22nd April 2022

Senior Executive Officer,
Planning Department,
Áras Chill Dara,
Devoy Park,
Naas,
Co. Kildare,
W91X77F.

Submitted via Online Portal

Our Ref: 501-00180-00141-05

Your Ref: Draft Kildare County Development Plan 2023-2029

Dear Sir/Madam

RE: DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029 - ROADSTONE LTD. SUBMISSION

SLR Consulting Ireland acts as planning and environmental advisors to Roadstone Limited, Fortunestown, Tallaght, Dublin 24. This submission relating to the Draft Kildare County Development Plan 2023 – 2029 has been prepared on their behalf.

ROADSTONE LIMITED

Roadstone Ltd. was formed in 2009 by the amalgamation of three of the construction materials businesses operated by CRH in Ireland, which were Roadstone Dublin Ltd., Roadstone Provinces Ltd. and John A. Wood Ltd.

The company is Ireland's leading supplier of aggregates, construction and road building materials and it employs several hundred people throughout the country.

Roadstone forms part of CRH, which is an international building materials group. It was founded in the 1930s and became part of Cement Roadstone Holdings (CRH) plc in 1970, following the merger of Roadstone and Cement Ltd. CRH is the leading global diversified building materials business, employing 79,200 people in 30 Countries across the globe.

Roadstone Limited has a number of property assets within the Kildare County Council administrative area, refer to Figure 1 below. These are located at:

- Allen Quarry;
- Clane;
- Kilglass Sand Pit; and
- Redbog Sand Pit.

These property assets contain significant aggregate resources and have provided / provide aggregates and added-value construction materials to support the local, regional, and national economy.

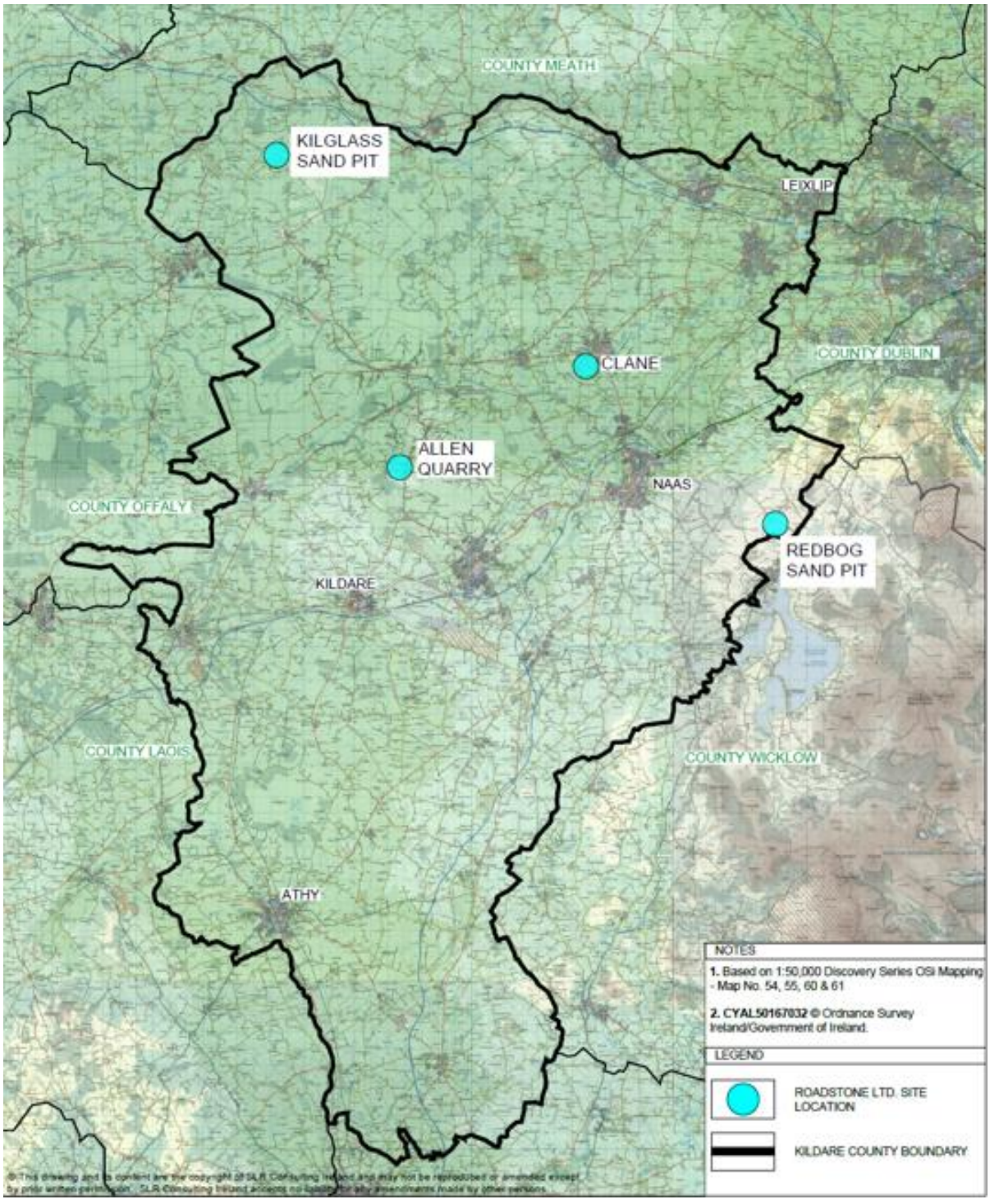

Figure 1: Roadstone Ltd. – Property Locations in Kildare

BASIS OF THE SUBMISSION

National and Regional Policy Context

The importance of the extractive industries to the wider economy and the need to protect the operations of working quarries and proven aggregate resources is firmly established in national and regional planning policy.

Project Ireland 2040, the National Planning Framework (NPF) refers to the following National Policy Objective (NPO) which is supportive of the extractive economy.

> **NPO 23**
> **Facilitate the development of the rural economy through supporting a sustainable and economically efficient** agricultural and food sector, together with forestry, fishing and aquaculture, energy and **extractive industries**, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.
>
> [Emphasis added]

The principal purpose of Regional Spatial and Economic Strategies (RSES) is to support the implementation of the NPF and the economic policies and objectives of the Government as contained in the National Development Plan (NDP) by providing the long-term strategic planning and economic framework for development of Ireland's regions.

Regional Spatial and Economic Strategy 2019-2031 for the Eastern and Midland Regional Assembly also acknowledges the role of the extractive industry and 'recognises that the rejuvenation of rural towns and villages requires that appropriate job creation in rural areas and that traditional sectors such as agriculture, tourism, extractive industries and forestry are complemented by diversification in sectors such as food, renewable energy and opportunities provided from improved digital connectivity'.

The RSES acknowledges that minerals form part of the region's natural capital and presents regional policy objective 6.7 in support of the extractive industry in relation to economy and employment.

> **RPO 6.7**
> **Support local authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as** agricultural and food, forestry, fishing and aquaculture, energy and **extractive industries**, the bioeconomy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.
>
> [Emphasis added]

Importance of Extractive Industries

In preparing policies that reflect the importance of the extractive industries, the planning authority should consider the recently published Essential Aggregates – Providing for Ireland's Needs to 2040[1] prepared by the Irish Concrete Federation (refer to copy appended to this submission).

