



Planning Ref: 2560577

22 January 2026

Planning Section
Roscommon County Council

Dear Sir/Madam

RE: 2560577 – Continued use of Quarry and associated works AT Cam Quarry, Curry & Cloonacaltry Townlands, Brideswell, Co. Roscommon

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

From the outset, the Heritage Council acknowledges the change in the overall footprint of the quarry development, from what was previously permitted by application P. Ref. 04/1479 and ABP PL20.21541. This is a smaller footprint and will reduce the pressure on the important habitats on site. However, given the recent publication of the Article 17 Report on [the Status of EU Protected Habitats and Species in Ireland 2025](#), which highlighted that 90% of Ireland's EU-protected habitats have an 'unfavourable' conservation status, with approximately half having a deteriorating trend, we are very conscious of any impacts on Annex I Habitats.

The application site has been identified as having the Priority Habitat 6210 Orchid-rich calcareous grassland*, as evidenced by the spatial data provided by the [2019 Article 17 Report](#). The presence of this habitat has been recognised as a priority habitat in the Biodiversity Chapter of Environmental Impact Assessment Report (EIAR) submitted with the application, specifically in paragraph 5.82. However there appears to be some contradictions regarding how the development interfaces with this habitat i.e. para 5.84 notes that the habitat to the southern part of the site is of higher value to biodiversity, but "will not be impacted or lost during the development", while para 5.144 notes that the removal of small areas of dry calcareous and neutral grassland will be required to facilitate the proposed development including the storage of overburden "in the southern area of the development", going on to say that, "there is the potential to affect Annex I grassland areas".

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

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Firstly, with due regard to the NRA 2009 and CIEEM 2018 guidance, the Heritage Council considers Annex I priority habitat to be of international importance, while more general calcareous grassland should be considered at least of county importance, depending on the quality of the habitat. It should not be considered as 'local' importance, which is currently suggested in the EIAR¹. This is equally true for species listed on Annex II of the Habitats Directive i.e. *Euphydryas aurinia* (Marsh Fritillary).

A distinction seems to be made in the EIAR between the northern section of the site and the southern section. Whilst the habitat map provided in this chapter is somewhat useful, there is a need to for more detail on how the development interfaces with:

- The Dry Calcareous and Neutral Grassland habitat in a general sense
- 6210 Orchid-rich calcareous grassland*

There is some ambiguity on this matter, as identified above. To address this, it is necessary that the overall area of calcareous and neutral grassland (GS1 under Fossitt) be categorised under 1), areas that only correspond to GS1, and 2) areas that correspond to Annex I Priority Habitat 6210. This should be clearly identified within the context of the development. The following further information should be requested:

1. A reassessment of the impacts on the named ecological features based on a more suitable description of their importance i.e. County, national and/or international.
2. A clear quantifiable amount of habitat loss - divided by Dry Calcareous and Neutral Grassland (GS1) in a general sense and the areas of these habitats that meet the priority Annex 1 Habitat (6210) standard.
3. A description of how the development including the overburden storage area has sought to avoid habitat loss, by identifying the least sensitive areas of the site for its location, and subsequent mitigation during the operations of the quarry.

We believe that there has been a somewhat unclear demonstration of how the development interfaces with this important habitat, and more specifically how such assessments have informed site layout. Equally we have concerns that internationally important habitats and species listed in the annexes of the Habitats Directive have been identified as being of 'local' importance. This is not commensurate and couches the subsequent assessment on a flawed premise. Once this matter has been clarified, the Annex I habitat should be removed from the development footprint, and this should be clearly demonstrated.

In addition, given the potential habitat loss on a grassland habitat that is potentially of international importance, mitigation measures such as retaining all existing grassland and scrub habitat which have established within the site boundary "as much as possible" and to naturally fill the quarry void once extraction ends "with water to create a wetland habitat" are insufficient measures to mitigate the impacts on this specific habitat.

¹ Table 5-10: Summary of Important Ecological Features Subject to Detailed Assessment

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The *Development Plans - Guidelines for Local Authorities 2022* note that the majority of the country lies outside of the protected/designated network and that there are many other sites which are of local importance for flora and fauna. The guidelines emphasise that local authorities have an important role to play in preventing the loss of such sites and the species which rely upon them for their survival. Policy Objective 10.1 of the Roscommon County Development Plan 2021-2027 seeks to ensure the protection, conservation and enhancement of the biodiversity of the county. Within this context Annex 1 habitats that exist outside of Special Areas of Conservation (SACs) are the highest level of non-designated ecological features.

More specifically Annex I Orchid Rich Grassland's current overall status is assessed as "*Bad* with a deteriorating trend" due to on-going habitat losses as noted in the most recent Article 17 reporting. In Volume 2 of the same reporting more detailed assessment has noted that the extraction of minerals (e.g. rock, metal ores, gravel, sand, shell) is of *high* influence on the habitat.

It is important to note within this context that the previously permitted application, which is due to expire on the 3rd October 2026, is now approximately 20 years old. Our knowledge of impacts on biodiversity has significantly increased since then, with the most recent reporting² identifying a worrying trend of continuation deterioration. While the proposed development seeks a smaller footprint than what was previously permitted, and the proposal does appear to integrate marsh fritillary habitat into the scheme, both of which are welcome, the impacts of Annex I Orchid Rich Grassland are not fully clear.

In conclusion, the Heritage Council believes that the application again demonstrates an unfavourable relationship between calcareous grassland habitat and quarrying, something that should be avoided in the future. In this specific case, the impact on this habitat needs to be better quantified and assessed. Specific further information is required to satisfy the aforementioned policies of the Roscommon County Development Plan 2021-2027.

I trust these views will inform Roscommon County Council's determination of this application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

² Ireland's State of the Environment Report (EPA 2024) and Article 17 Report NPWS 2025.

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