

15th January 2021

Administrative Officer,
Review of County Development Plan,
Forward Planning Department,
Áras An Chontae,
Great Water Street.
Longford,
N39 NH56.

Submitted via email

Our Ref: 501.00180.00141.33 L

Your Ref: Draft Longford County Development Plan 2021-2027

Dear Sir/Madam

RE: DRAFT LONGFORD COUNTY DEVELOPMENT PLAN 2021-2027

SLR Consulting Ireland acts as planning and environmental advisors to Roadstone Limited, Fortunestown, Tallaght, Dublin 24. This submission relating to the Draft Longford County Development Plan 2021 – 2027 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 property asset within the Longford County Council administrative area, refer to Figure 1 below. The property is located at:

- Moyne Quarry, Leggagh Townland, Moyne, Co. Longford.

This property asset contains aggregate resources and has provided / provides aggregates and added-value construction materials to support the local, regional and national economy.

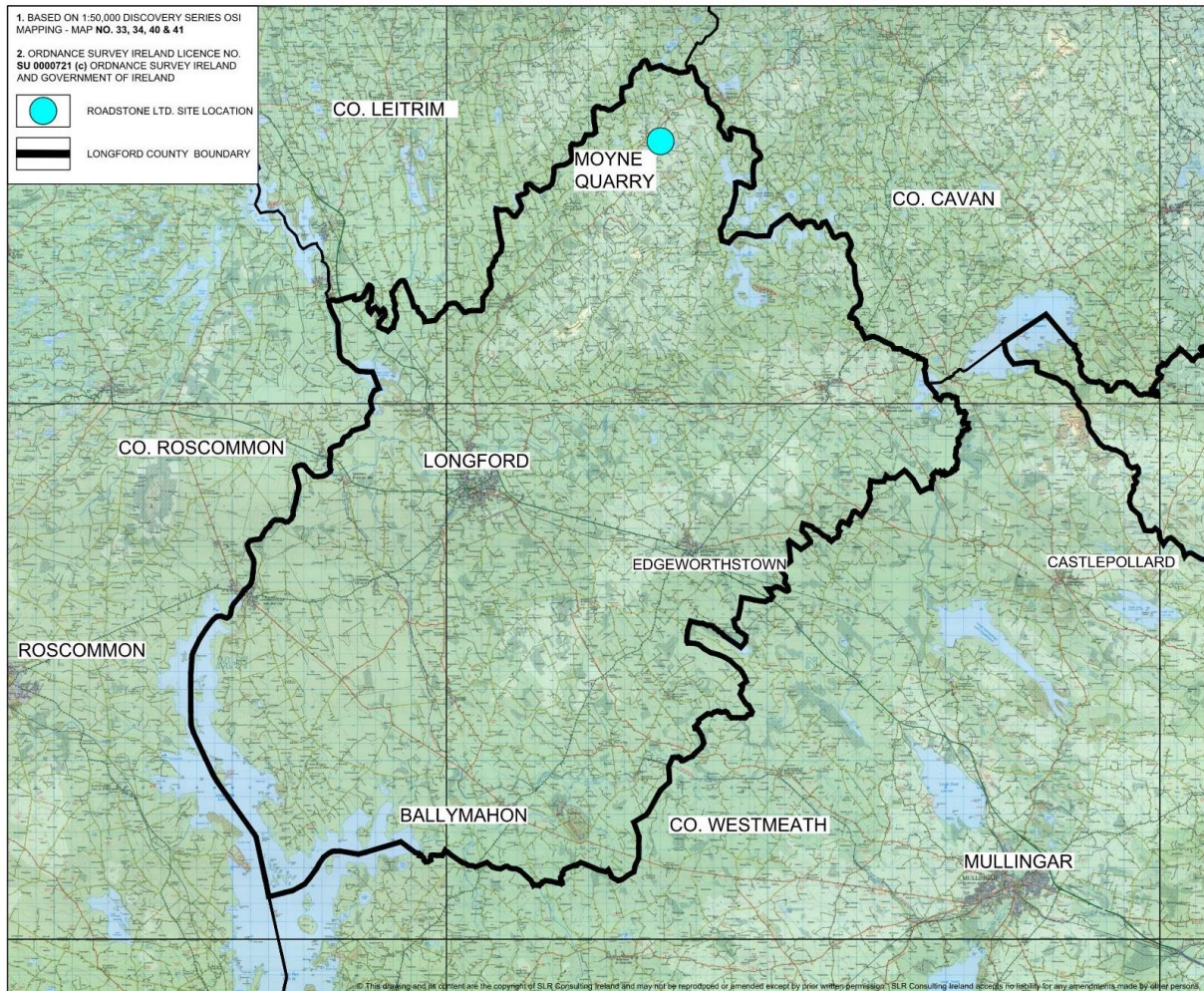


Figure 1: Roadstone Ltd. – Property Locations in County Longford

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 which is supportive of the extractive economy. National Policy Objective 23 states that it is the intention of the NPF to,

‘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.’

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.

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 2040¹ prepared by the Irish Concrete Federation (refer to copy appended to this submission).

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

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 tonnes of aggregates and every new school typically requires some 3,000 tonnes 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 LONGFORD COUNTY DEVELOPMENT PLAN 2021 - 2027

The Draft Longford County Development Plan 2021-2027 (CDP) states that the Plan sets out an overall strategy for the proper planning and sustainable development of County Longford and consists of a written statement and maps indicating the development objectives for the County. The Vision of the Plan is,

“to set out a framework for the sustainable physical development of the County, ensuring the conservation and protection of the built and natural environment, while providing in an equitable manner for all our people within the County’.

As such the Longford CDP provides for an overall strategy for the social, economic, cultural and physical development of the county. In order to achieve this, the CDP has the following aims to:

1. Implement relevant national and regional development policy provisions at a county level;
2. Strengthen and develop the economic, social and cultural life of the county in a way that can be sustained to safeguard the quality of life for future generations;
3. Provide a development framework which defines acceptable forms of development and appropriate locations.

The following provides an outline of the key policies and objectives within the Draft CDP that are considered relevant to this submission.

