

Ronan Megannety

Dan

From: LAPS
Sent: Monday 29 June 2026 15:32
To: Appeals2
Subject: FW: An Coimisiún Pleanála Reference Number ACP-324014-25
Attachments: NEHS submission rEIAR SID for Milford Quarries LTD at Clogrennane Co Carlow
EHIS ref 5989 ACP ref QD01 324014.pdf

From: SIDS <sids@pleanala.ie>
Sent: Monday, 29 June 2026 15:19
To: LAPS <laps@pleanala.ie>
Subject: FW: An Coimisiún Pleanála Reference Number ACP-324014-25

From: Robbie Doyle <robbie.doyle@hse.ie>
Sent: Monday 29 June 2026 13:17
To: SIDS <sids@pleanala.ie>
Subject: An Coimisiún Pleanála Reference Number ACP-324014-25

You don't often get email from robbie.doyle@hse.ie. [Learn why this is important](#)

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Dear Sir/Madam,

Please find attached HSE submission for Reference Number is ACP-324014-25 for Proposed Development at the existing sandstone quarry Clogrennane, Bilboa, Co. Carlow.

Best wishes,

Robbie

Roiibeárd O'Dúill | Oifigeach Sláinte Comhshaoil, Príomhaí | Seirbhís Sláinte Comhshaoil Cheatharlach-Cill Chainnigh
| HSE | Ospidéal Naomh Dymphna | Bóthar Bhaile Átha Í | Ceatharlach | R93 DE62

Robbie Doyle | Principal Environmental Health Officer | Carlow-Kilkenny Environmental Health Service | HSE | St.
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Seirbhís Sláinte Comhshaoil Náisiúnta FSS | National Environmental Health Service HSE

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Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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National Environmental Health Service Submission Report

(As a Statutory Consultee under Article 28 of the Planning and Development Act 2000
(as amended) & Regulations made thereunder)

EHIS reference: 5989 **Applicant:** Milford Quarries Limited

Location: Clogrennane, Bilboa, Co. Carlow

Report to: An Coimisiún Pleanála

Type of consultation: rEIAR SID

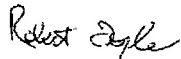
Planning reference: ACP-324014-25

Dear Sir/Madam

The National Environmental Health Service has reviewed the above planning application and have made the following observations regarding the proposed development. This report refers only to those sections of the planning documents which are relevant to the HSE and have an Environmental Health impact.

If you have any queries regarding this consultation report, please contact me.

Yours Sincerely,



Robert Doyle
Principal Environmental Health Officer
Date: 29/06/2026

Robbie Doyle | Principal Environmental Health Officer | Carlow-Kilkenny Environmental Health Service | HSE | St. Dymphna's Hospital | Athy Road | Co. Carlow | R93 DE62

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Seirbhís Sláinte Comhshaoil Náisiúnta FSS | National Environmental Health Service HSE



HSE Submission Report

Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000) and Regulations made thereunder)

Date: 29/06/2026

EHIS reference: 5989

Applicant: Milford Quarries Limited

Location: Clogrennane, Bilboa, Co. Carlow

Report to: An Coimisiún Pleanála

Type of consultation: rEIAR SID

Planning reference: ACP-324014-25

Introduction

The following HSE Departments were notified of the consultation request for the Planning EIAR Application on the 26th of May 2026:

- HSE South Emergency Management
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO Dublin & South East



This report only comments on Environmental Health impacts of the development as outlined in the rEIAR and the adequacy of the rEIAR from the Environmental Health viewpoint. The National Environmental Health Service has made observations and submissions on the following specific environmental health areas.

Proposed development:

Application under Section 177E of the Planning and development Acts 200-2021 for Substitute Consent consisting of quarrying including rock extraction by mechanical means and processing onsite using mobile primary crushing / screening and associated plant. The development also included soil storage areas, stockpiling areas, surface water management works and all ancillary works associated with the quarrying activities.

The rEIAR accompanies an application under Section 177E of the Planning and Development Act 2000, as amended, for development at an existing sandstone quarry at a site in the townland of Clogrennane, Co. Carlow. Substitute Consent is being sought to regularise the historic sandstone extraction and processing at the site comprising an extraction area of c. 8.66ha.

Assessment of the principle and description of the project

The National Environmental Health Service (EHS) is satisfied that the rEIAR provides an adequate description of the proposed project.

