



Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government



UNITED NATIONS
ECONOMIC COMMISSION FOR EUROPE

Ms. Fiona Marshall
Secretary to the Aarhus Convention Compliance Committee
Palais des Nations, Room 429-4
CH-1211 GENEVA 10
Switzerland

Your ref: ACCC/C/2013/107

Re: Communication to the Aarhus Convention Compliance Committee concerning compliance by Ireland with the provisions of the Convention on public participation in decision-making in relation to the extension of the duration of 3 planning permissions for a quarry (ACCC/C/2013/107)

Dear Ms. Marshall

We refer to your correspondence dated 29th June 2015 relating to the above and our response is set out below:

INTRODUCTION

1. We note that the communication as per the reference number above, alleges non-compliance with articles 6 and 7 of the Convention with respect to decision-making on the extension of the duration of 3 planning permissions for a quarry. We refute these allegations as follows.

FAILURE TO EXHAUST DOMESTIC REMEDIES

2. The Communicant has not attempted to avail of any domestic remedies. Paragraph 21 of the Annex to Decision I/7 imposes a requirement upon Communicants to exhaust domestic remedies unless the remedy is prolonged, ineffective or insufficient as a means of redress.
3. The Communicant has not availed of the domestic legal process to challenge any of the decisions made in respect of Trammon Quarry and has not shown that he was stopped from doing so.¹
4. A Communicant cannot avoid the obligation to exhaust domestic remedies in circumstances where he has neither evidenced nor even claimed any cause of action which would entitle him to avail of domestic remedies.²
5. Moreover, in respect of the earlier substantive processes, extensive opportunities were afforded to members of the public to participate in statutory consultations and appeals. Between 1998-2010 the developments at Trammon Quarry were subject to 4 separate statutory public consultation processes whereby the public was allowed to make observations on whether planning permission should be granted or refused.
6. During these processes the Planning Authorities received over 180 submissions from the public in respect of the various applications for planning permission lodged by Keegan Quarries³. On three occasions members of the public exercised their statutory right to appeal a grant of

¹ The Communicant argues in his letter to the Committee of 14th December 2014 that litigation is "extremely expensive and well beyond the financial ability of the public with typical judicial review litigation running into 10's of thousands of Euro and requires litigants to have deep pockets". This is not the basis of the present Complaint, was an argument introduced at a late stage, and is not adequately grounded. It is no defence to a failure to exhaust remedies.

² See also Paragraph 6(b) of Decision V/9 on general issues of compliance: "the Committee should ensure that, where domestic remedies have not been utilized and exhausted, it takes account of such remedies".

³ Refer to Appendix 1 hereto.

planning permission by the local council to An Bord Pleanála (The Irish Planning Board).

7. On the basis of the Communication's failure to comply with paragraphs 20 and 21 of Decision I/7, we respectfully request the Compliance Committee to find the present Communication inadmissible in its entirety.

ARTICLE 6 OF THE CONVENTION IS NOT ENGAGED

8. Article 6 of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the Aarhus Convention) relates to '*Public Participation In Decisions On Specific Activities*'.
9. Article 6(1)(a) states that the requirements of Article 6 are engaged "*with respect to decisions on whether to permit proposed activities listed in annex I*".

Thresholds in Annex I of the Convention

10. None of the development activities referenced in the communication (ie Meath County Council planning reference numbers: 97/1868, TA/30334 and TA/900976) relate to quarries where the surface of the site exceed the threshold of 25 hectares specified in Activity 16 of Annex 1 of the Convention⁴. Furthermore, the quarries referred to do not come within Activity 20 of Annex 1 of the Convention as the threshold for environmental impact assessment in the case of quarrying is also a site surface area of 25 hectares or more. In this regard, the surface area of the inter-related permitted sites equates to a total quarrying area of 16.79

⁴ Activity 16, as listed in Annex I of the Aarhus Convention. This threshold is identical to Class 19 of Schedule 5, Part 1 of the Planning & Development Regulations 2001, as amended, being the threshold for mandatory environmental impact assessment in Ireland.

hectares. We understand from Meath County Council that the quarrying area is situated within a larger overall development site totaling 22.145 hectares.