Chapter 4 **Core, Settlement and Housing Strategies** describes that the Core Strategy identifies the quantum, location and phasing of development in County Longford for the plan period, which reflects the nationally and regionally defined population targets and settlement hierarchy, cognisant of the availability of existing services, planned investment, sequential development and environmental requirements.

It is stated that the Core Strategy prepared for the Draft Longford County Development Plan 2021-2027 articulates the medium to longer term evidence and quantitatively based strategy for the spatial

development of County Longford, whilst demonstrating consistency with national and regional objectives as set out in the National Planning Framework (NPF) and the Eastern and Midland Regional Spatial and Economic Strategy (RSES).

In this regard, the Core Strategy highlights the population projections for Longford, that by **2026 the population of the county is expected to grow to between 44,500 – 45,500 persons**, and that **by 2031, growth is expected to continue and reach between 46,000 – 47,000 persons. This is a potential difference of 6,127 additional persons compared to the 2016 census figures** which recorded a population of 40,873. County Policy Objectives are also provided in this regard and those which are relevant to this submission are provided below,

CPO 4.1

Promote the sustainable growth and development of the county in accordance with the Settlement Hierarchy and population targets established within the Core Strategy and commensurate with the network of urban centres, villages and rural areas presented in the Settlement Strategy and their respective capacities to assimilate sustainable levels of future development.

CPO 4.4

Arrest the decline and stagnation in areas that have experienced low population growth or decline in recent decades.

Furthermore, the CDP describes that the Longford Housing Strategy projects a likely need for **1,169 additional residential units** in the county over the period from 2021 – 2027. County Policy Objectives are also provided in this regard, the following of which is relevant to this submission,

CPO 4.49

Provide new homes to meet expected future housing requirements in the County as identified in the HNDA. A total of 1,169 new homes shall be provided over the plan period to meet requirements a result of forecast population growth. New homes shall be provided in a planned and coordinated manner in accordance with the aims and policies of the Core Strategy, the RSES, and the National Planning Framework.

Chapter 8 **Economic Development** describes that Longford is home to a broad economic and employment base ranging from microenterprises to large-scale multinational companies. It is stated that this chapter sets out the economic strategy for County Longford, which aims to encourage employment growth and economic activity, and promote Longford as a local and regional centre of trade, business and tourism. It is further stated that in developing this economic strategy, cognisance has been taken of the diverse economic and industrial base within the County, as well as the urban and rural contexts that characterise the economic communities of County Longford. However, it should be noted that the quarry and extractive industry and its socio-economic benefits are not mentioned within the chapter.