The proposed development being applied for under this planning application comprises of:

Assessment of Public Consultation and the Non-Technical Summary

The National Environmental Health Service found the local newspaper advertisement as part of public consultation. The NEHS emphasises the need for early and meaningful public consultation in the development process even in the case of extension of an existing site.

Assessment of Consideration of Alternatives

'Description of Alternatives' in chapter 3 of the rEIAR provides a description of the alternatives considered which included

- Alternative locations
- Alternative designs
- Alternative layouts



- Alternative processes
- Do Nothing option

Assessment of Description of the Physical Environment

The Development Site currently comprises of an existing quarry void which is surrounded by agricultural lands. The Development Site was previously used to extract sandstone bedrock, with much of the extraction ceasing in 2014 (all activities ceased in 2023). The floor of the existing quarry void stands at ~304mOD (metres above Ordnance Datum). The Development Site is located on the eastern edge of the Castlecomer Plateau, an upland area in north Co. Kilkenny which also extends into Co. Laois and Co. Carlow at its northern edge.

The subject site encompasses a total area of approximately 41.86 ha in a wider landholding of 45.68 hectares, under ownership of the Applicant, Milford Quarries Ltd. The land is located within the townland of Clogrennane, Co. Carlow and directly sits along the Co. Laois/Co. Carlow border.

The site is approximately 6 km south west of Carlow town and approximately 3 km north-west of Ballinabranna. Within the overall landholding is the subject site, which consists of a sandstone rock quarry known as Redrock. The site is bounded by a private rural road that is connected to the L7129 Road to the west and the L7134 Road to the east. The M9 motorway can be accessed via Junction 6, approximately 5.5km to the south east of the site.

The site is approximately 2.1km west of the River Barrow, and the associated River Barrow and River Nore Special Area of Conservation (SAC - 002162).

Population and Human Health

The specific legislation relevant to human health protection is set out within the technical rEIA chapters relevant to each pathway (noise, air, soil, water, etc.).

Ultimately, all of the effects of a development on the environment impinge upon human beings. Direct effects relate to matters such as land, water and air quality, noise, and changes to landscape character. Indirect effects relate to such matters as flora and fauna.

Chapter 5 of the rEIAR examines the potential impacts of the historic quarry development on human beings. The scope of the work includes an evaluation of the



potential and indirect effects on the human populations of the surrounding environs however is analysed as settlement general locations and census data.

However chapter 5 does not show exactly how near sensitive receptors are in relation to this development i.e. (500m etc.) There is a settlement statement in relation to census and new builds in the area however definitive locations of the closest sensitive receptors; and the possible effects on same were not explored in this chapter and require further analysis.

This data is only available in Nosie chapter which does define locations however it should be fully evaluated within the population health chapter as part of the rEiAR.

The area surrounding the site is predominantly rural in character. Residential properties in the vicinity of the site comprise one-off dwellings and farmhouses along local roads that are primarily to the north, south and east of the site.

The nearest towns and villages to the site are:

- Ballinabrannagh, population 557 (c. 3km to the south-east)
- Carlow Town, population 27,351 (c. 5km to the north-east)
- Leighlinbridge, population 959 (c. 8km to the south)
- Muine Bheag/Bagenalstown, population 2,945 (c. 12km to the south-east)
- Castlecomer, population 1,502 (c. 14 km to the west)

The closest settlement centre is the village of Ballinabrannagh, located c. 3km from the subject site to the southeast via the L3041 road.

The initial phase of operations, which required construction work and soil stripping, has the potential to generate dust and noise, which could potentially cause nuisance.

During the operational stage, the potential impacts on air, noise, landscape and traffic would have included the following:

- The generation of noise by the operation of machinery; Blasting,
- The generation of dust, particularly during period of dry weather, through the removal and storage of overburden and the extraction of sand and gravel;
- Ongoing changes to visual amenity as overburden is removed and stockpiled and sand and gravel is extracted and stockpiled;
- The generation of traffic by the export of sand and gravel from the site

Noise and Vibration

Noise Sensitive Locations Based on the location of the site, the construction works and its proximity to the residential receptors the following noise sensitive receptors have been identified and are illustrated in Figure 11. 5 below.

