

**Dillon Corcoran**

---

**From:** Bord  
**Sent:** Tuesday 30 July 2024 12:51  
**To:** Appeals2  
**Subject:** FW: Case Number ABP-308036-20 Ummerra Gravel Pit, Macroom. Co.Cork  
**Attachments:** ABP-308036.20 Umera.doc

---

**From:** Michael McPartland <Michael.McPartland@fisheriesireland.ie>  
**Sent:** Tuesday, July 30, 2024 12:48 PM  
**To:** Bord <bord@pleanala.ie>  
**Subject:** Case Number ABP-308036-20 Ummerra Gravel Pit, Macroom. Co.Cork

**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 attached response to you letter of 19<sup>th</sup> July 2024.

Regards

Michael Mc Partland  
Senior Fisheries Environmental Officer.

-----  
Iascach Intíre Éireann  
Inland Fisheries Ireland

Tel + 353 (0)26 412 21/2  
Fax + 353 (0)26 412 23  
Email [michael.mcpartland@fisheriesireland.ie](mailto:michael.mcpartland@fisheriesireland.ie)  
Web [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

Sunnyside House, Macroom, Co. Cork, Ireland. P12 X602

-----  
Help Protect Ireland's Inland Fisheries

**Michael McPartland**  
**Senior Fisheries Environmental Officer**

✉ [Michael.McPartland@fisheriesireland.ie](mailto:Michael.McPartland@fisheriesireland.ie) • ☎ +353 (0)26 41222 • 🌐 [www.fisheriesireland.ie](http://www.fisheriesireland.ie) • 🏠 P12 X602



Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive species.  
Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit [www.fisheriesireland.ie](http://www.fisheriesireland.ie)



Iascach Intíre Éireann  
Inland Fisheries Ireland

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

30 July 2024

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

A chara

Further to previous correspondence and the IFI submission of 19<sup>th</sup> November 2020, thank you for forwarding subsequent information dated 8<sup>th</sup> January 2021 which we received on 22<sup>nd</sup> July 2024.

IFI's concerns in relation to the application were categorised under the headings of Water Quantity, Fish Passage and Water Quality. We have accessed the further information submitted in the context of each category and include below our original comments (in black) and comment on the information submitted to ABP on 8/1/21 (in blue).

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. An abstraction of 40m<sup>3</sup>/day from the Clashavoon Stream is proposed.

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 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.

The issue of water abstraction is addressed in Point 8 of the further information submitted. Further information submitted states that the impact of abstraction from the stream would be “*localised, imperceptible, brief and neutral*” at times of low flow. However, such descriptive terms are not supported by any facts or assessment. In this context, IFI have no reason to alter our comments of November 2020

#### 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.

The issue of the weir is addressed in Point 9 of the further information submitted. It is stated that “*DCWL will liaise with IFI regards the weir*”. This has not occurred, so IFI have no reason to alter our comments of November 2020.

#### 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.

Furthermore there appears to be ambiguity in the application in relation to the use of the “original” settlement pond. Page 19 of the EIAR states “*The proposed development is summarised as follows: .... – Inclusion of the original settlement pond (between the public road and Clashavoon Stream)*” while Page 65 of the same document states “*the original settlement pond located between the L-3423 and Clashavoon Stream is no longer used*”. The historical problems associated with the use of a settlement pond between the L-3423 and the Clashavoon Stream is acknowledged by the applicant in the application document. In this context IFI would ask that planning conditions would ensure there is no reactivation of a settlement pond or any other development works associated with the quarry in the narrow strip of land between the L-3423 and the Clashavoon Stream.

The issue of water quality and discharges is addressed in Points 10, 13,14 and 15 of the further information submitted. IFI would ask that any discharge of contaminated liquid from the site to any surface water channel requires a licence under the Water Pollution Acts.

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.