11. The provisions of Article 6(1) are therefore inapplicable.

Extension of Duration of Permission Does Not Engage Article 6(1)(a)

12. Article 6(1)(a) states that public participation requirements apply *"with respect to decisions on whether to permit proposed activities listed in annex I"*.
13. Where one particular permission covers the significant environmental effects of the project, public participation may be restricted to this decision.⁵ Some decisions might be of minor or peripheral importance, or be of limited environmental relevance, therefore not meriting a full-scale public participation procedure.⁶
14. A decision to extend the duration of an existing planning permission does not alter the previous permission, which substantively considered the development application and its environmental impact. It is not a decision to permit in the sense protected by Article 6(1)(a), and to the extent to which it extends an existing permission, the extension is a decision of *"minor or peripheral importance"*.⁷

⁵ (European Community ACCC/C/2006/17, ECE/MP.PP/2008/5/Add.10, 2 May 2008. The Committee previously stated that *"Where one permitting decision embraces all significant environmental implications of the activity in question, it might be sufficient. However, where significant environmental aspects are dispersed between different permitting decisions, it would clearly not be sufficient to provide for full-fledged public participation only in one of those decisions... It is of crucial importance in this regard to examine to what extent such a decision indeed "permits" the activity in question"*, at para 42.

⁶ (European Community ACCC/C/2006/17, ECE/MP.PP/2008/5/Add.10, 2 May 2008 - The Committee explained that: *"First, the very title of the Convention (ending with the words "in environmental matters") implies that even though it is not spelled out in article 6, the permitting decisions should at the very least be environment-related. Second, even within the environment-related permitting decisions that might be required before a given activity may proceed, there may be large variations in their significance and/or environmental relevance. Some such decisions might be of minor or peripheral importance, or be of limited environmental relevance, therefore not meriting a full-scale public participation procedure"*, at para 41.

⁷ European Community ACCC/C/2006/17, ECE/MP.PP/2008/5/Add.10, 2 May 2008, para 41.

Extension of duration of permission is an administrative process

15. The Communicant's key complaint appears not to be with the substantive decision making process related to the 3 planning decisions listed in the communication, but rather with the subsequent administrative function to extend the duration of the planning permissions. This was carried out by Meath County Council in accordance with Section 42 of the Planning & Development Act 2000, as amended. The full provisions of Section 42 are set out in Appendix 2 hereto.
16. In particular it is to be noted that "*a planning authority shall ... extend the appropriate period by such additional period not exceeding 5 years ...*" (emphasis added) provided that certain specified requirements are met.
17. Contrary to the Communicant's representations, the administrative decision to extend the duration of a planning permission is not a substantive decision which would have a significant effect on the environment. Rather, the process set out in Section 42 effectively binds the planning authority (eg County Council) to automatically extend the life of a permission when certain statutory criteria have been met. The previously permitted development/activity, which has been the subject of substantive consideration, may not be altered in any way.
18. The legislative provisions are such that the original grant of permission carries with it an automatic right and entitlement to an extension of a further five years provided certain specified requirements are met.
19. There are two types of scenarios in section 42 of the Planning & Development Act 2000, as amended, where the extension of duration of permissions shall apply: -

Section 42(1)(a)(i)

20. The first scenario applies where the planning authority (eg a County Council) is satisfied that:
- (I) the development to which the permission relates was commenced before the expiration of the appropriate period sought to be extended,
 - (II) substantial works were carried out pursuant to the permission during that period, and
 - (III) the development will be completed within a reasonable time.
21. When those 3 criteria are met, the planning authority shall, as regards a particular permission, extend the appropriate period (ie the duration of the permission) by such additional period not exceeding 5 years as the authority considers requisite to enable the development to which the permission relates to be completed.
22. This is not the same situation considered by Article 6(10) of the Convention, wherein "*Each Party shall ensure that, when a public authority reconsiders or updates the operating conditions for an activity referred to in paragraph 1, the provisions of paragraphs 2 to 9 of this article are applied mutatis mutandis, and where appropriate*".
23. In the present case, the substantive development and operating conditions of a permitted development are not being reconsidered or updated. Rather, the permitted development is merely being given only so much additional time as is deemed necessary and reasonable to complete the permitted development within the parameters of permitted development and environmental impact and mitigation as established in the original substantive planning consultation and consents stage. This additional period to be added is not open ended as it must be specified as a single period not exceeding 5 years and shall relate to a period which it is considered necessary to finish out the permitted development. In other

words, this extension can only be applied once.⁸ This is clearly an administrative function as there is no analysis or environmental assessment to be carried out by the consenting authority in extending the permitted duration once the already permitted development meets criteria (I) to (III) above.