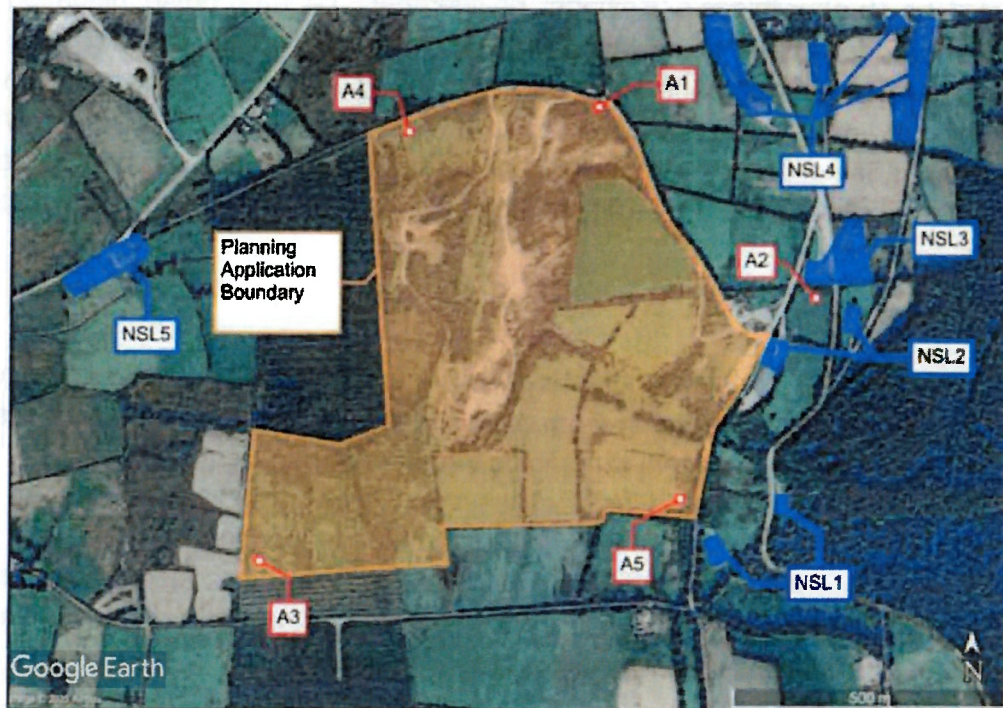


Figure 11.5: Noise Sensitive Locations & Noise Monitoring Locations

The noise sensitive locations are as follows;

- NSL1 are residential dwellings located approx. 441m southeast of the southernmost boundary of the approximate extraction area.
- NSL 2 are residential properties located approx. 380m to the east of the approximate extraction area.
- NSL 3 are a cluster of residential properties located approx. 315m east of the easternmost boundary of the approximate extraction area.
- NSL 4 are a cluster of residential properties located approx. 220m northeast of the approximate extraction area.
- NSL 5 is a residential property located approx. 550m west of the approximate extraction area.



The report has not given any information in relation to baseline noise data during operation. Therefore it is assumed that baseline noise data was not collected either before or during operations at the quarry. Baseline conditions at the closest residential receptors to the quarry have therefore been characterised using monitoring data collected after quarry operations ceased, during or before 2023.

It's not clear whether this is a 'Residual' noise impact, i.e. after noise mitigation is in place, or the background noise without the facility operating. The chapter does not clearly show the change in the noise environment by operation of the facility, even if the change is not then considered significant, which is the main purpose of rEIA. A comparison against an absolute noise level criteria is only part of the assessment as to the effects operation of the facility has had over the operating period with regards to noise.

Air

The application site and surrounding area falls into Air Quality Zone D, categorised as rural Ireland. The air quality in each zone is assessed and classified with respect to upper and lower assessment thresholds based on measurements over the previous five years. Upper and lower assessment thresholds are prescribed in legislation for each pollutant. The number of monitoring locations required is dependent on population size and whether ambient air quality concentrations exceed the upper assessment threshold, are between the upper and lower assessment thresholds, or are below the lower assessment threshold.

The Government's policy on air quality within Ireland is set out in the Air Quality Standards (AQS) Regulations 2011. The CAFE (Clean Air for Europe) Directive was transposed into Irish legislation by the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011). It replaces the Air Quality Standards Regulations 2002 (S.I. No. 271 of 2002), the Ozone in Ambient Air Regulations 2004 (S.I. No. 53 of 2004) and the EPA Act 1992 (Ambient Air Quality Assessment and Management) Regulations 1999 (S.I. No. 33 of 1999). The 4th Daughter Directive was transposed by the Arsenic, Cadmium, Mercury, Nickel and Polycyclic Aromatic Hydrocarbons in

It is understood that no boundary dust monitoring was taken at the Project lands during quarry operation.