Chapter 9 **Rural Economy** provides a section on **Extractive Industries**. It is described that the Council acknowledges the need for extractive industries in terms of supply of aggregate materials for the construction sector, transport infrastructure projects, and for the export market. However, this is also cautioned against potential wider environmental issues.

It is stated that the county contains a variety of raw materials critical to the construction industry in the form of sand, gravel, stone reserves including high purity limestones and shale used in cement and magnesia manufacture and base metal deposits. The potential of these resources to underpin

construction output and provide employment and economic growth in the local and regional economy is recognised, as is the need to exploit such resources in an environmentally sound and sustainable manner. It further acknowledged that by their nature, aggregates can only be worked where they geologically occur.

The importance of appropriately managing local landscape and visual impact is also described, however, it is described that allowing rehabilitation of quarry faces to take place parallel to extraction operations and providing planting on earth mounds at quarry entrances significantly reduces visual impacts while allowing for ecological and habitat recovery. Road reinstatement is also encouraged during operations, rather than after the site has been exhausted, in the interests of road and traffic safety.

The following County Policy Objectives are provided in relation to the Extractive Industry,

CPO 9.37

Recognise the role and facilitate the exploitation of County Longford's natural aggregate resources in a manner which does not unduly impinge on the environmental quality and the visual and residential amenity of an area, while continuing to regulate the extraction of aggregates and to seek the delivery of environmental benefits in the form of sustainable habitat creation in conjunction with the restoration phases of development.

CPO 9.38

Facilitate the sourcing of aggregates for and the operation of the extractive industry in suitable locations, subject to the protection of landscape, environment, road network, heritage, visual quality and amenity of the area.

CPO 9.39

Ensure that development for aggregate extraction, processing and associated concrete production does not significantly impact the following:

- *Existing and Candidate European Sites (Special Areas of Conservation (SACs) and/or Special Protection Areas (SPAs))*
- *Existing and proposed Natural Heritage Areas (pNHAs)*
- *Other areas of importance for the conservation of flora and fauna and biodiversity value*
- *Zones of archaeological potential*
- *Important aquifers and sensitive groundwater resources*
- *The vicinity of a recorded monument*
- *Sensitive landscape areas*
- *Established rights of way and walking routes*

CPO 9.40

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 the County Development Plan (Chapter 12: Natural Heritage and Environment and Appendix 7: Natural Heritage and Environment).

CPO 9.41

Ensure that extraction activities address key environmental, amenity, traffic and social impacts and details of rehabilitation.

In the assessment of planning applications for new development, intensification of use or diversification of activity, the Council will have regard to the nature of the proposal, the scale of activity proposed, the impact on the adjoining road network, the effect on the environment including important groundwater and aquifer sources, natural drainage patterns and surface water systems and the likely effects that any proposed extractive industry may have on the existing landscape and amenities of the county, including public rights of way and walking routes.

CPO 9.42

Ensure that all extractions shall be subjected to landscaping requirements and that worked out quarries should be rehabilitated to a use agreed with the Planning Authority which could include recreational, biodiversity, amenity or other end-of-life uses. The use of these rehabilitated sites shall be limited to inert waste and sites shall be authorised under the appropriate waste regulations.

Chapter 14 **Landscape Character** makes specific reference to Roadstone Ltd.'s property asset in a positive light stating that,

“The Roadstone Quarry at Moyne exerts a considerable landscape influence over Lough Naback, however, this serves to lessen the influence of the pylons and associated 110kv overhead wiring traversing the unit from east to west at this point”.

Finally, chapter 16 **Development Management Standards** provides such standards for the Extractive Industry. It is described that In the assessment of planning applications for new development and the intensification of use or diversification of activity, the Council will have regard to the nature of the proposal, the scale of activity proposed, the impact on the adjoining road network, the effect on the environment including important groundwater and aquifer sources, natural drainage patterns and surface water systems and the likely effects that any proposed extractive industry may have on the existing landscape and amenities of the county, including public rights of way and walking routes.