The objective of this document is to highlight to Government the need for a national planning policy for aggregates, which will underpin local and regional planning policy and ensure the sustainable supply of aggregates for Project Ireland 2040 and beyond. The document provides further detail on the role of locally supplied aggregates in supporting the demand for new homes, new schools, and better infrastructure. In meeting the demand arising from the projected population increase of an additional 1 million people as identified in the National Planning Framework, it is worth noting that every new home typically requires up to 400 tons of aggregates and every new school typically requires some 3,000 tons of aggregates. These requirements are most sustainably met by local sources and suppliers.

The document also makes recommendations to ensure that Government's stated objectives on aggregates within the National Planning Framework 2018 are implemented, not just for the benefit of the extractive industry, but also for the achievement of the ambitious goals of Project Ireland 2040. It highlights three important points that statutory planning policy needs to address at all spatial scales. These are:

1. Importance of Extractive Industries and Aggregates;
2. Identifying and Protecting Reserves;
3. Enabling Extraction of Aggregates.

Draft Kildare County Development Plan 2023 – 2029

It is stated in the introduction to the Draft Kildare Development Plan 2023 – 2029 (CDP) that the CDP is the key strategy document which structures the proper planning and sustainable development of land-use across County Kildare over the six-year statutory time period of the plan. The CDP seeks to address the physical, economic, social and environmental needs of the community, in terms of supporting structured new development, protecting the environment, enhancing valued assets and amenities. The preparation of the Plan has regard to key recent development trends and national, regional and local policy documents, in particular, the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Eastern Midland Region (RSES).

Of importance to this submission is chapter 2 **Core Strategy & Settlement Strategy**. It is projected therein that by 2026, the population of the County is expected to grow to between 249,000 to 254,000 people, and that by 2031, the population is expected to grow to between 259,000 to 266,500 people. At the higher end of the projection, this results in an additional 31,500 people by 2026 and an additional 12,500 people by 2031, compared to the 2016 census. With a high proportion of this growth being within the lifetime of this Plan and the identification of the relevant tiers of the settlement hierarchy, housing land has been allocated to provide for the delivery of an additional 9,144 housing units, by the end of the Plan period.

[1] https://www.irishconcrete.ie/wp-content/uploads/2019/10/Essential-Aggregates-Final.pdf

Of significance to this submission, section **9.9 Mineral Resources & Extractive Industry** of Chapter 9 **Our Rural Economy** describes that it's important to ensure that adequate supplies of aggregates are available to meet the future needs of the county and the region. It is also acknowledged that aggregate resources are important to the general economy with over 500 active quarries nationally in 2018, directly employing over 5,000 people. It is further specified that the industry provides a valuable source of employment in some areas of the county with 26 active quarries noted by the council throughout Kildare in 2019. It is appreciated that the sector is critical to ensuring the provision of raw materials for the construction industry to facilitate the building of infrastructure which will accommodate the anticipated population growth in the county and region.

Section 9.9.1 Post Closure of Extractive Industry provides a section dedicated to the **'After-Use Strategy for Quarries'**. It is described that the conditions of quarry after-use and rehabilitation frequently involve the restoration of quarries, as far as possible to their original appearance. It is stated that this may result in the loss of key features that may ironically, have some ecological benefit or rich biodiversity interest. As an example, it is stated that sand and gravel banks are sometimes used as nesting sites by sand martins; rock faces and cliff ledges can provide ideal nesting sites for ravens and peregrine falcons; their crevices have been known to provide nesting sites for jackdaws, kestrels, and barn owls. Duck species and waders (such as snipe and lapwing) have been known to frequent the ponds and wetlands at quarry sites. Some of these species are of high or medium conservation concern being listed as red or amber (Birds of Conservation Concern Ireland/International Union for the Conservation of Nature). Orchids and other wildflowers have colonized exposed areas while colonizing scrub vegetation provides a sanctuary for other birdlife and mammals.

It is therefore stated that in developing any after-use strategy and/or restoration plan, there will be a requirement to prepare a detailed survey and assessment of the intrinsic ecological character first (by an appropriate ecologist), identifying the range and location of key species of flora and fauna on site. The rehabilitation plan should work around these habitats and species in a process known as Rehabilitation Ecology. Ideally, the final restoration plan will provide for a mosaic of habitats, including, for example, cliff/sand or gravel banks, ponds, wetlands, open meadow (appropriately seeded), naturally recolonizing scrubland, and planted woodland (i.e., saplings of native tree species). The interface of habitats will provide for a rich biodiversity network. It is further stated that where obvious scarring and visual impact off-site is evident, infilling and backfilling may be desirable however rather than reverting to agricultural grasslands, the lands should be given over to specific biodiversity and ecological benefit with, for example, wildflower meadows and native woodland planting. In order to achieve this, it is emphasised that specific targets need to be established.

With respect to the above, a proposed requirement has been put in place relevant to quarry remediation plans. It is a requirement that quarry remediation plans provide for a minimum of 80% of the area to be provided for environmental benefit, biodiversity, and re-wilding. Where other after-use strategies are proposed (i.e., concrete batching, etc.) that might require more than the 20% in use for ongoing economic purposes, then other lands (including other disused quarries) may be used to compensate for any shortfall, either by the condition of use, sterilisation/legal agreement, or rehabilitation and transfer to either the Council or an established wildlife group such as the Irish Wildlife Trust, Birdwatch Ireland, the Native Woodlands Trust, etc. The 80% requirement for environmental/biodiversity may be waived at sites closer to urban areas where a significant portion of the site is being provided for sports, recreation, and amenity use.

With respect to the extractive industry in general, the following policy and objectives are provided:

Policy

RD P8
Support and manage the appropriate future development of Kildare's natural aggregate resources in appropriate locations to ensure adequate supplies are available to meet the future needs of the county and the region in line with the principles of sustainable development and environmental management and to engage with operators to appropriately manage extraction sites when extraction has ceased.

Objectives

RD O32
Ensure that development for aggregate extraction, processing and associated concrete production does not significantly impact the following:
- Special Areas of Conservation (SACs)
- Special Protection Areas (SPAs)
- Natural Heritage Areas (NHAs)
- Other areas of importance for the conservation of flora and fauna.
- Zones of Archaeological Potential.
- The vicinity of a recorded monument.
- Sensitive landscape areas as identified in Chapter 13 of this Plan.
- Scenic views and prospects.
- Protected Structures.
- Established rights of way and walking routes.

RD O33
Consult with the Geological Survey of Ireland (GSI), with regard to any developments likely to have an impact on sites of Geological Importance listed in Chapter 12 of this Plan.

Objective RD O34
Require applications for mineral or other extraction to include (but not limited to):
- An Appropriate Assessment under Article 6 of the Habitats Directive where any quarry / sand and gravel extraction are likely to have an impact on a Natura 2000 site (see Chapter 12).
- An Environmental Impact Assessment Report (EIAR).
- An Ecological Impact Assessment may also be required for subthreshold developments to evaluate the existence of any protected species / habitats on site.
- A detailed landscaping plan to be submitted indicating proposed screening for the operational life of the site. The predominant use of native plant species in the proposed landscaping plan will be expected.
- Detailed landscaping and quarry restoration plans. Habitats and species surveying shall be carried out and shall influence the restoration plan for the site.
- Comprehensive Site Restoration Plan and/or After-Use Strategy having regard to the principles of 'Rehabilitation Ecology'.
- Transport Impact Assessment.

Objective RD O35
Require, where permission is granted for quarrying / extraction of aggregates, the submission by the developer of a bond (cash deposit, bond from an insurance company or other security

acceptable to the planning authority) to ensure the satisfactory completion and restoration of the site.

