

*Vianh.*  
**Garry Dorgan**

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**From:** Bord  
**Sent:** Friday 6 November 2020 14:12  
**To:** Appeals2  
**Subject:** FW: Ummera Gravel Pit, Ummera, Macroom, Co.Cork ABP-308036-20  
**Attachments:** ABP-308036-20.doc

**From:** Michael McPartland <Michael.McPartland@fisheriesireland.ie>  
**Sent:** Friday 6 November 2020 13:47  
**To:** Bord <bord@pleanala.ie>  
**Subject:** Ummera Gravel Pit, Ummera, Macroom, Co.Cork ABP-308036-20

A chara

Please find attached submission

Michael Mc Partland  
Senior Fisheries Environmental Officer.

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Help Protect Ireland's Inland Fisheries

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D'fhéadfaí go bhfuil an ríomhphost seo agus ceangaltáin ar bith atá in éineacht leis faoi rún agus iad beartaithe d'úsáid an duine a bhfuil a s(h)eoladh air amháin. Dearcthaí nó tuairimí ar bith atá curtha in iúl ann, baineann siad leis an údar amháin, agus ní chaithfidh go n-aontaíonn Iascaigh Intíre Éireann leo. Mura tusa faighteoir beartaithe an ríomhphost seo, ná déan rud ar bith mar gheall ar an méid atá ann, ná é a chóipeáil ná é a thaispeáint do dhuine ar bith eile. Déan teagmháil leis an seoltóir, le do thoil, má chreideann tú go bhfuair tú an ríomhphost seo trí earráid.





**Iascach Intíre Éireann  
Inland Fisheries Ireland**

An Bord Pleanála  
64 Marlborough Street  
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06 November 2020

RE: Ummerra Gravel Pit, Ummerra, Macroom, Co.Cork  
ABP-308036-20

A chara

Thank you for your notification of the above referenced application for substitute consent.

IFI's, as the statutory body with responsibility for the protection of fisheries, interest in this application relates to the potential impacts the development could have on the adjacent Clashavoon Stream and Laney River, salmonid waters. These can be categorised as impacts on water quantity, fish passage and water quality.

Water Quantity:

Wash waters for the development are abstracted from the Clashavoon Stream. The EIS has calculated the 95%ile flow in the stream to be in the range 33-38 l/s and dry weather flow to be of the order of 17 l/s. The relative significance of the abstraction has not been assessed in the EIS nor can it be assessed by the reader as the abstraction volume does not seem to have been quantified. In the first instance IFI would ask that data is submitted, based both on historical practices and proposed future operational needs, which quantify abstraction volumes from the Clashavoon Stream. To enable meaningful analysis a monthly breakdown over a 1 year period is required.

This 95%ile flow statistic is the percentage of time that flow is exceeded at a monitoring gauges i.e. the flow that historically been reached fewer than 5% of the time. Such low flows typically occur during sustained periods of warm weather and minimal if any rainfall. Under such conditions fish and other aquatic inhabitants are particularly vulnerable to environmental stresses and predation. IFI considers that abstractions when river flows are at or below the 95% level should be avoided. In the case of the current application IFI would ask that a planning condition a) prevents any abstraction when river flows are at or below the 95% level and b) requires that the 95<sup>th</sup>% flow level be established at the abstraction point and permanently marked on an

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accessible gauge. Provision could be made for any water demand by the quarry during such periods by increasing on site water storage.

Furthermore, IFI would ask that planning conditions limit the future vertical development of the quarry to such an extent that there can be no extraction below the water table.

Fish Passage:

During a recent site inspection IFI identified that a stone weir constructed to facilitate the quarry abstraction from the Clashavoon Stream constitutes an obstacle to fish passage. This has been confirmed by the applicant in the EIS- *"A small weir has been created with boulders at the abstraction point to maintain water depth for the pump intake. This creates a small backwater upstream of the weir and creates an obstruction to the clear passage of fish"*. This obstruction is contrary to the provisions of the Fisheries Acts. IFI would ask that plans are submitted for consideration outlining an alternative abstraction mechanism design which does not obstructed fish passage.

Water Quality:

The EIS identifies that surplus site surface waters discharge to a roadside watercourse. IFI would suggest that this discharge should be licenced under the Water Pollution Acts due to its potential for on-site contamination by solids prior to discharge.

IFI would ask to be informed when further information is submitted and when a decision is reached on this application. Should you require any clarification please contact the undersigned.

Yours sincerely,

mmp  
Michael Mc Partland.  
Environmental Officer.