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Garry Morgan

From: Bord
Sent: Friday 6 November 2020 12:20
To: Appeals2
Subject: FW: HSE Submission for Ummerra Gravel pit Macrooom Co. Cork Ref ABP-308036-20
Attachments: HSE submission Ummerra Gravel pit ABP 30803620.pdf

Importance: High

From: Shane O'Flynn (EHO) <Shane.OFlynn@hse.ie>
Sent: Friday 6 November 2020 11:09
To: Bord <bord@pleanala.ie>
Subject: HSE Submission for Ummerra Gravel pit Macrooom Co. Cork Ref ABP-308036-20
Importance: High

To whom it may concern:

Please find attached the HSE submission for Ummerra Gravel Pit Ref ABP-308036-20

Regards,



**Shane O'Flynn,
Environmental Health Officer**

*HSE South,
North Lee Environmental Health Service,
Floor 2, Block 1,
St Finbarr's Hospital,
Douglas Road,
Cork*

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For the most up-to-date and accurate information and advice on Covid-19 please visit www2.hse.ie/coronavirus/



Seirbhís Sláinte
Níos Fearr
á Forbairt

Building a
Better Health
Service



North Lee Environmental Health Service,
Floor 2, Block 1 St Finbarr's Hospital,
Douglas Road,
Cork,

Phone: 021 4921801
E-Mail: ehonl@hse.ie

Date: 5th November 2020

Our reference: 1383

Licence Type: Planning Application

Name and address of applicant: Drimoleague Concrete Works Limited

Location of facility: Ummera Gravel Pit, Ummera Macroom,
County Cork

Reference No: ABP 308036-20

EIS/EIAR submitted: Yes

**Planning Authority to whom
EIS/EIAR has been submitted:** An Board Pleanála

Dear Sir/Madam

Please find enclosed the HSE consultation reports in relation to the above planning application. If you have any queries regarding any of this report the initial contact is Ms Catherine McCarthy, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

Catherine McCarthy

Catherine McCarthy
Principal Environmental Health Officer

Date:	5 th November 2020
Our reference:	1383
Licence Type:	Planning Application
Name and address of applicant:	Drimoleague Concrete Works Limited
Location of facility:	Ummerra Gravel Pit, Ummerra Macroom, County Cork
Reference No:	ABP 308036-20
EIS/EIAR submitted:	Yes
Planning Authority to whom EIS/EIAR has been submitted:	An Board Pleanála

Introduction

The following HSE departments were notified of the consultation request for the licence application on 6th October 2020

- Emergency Planning – David O’Sullivan
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Marie Woods
- CHO – Michael Fitzgerald

This report only comments on Environmental Health impacts of the licence application.

General

The Ummerra gravel pit has been in operation since the 1940’s with the current arrangements coming into effect since the late 1970’s. The activities at Ummerra gravel pit consist of extraction of sand & gravel.

The gravel pit is in a rural setting in the townland of Ummerra, approximately 2.5km to the northeast of Macroom. The gravel pit is in a landholding of approximately 20.22ha, of which 17ha is included for registration under Section 261. This 17ha of land is not interrupted by any natural or manmade boundaries. The remaining lands comprise of public roads or are separated from the 17ha by public roads. Areas within the 17ha not worked are used for grazing and host the old farmhouse and farm buildings. Part of the landholding is located between the public road and the Clashavoon Stream; the original settlement pond for the gravel pit is located in this area. The surrounding land use is predominantly grazing.

Site Visit by the Environmental Health Service(EHS)

A site visit was carried out by Mr Shane O'Flynn, Environmental Health Officer (EHO) on the 16th October 2020. The locations of sensitive receptors identified in the EIAR and access to and from the site were verified during this site visit. Observations were made on the current operation of the quarry and dust deposition around the site entrance and general areas around the site.

Third Party Submissions

The Environmental Health Service is not aware of any complaints with regard to public health due to the current operation of the site.

Protection of Surface Water:

The protection of surface water is considered in chapter 7 of the EIAR.

The gravel pit is within the catchment of the Clashavoon Stream. This catchment extends to an area of 15.6km². The Clashavoon Stream rises in Derryroe, approximately 3km to the north of Ummera. It flows in a southerly direction and is joined by a number of smaller streams, including one (Curraghanearla Stream) that joins just north of the gravel pit. The Clashavoon Stream joins with the Laney River near the southwestern corner of the landholding. The Laney River flows southwest just west of local road L-3423. It joins with the Sullane River near Bealick Mills. The confluence of the Sullane River with the River Lee is located approximately 3km to the south of Ummera at Coolcour. The EIAR states that this waterbody has an overall 'High' river waterbody status and is classified by the WDF as 'not at risk'.

Section 7.2 identifies potential impacts on surface water, section 7.3 outlines existing mitigation measures and section 7.4 outlines proposed remedial mitigation measures to improve surface water management at the gravel pit.

The EHS is satisfied that if the proposed mitigation measures are implemented in full there will be adequate protection of public health with regard to the protection of surface.

