

*Daire*

**Daragh Cassells**

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**From:** Dan Keohane <[REDACTED]>  
**Sent:** Thursday 15 August 2024 15:14  
**To:** Appeals2  
**Cc:** emurnane@dcwl.ie  
**Subject:** Ummera Gravel Pit, Macroom. ABP Case Numner ABP-308036-20  
**Attachments:** Let008 to ABP response 15 Aug 2024 rev 2.pdf

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**FAO Daire Littleton Caden**

Dear Mr. Littleton Caden

Please find enclosed the response, submitted on behalf of Drimoleague Concrete Works Ltd, to the observation submitted by Julia McSweeney and David Coakley as invited by the Board in its correspondence dated 19 July 2024.

Please confirm receipt.

Your sincerely,  
Dan Keohane  
[REDACTED]

CONFIDENTIAL

**Abstract**

15 August 2024

Mr. Dáire Littleton Caden,  
Executive Officer,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1  
D01 V902

**SENT BY EMAIL**

**Re: Substitute Consent Application for Ummera Gravel Pit  
Ummera County Cork  
For Drimoleague Concrete Works Limited  
ABP Case Number: ABP-308036-20**

Dear Mr. Littleton Caden,

With reference to the Board's correspondence dated 19 July 2024 and on behalf of Drimoleague Concrete Works Ltd (DCWL), please find herein our response to the observation made by Julia McSweeney and David Coakley dated 26 September 2020.

We note that the observations made by Julia and David relate largely to the Section 37L application for further development at the gravel pit (ABP Case Number: ABP-308194-20) and not the substitute consent application as referenced in the Board's letter. Nevertheless, DCWL is, without prejudice, making comment on the points raised.

Many of the points raised in the submission are addressed in the information previously submitted to the Board relating to the two applications made in August and September 2020. We refer the Board to:

- Application documentation for Substitute Consent, in particular the Remedial Environmental Impact Assessment Report for Ummera Gravel Pit, Macroom County Cork dated August 2020.
- Application documentation of further development, in particular the Environmental Impact Assessment Report for Further Development of Ummera Gravel Pit, Macroom County Cork dated September 2020.
- Submission to the Board, dated 08 January 2021, in response to the submission made by Cork County Council on the Substitute Consent application.
- Submission to the Board, dated 08 January 2021, in response to the submission made by Cork County Council on the Further Development application.
- Submission to the Board, dated 05 August 2021, in response to the Board's invitation to submit information supporting the existence of exception circumstances.

**Final / Restored Slope Angles**

Gravel pits are worked at steep to near vertical faces during operations. Setback distances to neighbouring properties are provided for safety. Distances imposed vary from quarry to quarry. The Section 261 conditions required a 5m buffer to the public road and with the requirement for screening berms, offsets from boundaries increased. As shown on the drawings submitted with both the Substitute Consent and Further Development applications, the buffer distance to the public road between the gravel pit and Julia / David's house is approximately 40m. Drawing No.5-Sheet 2 submitted with the Section 37L Further Development application shows the section through the gravel pit near their house – Section C-C. This clearly shows future excavation at a safe angle. It is DCWL's intention to work the gravel pit having due regard to safe working angles, offsets to boundaries, etc, and confirms that these works can be completed in a safe manner as shown on the drawings accompanying the Section 37L Further Development application.



### **Lifespan**

Julia and David suggest a re-visit of the operations mid-way through its proposed lifespan. In light of the large capital and on-going costs, gravel pits and quarries are generally afforded a long lifespan as their location is dependent on the occurrence of the natural resource in economic reserves and where extraction can be carried out with minimal environmental impact, such as at Ummerra. DCWL has good relationships with its neighbours at all of its facilities, working with them to reduce impacts of its operations. DCWL has an open-door policy in this regard and welcome any suggested improvements. It will take the same approach at the Ummerra gravel pit. In this regard, DCWL allows Julia and David to cut hay / silage from its fields adjacent to the gravel pit for a nominal sum. We note that most of the extraction area of the Section 37L application is towards the south, moving away from Julia and David's house and farm.

### **Restoration / After Use**

It is expected that the remaining reserves will be exhausted within the 15-year lifespan sought for the gravel pit. As with any similar development, any extension to the permitted lifespan would be subject to a further planning application. As detailed in the EIAR submitted with the Section 37L application, it is proposed to restore most of the site back to agricultural use, with elements of the site retained to enhance biodiversity. As far as other uses for the site, they would be subject to separate planning applications, but it is not DCWL's intention to apply for permission for such developments / activities.

### **Water Supply**

The proposed depth of excavations is shown on the cross-sections – refer to Drawing No.5-Sheet 1 and Drawing No.5-Sheet 2 of the Further Development application. Groundwater is assessed in Chapter 8 of the EIAR submitted with that application. As discussed in Chapter 8, the gravel pit is 130m downgradient of Julia / David's well (referred to as W1 on Figure 8-5). As such, operations at the quarry can't affect water quality at their well. There will be no groundwater abstraction at the gravel pit, so operations at the gravel pit will not affect the quantity of water supplied by this well. With the distances involved, the relative locations of the gravel pit and supply well, and groundwater flow direction, no impact on the well is predicted. DCWL is happy to include a condition that in the event of the gravel pit operations affecting the water supply of the well, then it will drill another well for Julia / David at its own expense.

### **Permission of House**

DCWL has no objection in principle to a planning application for a house on Julia / David's farm.

### **Dust**

In their observation, Julia and David indicate that dust has been an issue at their home and farm, and that David has a health condition. It is acknowledged that, in general, dust can be an issue at gravel pits and weather conditions strongly influence the potential affects. The mitigation measures to control dust are discussed in Section 6.4 of the EIAR submitted with the Section 37L application and further discussed in correspondence (dated 08 January 2021) submitted to the Board in response to the Council's submission on that application. In that correspondence it was noted that during the preparation of the EIAR, I spoke with Julia and David who indicated that they were no longer affected by dust from the gravel pit, and it was no longer a nuisance. It had been an issue previously, but since the maturing of the trees planted along the western perimeter of the gravel pit and along the access road, dust was no longer an issue. As detailed in the above referenced application documents, DCWL has proposed further dust mitigation measures including paving the access road into the site.

### **Ragwort**

DCWL will remove ragwort from the screening berms. DCWL intends to pull this by hand and gather the stalks for disposal. This will be done by the end of August and annually thereafter. As noted in the submission, the berms are difficult to access with machinery. DWCL would be happy with a condition in this regard.



In conclusion, it is DWCL intention to work with its neighbours to foster good relationships. DCWL would welcome input from its neighbours on any operational practices that might cause concern and will implement within reason the necessary changes and improvements to address those concerns.

If you have any queries, please contact the undersigned.

Yours sincerely,

A handwritten signature in blue ink, reading "Dan Keohane", is positioned above a horizontal line.

Dan Keohane

Encl.