RD O36

Require road re-instatement work to be on-going during operations, in the interests of road and traffic safety. Works undertaken to re-instate/improve the public road should be undertaken by the quarry developer or paid by them and completed by the Council

RD O37

Protect and safeguard the county's natural aggregate resources from inappropriate development, by seeking to prevent incompatible land-uses, for example, rural housing that could be located elsewhere from being located in the vicinity of the resource, since the extraction of minerals and aggregates is resource based.

RD O38

Have regard to the following guidance documents (as may be amended, replaced, or supplemented) in the assessment of planning applications for quarries, ancillary services, restoration, and after-use:
- Quarries and Ancillary Activities: Guidelines for Planning Authorities, DEHLG (2004).
- Environmental Management Guidelines – Environmental Management in the Extractive Industry (Non-Scheduled Minerals), EPA (2006).
- Archaeological Code of Practice between the DEHLG an ICF (2009).
- Geological Heritage Guidelines for the Extractive Industry (2008).
- Wildlife, Habitats, and the Extractive Industry – Guidelines for the protection of biodiversity within the extractive industry, NPWS (2009).

RD O39

Ensure the satisfactory and sensitive re-instatement and/or re-use of disused quarries and extraction facilities, where active extraction use has ceased. Future uses should include amenity, recreation and biodiversity areas and shall be informed by an assessment of the specific site/lands. Proposals for future uses/infill of these areas should be agreed with the Planning Authority through the development management process.

RD O40

Require that quarry remediation plans provide for a minimum of 80% of the area to be provided for environmental benefit, biodiversity and rewilding. Where other after-use strategies are proposed (i.e., concrete batching, etc.) that might require more than the 20% in use for ongoing economic purposes, then other lands (including other disused quarries) may be used to compensate any shortfall, either by condition of use, sterilisation/legal agreement, or rehabilitation and transfer to either the Council or an established wildlife group. The 80% requirement for environmental/biodiversity may be waived at sites closer to urban areas where a significant portion of the site is being provided for sports, recreation, and amenity.

Section 15.9.6 **Extractive Industry** of Chapter **15 Development Management Standards** provides the development management standards for the sector.

When assessing planning applications for quarry and ancillary developments, the Council will have regard to.

- Section 261 and Section 261A of the Planning and Development Act, 2000 (as amended);

- the Quarries and Ancillary Activities Guidelines 2004 and any amendments to the Guidelines which may be made, and
- the Environmental Protection Agency's (EPA) publication 'Environmental Management in the Extractive Industry (non– scheduled minerals)' 2006.

In addition to the above, all planning applications for quarry and ancillary developments, such as batching plants, crushing and screening, shall appropriately detail the environmental baseline of the area in which extraction is proposed, the likely impacts and proposed mitigation measures relating to;

- Human health;
- Groundwater, surface water and important aquifers and compliance with the objectives of the Water Framework Directive;
- Natura 2000 sites (Special Areas of Conservation and Special Protection Areas), Natural Heritage Areas, proposed Natural Heritage Areas and other sites for environmental or ecological protection such as Statutory Nature Reserves, Ramsar Sites, Wildfowl Sanctuary and Biogenetic Reserves;
- Flora and fauna;
- Sensitive local receptors such as residences, Areas of High Amenity, Landscape Sensitivity Areas, Key Scenic Views and Prospects, and Key Amenity Routes as outlined in Chapter 13 of this Plan;
- Landscaping, berms and screening proposals;
- Local transportation networks with particular reference to details of haul routes, trip movements and articulated lorry weights;
- Noise, vibration, and dust emissions; and
- Archaeological and architectural heritage of the area.

Planning applications shall also include general details on the proposed development as follows:

- Project description;
- Map(s) showing (a) total site area, (b) area to be excavated, (c) any ancillary proposed development, (d) nearest dwellings or any other development (within 1 km of the site);
- Description of aggregate to be extracted and / or processed;
- Description of cumulative impact when taken together with other quarries in the vicinity;
- Method of extraction and equipment to be used;
- Details of storage of materials and overburden;
- Total and annual tonnage of extracted aggregates, expected life of the extraction, maximum extent and depth of working;
- Details of any blasting;
- Fuel and chemical storage;
- Floor levels showing depths of extraction.
- Phasing programme for extraction and rehabilitation;
- Restoration and after care proposals for the site (plans and section drawings), including long-term quarry face stability, long-term water pollution potential and control, removal of buildings, plant and machinery, fencing and security.
- Remediation plans provide for environmental benefit, biodiversity, and re-wilding rather than simply re-grassing and reverting back to agricultural use / sheep grazing.

In order to facilitate the sustainable development of the extractive industry, the Council will require the lodgement of a financial bond to ensure the satisfactory reinstatement of the site following the

completion of extraction and the payment of an adequate contribution towards the upgrading or repair of the local road network.

Traffic Assessments and Road Safety Audits may be required as part of any application. Proposals for batching plants, crushing, and screening on exhausted quarry sites are required to provide details on the source of aggregate and also the number of expected trips from source to plant and then from plant to offsite.

Note:

- The Council favours the use of existing licensed quarries over proposals for extraction from green field sites.
- The Planning Authority, may in certain instances, depending on the size and characteristics of the proposed development, require the preparation of a Natura Impact Statement, Environmental Impact Statement, and other assessments.

SUBMISSION COMMENTS

The following outlines the key points that Roadstone Ltd. would like to address in relation to the proposed Draft Kildare County Development Plan 2023 – 2029 (CDP).

Chapter 2 Core Strategy and Settlement Strategy – the extractive industry should be considered crucial to unlocking the county's potential

Of significance to this submission is chapter 2 **Core Strategy and Settlement Strategy.** It is projected therein that by 2026, the population of the County is expected to grow to between 249,000 to 254,000 people, and that by 2031, the population is expected to grow to between 259,000 to 266,500 people. At the higher end of the projection, this results in an additional 31,500 people by 2026 and an additional 12,500 people by 2031, compared to the 2016 census. **In this regard, it has been forecasted that an additional 9,144 homes will be required throughout the Plan period.**

As a result, it is significant to note that the extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland. Not only homes but also roads, motorways, schools, hospitals, colleges, factories, water, and sewerage systems are all constructed with construction aggregates and concrete products. The construction of power stations, railways, wastewater and water treatment plants and sporting stadia is also heavily dependent on the supply of crushed stone, concrete and other building materials made from aggregates.

Due regard should be given to the fact that the county has significant but finite mineral resources, and it should be the aim of the proposed CDP to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry, whilst of course, ensuring that environmental, rural, scenic, and residential amenities are protected. There is a need to safeguard valuable un-worked deposits from permanent development that would prevent or hinder their future extraction and thus appropriate control measures should be put in place to avoid such a scenario. Policy RD P8 and Objective RD 037 is welcomed in this regard.

Chapter 9 Our Rural Economy – Potential to further acknowledge the socio-economic potential and benefits of the quarry and extractive industry

The section afforded to 'Extractive Industries', within Chapter 9 Our Rural Economy is welcomed. It is acknowledged that the extractive industry provides essential raw materials for the construction industry as well as providing employment and economic growth for the local and regional economies. It is further acknowledged that the continual supply of aggregates, including recycled construction and demolition material is necessary for continued economic growth, which is an integral requirement for the implementation of the National Development Plan, and private sector development. Suitably, it is understood that reserves of suitable material are finite, and extraction can only take place where these reserves are found.

