
RE: Query - Appropriate forest road network and density - Urgent response required by 17-4-26

1 message

Forestry Support Unit <FSU@agriculture.gov.ie>
To: Neil Foulkes <neilfoulkes62@gmail.com>
Cc: Forestry Support Unit <FSU@agriculture.gov.ie>

16 June 2026 at 17:35

Dear Mr. Foulkes,

The Department responded to you on this matter on the 8th May. That response does not appear below. However, we attach one of your email sequences where it does.

Best regards

Forestry Support Unit

From: Neil Foulkes <neilfoulkes62@gmail.com>
Sent: Tuesday 16 June 2026 13:09
To: Forestry Support Unit <FSU@agriculture.gov.ie>
Cc: forestry agriappeals <forestry@agriappeals.gov.ie>
Subject: Re: Query - Appropriate forest road network and density - Urgent response required by 17-4-26

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FSU,

I am providing you with one further opportunity to provide a substantive response to my query on the matter of Appropriate forest network and density as it is addressed in the context of EIA Screening. Your response or failure to respond will be placed on the record with the FAC in respect of any future appeals against Forest Road licences. For your reference the query is this;

I refer to the Forest Road EIA Screening Form question: *“Is this proposal in keeping with the achievement of an appropriate forest road network and density within the forest area being serviced?”*

I would be grateful if you could clarify where, within DAFM’s published guidance or policy documents, the criteria or metrics defining an “appropriate” forest road network and density are set out.

In particular, I am seeking any specific standards, thresholds, or spatial guidelines used to assess compliance with this requirement.

The framing of the question implies a defined objective - a condition to be achieved. What is that objective?

DAFM must have a consistent and factual basis to underpin the Inspector's response to this question. Anything less would leave it to the individual discretion of the Inspector which is not a reasoned basis for decision making.

Yours sincerely, Neil Foulkes

On Tue, 5 May 2026 at 08:00, Neil Foulkes <neilfoulkes62@gmail.com> wrote:

Forestry Support Unit,

I refer to my query of 13 April 2026 regarding the criteria underpinning the assessment of an "appropriate forest road network and density", and my follow-up of 24 April 2026 highlighting the time-bound nature of this request .

To date, I have not received a substantive response.

As previously outlined, this query arises in the context of an active appeal process with strict statutory timelines. The absence of a timely response continues to materially impede my ability to engage effectively in that process.

I would be grateful if you could now provide a clear and substantive response to the query without further delay.

If I do not receive a response within **5 working days** of this email, I will have no option but to escalate the matter as a **formal complaint**, on the basis of:

- failure to engage with a legitimate and clearly framed query, and
- failure to have due regard to the time-bound nature of access to justice procedures.

I trust that escalation will not be necessary and I look forward to your prompt reply.

Yours sincerely,
Neil Foulkes

On Fri, 24 Apr 2026 at 08:00, Neil Foulkes <neilfoulkes62@gmail.com> wrote:

FSU,

Can you please respond to this query - I clearly indicated the timebound nature of the query and once again you have not had regard to this. I consider this to be unacceptable. Where a public authority initiates time-bound access to justice procedures it should be in a position to support active engagement related to those processes within the timescales of those procedures.

If you want to require appellants to submit all grounds and evidence relating to appeals within 14 working days and then you deny appellants access to information within that time period this gives a distinct appearance, at best, of a lack of impartiality.

Can you please commit to having due regard to request timescales in future. Where you cannot meet them please explain why in advance so that alternative actions can be taken to ensure that justice is served.

Please hold this record on file. I will be referring back to it in future appeals.

Yours sincerely, Neil Foulkes

On Mon, 13 Apr 2026 at 15:29, Forestry Support Unit <FSU@agriculture.gov.ie> wrote:

Dear Mr. Foulkes,

The Department acknowledges receipt of your correspondence and will respond, if appropriate, in due course.