There is variability in the deposition rates recorded across the monitoring months and locations. Furthermore, all monitoring was completed after quarrying activities ceased. As such, the quarry's contribution of recorded deposited dust is not represented within the monitoring data.



The most important climatological parameters governing the atmospheric dispersion of particles are as follows:

- wind direction: determines the broad transport of the emission and the sector of the compass into which the emission is dispersed; and
- wind speed would have an affect ground level emissions by increasing the initial dilution of particles in the emission. It will also affect the potential for dust entrainment.

For the rEIA, the baseline environment is not therefore as per the original green field agricultural site but is the baseline environment after years of unauthorised activities.

The baseline air quality in 2000 is potentially different to that of the presented data from 2024. The baseline at the start of the unauthorised activities was the original air quality together with any contribution from the years of quarry activity, together with any cumulative activity from other quarries/industry within the area was not assessed prior to this development.

Hydrology and Hydrogeology

The groundwater quality should have been monitored whilst the quarry was in operation in the boreholes at the site to determine if there is a deterioration in quality as a result of construction related activities, if so and depending on the nature of the results then additional measures to protect groundwater quality will be implemented.

There is no details showing a full monitoring system historically while this quarry was in operation. The effectiveness of the additional mitigation should have been verified through a sampling programme.

The course of the Raheendoran Stream has been altered by the historic quarrying activities. Within the extraction area the headwaters of this stream (~120m in length) have been removed and are no longer present as per data submitted within the rEIAR.

Chapter 8 Hydrology & hydrogeology states:

"Water which used to make its way into the stream now gathers on the floor of the quarry and outfalls from the existing quarry void via 2 no. separate outfall locations as discussed below. A large, flooded area is present in the northeast of the existing quarry void. This flooded area outfalls to a small drain which is located along an access track in the northeast of the Development Site. Meanwhile, some settlement ponds and flooded areas located towards the centre of the existing quarry void and outfall to the southeast. This outfall flows through a narrow, deeply incised gully



before it discharges into a larger settlement pond in the east of the overall landholding. This settlement pond, and the wet flooded areas in the quarry void, provide treatment in the form of attenuation and settlement of suspended solids. The treated water flows from the settlement pond to the northeast and joins with the discharge from the northern outfall which flows along the existing access track. The combined discharge then flows to the east for ~630m before it discharges into the EPA mapped Mortarstown Stream (EPA Code: 14M40). This stream is a tributary of the Fushoge River (EPA Code: 14F03), discharging into the Fushoge River just upstream of its confluence with the River Barrow. The Development has therefore altered the hydrology at the Development Site by removing the upper reaches of the Raheendoran Stream and redirecting water which used to flow in the Raheendoran Stream to the Mortarstown Stream”.

Any settlement lagoons should have been maintained and monitored carefully and should be constructed from the clayey subsoil that is present directly underneath the residual peat over much of the site and will operate as sealed lagoons. There is no detail on the construction or management of lagoons throughout the operational phase of this quarry. This mitigation measure prevents a loss of water through the base of the lagoons and will prevent any silt fines from the lagoon(s) going to groundwater.

There is no information on the rate of dewatering, the pump specification or the location of discharge at the Site. The course of the Raheendoran Stream has been altered by the historic quarrying activities the drainage affect and groundwater distribution regarding this activity which was done without an EIA at the time needs careful consideration.

Restoration of the Proposed Quarry

In the case *Fowler V Keegan* it was deemed that the large water bodies left behind were a health and safety water hazard. It is stated in Chapter 8 that the following is proposed-

“Water will be redirected back into the stream through a diversion channel from the existing settlement pond to the stream, upstream of the proposed wildlife pond. The settlement pond and wildlife pond will provide attenuation of water during this phase”.

As a minimum, regard should be had to the guidance issued by the Health and Safety Authority's on 'Quarrying – Trespass, Boundary Fencing and Prevention of Drowning'. To discourage trespassers a barrier of sufficient height and strength should be installed around the perimeter of the proposed water-filled void. Barriers should be inspected regularly and maintained in good condition.



Potential for future health gain from the restoration of the proposed development should be included in the EIAR.