24. This statutory provision has been available in primary planning legislation since the enactment of the Planning & Development Act 2000, as amended. The Communicant alleges that S.42 was intended to apply to *construction type developments* and that it was *never intended to apply to quarry type consents* and that it was *specifically implemented with housing developments in mind*.⁹
25. There is no basis for these assertions. This provision is available to all developments where substantial works have been carried out, to allow a reasonable period of time for the development to be completed. No changes whatsoever may be made to the nature and extent of works which were permitted through the substantive public consultation consent process. The planning authority may only attach additional conditions requiring the giving of adequate security for the satisfactory completion of the proposed development.

Section 42(1)(a)(ii)

26. The second scenario is a more recent legislative innovation dating from 2010, which was implemented to allow the extension of duration of permitted developments which had not commenced or where substantial works had not been carried out, but only if the following criteria apply:

(I) that there were considerations of a commercial, economic or technical nature beyond the control of the applicant which

⁸ Section 42(7) was inserted by the 2010 Planning and Development (Amendment) Act and permits a further extension but only where there has been a decision to grant an extension prior to the commencement of the section and the planning authority is satisfied that the development has not been completed due to circumstances beyond the control of the person carrying out the development. This was one of the responses considered necessary to alleviate hardship following the financial and property crash which commenced in 2007/2008.

⁹ Paragraphs 6 and 8 of Communication to the Aarhus Compliance Committee, dated 11th November 2013.

substantially militated against either the commencement of development or the carrying out of substantial works pursuant to the planning permission,

(II) that there have been no significant changes in the development objectives in the development plan or in regional development objectives in the regional spatial and economic strategy for the area of the planning authority since the date of the permission such that the development would no longer be consistent with the proper planning and sustainable development of the area,

(III) that the development would not be inconsistent with the proper planning and sustainable development of the area having regard to any guidelines issued by the Minister under section 28, notwithstanding that they were so issued after the date of the grant of permission in relation to which an application is made under this section, and

(IV) where the development has not commenced, that an environmental impact assessment, or an appropriate assessment, or both of those assessments, if required, was or were carried out before the permission was granted.

27. As may be seen, the substantive development and operating conditions of a permitted development are not being “reconsidered or updated”.¹⁰ Rather, the permitted development is merely being given only so much additional time as is deemed necessary and reasonable to complete the permitted development.

28. This additional period is not open ended: it must be specified as a single period not exceeding 5 years and shall relate to a specified period which it

¹⁰ Article 6(10) of the Aarhus Convention.

is considered necessary to finish out the permitted development. In other words, this extension of duration can only be applied for a single time.¹¹

29. This feature is available to all developments where substantial works have not been carried out or commenced, as per the above criteria, to allow a reasonable period of time for the development, as permitted, to be completed.
30. Again, this provision does not allow any changes whatsoever to be made to the nature and extent of the works which have been permitted through a substantive public consultation consent stage. The planning authority may only attach additional conditions requiring the giving of adequate security for the satisfactory completion of the proposed development.

The applications for extension under consideration

31. With reference to the specific cases referenced in the communication, and as set out in more detail in Appendix 1 hereto, two of the permitted quarry developments (reference numbers 97/1868 and TA/30334) sought and were granted extensions of duration under section 42(1)(a)(i) whereby substantial works were already carried out.
32. The third permitted development (reference number TA/900976) sought to avail of section 42(1)(a)(i), however, the application was refused permission because the applicant did not demonstrate that substantial works pursuant to the permission had been carried out. This refusal further illustrates the administrative nature of the process: the planning authority was bound to refuse the extension of duration once the relevant criteria could not be met.

¹¹ Section 42(7) was inserted by the 2010 Planning and Development (Amendment) Act and permits a further extension but only where there has been a decision to grant an extension prior to the commencement of the section and the planning authority is satisfied that the development has not been completed due to circumstances beyond the control of the person carrying out the development. This was one of the responses considered necessary to alleviate hardship following the financial and property crash which commenced in 2007/2008.