In this regard, the following standards are provided,

DMS16.175

Require that all extract industry development complies with the requirements of Section 261 and Section 261A of the Planning and Development Act, 2000 (as amended), the Quarries and Ancillary Activities Guidelines 2004 or any updates thereof and EPA Guidelines for Environmental Management in the Extractive Industry 2006 or any updates thereof.

DMS16.176

Require Developer's / Applicant's to submit the following:

- a) An appropriate map detailing total site area, area of excavation, any ancillary proposed development and nearest dwelling and/or any other development within 1km of the application site.*
- b) A description of the aggregate to be extracted, method of extraction, any ancillary processes (crushing etc.), equipment to be used, stockpiles, storage of soil and overburden and storage of waste materials.*
- c) The total and annual tonnage of extracted aggregates expected in the lifetime of the extraction, maximum extent and depth of working and a phasing programme.*
- d) Details of water courses, water table depth and hydrological impacts, natural and cultural heritage impacts, traffic impact, waste management and the impacts upon landscape and walking and cycling routes.*

- e) *Assessment of cumulative impact when taken with any other extractive operations in the vicinity.*
- f) *Likely environmental effects, proposed mitigation measures and restoration.*
- g) *Detailed Rehabilitation and after-care proposals. These should include a report with plans and section drawings, detailing the following:*
 - 1. *Anticipated finished landform and surface/landscape treatments (both of each phase proposed (where applicable) and the excavation as a whole).*
 - 2. *Quality and condition of topsoil and overburden.*
 - 3. *Rehabilitation works proposed.*
 - 4. *Type and location of any vegetation proposed.*
 - 5. *Proposed method of funding and delivery of restoration/reinstatement works etc.*
- h) *Current Legal Planning Status of the Existing Development (Quarry/Sand and Gravel Pit).*
- i) *Justification on need for the development proposed, the extent of existing authorised quarry supplies available and the impact of the development on the local environment.*
- j) *Limited duration on permissions may be provided to allow for the re-evaluation of the development in light of unforeseen environmental implications and in light of changes in environmental standards and technology.*

DMS16.177

Encourage the rehabilitation and suitable re-use of disused pits and quarries where appropriate having regard to all appropriate environmental considerations.

DMS16.178

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 the County Development Plan (see Chapter 12: Natural Heritage and Environment and Appendix 7: Natural Heritage and Environment).

DMS16.179

Require by way of planning condition that the developer lodge a financial bond to ensure the satisfactory reinstatement of the site following the completion of extraction. This bond shall be index linked.

DMS16.180

A special contribution levy may be required from the developer towards the cost of upgrading or repairing the local roads serving the quarry and to minimise the adverse impacts of associated quarry operations on the road network.

SUBMISSION COMMENTS

The following outlines the key points that Roadstone Ltd. would like to address in relation to the proposed Draft Longford County Development Plan 2021 – 2027.

Chapter 4 Core, Settlement and Housing Strategies – the extractive industry should be considered crucial to unlocking the county’s potential

It is noted in the Draft CDP that by 2031 the county is expected to grow to between 46,000 – 47,000 persons. This is a potential difference of **6,127 additional persons** compared to the 2016 census figures. Furthermore, the CDP describes that the Longford Housing Strategy projects a likely need for **1,169 additional residential units** in the county over the period from 2021 – 2027, to accommodate the increasing population.

In this regard, 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.

Moreover, extensions to existing permitted quarry operations should be given favourable consideration where the Planning Authority is considering planning applications for same, which have proven aggregate resources within established operations and all the necessary quarry infrastructure, haul routes, markets, environmental monitoring measures and licensing, etc., would have already been put in place. This would help ensure that environmental, rural, scenic and residential amenities as mentioned above, are protected, whilst at the same time support the county in meeting the population and housing growth targets as mentioned, given the related construction activity requirements that would ensue.

Chapter 8 and 9 Economic Development and Rural Economy – the potential positive contributions of the extractive industry

It is submitted that the Draft CDP be revised to adequately outline the economic value and significance of the aggregates sector, emphasising the sector’s significance in terms of economic development and employment.

