



## Irish Concrete Federation

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**Administrative Officer,  
Forward Planning Department,  
Louth County Council,  
County Buildings,  
Dundalk,  
Co. Louth.**

**21<sup>st</sup> December 2020**

### **Re: Comments on Draft County Development Plan 2021-2027**

**Dear Sir or Madam,**

With regard to the public consultation on the Draft County Development Plan 2021-2027, the Irish Concrete Federation (ICF) would like to make the following comments and observations.

1. The ICF acknowledges the significant recognition afforded to the Extractive Industry in the Draft Plan, specifically Section 11.4.2. There is a clear need for a National Aggregate Policy at this time but, in its absence, the County Development Review process is the only mechanism for strategic policy and provision for the industry, which underpins the Construction Sector. It is, therefore, important that Development Plans around the country include supportive policy objectives to protect and promote this sector, such as in ENV41 and ENV42. However, the industry's role in the economic life of the county has been somewhat ignored in Chapter 5 where it must be inferred under the general reference to 'rural resource-based enterprises' in Section 5.19.3. Given the industry is essential to the delivery of infrastructure (EE30), I suggest a more specific acknowledgment in this section or the policy objectives (EEs) is warranted.

It is fair to say that the mainstream Extractive Industry has been working steadily to improve industry perception and modus operandi with considerable achievements to date. Indeed, a Louth based former ICF Quarry of the Year and UEPG Award Winner at Gallstown has established a European wide reputation as being among the top ranked extractive developments in Europe.

2. Having been devastated by the recession where industry output dropped 85%, the extractive industry is now using perhaps 10-12 tonnes per capita per annum, which while still far short of the 30+ tonnes of 2007 is already on the upper level of European countries where the average is 6-7 tonnes. This is indicative of the low density of population, relatively large road network, and historical shortages of many forms of physical infrastructure.

The industry needs appropriate support in the planning process, with expected housing levels required to increase rapidly to meet current needs adding further to the per capita usage.

3. It is equally crucial that market demand is met from legitimate industry in a planned and controlled manner. Regrettably, a significant portion of national demand has been met from unauthorised sources in the past and this is on the rise again as the industry recovers. This

undermines the entire planning process and gives professional legitimate industry a bad name and unfair competition. A strong commitment to rigorous development control and enforcement might usefully be included in Section 11.4.

4. The objectives of the draft CDP with regard to carbon reduction are noted. In assessing all development, the whole life cycle of aggregate and concrete products must be Appropriately accounted for, noting that both are 100% recyclable.

The ICF is engaged with the EPA on trying to establish national End of Waste criteria for recycled concrete aggregates and it is hoped this will be accomplished in 2021, opening markets for recycled aggregates. However, it should be noted that available demolition concrete would only replace approximately 2% of national demand for aggregate products, and use of recycled products should therefore be promoted but not mandated on specific developments as finding adequate markets for the products is certain.

While there are technical impediments to their re-use in high strength concrete, mainly due to unknown provenance, recycled aggregates meet several TII and NSAI specifications for use in siteworks, generally in non-structural uses.

5. In Section 11.4, the appropriateness of extractive sites for soil recovery as part of the site remediation process would be supportive of ENV 40, noting extractive sites will already have the necessary infrastructure to seamlessly deal with soil recovery and certainty of use. The Management Guidelines in Section 13.15.1 should seek to encourage consideration soil recovery as a complimentary part of every extractive development proposal.

6. In relation to environmental management of potential emissions generally, the Quarry Planning Guidelines, as published by the Department of the Environment Heritage and Local Government in April 2004 (as referenced), the ICF Environmental Code of October 2005, and the Guidelines for Environmental Management in the Extractive Sector as published by the Environmental Protection Agency in May 2006 are the key documents for standards required of extractive developments and would all be usefully specified in the Management Guidelines.