33. Subsequent to this decision to refuse an extension of duration under section 42(1)(a)(i), the applicant then applied for an extension of duration of the same permission (i.e. TA900976) under section 42(1)(a)(ii), following which the development was deemed to meet all the relevant criteria in that subsection in which case the planning authority was obliged to grant the extension of duration.
34. The sole discretion exercised by the planning authority, when dealing with all three permitted developments, was to link the extended completion date of all three permitted developments (operated by the same applicant). The planning authority considered 5 years as requisite to enable the development to which the permission relates to be completed.

The alleged requirement for an EIA

35. The Communicant alleges that the decision under S.42 of the Planning and Development Act 2000, as amended, to extend the duration of planning permissions for Trammon Quarry requires an EIA under Irish law. A decision to extend does not require an EIA as a matter of Irish or EU law, and consequently paragraph 20 of Annex I does not apply.¹²
36. The EIA Directive¹³ states that Member States shall adopt all measures necessary to ensure that, before consent is given, projects likely to have significant effects on the environment are made subject to a requirement for development consent¹⁴ and an assessment with regard to their effects. The Directive does not apply to decisions which involve merely the detailed regulation of activities for which the principal consent, raising the substantial environmental issues, has already been given.¹⁵ A decision under section 42 of the Planning and Development Act 2000, as amended,

¹² Paragraph 20 of Annex I of the Convention states that public participation requirements apply to any activity not covered by paragraphs 1-19 of Annex I where public participation is provided for under an EIA procedure in accordance with national legislation.

¹³ Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment as amended by Council Directive 97/11/EC of 3 March 1997, Directive 2003/35/EC of 26 May 2003 and Directive 2009/31/EC of 23 April 2009, now codified in Directive 2011/92/EU of 13 December 2011.

¹⁴ Article 1(2)(c) of the Directive states that 'development consent' means the decision of the competent authority or authorities which entitles the developer to proceed with the project.

¹⁵ *Dunne v Minister for Environment* [2007] I IR 194, at para 46 and 47.

is an administrative decision extending the duration of activities for which the principal consent has already been given and does not require a repeat EIA.

37. The original decisions of the planning authorities to grant planning permissions in respect of Trammon Quarry following substantive consideration of the various development applications (including a statutory public consultation process and an EIA) constitute the development consents for the purposes of the EIA Directive. The original decisions are not challenged in the within communication and to the extent the Communicant challenges the lack of an EIA upon extension, it is not within the remit of the Compliance Committee to review the legality of same.¹⁶

Article 6(1)(b) is not engaged

38. The Communicant has not demonstrated at all that Article 6(1)(b) shall apply in any of the 3 developments/activities listed in the communication. Ireland reserves its right to address this issue at a later point.

Comprehensive Public Consultation on substantive decisions

39. Notwithstanding the non-application of Article 6(1)(a), the unproven application of Article 6(1)(b) and the non-applicability of Article 7 of the Convention (as discussed in more detail in paragraph 44 below), it is also noted that the decisions relating to the developments ('activities', as per Article 6) referenced by the communicant were the subject of comprehensive public participation as provided for under the provisions of the Planning & Development Act 2000, as amended, or, with reference to

¹⁶ Spain ACCC/C/2008/24 ECE/MP.PP/C.I/2009/8/Add.1, para 82. See paragraph 46 below.

the first listed activity (reference number 97/1868) under the 2000 Act's predecessor (the Local Government (Planning & Development) Act 1963, as amended) whereby:

- details of the 3 relevant planning consent applications (Meath County Council planning reference numbers: 97/1868, TA/30334, and TA/900976), were published by the applicant in a national or local newspaper and site notices erected at the entrance to the development site (as per the provisions of the Planning & Development Regulations 2001, as amended, or its predecessor), including a public invitation to examine the planning application documents and drawings (including Environmental Impact Statements in the 2 latest planning applications, 1 of which was refused permission by An Bord Pleanála) and to make a written submission to the county council on the application, and
- details of the application were noted on Meath County Council's searchable website following their receipt and registration of the applications.

40. With reference to the 3 planning applications relating to quarry development at Trammon, Rathmoylan, Co. Meath, as listed in the communication, it is important to note that in the 2 most recent consent applications, members of the public exercised their rights under the Planning & Development Act 2000, as amended, to appeal the decisions of Meath County Council to grant permission to An Bord Pleanála (the independent National Planning Appeals Board). No party chose to appeal the decision of the County Council to grant permission for the first listed activity (reference number 97/1868).