Protection of Ground Water:

The protection of ground water is considered in chapter 8 of the EIAR.

Section 8.2.6 outlines ground water usage near the site. It states that the site is not serviced by mains water, that houses and farms near the gravel pit use bored / dug wells for drinking water supply. The EHS welcomes both the use of the GSI well database and the additional identification of local wells by door to door surveys. Details of wells identified are summarised on Table 8-2.

An impact assessment of ground water is outlined in section 8.3.

The existing mitigation measures on the soils, geology and hydrogeology are outlined in section 8.4 and further proposed mitigation measures are outlined in section 8.4.

The EIAR states that Groundwater was not monitored as part of the assessment. The Environmental Health Service recommends that in order to establish baseline water quality, any wells identified as a drinking water supply and located within 150m of the gravel pit extraction facility should be sampled. Sampling parameters should be agreed with the Local Authority. These wells should be sampled at least biannually during the extraction period and once within the first year following cessation of operations on site to establish if there are any changes in water quality. This recommendation is in the interest of the protection of water quality and public

health. In the event of the quarrying activities having an adverse impact on the existing private wells in the vicinity in terms of water quality or yield issues the developer should undertake appropriate remedial measures as agreed with the Planning Authority, at his expense.

Air Quality:

Air quality is considered in chapter 6 of the EIAR.

The main source of air pollution identified in the EIAR is dust arising from extraction activities in the gravel pit. Dust monitoring has been carried out at the gravel pit at 3 locations the results of which can be found at table 6-3. All the inorganic dust depositions fall well below the EPA limit of 350mg/m² /day.

The dust mitigation measures are outlined in section 6.4 and remedial mitigation measures are outlined in section 6.5.

The EHS recommends that in addition to the current mitigation measures outlined in section 6.4 the following measures should also be included:

- a. Sweeping of hard road surfaces and provision of a water bowser on site, regular spraying of haul roads.
- b. Wheel washing facilities at site exit.
- c. Enclose delivery vehicles.
- d. Inspect and clean public roads in the vicinity if necessary.
- e. The EIAR states that the sprinkler system in the gravel pit has fallen into disrepair in recent years. The sprinkler system must be fully restored and regular checks carried out to ensure it is working adequately.

Noise and Vibration

Noise and vibration impacts are assessed in section 5 of the EIAR. The impact assessment is discussed in section 5.7.

In relation to vibration the EIAR states that "as sand and gravel extraction operations typically do not give rise to groundborne vibration, vibration has been scoped out of this assessment." The EHS are satisfied that as there is no blasting operations permitted on site and the planning application does not include for blasting it is not anticipated that issues will arise from vibration.

The EHS notes that due to the existing operation of the quarry, the proposal will not involve a significant change in the existing noise environment. The quarry operates within the EPA guidance levels for absolute noise exposure.

The EIAR states that the current hours of operation are limited to:

In the S261 registration form, the hours of operation were indicated as being:

- Weekdays – 07:00 to 18:00
- Saturdays – 07:00 to 16:00

Condition No.3 of the QR01 gives the working hours as:

- Weekdays – 07:00 to 19:00
- Saturdays – 07:00 to 14:00
- No operations on Sunday or Public Holidays

The EIAR then goes onto say that in practice the hours of operation are:

- Weekdays - 09:00 to 18:00
- Saturdays – 09:00 to 13:00

The EHS welcomes the reduced hours of operation which have been identified. The main control in the protection of public health is the limiting of operational hours for the quarry.

Mitigation identified in section 5.9 of the EIAR should be implemented in full.

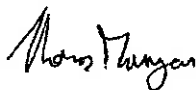
Conclusion

Should permission be granted for the proposed development, the Environmental Health Service makes the following recommendations:

- The Environmental Health Service recommends that in order to establish baseline water quality, any wells identified as a drinking water supply and located within 150m of the gravel pit extraction facility should be sampled. Sampling parameters should be agreed with the Local Authority. These wells should be sampled at least biannually during the extraction period and once within the first year following cessation of operations on site to establish if there are any changes in water quality. This recommendation is in the interest of the protection of water quality and public health. In the event of the quarrying activities having an adverse impact on the existing private wells in the vicinity in terms of water quality or yield issues the developer should undertake appropriate remedial measures as agreed with the Planning Authority, at his expense.
- In addition to the current mitigation measures for dust outlined in section 6.4 the following measures should also be included:
 - a. Sweeping of hard road surfaces and provision of a water bowser on site, regular spraying of haul roads.
 - b. Wheel washing facilities at site exit.
 - c. Enclose delivery vehicles.
 - d. Inspect and clean public roads in the vicinity if necessary.
 - e. The EIAR states that the sprinkler system in the gravel pit has fallen into disrepair in recent years. The sprinkler system must be fully restored and regular checks carried out to ensure it is working adequately.



Shane O'Flynn
Environmental Health Officer



Thomas Mangan
Environmental Health Officer
Environment Operational Unit