It is also welcomed that this chapter refers to aggregate resources being of importance to the economy in terms of generating employment. It is referenced that there were 500 active quarries nationally in 2018, directly employing over 5,000 people. It is also remarked that the industry provides a valuable source of employment in some areas of the county with 26 active quarries noted by the council throughout Kildare in 2019. As a result of this, it is noted that the active quarries have a positive impact within the county along with providing raw materials for the construction industry and facilitating the building of infrastructure which will accommodate anticipated population growth in the county and region.

Furthermore, a successful quarry and extractive industry within the county is to the benefit of numerous stakeholders involved in the development of residential buildings, infrastructure, health care facilities, education facilities and all other forms of built development. Extraction can only take place where resources occur and it is, thus, tied to certain locations. It should be ensured that the CDP allows for the provision of adequate aggregate resources to meet the future growth needs of the county and to facilitate the exploitation of such resources where there is a proven need for a certain mineral/aggregate. This of course, should be facilitated, whilst exercising appropriate control over the types of development taking place in areas containing proven deposits and should be subject to the necessary environmental assessments.

These considerations will allow the aggregates sector to continue to facilitate its crucial role within construction and development supply chains, therefore supporting economic development and employment in the county. It is submitted that the Council should have due regard to Roadstone Ltd.'s property assets within the county and the added value these locations can bring within construction supply chains and the related impact on the local, regional and national economy. The existing operations are long established, capable of providing significant socio-economic benefits to the area and should be regarded as central to achieving the wider county development targets and objectives.

It is appreciated that an array of policies and objectives are proposed regarding the preservation of quarries in their existing landscape for the benefit of biodiversity post-cessation. It is also welcomed that objective RD 039 as provided effectively facilitates the after use of quarry lands following the cessation of quarry related operations. It is also acknowledged that objective RD O40 provides for flexibility at sites closer to urban areas where the 80% requirement for environmental/biodiversity may be waived to provide for sports, recreation, and amenity use. Nonetheless, subject to site characteristics, demand and appropriate planning and environmental considerations, it is submitted that an after use policy for such sites could also encourage the rehabilitation of disused quarries and extractive sites, to include for backfilling with inert soil and stone.

Furthermore, in review of policy RD 036, it is considered that the effect and implications of the policy should be assessed in accordance with the required number of quarry related operation vehicles. It is therefore submitted that the policy should be amended along the lines of the following:

RD O36
Require road re-instatement work to be on-going during operations, in the interests of road and traffic safety. Works undertaken to re-instate/improve the public road should be undertaken by the quarry developer or paid by them, in line with road usage, and completed by the Council.

Concluding Remarks and Further Significant Considerations

It is submitted that the Draft CDP should acknowledge that aggregate resources are not evenly distributed across the country or county and can only be worked where they occur naturally. As well as providing essential building materials for the construction industry, aggregate resources are also essentially a finite resource, in that, once extracted they cannot be replaced.

While Roadstone Ltd. are broadly in favour of the policies and objectives outlined above, it should be highlighted that there is further potential to strengthen policy provisions in relation to identifying and protecting aggregate reserves in the county.

Under other planning systems (including England and Wales), this is standard practice and is referred to as the 'safeguarding of reserves'. Guidance on the planning for mineral (aggregates) extraction in plan making and the application process2 defines the purpose of safeguarding as follows,

> *"Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance."*

This guidance also states that the relevant planning authorities should adopt a systematic approach for safeguarding mineral resources, which include the following principles,

- uses the best available information on the location of all mineral (aggregate) resources in the authority area. For example this may include use of Geological Survey of Ireland (GSI) mapping as well as industry sources;
- consults with the extractive industry, local communities and other relevant interests to define '*Minerals Safeguarding Areas'*;
- sets out '*Minerals Safeguarding Areas*' on a map that accompanies the county or local development plans; and
- adopts clear development management policies which set out how proposals for non-minerals development in 'Minerals Safeguarding Areas' will be handled, and what action applicants for development should take to address the risk of losing the ability to extract the resource. This may include policies that encourage the prior extraction of minerals, where practicable, if it is necessary for non-mineral development to take place in 'Minerals Safeguarding Areas' and to prevent the unnecessary sterilisation of minerals.

In accordance with the above approach, Roadstone Ltd. would suggest that the CDP highlights areas containing proven deposits on an appropriate map, in order to protect them from the future development of incompatible land use. The adopted CDP should ensure that the extraction of aggregates can take place in suitable locations where the resource exists.

It is important to ensure that the future interpretation of CDP policies does not result in the sterilisation of aggregate and related resources and does not prevent the secure, long-term supply of construction aggregates, and value-added products such as concrete products and road making materials. As stated, Policy RD P8 and Objective RD 037 is welcomed in this regard.

Yours faithfully
SLR Consulting Ireland

Ciarán O'Sullivan
Associate
Enc. Irish Concrete Federation (2019) Essential Aggregates
Cc. S. Geragthy (Roadstone Ltd.)

IRISH CONCRETE FEDERATION

Set for life

ESSENTIAL AGGREGATES

PROVIDING FOR IRELAND'S NEEDS TO 2040

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Statement by Larry Byrne, President, Irish Concrete Federation

Aggregates are the essential primary raw material used for the construction of Ireland's built environment. They are used extensively for the construction, upgrade and maintenance of our homes, schools, hospitals and places of work as well as other essential infrastructure such as our road and transport network and water and wastewater infrastructure. In essence, aggregates are the backbone of sustainable construction in Ireland, without which modern and future living would not be possible.

Ireland has a ready but diminishing supply of high quality aggregate reserves. It is critical that Government recognises the strategic importance of access to a steady and dependable supply of local, high quality raw materials necessary for the construction of Ireland's future built environment as highlighted in Project Ireland 2040 which was launched in 2018. It is also essential that Government, when planning for Ireland's future needs, recognises that by their nature, aggregates can only be accessed where they occur. It is therefore essential that Ireland's future supply of aggregates is planned, monitored and managed in a sustainable manner. This will require leadership from Government and support from industry and all other stakeholders.

The Irish Concrete Federation (ICF) greatly welcomes the statement in the National Planning Framework 2018 acknowledging the essential role of aggregates in Ireland's future development. It is now essential that Government, in consultation with all stakeholders, develop a national policy for aggregates which acknowledges their strategic importance in Ireland's future. This overarching policy should underpin and inform local and regional planning, promote the identification and protection of essential strategic reserves of aggregates throughout Ireland and enable the extraction of aggregates in a sustainable manner compatible with protection of the environment and the quality of life of our people. To this end, it is also essential that the Government's enforcement and procurement functions ensure that the public infrastructure projects identified in Project Ireland 2040 are constructed with aggregate raw materials from authorised extractive sites.

ICF looks forward to presenting this policy statement on behalf of our members throughout Ireland to all stakeholders and we welcome all feedback on its content. We hope it will stimulate discussion and outcomes that will contribute towards a sustainable future, not just for our industry but for the achievement of the ambitious goals of Project Ireland 2040.

Statement by Koen Verbruggen, Director, Geological Survey Ireland

The Department of Communications, Climate Action and Environment and the Geological Survey Ireland are acutely aware of the key role that raw materials will play in the delivery of Project Ireland 2040. While the ultimate building blocks of our homes, schools and roads are frequently overlooked, the role they play in society cannot be understated. For every house we build in Ireland, we need approximately 400 tonnes of aggregates, which is a house-sized hole in the ground. Raw material potential has recently been explicitly recognised within the 2019 Climate Action Plan as a key potential rural employer while local sources of aggregates are vital in the drive to reduce our carbon footprint and to transition towards a more sustainable society.