41. It is also notable, with reference to the online records of both Meath County Council and An Bord Pleanála, that a fourth planning application for quarry development at Trammon, Rathmoylan, County Meath by Keegan Quarries was granted permission by Meath County Council (reference number TA/60629) but was subsequently appealed by third

parties to An Bord Pleanála whereby An Bord Pleanála ultimately decided to refuse permission (An Bord Pleanála ref PL17.226884). This is a clear indication of the successful application of public participation in decisions on specific activities.

42. Details of all four planning applications relating to Keegan Quarries at Rathmoylan (including the application which was refused permission by An Bord Pleanála) are provided in tables in Appendix 1 attached hereto.
43. Consequently, even if Article 6 were applicable, all of the above decision making processes are fully compliant with the principles of Article 6 of the Convention relating to '*Public Participation In Decisions On Specific Activities*'.

ARTICLE 7 IS NOT APPLICABLE

44. The Communicant also alleges that Article 7 has been breached by the decision to extend the duration of certain quarry activities in Rathmoylan, County Meath. The subject matter of the communication relates to the extension of the duration of a permitted development/activity (in this case quarrying activity) under Section 42 of the Planning & Development Acts 2000 to 2015. This clearly does not relate to the the preparation of plans, programmes and policies relating to the environment, as per the Aarhus Convention.¹⁷ This aspect of the Communication is manifestly unfounded.

THE EXTENSION DID NOT REQUIRE AN APPROPRIATE ASSESSMENT

¹⁷ The Committee has previously pointed out that "*When determining how to categorize a decision under the Convention...it is determined by the legal functions and effects of a decision...*" (Belgium ACCC/C/2005/11, ECE/MP.PP/C.1/2006/4/Add.2, para. 29). On a previous occasion the Committee had regard to the definition of "*plans*" in the European Commission Guide for Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment: "*Plan is one which sets out how it is proposed to carry out or implement a scheme or a policy. This could include, for example, land use plans setting out how land is to be developed, or laying down rules or guidance as to the kind of development which might be appropriate or permissible in particular areas.*" Definition of "*program*" is "*the plan covering a set of projects in a given area... comprising a number of separate construction projects...*". ACCC/C/2005/12 Albania, ECE/MP.PP/C.1/2007/4/Add.1 31 July 2007, footnote 6 at page 16.

45. The Communicant also alleges that the developments at Trammon Quarry impact the integrity of the River Boyne and Blackwater Special Area of Conservation. The Communicant alleges Ireland and Meath County Council breached its duty in failing to seek an Appropriate Assessment under the Habitats Directive before deciding to extend the duration of planning permission for the developments in Trammon Quarry.
46. First, it can be observed that the Committee has previously noted that *"it cannot address the adequacy or result of an EIA screening procedure, because the Convention does not make the EIA a mandatory part of public participation; it only requires that when public participation is provided for under an EIA procedure in accordance with national legislation (para. 20 of annex I to the Convention), such public participation must apply the provisions of its article 6. Thus, under the Convention, public participation is a mandatory part of the EIA, but an EIA is not necessarily a part of public participation. Accordingly, the factual accuracy, impartiality and legality of screening decisions are not subject to the provisions of the Convention, in particular the decisions that there is no need for environmental assessment, even if such provisions are taken in breach of applicable national or international laws related to environmental assessment, and cannot be thus considered as failing to comply with article 6, paragraph 1 of the Convention."*¹⁸
47. Second, competent authorities are obliged under Irish law¹⁹ to screen for Appropriate Assessment and if necessary perform Appropriate Assessment in respect of all proposed developments which impact on a European Site, which includes *inter alia* Special Areas of Conservation.²⁰

¹⁸ Spain ACCC/C/2008/24 ECE/MP.PP/C.I/2009/8/Add.1, para 82.

¹⁹ Part XAB of the Planning and Development Act 2000 as amended.

