Kildare. Enforcement Notices/Warning Letters should be checked by An Bord Pleanála when making a decision on this case.
- Mr Keegan’s Own Admissions:
 - Keegan Quarries submission to Meath County Council in respect to Readymix Ireland’s application dated 1998 & dated 29th January 1999 – Mr Keegan was concerned about the level of blasting that would ensue if planning permission were to be granted to an additional quarry. He further stated in that letter that he believed there was; ‘an adequate number of quarries to meet demand’. Finally he was ‘very worried about the unnecessary upset that would be caused to the local people by a second quarry.’
 - Keegan Quarries Ltd submissions to An Bord Pleanála in respect to Readymix Ireland’s application of 1998 & dated 11th May 1999 – in this letter Mr Keegan was worried about the noise levels that would result from a second quarry and states ‘that the people of the locality would have a lot to complain about’. He goes on to say ‘Dust is very hard to control, especially in a Limestone quarry.’ That he ‘sees a lot of problems with two quarries working side by side’ and that 2 quarries combined would ‘have a huge impact on the residences of the area’.

So, even through Mr Keegan's own admissions he did not feel 2 quarries operating side by side was a good idea however, has proceeded to expand his quarry extensively without authorisation.

As a local resident living besides a large quarry/concrete products manufacturing operation has its own challenges/nuisance:

- Blasting – blasting is particularly disruptive. We feel the blasting within the house which shakes when a blast occurs. This has often scared both our children and dogs as they do not know what is happening. It also gives us concern to the impact it is having to the integrity of the structure of our building and the impact of continued blasts over time.
- Dewatering – lowering the water table is very concerning as we have a private well and water supply. We have no access to mains water to our property. We have already seen in previous years when the weather is warm many wells in the area drying up and we ourselves were without water for several months in 2022. Dewatering also removes finer particles from the soil leading to a lowering of the land topography in the area. This in turn is known to be responsible for structural damage. Furthermore, the quarry is being de-watered on a 24/7 basis. A large generator and pump is running on a 24/7 basis causing annoyance and loss of amenity to local residents.
- Passing traffic movements – this is one of the principle nuisance issues, which we encounter. Un-laden trucks can be particularly noisy, while with fully laden trucks, engine labouring under high revs is a cause of great annoyance as they pass up and down the road. The increase in traffic of heavy vehicles is also a concern for children who are trying to get to bus routes and schools.
- Dust – fugitive dust continues to be a major issue and drenches the countryside with a frequent film of dust on our vehicles and also the vegetation. Muddy roads are a regular issue each winter and keeping vehicles clean is impossible. The dust impact the growing of our food, with things like blackberries being impacted by the high dust level.
- Air quality – as a Mother with a son who has breathing issues, air quality is a big issue for me. The continued silica dust in the environment from the quarries is a concern.
- Visual – there is now a very visual unauthorised mountain of overburn, which can be seen for miles. It is also hazardous to machine operators and/or any person who may wander up on top thereof. Landslides from this have been observed by local residents in the past.
- Biodiversity and loss of agricultural lands – given the significant area of lands which are now under quarry in Trammon, it follows that the loss to pasture and agriculture has been significant. The consequent loss to biodiversity has also been significant. The quarries in the area are constantly expanding removing large numbers of trees and woodland habitat; the very same habitat that they once promised to hold onto when the quarries were first applied for on a Greenfield site.
- Other concerns include – out of hours operations, noise, hydrology, heavy vibrations, night-time lighting, and stockpiling.

As An Bord Pleanála review this Substitute Consent application we would request they strongly consider the following when making their decision:

- Planning consent expired in August 2018, however unauthorised/illegal operations and expansion has taken place from then until now,

- The lack of consideration for the planning process from Mr Keegan, not only at the Tromman site in Rathmolyon but also other sites under his ownership across Meath, Westmeath and Kildare.
- Mr Keegan's own admissions to the impact of a second quarry to the locality of Rathmolyon in 1999.
- The impact to local residents – in particular their homes in regards to structural integrity and water supply. These are the main assets families hold and if water supply or structural damage is caused due to blasting you are taking away a family's ability to liquidise an asset if required or have a roof over their heads.
- The planning process is in place to protect both the community and the environment. There has been blatant disregard for this process from Keegan Quarries Limited over a substantial number of years which should not be ignored.

Kind Regards,



Trevor and Jade Reilly
Tobertyan
Rathmolyon, Co. Meath
A83 RP77