It is extremely important that the current realities of aggregate production are fully understood and that any deficits in the current planning system can be identified and remedied appropriately. Geological Survey Ireland has previously collaborated with the Irish Concrete Federation to publish guidelines for the management of the protection and promotion of geological heritage in the quarry industry, in previous iterations of quarry directories, and robustly supports sustainable access to raw materials. It is a provider of key geoscience information for spatial planning and policy decisions and current initiatives include aggregate potential mapping, a quarry directory and planning tools for aggregates. These aspects form a crucial part of the Department of Communications, Climate Action and Environment's statement of strategy for 2019 to 2021, specifically the overarching goal of sustainable resource use.

Geological Survey Ireland is pleased to welcome this publication of the Irish Concrete Federation's document on planning policy for the aggregates industry. I trust that the recommendations within will be helpful and informative for planners and policy makers and that we can work together to ensure continued sustainable access to necessary raw materials.

1. Foreword

In February 2018, the Irish Government launched Project Ireland 2040, a national commitment over a multi-annual period, of significant investment in Ireland's infrastructure. A capital budget for investment was accompanied by the National Planning Framework 2018.

An easily overlooked reality is that the achievement of the objectives of Project Ireland 2040 will necessitate access to significant reserves of aggregates (stone, sand and gravel) over the lifetime of the plan. It is not an exaggeration to state that many of the investment priorities within Project Ireland 2040 will not be realised without aggregates and aggregate based materials.

The importance of aggregates was acknowledged in the National Planning Framework 2018. However planning policy at national, regional and local level fails to grasp the unique and strategically critical role that aggregates play in underpinning economic and social life. It is essential that the importance of aggregates and aggregate based products to Ireland's future is recognised by Government and that Ireland's strategic reserves of aggregates are identified and protected and their use enabled in a sustainable manner.

It is equally important that the quarrying industry plays its part in ensuring that operations are carried out in a sustainable manner and that the state's planning enforcement and procurement functions ensure that only authorised operators are entitled to supply the marketplace.

The objective of this document is to highlight to Government the need for a national planning policy for aggregates, which will underpin local and regional planning policy, to ensure the sustainable supply of aggregates for Project Ireland 2040 and beyond. The document examines the Government statement on the role of aggregates within the National Planning Framework 2018, distils it down to its key points and compares it to the industry's experience in interfacing with the planning system currently. The document also makes recommendations to ensure that Government's stated objectives on aggregates within the National Planning Framework 2018 are implemented, not just for the benefit of the extractive industry, but for the achievement the ambitious goals of Project Ireland 2040.

2. Irish Concrete Federation

The Irish Concrete Federation (ICF) is the national representative body for the Irish aggregates and concrete products industry. ICF members comprise almost 100 companies employing over 5,000 people throughout Ireland. ICF members are involved in the extraction, processing and delivery of the essential aggregate and concrete materials used in the construction of Ireland's built environment. The members of the ICF account for approximately 80% of total industry output in terms of volume and value.

Since the formation of the ICF, environment and planning have been priorities to be addressed in a proactive, professional and responsible manner by the organisation. ICF strongly believes that the key to success in this area is a partnership approach between industry, government departments, national and local planning bodies and environmental organisations. In the past, ICF has participated in the development of Planning & Environmental Guidelines, Codes of Practice and Guidelines in the areas of Archaeological Heritage, Geological Heritage, Groundwater Investigation and Biodiversity with various Government departments, the Environmental Protection Agency, Institute of Geologists of Ireland, Geological Survey Ireland and National Parks and Wildlife Service. The ICF regularly meets with non-governmental environmental bodies on many matters of common interest.

3. Essential Points

1. Ireland has **abundant natural reserves** of high quality aggregates (stone, sand and gravel).

2. These aggregates are the **essential raw materials** from which Ireland's future infrastructure will be built, including our homes, offices, schools, hospitals and transport network.

3. Aggregates can **only be accessed where they occur.** Currently there are approximately 500 large commercial quarries extracting aggregates throughout Ireland.

4. The supply of local aggregates is essential to the sustainable development of Irish communities. Local supplies of raw materials reduce transport distances, thereby **reducing their carbon footprint** compared to non-local sources.

5. Current demand for aggregates in Ireland at 12 tonnes per capita is twice the average demand in the EU 28. Project Ireland 2040 will necessitate the production of approximately **1.5 billion tonnes** of aggregates.

6. Scarcities of some particular aggregate products are already emerging in the eastern and midland regions. Therefore, the future supply of aggregates needs to be **planned, monitored and managed** in a sustainable manner.

7. In recognition of the strategically essential role of aggregates, Ireland needs a **National Aggregates Planning Policy** to underpin local and regional planning policy.

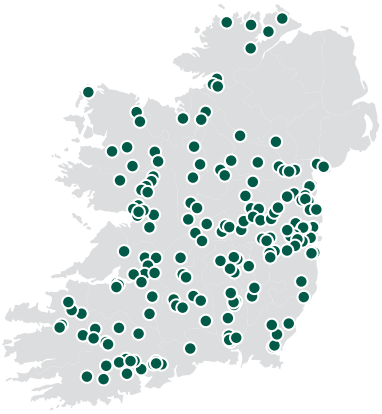
8. To provide for the country's future development, Ireland's strategic reserves of aggregates need to be **identified, quantified and protected.**

9. **A robust, effective and efficient planning system** for quarries is necessary to ensure that the extraction of Ireland's aggregate reserve is enabled in a sustainable manner. Currently, the average decision making timeframe for quarry planning applications is **76 weeks** with some decisions taking in excess of **2 years.**

10. The state's planning enforcement and procurement functions must ensure that **only authorised operators are entitled to supply the marketplace.**

4. The Irish Quarrying and Concrete Products Industry 2018

PEOPLE & LOCATIONS



500+
ACTIVE QUARRIES

200+
CONCRETE MANUFACTURING PLANTS

€300 MILLION+
WAGES & SALARIES

5000+
DIRECTLY EMPLOYED

EXPORTS

> €125 MILLION
EXPORTS OF PRECAST CONCRETE

PRODUCTS

> 4.8 MILLION m³
OF READY-MIXED CONCRETE

> 125 MILLION
CONCRETE BLOCKS

> 36 MILLION
TONNES OF AGGREGATES

> 2 MILLION
TONNES OF ROAD SURFACING MATERIALS

> 2 MILLION m²
OF PAVING PRODUCTS

> 1 MILLION
TONNES OF AGRICULTURAL LIME

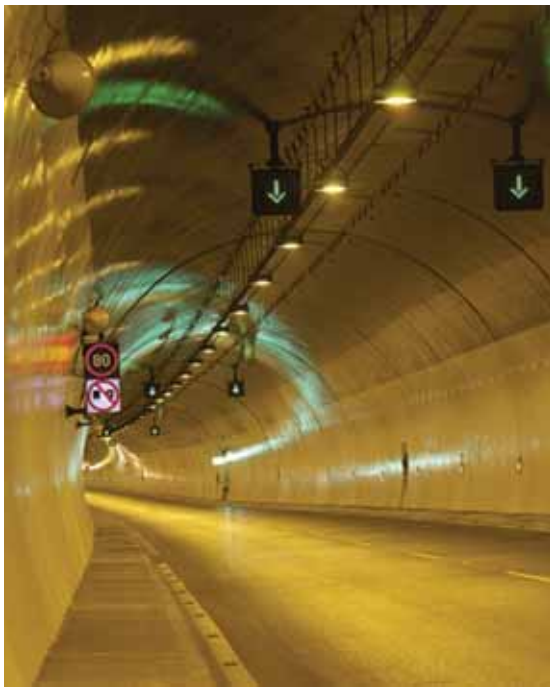
5. Project Ireland 2040

In February 2018, the Government published Project Ireland 2040 which is the overarching policy and planning framework for the social, economic and cultural development of our country for the next 20 years and beyond. It includes the National Development Plan - a ten year strategy for public capital investment of almost €116 billion to 2027 and the 20-year National Planning Framework.

