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From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
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Good afternoon,

Attached are heritage-related observations/recommendations for the above-mentioned application. Please acknowledge receipt.

Regards,

Brian Bone
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

Aonad na nIarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90



Planning Ref: ACP-324015-25

(Please quote in all related correspondence)

6 August 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to: appeals@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended

Substitute Consent Application by Milford Quarries Limited for further development consisting of further quarry extraction over an area of c. 16.17 ha to include the pre-existing quarry extraction area and additional agricultural lands in the western and southwestern portion of the site. The projected lifespan of the quarry is c. 20 years. The proposed development will involve blasting, extraction and processing of rock using mobile primary crushing / screening and associated plant on the proposed quarry floor. The proposed quarry void will be extracted over 4 no. phases (phase 1 will involve levelling of existing quarry floor; phase 2 will expand existing extraction area to the west with a single bench depth of c. 20 m; phases 3 and 4 will expand the extraction area to the south west to a depth of 2 no. benches of c. 10m each) The resulting quarry floor depth will be c. 300m AOD with a proposed rate of extraction of c. 200K tonnes per annum over the projected lifetime of the quarry. The proposed development will include for construction of earthen screening berms, expanded soil storage areas and will utilise existing quarry entrances from the northern boundary. Primary entrance to be upgraded with electric gates and security cameras. The main quarry access linking to the L7130 local road to the east will be upgraded. The proposed surface water management plan will utilise the existing surface water management onsite while introducing expanded settlement ponds with baffle features. The proposed development will also include a proposed weighbridge office, staff welfare unit and wheel wash. The proposed development will be accompanied by a restoration plan which will utilise existing excavated materials from the site at Clogrennane, Bilboa, Co Carlow



A chara,

I refer to correspondence dated 18 May 2026 received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

These observations are provided by the Department in its role as the statutory nature conservation authority and having regard to its functions under the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), the Wildlife Acts 1976–2023, and the requirements of Article 6 of the Habitats Directive (92/43/EEC) and Article 4 of the Birds Directive (2009/147/EC). The comments are made in the context of the Planning Application Consultation and are intended to assist the competent authority in its consideration of the Natura Impact Statement (NIS), the Environmental Impact Assessment Report (EIAR) and the potential effects of the development on protected habitats, protected species and wider biodiversity interests.

Appropriate Assessment

Having reviewed the NIS, the Department is not satisfied that sufficient information has been provided to permit a conclusion, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of the River Barrow and River Nore Special Area of Conservation (SAC) (Site Code: 002162), either alone or in combination with other plans and projects.

The NIS relies heavily on the conclusion that water quality impacts can be avoided through the operation of settlement ponds, hydrocarbon interceptors, attenuation measures, operational management procedures and adherence to best practice mitigation. While such measures may be appropriate, insufficient detail has been provided regarding the design capacity, performance standards, maintenance requirements and long-term effectiveness of these systems over the proposed 20-year operational life of the quarry. In the absence of this information, it is difficult to determine whether the proposed mitigation is capable of ensuring the protection of downstream qualifying interests under all operational and extreme weather conditions.

Particular concern arises in relation to aquatic qualifying interests of the River Barrow and River Nore SAC, including Freshwater Pearl Mussel (*Margaritifera margaritifera*), Atlantic Salmon (*Salmo salar*), Brook Lamprey (*Lampetra planeri*), River Lamprey (*Lampetra*



fluviatilis), White-clawed Crayfish (*Austropotamobius pallipes*) and Otter (*Lutra lutra*). The assessment does not appear to provide sufficient species-specific analysis of the sensitivity of these qualifying interests to sediment mobilisation, nutrient release, hydrocarbon contamination, blasting by-products or hydrological alteration. Instead, aquatic qualifying interests are largely assessed collectively.

The Department also notes that the site is associated with historic modification of local drainage features, including the loss and diversion of headwater stream habitat within the quarry footprint. Given the concurrent substitute consent process and the acknowledged hydrological connectivity to the SAC, further information is required regarding the cumulative implications of both historic and proposed quarrying activities for downstream European site interests.

The in-combination assessment is considered insufficiently detailed. The cumulative assessment relies largely on broad conclusions that other developments have been assessed under the planning system and are, therefore, unlikely to contribute to significant cumulative effects. Additional analysis is required in relation to cumulative impacts arising from quarrying activities, licensed industrial activities, forestry operations, agricultural land use and other existing or permitted developments within the wider catchment.

Accordingly, the Department is not satisfied that the information currently submitted allows a complete, precise and definitive assessment of the implications of the proposed development for the conservation objectives of the River Barrow and River Nore SAC.