Best regards

Forestry Support Uni

From: Neil Foulkes <neilfoulkes62@gmail.com>

Sent: Monday 13 April 2026 08:00

To: Forestry Support Unit <FSU@agriculture.gov.ie>

Subject: Query - Appropriate forest road network and density - Urgent response required by 17-4-26

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In particular, I am seeking any specific standards, thresholds, or spatial guidelines used to assess compliance with this requirement.

This query relates to an active appeal and a response is required by 17-4-24

Yours sincerely, Neil Foulkes

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D’fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphost seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.

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----- Forwarded message -----

From: Neil Foulkes <neilfoulkes62@gmail.com>

To: Forestry Support Unit <FSU@agriculture.gov.ie>

Cc:

Bcc:

Date: Tue, 2 Jun 2026 07:00:00 +0000

Subject: Re: Query - Appropriate forest road network and density

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Hello FSU,

The substantive matter raised in my query of 13th April remains unresolved;

Can DAFM please clarify whether there are any published or internal guidance documents, policies, procedures, criteria or assessment methodologies used by DAFM inspectors in responding to the EIA Screening Form query as to whether a proposal is "in keeping with the achievement of an appropriate forest road network and density within the forest area being serviced".

If the answer is Yes, can you please identify the guidance concerned.

Yours sincerely, Neil Foulkes

On Fri, 8 May 2026 at 14:22, Neil Foulkes <neilfoulkes62@gmail.com> wrote:

Forestry Support Unit,

Thank you for your reply. The response is helpful to a degree and appreciated.

However, it does not fully address the core of the question that I raised.

The issue is not what level of road density may be desirable from the perspective of a forest owner or operational efficiency. Rather, the issue is that the Forest Road EIA Screening Form requires the competent authority to make a Yes / No assessment as to whether a proposal is "in keeping with the achievement of an appropriate forest road network and density within the forest area being serviced".

This is a site / project specific query.

That necessarily implies that DAFM:

- has criteria, standards or assessment principles against which the proposal is evaluated; and
- is in a position to reason why a particular proposal is considered "in keeping" or not in a given case.

While your response refers generally to international research and a grant threshold of 25m/ha, it remains unclear:

- whether DAFM applies any published assessment methodology or decision-making criteria when answering this EIA screening question;
- whether the assessment is purely numerical or also spatial in nature;

- how environmental considerations are weighed against operational considerations; and
- how an inspector determines that a proposal should properly receive a “Yes” rather than a “No” response.

This is important because the question appears within an EIA screening process undertaken by the competent authority and therefore cannot simply be treated as a matter of applicant preference or operational discretion.

I would therefore be grateful if you could clarify whether there are any published or internal guidance documents, policies, procedures, criteria or assessment methodologies used by DAFM inspectors in making this determination. If there are not, then can you please confirm this.

Yours sincerely,
Neil Foulkes

On Fri, 8 May 2026 at 14:12, Forestry Support Unit <FSU@agriculture.gov.ie> wrote:

Dear Mr. Foulkes,

The appropriate forest road density is one that balances requirements for efficient forest access and transport of timber with the costs for construction and any potential environmental disturbance. In practice, international research shows that the optimum forest road density is between 20m/ha and 30m/ha. A forest road density of 25m/ha works well under Irish conditions given operational scale, typical equipment types and terrain conditions and is the threshold limit for grant aid. Forest road allocations above 25m/ha or at a lower level are possible if desired by forest owners, subject to individual requirements.

The Department trusts that this correspondence is of assistance to you. The Department is of the opinion that substantive and appropriate engagement with your correspondence has occurred and, in accordance with our Customer Charter, consider this the final correspondence on the matters raised in your correspondences on this matter.

Best regards

Forestry Support Unit

From: Neil Foulkes <neilfoulkes62@gmail.com>

Sent: Tuesday 5 May 2026 08:00

To: Forestry Support Unit <FSU@agriculture.gov.ie>

Subject: Re: Query - Appropriate forest road network and density - Urgent response required by 17-4-26

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 **Re: Query - Appropriate forest road network and density.eml**
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