The National Planning Framework 2018 is the Government's high-level strategic plan for shaping the future growth and development of our country to the year 2040. It is a framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment - from our villages to our cities, and everything around and in between.

In its public consultation process which formed part of the process of the development of the National Planning Framework, the Government issued its "Issues and Choices" consultation paper. In response, ICF made a submission highlighting the essential role that Ireland's national reserves of aggregates (stone, sand and gravel) will play in achieving the objectives of the National Planning Framework.

Notwithstanding its brevity, ICF greatly welcomes the statement in the National Planning Framework acknowledging the essential role of aggregates in Ireland's future development. This statement by Government must now underpin and inform national, regional and local planning in respect of aggregates.



"Extractive industries are important for the supply of aggregates and construction materials and minerals to a variety of sectors, for both domestic requirements and for export. The planning process will play a key role in realising the potential of the extractive industries sector by identifying and protecting important reserves of aggregates and minerals from development that might prejudice their utilisation. Aggregates and minerals extraction will continue to be enabled where this is compatible with the protection of the environment in terms of air and water quality, natural and cultural heritage, the quality of life of residents in the vicinity, and provides for appropriate site rehabilitation".

National Planning Framework – Feb 2018

6. Aggregates within the National Planning Framework 2018

The Government's statement on the role of aggregates as outlined in the National Planning Framework 2018 while welcome, does not grasp the strategically essential role that aggregates will play in achieving Project Ireland's objectives for the coming 20 years. It correctly acknowledges the role that the planning process will play in identifying and protecting important reserves of aggregates and enabling extraction of aggregates in an environmentally sustainable manner. However, the reality is that, for operators of extractive sites, the current planning system is prolonged, overly complex and can be a source of great uncertainty for operators who wish to continue existing operations or seek planning approval for new locations.

In order to highlight the challenge facing Government to achieve its stated objectives for aggregates and the extractive sector, it is necessary to examine the core statement within the National Planning Framework against the background of current practice and operator experience. For the purpose of analysis, the statement has been subdivided into three constituent parts as follows:

1. *Importance of Extractive Industries and Aggregates*
2. *Potential of the Sector / Identifying and Protecting Reserves*
3. *Enabling Extraction of Aggregates*

6.1 IMPORTANCE OF EXTRACTIVE INDUSTRIES AND AGGREGATES

> *"Extractive industries are important for the supply of aggregates and construction materials and minerals to a variety of sectors, for both domestic requirements and for export"*
>
> ***- National Planning Framework, 2018***

The Government statement on the importance of extractive industries is welcome. However it misses the essential point that extractive industries are not just important as a source of supply to a variety of sectors both domestic and for export; aggregates are an essential requirement for Ireland's future. Put simply, Project Ireland 2040 will not happen without aggregates! This is not an inflated statement of the extractive sector's importance. It is simply a statement of fact.

The Irish quarrying industry comprises approximately 500 active quarries. These quarries produce aggregates from crushed rock, sand and gravel which are used as key building materials in the construction of all of Ireland's social infrastructure and are essential to our quality of life. Aggregates are also the basic raw materials for concrete products which are ubiquitous in Ireland's built environment. There are approximately 220 ready mixed concrete plants and 20 large scale precast concrete plants located throughout Ireland. In addition, there are 40 plants producing bitumen bound road surfacing materials for Ireland's national road network.

Put simply, Ireland's economy could not function without aggregates which touch virtually every aspect of our lives – in housing, schools, hospitals, offices, roads, rail, airports, water infrastructure and agriculture. Aggregates underpin the economy and are the backbone of sustainable construction in Ireland, without which modern and future living will not be possible.

Figure 1 and Figure 2 show the output of aggregates and ready mixed concrete in Ireland since 2013. It should be noted that despite the steady growth in output in recent years, demand for aggregates and aggregate-based construction materials remain substantially below levels experienced throughout the previous decade.

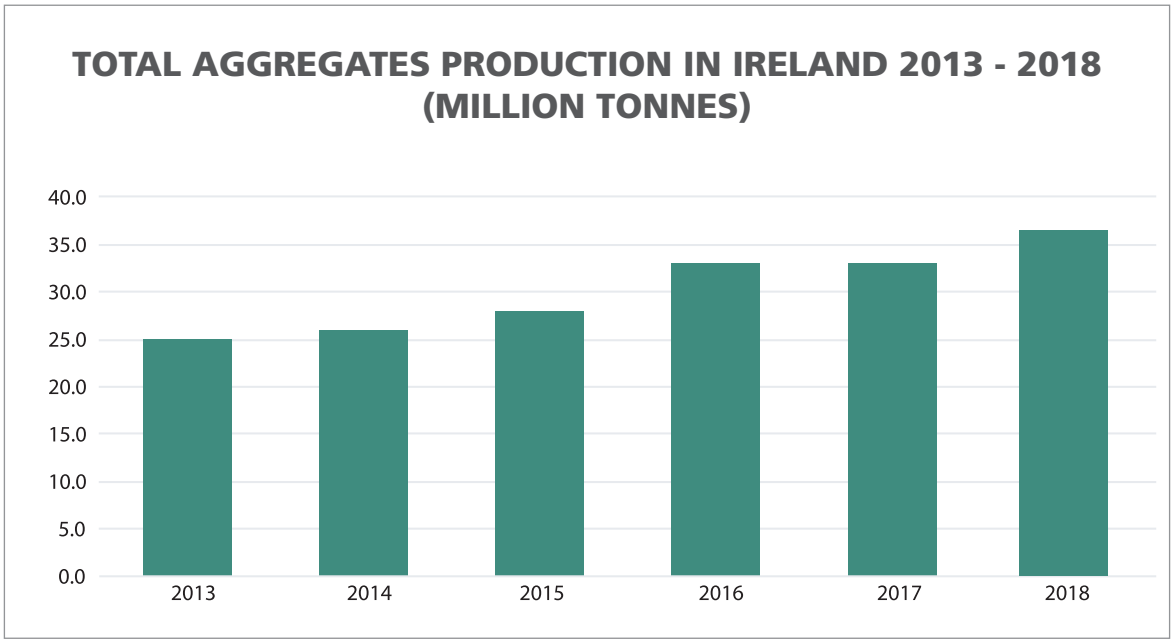


Figure 1

Did you **know?**

- *Every new **home** typically requires up to **400 tonnes** of aggregates*
- *Every new **school** typically requires some **3,000 tonnes** of aggregates*
- *A new **sports stadium** may require up to **300,000 tonnes** of aggregates*
- *Every new **1 km of roadway** requires up to **30,000 tonnes** of aggregates*

Aggregates are not just essential for the manufacture of construction materials for the domestic market, they are also the key ingredient for the production of precast concrete products, approximately half of which are exported to the UK. In 2018, the value of precast concrete exported to the UK exceeded €125 million.

Due to Ireland's infrastructural deficit and dispersed pattern of settlement and its resulting large road network, the current demand for aggregates in Ireland, at 12 tonnes per capita per year, is twice the average demand in the EU 28.