Similarly, we would welcome an acknowledgement of several additional publications as reference documents, with which the ICF played a role in development and publication, e.g. the NPWS Notice Nature Guidance on Biodiversity in the Extractive Industry as well as the GSI's Geological Heritage Guidelines for the Extractive Industry. All of these documents are available on request or can be down-loaded from [www.irishconcrete.ie](http://www.irishconcrete.ie).

7. As above, the ICF has worked closely with the GSI in the area of geological heritage. The GSI understand the value of the Extractive Industry in the furtherance of knowledge of Geology and discovery of Geodiversity. It is through excavation that we learn about geological heritage, hence protection is not always the correct approach, nor is it universally endorsed by the GSI. The referring of extractive development proposals to GSI is welcomed (ENV46).

8. We are confident that the Extractive Industry can work within the general landscape and protection policies of the Plan, allowing for development throughout the county in order to minimise the environmental impact of unnecessary and unsustainable road haulage of materials from further afield. It must be noted that there is a severe shortage of sand and gravel in the North-East of the country, with County Louth containing enormous resources in this area/

It is important that development applications should include operational landscaping schemes and restoration plans sympathetic to the general landscape in which it is set. However, some sites of longstanding may have difficulty complying with modern standards in this area and due regard should be had to their reasonable entitlement to favourable consideration of future development applications on this basis.

9. The capital investment required to properly develop and manage a sustainable extractive development cannot be achieved if it is subject to short term planning consents and policy restraints. The Federation would welcome a commitment in the Draft Plan to issue permissions with terms commensurate with the resources available for extraction and would further welcome support for significant extensions to existing professionally managed quarries. It is possible to construct a planning condition whereby the recommendations of EPA Guidelines or any revision of that document or other relevant legislation applies to a site on an ongoing basis. This again allows for the environmental management procedures and emission limits to be updated without the need for a new planning application, solely for the purpose of reviewing the existing permission.

Given the current level of NIMBYism that exists in every county, there is no guarantee that even the cleanest of sites can get through the planning process, at least without some restriction on existing practices, hence the need for long term well constructed planning permissions with terms commensurate with the timescale for development of the aggregate resource to avoid unnecessary 'review permissions'.

10. With regard to the transportation of aggregates, an appropriate contribution to road improvements and maintenance should be calculated, based on a balance of impact of all road users so as not to unjustly penalise an authorised development. The impact of unauthorised development on roads nationally is clear and can only be resolved through strong Enforcement action. Authorised development, paying for road improvements, development contributions and operating to high environmental principles, cannot compete with unauthorised developments that have a much smaller cost base. Therefore, for the Planning Authority to seek road and development contributions from legitimate industry, it must ensure that legitimate industry is not being unfairly competed with by unauthorised developments.

11. Operating in a Border County, the concrete industry operators in County Louth must compete with cross-border competition daily. To do this, the playing field must be level. Most Northern Ireland based operators do not have restrictions on time of operation and



routinely capture the business of morning concrete pours in Dundalk on the basis that local plants can't open until 8am (generally) while NI operators can deliver concrete into Dundalk from 6am onwards (routinely during the last boom).

The concrete market is about service and low margins/high volume. The current restrictive planning conditions do much to hand over a large section of the market to operators from outside the county unopposed. This is inherently unfair. A condition allowing for concrete plants to open and operate from 6am is required and can be accomplished subject to night-time noise restrictions and mitigation measures, and even a restricted number of such instances in any given year.

12. The Port of Drogheda has been the location for marine dredging and landing of aggregates in the past, albeit these works were part of the port maintenance works. It is likely that marine aggregates will become part and parcel of the extractive industry, given the shortage of access to land-based sand and gravel resources.

The potential for landing marine aggregates at Drogheda should be expressly reflected in EE25, supporting development and growth of the maritime economy, and EE34, supporting improvements and expansion of Drogheda Port.

Please feel free to contact me regarding any queries you may have or for copies of the referenced documents.