²⁰ A Special Area of Conservation means a site designated by the Minister as a special area of conservation pursuant to Article 4, paragraph 4 of the Habitats Directive. Article 6(3) of the Habitats Directive requires that: "Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of

48. The Communicant's allegations outlined in paragraph 18 of his Communication of 1th November 2013, in relation to the alleged environmental threat posed by the developments at Trammon Quarry to the River Boyne and Blackwater Special Area of Conservation, are strongly contradicted by a 2014 decision of An Bord Pleanála (Reference Number: 17.QV.0217).²¹ An Bord Pleanála set aside the decision under S.261A of the Planning and Development Act 2000, as amended,²² of Meath County Council (Reference Number: QY75) that the developments at Trammon Quarry should have been subject to Appropriate Assessment: "*Having evaluated all the available scientific and technical information relating to the subject site, the Board considered that...the development on this site after the 26th day of February, 1997 would not have been likely to have had a significant effect on any European Site, in view of the conservation objectives of those sites, and, therefore, that development was not carried out after the 26th day of February, 1997, that would have required an Appropriate Assessment.*"

CONCLUSION

49. In summary, Ireland contends that the Communicant has not attempted to avail of any domestic remedies as required by paragraph 21 of the Annex to Decision I/7. On the basis of the Communication's failure to comply with paragraphs 21 of Decision I/7, we respectfully request the Compliance Committee to find the present Communication inadmissible in its entirety.

paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

²¹ <http://www.pleanala.ie/documents/orders/QV0/DQV0217.pdf>.

²² As noted in Ireland's preliminary comments on preliminary admissibility of 27th March, the "261A procedure was introduced to ensure compliance with judgments of the ECJ in respect of EIA and habitat issues. The procedure required an assessment by planning authorities of all quarries within their administrative areas to see if they were compliant with the EIA Directive and the Habitats Directive. Depending upon the outcome quarries were considered to be compliant, or were required to apply for substitute consent or were declared to be unauthorised developments and required to cease operations".

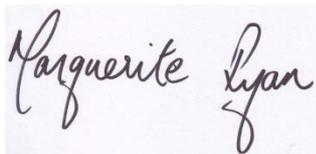
50. Moreover, and in the alternative, the Communicant has not established that the thresholds in Annex I, required for Article 6 to apply, have been triggered. A decision to extend the duration of an existing planning permission is not a decision to permit a proposed activity for the purposes of Article 6(a)(1). We therefore request that the complaint be ruled inadmissible.
51. Separately, and notwithstanding the proposition that the communication is inadmissible, we also contend that the planning processes referenced by the Communicant have had the benefit of full and substantial public participation, wherein 3 of the 4 Keegan Quarry permissions granted by the County Council were appealed to An Bord Pleanála following statutory public consultation, and 1 of those 3 grants of permission was overturned and refused permission by An Bord Pleanála. This clearly illustrates that a robust and comprehensive public consultation process takes place when substantive planning decisions are being considered in Ireland.
52. The decisions to extend the duration of planning permissions of the 3 cases the subject of the complaint are not substantive decisions significantly impacting on the environment, but rather are a reasonable administrative approach to facilitate the completion of permitted developments within a single specified period after the elapsing of the initial planning permission period. This extension of duration process is both necessary in any well-regulated planning system and long established in Irish law.
53. Finally, the Communicant has not established that Ireland or Meath County Council has breached any legal obligations by not conducting an Environmental Impact Assessment or Appropriate Assessment before granting an extension of duration of planning permission under S.42 of the Planning and Development Act 2000, as amended, nor is this a matter relevant to the Aarhus Convention.
54. Ireland does not address the various miscellaneous criticisms of the sites in question, such as alleged dewatering and archaeological and heritage

matters, which (if merited) would be matters for domestic enforcement and do not fall within the compass of the Aarhus Convention.

For the reasons above, we respectfully request that the communication as referenced above is dismissed.

Please do not hesitate to contact the undersigned if you require any further information.

Yours sincerely,

A handwritten signature in black ink that reads "Marguerite Ryan". The signature is written in a cursive style with a large initial 'M' and 'R'.

Marguerite Ryan
National Focal Point- Aarhus

APPENDICES

- 1 Details of Planning Applications for Quarry Developments at Trammon, Rathmoylan, County Meath
- 2 Section 42 of the Planning & Development Act 2000, as amended (Law Reform Commission Revised Act, updated to 10 September 2015²³)

²³ Refer to: http://www.lawreform.ie/fileupload/revisedacts/withannotations/en_act_2000_0030.pdf.