The National Development Plan, with planned investment in infrastructure of almost €116 billion in the ten years to 2027, will bring public capital investment in Ireland to be amongst the highest in the EU. It is therefore inevitable that demand for aggregate based construction materials will continue to increase in the coming years, given that the planned investment in housing, transport and education infrastructure and other priorities identified in the Plan will require a sustainable supply of aggregates from our national aggregate reserves. ICF estimates that approximately 1.5 billion tonnes of aggregates will be required to meet Ireland's societal investment needs to 2040.

In addition, quarries will make an important contribution to the circular economy as recycled aggregates from construction and demolition waste, while unlikely to exceed 5% of demand, will be an integral part of the future construction supply chain.

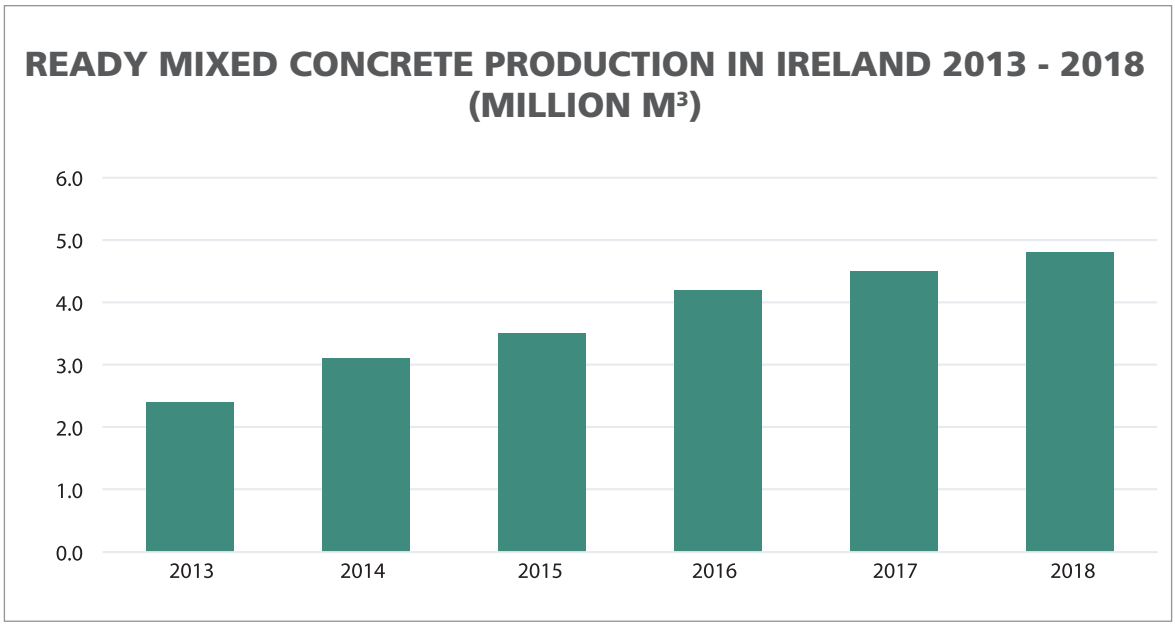


Figure 2

6.2 POTENTIAL OF THE SECTOR / IDENTIFYING AND PROTECTING RESERVES

"The planning process will play a key role in realising the potential of the extractive industries sector by identifying and protecting important reserves of aggregates and minerals from development that might prejudice their utilisation".

– National Planning Framework, 2018

The planning process will undoubtedly play a key role in realising the potential of the extractive industries sector and enabling a long term, sustainable supply of raw materials. However, while crucially important, the identification and protection of important reserves of aggregates is not simply about achieving a sector's potential; it is imperative for Ireland's future development.

Policy makers and the general public often fail to make the link between the construction of Ireland's public infrastructure and its dependence on a sustainable local supply of quality aggregates from quarries located throughout the country. Too often, certainty of supply of aggregates is assumed and decision making fails to acknowledge the reality that, unlike other industries, aggregates can only be accessed where they arise and where capable of achieving planning authorisation, compatible with the local environment.

While Ireland currently has a ready supply of high quality aggregate reserves, existing reserves at active quarries and pits are being progressively diminished by ongoing extraction activity and are not being replenished at an equivalent rate. Ireland needs an authorised reserve of approximately 1.5 billion tonnes of aggregates to meet expected demand for Project Ireland 2040.

However, scarcities in particular products such as sand in the eastern and midland regions of the country are already emerging as terrestrial sources of aggregates from sand and gravel and rock deposits continue to be diminished. It is increasingly difficult to source quality aggregates required for construction products such as high specification concrete, adjacent to major population centres, in particular, Dublin. In the absence of a local source of aggregates, demand can only be met by transporting large volumes of heavy product over longer distances with the obvious negative economic and environmental consequences.

In order for the planning process to identify and protect important reserves of aggregates, there needs to be a national planning policy overseeing access to national aggregate reserves and this policy must inform regional and local planning objectives and decision making. The current lack of a co-ordinated national policy on access to our national reserves of aggregates means that it is the responsibility of individual planning authorities to set their own planning policy in this area without regard to a national objective. For this reason aggregate planning policy in Ireland has evolved through the County Development Plan system. Inevitably this leads to much variance throughout the country in the treatment of planning matters for access to aggregate reserves. Often there is little consideration given to integrated aggregate resource assessment and associated planning and development with low importance attached to the identification and protection of important reserves of aggregates.

The absence of a national aggregates policy also means that the requirements on developers when extracting and processing aggregates vary greatly between local authorities. This contributes negatively to the development of a sustainable aggregate supply base throughout the country, damages environmental performance and creates uncertainty for operators. Indeed, there is the additional reality that, quite often, policy in areas which depend on aggregate extraction activities are often unduly restrictive rather than complimentary in nature with progressive aggregate planning policy. Local planning policy for access to aggregates should complement policy in housing and transport infrastructure. Similarly, local infrastructure development should not potentially sterilise access to the aggregate resources needed for its development.

Essentially there is often little appreciation at national, regional and local level of the reality that the future provision of aggregate resources has to be planned, monitored and managed now to ensure a sustainable supply of these materials to provide for Ireland's future infrastructure development.

6.3 ENABLING EXTRACTION OF AGGREGATES

"Aggregates and minerals extraction will continue to be enabled where this is compatible with the protection of the environment in terms of air and water quality, natural and cultural heritage, the quality of life of residents in the vicinity, and provides for appropriate site rehabilitation"

– National Planning Framework 2018

In order for Government to enable extraction in a manner compatible with the environment, natural and cultural heritage and local residents, the planning process for extraction operations needs to be reformed and streamlined.

Following Section 261 and Section 261A of the Planning and Development Act, the planning status of the extractive industry is on a much more sustainable footing. The former common practice of 'retention and extension' development applications has been replaced by fully prospective applications compatible with Environmental Impact Assessment and Appropriate Assessment legislation.

However the process of enabling the continued operation of existing operations and authorising new extractive sites in order to meet the country's future needs, while ensuring best societal and environmental practice, is prolonged, unwieldy and not fit for purpose. The excessive duration of the planning process for quarries has not been helped by historically poorly drafted national legislation that consistently fails to recognise the evolving nature of quarrying activities, which differ greatly from other more common forms of development.

An ever more complex and evolving European environmental legislative framework, as well as frequent and routine objections and appeals, both reasonable and vexatious, to the opening of new quarries and the continuation of existing operations also add to the indeterminate nature of the planning decision making process.

In effect, the reality is that the extractive industry operates in a planning system which has an indeterminate timeframe for decision making, despite the statutory objective of an eight week timeframe for local authority planning decisions and an eighteen week timeframe for appeals to An Bord Pleanála.