EIAR Comments

The EIAR identifies a number of ecological receptors of conservation significance within the site, including breeding birds, bats, amphibians and riparian habitats. However, the Department considers that a number of aspects of the ecological assessment require further clarification.

The proposed development involves blasting, drilling, crushing, screening and associated quarrying activities over a period of approximately 20 years. Notwithstanding this, there appears to be limited assessment of the ecological effects of blasting-related noise and vibration on fauna present within the site. The noise and vibration assessment is focused primarily on human receptors and structural effects. The potential ecological consequences of repeated blasting events on protected species and sensitive habitats do not appear to have been assessed in sufficient detail.



The Department notes that the EIAR Interactions Chapter identifies interactions between biodiversity and hydrology, air quality and climate, but does not identify any interaction between biodiversity and noise/vibration despite blasting forming an integral component of the proposed development. The basis for this omission is unclear.

The biodiversity surveys identified ecological features and species dependent on quarry cliff faces, spoil mounds, ponds, hedgerows and scrub habitats. While mitigation has been proposed, additional information is required to demonstrate how ecological function will be maintained throughout the duration of quarry operations and not solely following restoration.

The Department also notes that much reliance is placed on future ecological monitoring and adaptive management measures. Whilst monitoring is important, monitoring cannot substitute for a robust assessment of likely impacts nor remedy deficiencies in baseline ecological information.

The cumulative ecological assessment is also considered limited. The extent to which the proposed development may contribute to cumulative disturbance, habitat loss, water quality impacts or fragmentation of habitats has not been fully demonstrated.

Protected Species Comments

The Department notes that surveys undertaken for the application recorded or identified the presence of a number of protected species, including Peregrine Falcon (*Falco peregrinus*), Sand Martin (*Riparia riparia*), Smooth Newt (*Lissotriton vulgaris*), Common Frog (*Rana temporaria*), Irish Hare (*Lepus timidus hibernicus*) and several bat species.

Peregrine Falcon

The Department has particular concerns regarding the assessment of Peregrine Falcon.

The ecological surveys recorded repeated Peregrine Falcon activity within the quarry together with evidence suggesting regular use of quarry cliff habitats. The submitted documentation also acknowledges that quarry faces provide potentially suitable nesting habitat. However, the survey effort available to the Department appears to have been concentrated during July and August and it is unclear whether sufficient survey effort was undertaken during the key breeding period to conclusively determine nesting status.

Furthermore, the mitigation measures proposed by the applicant include annual Peregrine monitoring, liaison with the National Parks and Wildlife Service of the Department and a 300 metre drilling and blasting exclusion zone should nesting occur. While welcome, these



measures indicate that occupation of the site by breeding Peregrines remains a realistic possibility during the operational life of the quarry. In that context, it is noted that local National Parks and Wildlife Service staff have confirmed Peregrine Falcon breeding within the site for the last two years.

The Department considers that additional information is required to robustly assess the implications of blasting, drilling and associated disturbance for Peregrine Falcon.

Sand Martin

The surveys recorded active Sand Martin nesting burrows within the quarry. The presence of an active breeding colony is a material ecological consideration.

While the applicant proposes seasonal restrictions and provision of alternative nesting habitat, further detail is required regarding:

- the extent of nesting activity
- the relationship between the colony and proposed quarry operations
- the timing of stockpile removal and quarry works
- contingency measures should colony occupation expand during operations

Bats

Five bat species were recorded during survey work. All bat species are strictly protected under the Habitats Directive and associated national legislation.

The Department considers that additional clarification is required regarding:

- potential impacts of blasting on bats
- impacts of lighting associated with quarry infrastructure, security measures and access works
- potential effects on commuting routes and foraging habitat
- long-term disturbance associated with quarry operations



The assessment appears to focus primarily on roost presence rather than wider habitat functionality.

Smooth Newt and Common Frog

The submitted information confirms the presence of Smooth Newt and Common Frog within quarry ponds. The proposed mitigation includes pond creation, translocation and monitoring measures, indicating that impacts on existing breeding habitat are anticipated.

Further information should be provided regarding:

- the timing of pond loss
- timing of replacement habitat creation
- receptor site suitability
- habitat management arrangements
- long-term monitoring commitments and success criteria

Conclusion

Based on the information currently before the Department, uncertainty remains regarding the assessment of impacts on several protected species, most notably Peregrine Falcon, bats, Sand Martin and Smooth Newt. Additional information is, therefore, required (as set out above) before the Department can conclude with confidence that the proposed development would not result in significant adverse effects on protected species or their breeding, resting or supporting habitats.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie where used, or to the following address:

The Manager
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Is mise, le meas,

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration

