



## 1. INTRODUCTION

### 1.1 Preamble

This Environmental Impact Statement (EIS) is being submitted to the Environmental Protection Agency (EPA) by Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, Co. Mayo to accompany a Review of an existing Waste Licence, W0265-01 for an existing soil recovery facility at Tallagh, Belmullet, Co. Mayo (new EPA reference W0256-02).

The existing licensed facility, as per licence W0256-01, is a soil recovery facility, which is licensed for a final topographic level of a 1m Land Raise and with the acceptance of 24,900 tonnes per annum of soil and stone and its recovery, by spreading material over the deposition site area, with a consequential benefit for improving the land for agricultural use.

The application for the Review of Waste Licence W0256-01 is for the continued operation per the existing waste licence, with no change to the licensed final topographic level of a 1m Land Raise and with the acceptance of up to a maximum of 90,000 tonnes per annum of soil and stone for recovery as described above – this is to allow for the acceptance of the currently available suitable material from a nearby large infrastructural project, which is to provide for material from a well monitored source of incoming soil and stone.

The review of the Licence creates no proposed change to the content, nature, composition or volume of materials intended for recovery by deposition at the site, and the overall tonnage of 265,000 tonnes for which the existing licence was issued remains unaffected. The activity will just take a shorter time span to complete and fully restore to beneficial agricultural use.

### 1.2 Exempted Planning Status

The activities carried out under the existing Waste Licence are exempt from Planning Permission, as per the 2009 Waste Licence application. The EPA Technical Committee report dated 27<sup>th</sup> April 2011 relating to the existing Waste Licence acknowledges the development to be exempt from planning permission.

The letter of 8th May 2012 received from Mayo County Council confirms that the proposed alterations to the scheduling of the materials recovery at the site (i.e. the subject matter of the review of the waste licence) does not affect the planning status of the works as exempted development. See **Figure 1.2.1** for a copy of the letters received from Mayo County Council the relevant planning authority in this regard.

In accordance with Section 40 (2A)(C) of the Waste Management Acts (1996-2013), the EPA has addressed the information submitted for a Review of the existing Waste Licence and considers that the licence review application must be made subject to an Environmental Impact Assessment (EIA). Therefore in accordance with Section 42 (II)(b) of the Waste Management Acts (1996-2013), Lennon Quarries Ltd. hereby submits as Environmental Impact Statement (EIS).



Figures 1.2.1: Letters relating to Exempted Planning Status of Soil Recovery Activity



## COMHAIRLE CHONTAE MHAIGH EO

Aras an Chontae, Caislean a 'Bharraigh, Chontae Mhaigh Eo.  
Teileafóin (094) 9024444 Fax (094) 9023937 Website: www.mayococo.ie

Your Ref.

TOBIN CONSULTING ENGINEERS CASTLEBAR		
PROJECT NO.	J084	Our Ref.
FILE REF.	1a	18 <sup>th</sup> November 2009
Date Received	20 NOV 2009	
PASS TO	ACTION BY	DATE
E Sweeney		

Dr Emma Sweeney,  
Senior Environmental Scientist,  
Patrick J Tobin & Co Ltd.,  
Market Square,  
Castlebar,  
Co Mayo.

Re: Application to the Environmental Protection Agency for a Waste Licence,  
EPA Ref: W0256-01 – Lennon Quarries Ltd.

Dear Dr Sweeney,

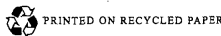
I refer to the above and to your letter received on the 16<sup>th</sup> November, 2009. I wish to inform you that the "deposition of natural soil and stones for the purposes of reclamation for agricultural purposes" does not constitute a material change in use of the land and such deposition would be regarded as exempt development under Class 11 of the 2001 Planning & Development Regulations.

Yours sincerely,

Iain Douglas S.P.  
Planning & Development

Consent of EPA required for any other use.

MAYO COUNTY COUNCIL, Aras an Chontae, Castlebar, Co. Mayo. Tel: (094) 9024444





Consulting Engineers

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**Palgreen House**, Palgreen Road, Railway, Ireland. Tel: +353 (0)81 800711 Fax: +353 (0)81 800700  
**Belvoir Park, Roslinduff Bay**, Lower Shelburne Road, Loughs, Ireland. Tel: +353 (0)91 426751 Fax: +353 (0)91 480238  
**Malinbeg**, Loughs, Co. Fermanagh, Ireland. Tel: +353 (0)28 3650000 Fax: +353 (0)28 3650000  
**2nd Floor, Upper Shelburne**, Malinbeg, Donegal, Co. Lond. Ireland. Tel: +353 (0)91 426751 Fax: +353 (0)91 426751  
**44 Cyprien St.**, T1-152 Dublin, Ireland. Tel: +353 (0)1 555 8848 Fax: +353 (0)1 555 7325  
**Riley Court, Millers Hill Road**, University of Wexford Campus, Wexford, Ireland. Tel: +353 (0)53 8452144

**Mr. Ian Douglas**  
**Senior Planner**  
**Planning Department**  
**Mayo County Council**  
**Aras an Chontae**  
**The Mall**  
**Castlebar**  
**Co. Mayo**

TOBIN CONSULTING ENGINEERS  
CASTLEBAR

RECEIVED

15 APR 2012

DATE	ACTION BY	DATE

April 17<sup>th</sup> 2012

**RE: Alteration of scheduling by Lennon Quarries Ltd. - Material Recovery Facility, Tallagh, Belmullet, County Mayo**

Dear Mr. Douglas,

I am writing on behalf of our client Lennon Quarries Ltd., Glencastle, Bunsowen, Ballina, Co. Mayo (The Applicant) which holds a current Waste Licence Reference W0256-01 for recovery of natural soil and stones at an existing Inert Material Recovery Facility, at Tallagh, Belmullet, County Mayo.

As per your letter of 18/11/09 the activities as outlined at the Material Recovery Facility are Exempt from Planning, and as such do not require an accompanying Environmental Impact Statement.

Our client proposes to alter the scheduling of the material recovery at the site and wished to complete the above licensed recovery of soil and stones over a period of 2.5 years at this location.

Consent of copyholder required for any other use. For inspection purposes only.

**Directors:** L.E. Weldon (Chairman) R.P. Tobin (Managing Director) B.J. Downes M.F. Garrick J.P. Kelly  
 S. Finlay R.J. Fogarty D. Grehan S. Cavanagh (Company Secretary)  
 W. McDermott C. McGovern B. Mulligan C.O'Keefe D.A. Downes (Consultant)

**Associates:** T. Cannon P. Cogan D. Connors B. Gallagher B. Hickey  
 M. Hagan B. Hutchinson D. Kennedy E. McParlan S. Tinsley

Co. Reg. No. 42804 - Registered Office: Palgreen House, Palgreen Road, Railway, Ireland.

There is no proposed change to the content, nature, composition or volume of materials intended for recovery by deposition at the site. Our client wishes simply, to complete the licensed recovery works over a shorter time period.

I would ask you to confirm that this will not affect the status of the site, whereby, the recovery of natural soil and stones at the site remains exempt from planning permission and as such, does not require an Environmental Impact Assessment.

Yours Sincerely,

**Sean Finlay**  
**Director**  
**Tobin Consulting Engineers**



## Comhairle Contae Mhaigh Eo

Áras an Chontae, Caisleán an Bharraigh, Contae Mhaigh Eo.  
Teileafón: (094) 9024444 Facs: (094) 9023937

Do Thag. / Your Ref.

Ár dTag. / Our Ref.

Mr. Sean Finlay, Director,  
Tobin Consulting Engineers,  
Market Square,  
Castlebar,  
Co. Mayo.

TOBIN CONSULTING ENGINEERS		
PROJECT NO:		
FILE NO:		
Date Received	13 MAY 2012	
DATE	DATE	DATE

8<sup>th</sup> May 2012

**Re: Alteration of Scheduling by Lennon Quarries Ltd.  
Material Recovering Facility at Tallagh, Belmullet, Co. Mayo.**

Dear Mr. Finlay,

I wish to acknowledge receipt of your correspondence received at this office on 19<sup>th</sup> April 2012, in relation to the above.

I wish to inform you that the proposed alterations to the scheduling of the materials recovery at the site does not affect the planning status of the works as exempted development.

Yours sincerely,

  
Mary Killoran Coyne, A.O.,  
Planning & Development.

www.mayococo.ie

## Mayo County Council

Áras an Chontae, Castlebar, Co. Mayo. Tel: (094) 9024444 Fax: (094) 9023937



### 1.3 The EU Waste Framework Directive (2008/98/EC)

EU Directive 2008/98/EC was published in the Official Journal of the European Union on 22/11/2008 and was implemented in Ireland as the Waste Management (Waste Framework Directive) Regulations 2011 (S.I No. 126 of 2011). The following paragraphs have a bearing on the recovery of soil and stones at the Tallagh soil recovery facility:

The Directive stated that:

- *In its conclusions of 1 July 2004, the Council called on the Commission to bring forward a proposal for the revision of certain aspects of Directive 75/442/EEC, repealed and replaced by Directive 2006/12/EC, in order to clarify the distinction between waste and non-waste and that between recovery and disposal.*
- *The definitions of recovery and disposal need to be modified in order to ensure a clear distinction between the two concepts, based on a genuine difference in environmental impact through the substitution of natural resources in the economy and recognising the potential benefits to the environment and human health of using waste as a resource.*
- *It is therefore necessary to revise Directive 2006/12/EC in order to clarify key concepts such as the definitions of waste, recovery and disposal, to strengthen the measures that must be taken in regard to waste prevention, to introduce an approach that takes into account the whole life-cycle of products and materials and not only the waste phase, and to focus on reducing the environmental impacts of waste generation and waste management, thereby strengthening the economic value of waste. Furthermore, the recovery of waste and the use of recovered materials should be encouraged in order to conserve natural resources. In the interests of clarity and readability, Directive 2006/12/EC should be repealed and replaced by a new directive.*
- *The waste status of uncontaminated excavated soils and other naturally occurring material which are used on sites other than the one from which they were excavated should be considered in accordance with the definition of waste and the provisions on by-products or on the end of waste status under this Directive.*

Under Article 3 of Directive 2008/98/EC the following definitions shall apply:

- *'waste' means any substance or object which the holder discards or intends or is required to discard. This definition is key as it is referred to throughout the Directive as Point (1) of Article 3.*
- *'recovery' means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II sets out a non-exhaustive list of recovery operations.*
- *'disposal' means any operation which is not recovery even where the operation has as a secondary consequence the reclamation of substances or energy. Annex I sets out a non-exhaustive list of disposal operations.*



The EU Directive 2008/98/EC and Waste Management (Waste Framework Directive) Regulations 2010 provide clear and unambiguous definitions of Waste Disposal and Waste Recovery. Under the 1975 Waste Directive 75/442/EEC, the term “disposal” included “recovery”. This outdated Directive has now been repealed.

#### **1.4 Environmental Impact Assessment Legislation**

This Environmental Impact Statement has been prepared in accordance with the following legislation:

- The European Community Directive (85/337/EEC) on Environmental Impact Assessment as amended by Directive 97/11/EC.
- The European Communities (Environmental Impact Assessment) Regulations, 1989 to 1999 as implemented in Ireland. These include European Communities (Environmental Impact Assessment) Regulations, 1989 (S.I. No. 349 of 1989), the European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1994 (S.I. No. 84 of 1994), the European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1996 (S.I. No. 101 of 1996), the European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1998 (S.I. No. 351 of 1998), the European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1999 (S.I. No. 93 of 1999). These regulations shall be construed as one and may be collectively cited as the European Communities (Environmental Impact Assessment) Regulations 1989 to 1999.

In accordance with Section 40 (2A)(C) of the Waste Management Acts (1996-2013), the EPA has addressed the information submitted for a Review of the existing Waste Licence and considers that the licence review application must be made subject to an Environmental Impact Assessment (EIA). Therefore in accordance with Section 42 (II)(b) of the Waste Management Acts (1996-2013), Lennon Quarries Ltd. hereby submits as Environmental Impact Statement (EIS).

#### **1.5 Structure and Content of the Environmental Impact Statement**

An Environmental Impact Statement (EIS) *“means a statement of the effects, if any, which proposed development, if carried out, would have on the environment”*.

This Environmental Impact Statement is presented in the “Grouped Format Structure” as set down in the Environmental Protection Agency (EPA) publication: **Guidelines on the information to be contained in Environmental Impact Statements** (2002).

Due regard has been given in the preparation of this EIS to the requirements of Article 94 contained in Schedule 6 of the Planning and Development Regulations, 2001 (S.I. 600 of 2001) – *“Information to be Contained in an EIS”*.





This EIS is sub-divided into four distinct sections, each with a number of sub-sections. As an overview they comprise of:

▪ **Section 1 - Introduction**

Background to the application site and operator with a preamble and introduction to the EIS. This section also includes pre-application consultations and legal requirements followed.

▪ **Section 2 – Description Of The Proposed Development**

A detailed description of the proposed development, including information on the site, design and size of the proposed development. This also includes operational considerations and final restoration schemes. This section also identifies the data required to assess the main effects which the development is likely to have on the environment.

▪ **Section 3 – The Existing Environment, Environmental Impacts and Mitigation Measures**

Detailed information on aspects of the existing environment, identifying potential impacts on the environment by the proposed development, and recommends mitigation measures to reduce or eliminate these impacts. They are grouped under the following sub-sections:

- Scoping Report
- Flora and Fauna
- Water
- Air Quality and Dust
- Noise
- Hydrogeology – Geology, Groundwater and Soils
- Cultural Heritage
- Human Beings and Material Assets
- Landscape and Visual Assessment
- Interaction of the Foregoing

▪ **Section 4 – Non-Technical Summary**

A summary in non-technical language of the information contained within the EIS.

## **1.6 The Applicant**

Lennon Quarries Ltd., is a local County Mayo owned/operated company, which provides employment to ca. 25 no. people in the Belmullet area. The company is primarily a quarry/rock aggregate provider, with a large quarry located in Glencastle, Bunnahowen, Ballina, County Mayo.



Lennon Quarries Ltd are a member of the the Soil Recovery Association (SRA) which is a National Organisation affiliated to the Construction Industry Federation (CIF) which represents Members involved in the excavation, transport and recovery of soil and stones at authorised permitted and licensed soil and stone recovery facilities.

The SRA has been instrumental in preparing the new EPA Waste Licence Form and Guidance Notes for Waste Soils Recovery Facilities in conjunction with the EPA. In this regard the SRA had had extensive discussions with the EPA concerning the implementation of the new Regulations including meetings on 12/6/2008 and more recently on 29/1/2009.

### **1.7 Existing Waste Authorisation**

Lennon Quarries Ltd. branched out into the Waste Management Area in 2005, when they applied for and received Waste Collection Permit CW276 from Mayo County Council.

The existing licensed site at Tallagh, Belmullet, Co. Mayo, formerly operated as an authorised waste permitted facility for the purpose of the consequential benefit to agriculture under a Waste Permit No. Per 144 06/07/2005.

This Waste Permit was granted in January 2006, under the Waste Management (Permit) Regulations, 1998 and authorised the activity under Class 10 of the Fourth Class 10 of the Fourth Schedule of the Waste Management Act 1996 (as amended): "*The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system*"

Existing and proposed inert waste recovery activities (for the purposes of Improvement or Development of Land) which may have previously operated under a Waste Permit under the Waste Management (Permit) Regulations, 1998 became subject to the Waste Management (Facility Permit and Registration) Regulations 2007 (S.I 821 of 2007) as amended by the Waste Management (Facility Permit and Registration) (Amendment) Regulations 2008 (S.I 821 of 2007) as from 1<sup>st</sup> June 2008.

These new Regulations set out new thresholds for inert waste recovery facilities and in particular for operating under Waste Facility Permits. This is set out under Class 5 and Class 6 of Part 1 of the Third Schedule of the Waste Management (Facility Permit and Registration) Regulations 2007 (S.I 821 of 2007) as amended by the Waste Management (Facility Permit and Registration) (Amendment) Regulations 2008 (S.I 821 of 2007). These regulations set out time scales and requirements for inert waste recovery facilities that were above the new thresholds to apply to the EPA for a Waste Licence.

The new thresholds for Waste Facility Permits were as follows: Class 5: *Recovery of excavation or dredge spoil, comprising natural materials of clay, silt, sand, gravel or stone and which comes within the meaning of inert waste, through deposition for the purposes of the improvement or development of land, where the total quantity of waste recovered at the facility is less than 100,000 tonnes.*

Class 6: *Recovery of inert waste (other than excavations or dredgings comprising natural materials of clay, silt, sand, gravel or stone) through deposition for the purposes of the*





*improvement or development of land, where the total quantity of waste recovered at the facility is less than 50,000 tonnes.*

The new Regulations set out a period of 180 working days from the 1<sup>st</sup> June 2008 for all existing soil and stone recovery facilities whose threshold exceeds 100,000 tonnes to either cease operations by 13<sup>th</sup> February 2009 or else have applied to the EPA for a Waste Licence prior to the 13<sup>th</sup> February 2009. The EPA wrote out to many existing facilities on 31/10/2008 asking operators to confirm which of three following options they would be adopting:

1. Apply to the EPA for a licence prior to the 13<sup>th</sup> February 2009 or before the expiration of your current permit (whichever is sooner).
2. Reduce your capacity below 100,000 tonnes threshold and continue to operate under a permit issued by the Local Authority.
3. Cease the activity by 13<sup>th</sup> February 2009.

Lennon Quarries Ltd. applied for Waste Licence (Ref: WO256-01) and continued to operate under their Waste Permit until this licence was decided upon.

The Waste Licence was granted by the EPA on the 20<sup>th</sup> May 2011 for the recovery of waste soil and stones by deposition on land at Tallagh, Belmullet, County Mayo. The Waste Licence specifies a maximum of 24,900 tonnes per annum of waste soil and stones will be used to raise the level of the site by one metre in order to improve the land for agricultural purposes.

The EPA requested that the Lennon Quarries Ltd. who are both the applicant and the operator of the facility, to apply for a Review of their existing licence to seek an increase in the annual tonnage of soil and stones entering the site from 24,900 to 90,000 tonnes.

## **1.8 Site Selection and Alternatives**

The existing soil recovery site at Tallagh has been up and running since it was granted a Waste Permit back in January 2006. It has also operated for the past ca. 2 years under a Waste Licence without any complaints or enforcement issues as proven by Agency records.

Furthermore the compliance monitoring is all up to date and is all compliant with the license requirements and therefore indicates that the inert soil recovery works undertaken at the existing site to date have not had any detrimental impact on the local water environment.

Therefore as an established authorised site which has undergone a full assessment by the Agency, it was not necessary to carry out a site selection study as would be required for a "green-field" site.

Furthermore, a soil recovery facility for the consequential benefit to agriculture can only be sited where the need arises as in this case with the marginal agricultural lands at Tallagh. It is not appropriate therefore to identify and appraise the merits of alternative candidate sites for the proposed waste recovery activities.



The use of inert soil and stone in the recovery activity is the most suitable material for the as it prevents the use of primary aggregates such as quarried rock and therefore protects valuable rock reserves.

At all stages of the site design and site operation, alternative techniques, equipment and machinery have been considered and employed where appropriate to ensure that the continued operation of the soil recovery facility does not have any significant negative impacts upon the environment.

### **1.9 Data Necessary to Identify and Assess Environmental Effects of Development**

The data necessary to identify and assess the environmental effects of the development are:

- (i) The existing environment, as described in Section 3 by the specialists in various fields.
- (ii) The characteristics of the development as described in Section 2, including its size and scale, processes involved and the emissions from the existing licensed soil recovery facility.
- (iii) The potential environmental effects of the project are assessed and proposed mitigation measures are presented in Section 3.

Information on all aspects of the environment was obtained from published information and from specially commissioned field surveys.

### **1.10 Difficulties Compiling Specified Information**

Baseline information for the existing site and its environment was readily compiled by the EIS contributors and no such difficulties were found.

### **1.11 Forecasting Methods Used to Assess the Effects on the Environment**

The methods employed to forecast the effects on the various aspects of the environment are standard techniques used in the professional disciplines. The general procedure employed was to describe the receiving environment in a dynamic fashion, to add to that a projection of the loading placed on all aspects of the environment by the development in its mitigated form and thereby arrive at the net likely significant effect of the development on the environment.

### **1.12 Contributors to the EIS**

The preparation and co-ordination of this Environmental Impact Statement on behalf of Lennon Quarries Ltd. has been undertaken by Mr. Freddie P.R. Symmons B.Env.Sc. (HONS) MCIEEM – Senior Environmental Consultant of Kingfisher Environmental Consultants and Full Member of the Chartered Institute of Ecology and Environmental Management.

Kingfisher Environmental Consultants Kingfisher Environmental Consultants have prepared and lodged in excess of 60 waste permit applications in Ireland for land reclamation activities and in particular in relation to sites where the sole purpose is the reclamation of land using



inert soil and stones for the consequential benefit to agriculture. This particular experience dates back to 1998. In addition we have vast experience in planning and case law as it pertains to land reclamation and this includes Section 5 (planning exemption) applications and planning applications for land reclamation activities.

Kingfisher Environmental Consultants formed and established the Soil Recovery Association (SRA) in Ireland in 2005 and are lead consultants to this industry led organisation. Extensive representations were made in 2005 and 2008 to the Department of Environment concerning the now enacted Waste Management (Facility Permit and Registration) Regulations 2007 (S.I 821 of 2007) as amended by the Waste Management (Facility Permit and Registration) (Amendment) Regulations 2008 (S.I 821 of 2007).

Furthermore Kingfisher Environmental Consultants assisted (on behalf of the Soil Recovery Association) with the drafting of the New EPA Waste Licence form for soil recovery facilities and also assisted in the preparation of the Guidance Note for Soil Recovery Activities.

### 1.13 Consultations

In preparing this Environmental Impact Statement, a number of organisations provided services/information which has been used in the compilation of this EIS. These included:

- Mayo County Council
- Environmental Protection Agency
- Inland Fisheries Ireland
- Department of the Environment
- Geological Survey Of Ireland
- Meteorological Service, Dublin
- National Parks and Wildlife Service
- OPW - Archaeology Section
- Ordnance Survey Ireland

Other consultations and informal discussion held by contributors in undertaking their environmental impact assessments are detailed in the specialist environmental sections of the EIS, together with details of relevant archives and documentation held by state agencies and organisations

Lennons Quarries Ltd. have the support of the local community with regards to the proposed review of their existing Waste Licence W0256-01.

This is in the form of letters of support for the proposed review from all the nearest residential dwellings (which would be considered the nearest potential noise and dust sensitive receptors). See **Figures 1.13.2** (letters) and associated map **Figure 1.13.1**. Furthermore, there is the full support of the local GAA Club (see **Figure 1.13.3**), an adjoining land-use and a major part of the local rural community.

Finally, Lennon Quarries have a letter of support from the Fisheries Board for the proposed review of their existing Licence - see **Figure 1.13.4**.





**Figures 1.13.2: Letters of Support from Local residents who have been consulted and support the review of Waste Licence W0256-01**

21/06/2012

**To Whom It May Concern,**

I am writing this letter to acknowledge that I have been informed by TJ Lennon of Lennon Quarries that he intends to apply for an amendment to his EPA licence for his Tallagh site to increase his annual tonnage allowance from 24,900 TPA to approximately 50,000TPA.

I have had no cause for concern in the past in relation to the operation of the site, and during this time to date, the site activities have not given any cause for concern to me.

I understand that the granting of the amendment in the licence will result in the completion of the site in a shorter timeframe than would otherwise be the case, and as such I would like to state that I have no issue with the granting of such an amendment.

Best Regards,

Signature

JAMES A CAREY

*James A. Carey*

Address

Forthwader BELMULLET.



21/06/2012

To Whom It May Concern,

I am writing this letter to acknowledge that I have been informed by TJ Lennon of Lennon Quarries Ltd that he intends to apply for an amendment to his EPA licence for his Tallagh site to increase his annual tonnage allowance from 24,900 TPA to approximately 30,000 TPA.

I have had no cause for concern in the past in relation to the operation of the site, and during this year to date, the site activities have not given any cause for concern to me.

I understand that the granting of the amendment in the licence will result in the completion of the site in a shorter timeframe than would otherwise be the case, and as such I would like to state that I have no issue with the granting of such an amendment.

Best Regards,

Signature

MICHAEL CAWLEY

Michael Cawley

Address

Tallagh Road Belmullet





21/06/2012

To Whom It May Concern,

I am writing this letter to acknowledge that I have been informed by TJ Lennon of Lennon Quarries Ltd that he intends to apply for an amendment to his EPA licence for his Tallagh site to increase his annual tonnage allowance from 24,900 TPA to approximately 90,000 TPA.

I have had no cause for concern in the past in relation to the operation of the site, and during this year to date, the site activities have not given any cause for concern to me.

I understand that the granting of the amendment in the licence will result in the completion of the site in a shorter timeframe than would otherwise be the case, and as such I would like to state that I have no issue with the granting of such an amendment.

Best Regards,

Signature

JAMES DONOVAN

*James Donovan*

Address

Tallagh Road Belmullet Co Mayo



21/06/2012

To Whom It May Concern,

I am writing this letter to acknowledge that I have been informed by TJ Lennon of Lennon Quarries that he intends to apply for an amendment to his EPA licence for his Tallagh site to increase his annual tonnage allowance from 24,900 TPA to approximately 90,000 TPA.

I have had no cause for concern in the past in relation to the operation of the site, and during this year to date, the site activities have not given any cause for concern to me.

I understand that the granting of the amendment in the licence will result in the completion of the site in a shorter timeframe than would otherwise be the case, and as such I would like to state that I have no issue with the granting of such an amendment.

Best Regards,

Signature

VINCENT CONNOR

Vincent Connor

Address

Tallagh R.D. Belmullet Co Mayo



Figure 1.13.3: Letter of Support from Local GAA Club



22/06/2012

**C.L.G.**  
**Béal an Mhuirthead**  
Tallagh, Béal an Mhuirthead,  
Co Mhaigh Eo.

secretary.bealanmhuirthead.mayo@gaa.ie  
www.clgbealanmhuirthead.com

Rúnaí  
Róisín Nic Rudaigh  
086 87522709

Cathaoirleach  
Sean Ó Gallchoír  
086-2801933

Cisteoir  
Anne Marie Barrett  
087 1516831  
Josephine Walsh  
086 3576944

To Whom It May Concern

Having been informed by TJ Lennon of Lennon Quarries Ltd that he intends to apply for an amendment to his EPA licence for the Tallagh site, I visited the site with my fellow club officers and discussed with Mr Lennon what his amendment proposed.

We understand that he proposes to increase his tonnage from 24,900 to 90,000 tonne per annum approximately. We as a community club have no concern to our facilities which we recently developed. Our newly developed site borders Mr Lennon's site and to date we have had no problems or concerns raised by our extensive membership which covers all ages and sections of the community.

We understand that the total quantity of soil to be used will not change but will be imported over a shorter time than is currently licensed. This will result in the site being completed and reseeded in approximately 3 years. We are supportive of this proposal.

Yours Sincerely,

*John Gallagher*  
John Gallagher

086 2801933

097-85800 work

097-85793 - Home

*Sean Ó Gallchoir*  
Cathaoirleach



Figure 1.13.4: Letter of Consultation from Inland Fisheries Ireland Concerning the Review of Waste Licence W0256-01



3 July 2012

Mr. T.J. Lennon  
Lennon Quarries Ltd.,  
Glencastle  
Bunnahowen  
Ballina  
Co. Mayo

RE: Amendment request for Lennon Quarries Ltd. Soil/Stones Recovery Facility Waste Licence W0256-01 at Tallagh, Belmullet, Co. Mayo

Dear Mr. Lennon,

On the 28<sup>th</sup> June 2012 the above site was inspected by IFI staff and a meeting was held with you at your offices to discuss a proposed amendment to the above licence. It is proposed to increase the annual quantity of deposited material from 24,900tonne to 90,000tonne. IFI have no objections to the amendment provided there are no negative impacts on water quality in the Clooneen River or Moyrahan Bay and the following conditions are retained.

- The five on site settlement ponds must be monitored and maintained as per the waste licence.
- The Clooneen River buffer zone must be retained and each cell must be capped and seeded as it is filled.

Yours sincerely

  
John Conneely  
Director

tjlennon-0612



## 1.14 Appropriate Assessment Screening

### 1.14.1 Background to Appropriate Assessment

As part of a Review of Waste Licence (W0256-01) that was made to the EPA in August 2012 (Current Reference - W0256-02), the EPA requested further information under Article 12(2)(b)(ii) of the Waste Management (Licensing) Regulations.

Lennon Quarries Ltd. were requested by the Environmental Protection Agency (EPA) to Screen for Appropriate Assessment, for proposed waste management activities at Tallagh, Belmullet, County Mayo, on land under the control of Lennon Quarries Ltd.

In July 2013, Tobin Consulting Engineers on behalf of Lennon Quarries Ltd., carried out a Screening Statement and is included as **Appendix 1.14**.

With the introduction of the Birds Directive in 1979 and the Habitats Directive in 1992 came the obligation to establish the Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. In Ireland, the Natura 2000 network of European sites comprises Special Areas of Conservation (SAC's) and Special Protection Areas (SPA's).

Appropriate Assessment (AA) involves a case-by-case examination of the implications of a development for the Natura 2000 site and its conservation objectives. This may be presented in the form of a Natura Impact Statement. In general terms, implicit in Article 6(3) of the Habitats Directive is an obligation to put concern for potential effects on Natura 2000 sites at the forefront of every decision made in relation to plans and projects at all stages.

Screening for Appropriate Assessment is the first stage and critical test of Appropriate Assessment and the question is asked whether the development is considered to have a significant impact on the designated Natura 2000 site. The purpose of screening is to determine, on the basis of a preliminary assessment and objective criteria, whether:

- i) a plan or project is directly connected to or necessary for the management of the site, and
- ii) whether a plan or project, alone and in combination with other plans or projects, could have significant effects on a Natura 2000 site in view of the site's conservation objectives.

As most projects will not be related to point (i) above, this will virtually always be irrelevant but with regards to point (ii) if the answer is no then the process is complete and full appropriate assessment is not required. Screening therefore is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3) of the Habitats Directive.

### 1.14.2 Findings of Appropriate Assessment Screening



Lennon Quarries Ltd. operates an existing inert material recovery facility on lands at Tallagh, Bemullet, Co. Mayo. They wish to increase the total tonnage of material accepted per annum from 24,900 TPA to 90,000 TPA and are requesting that the current Waste Licence be reviewed and amended accordingly.

To that end, the Appropriate Assessment Screening Report considers whether any activity or proposed increase in activity on the lands, either individually or in combination with other plans or projects is likely to have a significant effect on Natura 2000 sites, in view of best scientific knowledge and the conservation objectives of the site(s).

The Appropriate Assessment Screening Report included as **Appendix 1.14** finds that:

*“The proposed development is not located in a Natura 2000 site. The river draining the site is the only possible linkage of site activities to Natura 2000 sites as Broadhaven Bay SAC is linked by this river which receives the treated water from the site. The only identifiable potential impact is indirect low risk water quality affects from onsite activities to downstream Natura 2000 sites.*

and:

*“The assessment of significance determines that localised impacts are negligible in the immediate vicinity of the development and hence beyond the immediate works area i.e. downstream SAC. No significant impact is expected to arise to the Broadhaven SAC and specifically the key qualifying habitats requiring consideration as a result of the proposed increase in inert natural material accepted at this location. The key monitoring and precautionary mitigation requirements of the Waste Licence are relevant to minimising risk to water quality and are recommended”.*

The Appropriate Assessment Screening Report included as **Appendix 1.14** concludes that:

*“It is considered that no significant adverse effects are expected to arise to Natura 2000 sites from the proposed development and the project can be screened out of further stages of Appropriate Assessment”.*





**Appendix 14.1: Screening for Appropriate Assessment Report**

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