An analysis by SLR Consulting of quarry development planning applications appealed to An Bord Pleanála in the years 2015 to 2018 shows that the average decision making timeframe was approximately 76 weeks, taking into account both the local authority and An Bord Pleanála decision making processes. In some cases the decision making process took in excess of two years.

The average timeframe for a decision at local authority level was 34 weeks clearly indicating that requests for further information in respect of quarry applications are practically routine, while the average timeframe of 42 weeks at An Bord Pleanála is more than double its statutory objective of eighteen weeks to determine appeal cases.

Quarry Development Planning Decision Making Timeframe 2015-2018 (Planning Applications Appealed to An Bord Pleanála)			
Year Appeal Lodged with An Bord Pleanála	Average Timeframe at Local Authority (weeks)	Average Timeframe at An Bord Pleanála (weeks)	Average Total Timeframe (weeks)
2018	27	47	74
2017	41	65	106
2016	33	34	67
2015	34	37	71

The timeframes above do not include an approximate one year pre-application preparatory period for operators prior to lodging of planning applications, or the time required for any pre-commencement compliance submissions arising from conditions attached to planning permission and agreement of same with the local authority.

In addition, it is increasingly common for An Bord Pleanála decisions to be judicially reviewed in the courts, where 'standing' is becoming easier to achieve.

The principal contributory factors to the delays in the planning decision making process for quarries are as follows:

(a) Lack of Priority

The deficit of direction at national policy level on the need to identify and protect essential reserves of aggregates has led to a relative lack of priority attached to the management of a sustainable aggregate supply base in individual local authority areas when compared with other developments such as housing and infrastructure.

(b) Lack of Expertise of Nature of Quarrying

Quarry development is not the same in nature, scale and duration as other developments. Clearly, the ongoing extraction of aggregates in quarries is wholly different from other forms of "one-off" development such as houses, buildings and public infrastructure. This is due to a number of factors including the longevity of extraction activities, the range of impacts and the cyclical demand patterns for materials. Technically, extractive developments are a continuous combination of 'works' and 'use' unlike other developments which expand in discrete steps. Consequently, much national legislation is not written with quarries in mind, resulting in the need for further clarification and request for information leading to inevitable planning delays.

(c) Decision Making Timeframes & Targets

The statutory timeframe objectives for local authority and An Bord Pleanála decisions are not realistic in the case of extraction activities. The reality is that these target timeframes for decisions effectively prolong the duration of the planning process for quarries by encouraging 'Requests for Further Information' to avoid exceeding the target timeframes. In addition, the natural desire to meet statutory timeframes lends greater incentive to prioritise other more common and less complex forms of development such as housing.

Upon eventual emergence from the planning process, the grant of a planning permission is subject to planning conditions and a defined duration. Notwithstanding the complexity of the approval process, the duration of planning permissions for quarries range from as little as five years up to twenty five years. Permissions of five to ten years duration fail completely to grasp the scale of investment required to plan and manage the long term supply of aggregates to meet societal needs in a local area while also effectively stalling any future investment in plant, equipment and people by operators.

In summary, far from enabling ongoing extraction in a manner compatible with the environment, natural and cultural heritage and local residents, the duration and unwieldy nature of the planning process not only undermines ongoing access to aggregate reserves where they arise, it also adds great uncertainty to individual businesses, thereby directly impacting on investment in plant, machinery and people at individual enterprise level.

7. Recommendations

The Government has set ambitious objectives for the delivery of much needed homes and public infrastructure in Project Ireland 2040. It is crucial that the link is made between the need for Ireland's future housing and infrastructure and the raw material supply chain that enables those societal necessities to be delivered and that this raw material supply chain is identified and protected.

ICF recommends that the following proactive steps are taken by Government and other stakeholder organisations to ensure that future demand for aggregates can be supplied sustainably to ensure the achievement of Government's objectives.

1. National Aggregates Planning Policy

National policy makers must recognise that supply of aggregates cannot be assumed and must be planned, monitored and managed to ensure that future demand can be supplied in a sustainable manner and support growth in the economy. A national policy for aggregates must be developed by Government to underpin and inform local and regional planning policy and to promote the identification and protection of essential strategic reserves of aggregates throughout Ireland.

2. Identification and Protection of Aggregate Reserves

Drawing from the national policy, the three Regional Assemblies and individual Local Authorities should, as part of their development planning, have regard to and make provision for the protection of strategic aggregate resources within their functional areas.

Every local authority or area development plan should give due regard to the information contained in the Geological Survey Ireland Aggregate Potential Mapping resource maps when considering policy for the protection and zoning of raw material reserves. Geological Survey Ireland has undertaken a substantial body of work identifying the aggregate reserves of each county and planners should have regard to these databases and maps when considering planning applications.

Industry should have the opportunity to inform planning authorities on the location of substantial strategic aggregate reserves through the review of County Development Plans and Local Area Plans. Further development applications in the vicinity of these reserves should be considered having regard to the likely future development of these locally important reserves.

3. Decision Making Timeframes

The Environmental Impact Assessment (EIA) Regulations transposing the EIA Directive (2014) require that a meaningful scoping process is undertaken prior to submission of development applications. It is imperative that such a scoping process is implemented for all quarry planning applications and that planning authorities are sufficiently resourced to carry out this process in an effective manner. An effective pre-planning scoping process should reduce the level of additional detail required during application processing, thereby reducing the decision making timeframe. In addition, An Bord Pleanála should prioritise quarry development to ensure its statutory objective of deciding appeals within 18 weeks is achieved.

4. Direct Planning Applications to An Bord Pleanála

As practically all decisions by local authorities in respect of large scale extractive applications are appealed to An Bord Pleanála, a process to facilitate development applications directly to An Bord Pleanála should be introduced, subject to thresholds in terms of scale or output.

5. Quarry Planning Permission Durations

Given the highly capital intensive nature of the extractive industry in terms of plant, equipment, site infrastructure, landscaping and mitigation measures, the regulatory certainty needed for professional operators can only be provided by the granting of permissions of long term duration. Planning permission durations should be commensurate with the planned extraction of resources present which can often exceed 30 years where important and substantial reserves have been identified.

6. Sufficient Planning Authorisations

The planning system should ensure steady and adequate provision of aggregate supplies within the context of a supportive national policy, by issuing sufficient planning consents to meet demand and to help the extractive industry to thrive in a sustainable manner. Priority should be given to existing sites to ensure existing employment and investment is maintained.

7. Enforcement

Government must actively promote a strong and consistent commitment to enforcement by planning authorities of planning legislation to protect and enhance Ireland's natural environment and ensure that only authorised operations can supply the marketplace.

8. Public Procurement

A policy of procuring materials only from authorised sources by the state and local authorities is essential to protect the environment and support compliant businesses.

9. Recycling of Aggregates

Government should adopt national end-of-waste criteria to facilitate the processing and reuse of recycled aggregates in the construction chain within a supportive planning framework.

10. General Public

Industry should work with Government and other stakeholder organisations to improve public understanding of the critical need for aggregates for the development of local communities.

11. Sharing of Knowledge

Proactive and practical steps to address knowledge and understanding gaps within the planning system on the unique nature, duration and impacts of quarrying should be taken by both the industry and planning authorities. Resources within the three regional assemblies should be pooled to avail of specialist expertise in local authorities. Geological Survey Ireland is a source of valuable expertise available to regional assemblies and local authorities. Industry will actively encourage and facilitate education and training days and events for planners in quarries.

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