There is not in great detail on the restoration process or full detailed plans. The map provided is not comprehensive. The Environmental Management Plan should lay out how the retained habitats will be protected during extraction; how continued management is undertaken post restoration and how the results are monitored to allow management revisions as necessary. This monitoring should be undertaken for the first 5 years after restoration.

The National Environmental Health Service recommends that the submission of a full Site Restoration Plan, which includes a timeframe for undertaking restoration works, is included as a condition of planning permission, if granted

Cumulative impacts

The National Environmental Health Service notes the assessment of cumulative impacts throughout the EIAR and is not satisfied that the projects listed in the rEIAR were assessed for the potential to give rise to cumulative impacts.

Health Gain/ current recreational use

It is noted that the rural area is being used for cycling, pedestrians and awareness should be raised with HGV drivers on these small roads to take due care. It is also noted that these roads are quite and used by walkers/ runners living in the area. Measures should be taken to reduce the volumes of through-traffic, speeds of traffic especially HGVs, and especially in the vicinity the quarry and housing.

The Introduction of traffic calming measures / enforce low traffic speeds for access and exit from the quarry making it safer for cyclists and other road users.

Conclusions

The rEIAR relies on predictive methodology and no information regarding any EIA had been undertaken prior to/during operation.

If it is the case that i.e. there was no monitoring of dust, noise or surface and ground water during the quarrying activities, then the NEHS considers this a significant issue with regard to the protection of Public Health.

If the planning process had been complied with, then the results of the monitoring are relevant and pertinent to the rEIA. If there are monitoring results from the operational period of this quarry, then their omission in the rEIA is a significant omission for the validity of the process.



Authorised development is subject to public participation and mitigation based on stakeholder consultation. Potential nuisance aspects of development can be less significant if there is a fixed time span. Unauthorised development is not subject to this. Therefore, the environmental impacts are likely to be more significant, particularly around the public health areas of noise exposure and dust nuisance.

The rEIAR has not demonstrated that Quarrying activities were within the predicted limits to protect health with regard to dust or noise or protection of ground and surface water and therefore has not demonstrated that the unauthorised development operated within the health protection standards. The rEIAR relies on predictive methodology that has not been validated through monitoring whilst the quarry was operational.

The conclusion that Air, noise and water emissions did not cause a nuisance at sensitive receptors is not supported by any evidence and is contradicted by a 3rd Party submission on the planning file.

A handwritten signature in black ink, appearing to read 'Eve Smith'.

Eve Smith

Environmental Health Officer

Environment/Climate Change, Network Support Unit (NSU)

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to:**

Robbie Doyle PEHO,

National Environmental Health Service HSE,

St. Dymphna's Hospital, Carlow,

Co. Carlow R93DE62



EHIS Reference No: 5989

An Coimisiún Pleanála Ref No: ACP-324014-25

Date: 10/06/2026

A Chara

Thank you for the opportunity to comment on this application.

Due to resource constraints, Emergency Management is not in a position to provide a bespoke response to individual applications.

Under Section 7(1) of the Health Act, 2004, the HSE is charged with using the resources available to it *'in the most beneficial, effective and efficient manner to improve, promote and protect the health and welfare of the public'*. It is within this context, that the below emergency planning comments are provided.

At a strategic level, the following should be considered during the planning application process:

1. Impact upon access to health service facilities during construction and operation.
2. The availability of health services within the area for the population increase during construction, and, if applicable, operation of the development.
3. Impact upon health service delivery in the area during construction of the development, especially any traffic restrictions.
4. Location of Upper and Lower Tier COMAH sites within the area, including any "area in which people may be affected", as defined by the Central Competent Authority (i.e.; the Health and Safety Authority).
5. Any enhancement that the development offers to increase resilience of, or protection to, critical infrastructure.
6. Any existing, or potential designation of the development under European Union (Resilience of Critical Entities) Regulation 2024 – SI 559 of 2024

Before a new development becomes operational, a suitable emergency plan should be developed for the site, in line with relevant legislation. More information on 'Emergency Plans' for specific industries can be found on www.hsa.ie

If a developer / operator wishes to liaise directly with the Health Service Executive (HSE) regarding a specific risk impacting upon population health and/ or health service delivery, then please contact the appropriate HSE Emergency Management Office. [Click Here for contact details](#)

David O'Sullivan
Chief Emergency Management Officer – HSE SOUTH