Although chapter 8 Economic Development describes that Longford aims to encourage employment growth and economic activity and promote Longford as a local and regional centre of trade, business and tourism, there is not a single reference to the potential benefits or socio-economic contributions of the quarry and extractive industry. It is therefore submitted that the importance of the sector should be stressed within the proposed plan and its significance with regard to construction and development supply chains, as well as the county’s growth objectives should be made clear.

In contrast, detail regarding the industry in chapter 9 Rural Economy is welcomed, which acknowledges the need for extractive industries in terms of supply of aggregate materials for the construction sector, transport infrastructure projects, and for the export market. It is stated that the county contains a variety of raw materials critical to the construction industry. The potential of these resources to underpin construction output and provide employment and economic growth in the local and regional economy is also recognised and it is further acknowledged that by their nature, aggregates can only be worked where they geologically occur.

In review of the foregoing, it is considered that the economic benefits of the quarry and extractive industry should feature in both economic chapters outlining the industry's potential in assisting with meeting the aforementioned population and housing delivery targets, as the benefits and impact are not limited to the rural economy alone but have the potential to induce a wider impact in settlements across the county.

Chapter 9 also provides a number of County Policy Objectives (CPOs) pertinent to the industry, which are considered reasonable, however, it is noted that with the exception of CPO 9.37, these are entirely focused on the protection of the existing natural environment and residential amenity. While, it is agreed it is crucial to put such measures in place, there is nonetheless a missed opportunity in not emphasising the socio-economic benefits of the extractive industry within such policies. It is therefore submitted that the importance of the sector should be stressed within policy objectives of the proposed plan, facilitating a means to unlock the sector's economic potential to the benefit of the county.

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. Furthermore, there is a need to safeguard valuable un-worked deposits from permanent development that would prevent or hinder their future extraction.

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 and further afield. It is submitted that the Council should have due regard to Roadstone Ltd.'s property asset within the county and the added value this brings in terms of the local, regional and national economy. It should be noted that the property asset / extraction location is long established, providing significant socio-economic benefits to the area.

Chapter 16 – Development Management Standards Assessed

The policy objectives and related development controls proposed in the new plan within Chapter 16 Development Management Standards are generally considered reasonable for the sector and it should be emphasised that Roadstone Ltd.'s property asset / extraction location at Moyne is in accordance with the proposed development controls.

However, Roadstone would like to make the following point known regarding the proposed development standard as quoted below,

DMS16.180

A special contribution levy may be required from the developer towards the cost of upgrading or repairing the local roads serving the quarry and to minimise the adverse impacts of associated quarry operations on the road network.

In review of the above it should be acknowledged that the sector provides significant financial contributions to local authorities through the Development Contribution Schemes and payment of rates. If applied, any special contribution on a particular development should be determined on a proportionate basis in the context of overall traffic usage and traffic related to the development.

Further Significant Considerations

It should be noted 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

² <https://www.gov.uk/guidance/minerals#minerals-safeguarding>

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.

Furthermore, it is reemphasised that extensions to existing quarry operations should be given favourable consideration where the Planning Authority is considering planning applications for same, as this would help to ensure that environmental, rural, scenic and residential amenities as mentioned herein, are protected, whilst at the same time support the county in meeting its population and housing growth targets, given the related construction activity requirements that would ensue.

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.

Yours sincerely
SLR Consulting Ireland



Ciarán O'Sullivan
Associate

Enc. Copy of “Essential Aggregates” (Irish Concrete Federation, 2019)

Cc. Mr. S. Geraghty (Roadstone Ltd.)



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

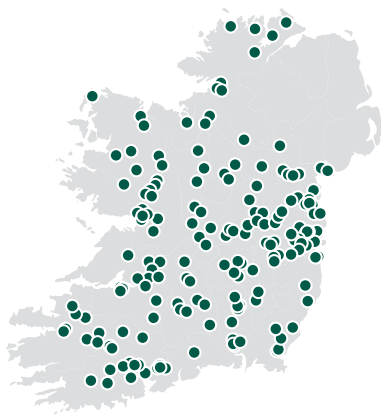
A robust, effective and efficient planning system for quarries is necessary to ensure that the extraction of Ireland's aggregate reserve is enabled in a sustainable manner. Currently, the average decision making timeframe for quarry planning applications is **76 weeks** with some decisions taking in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

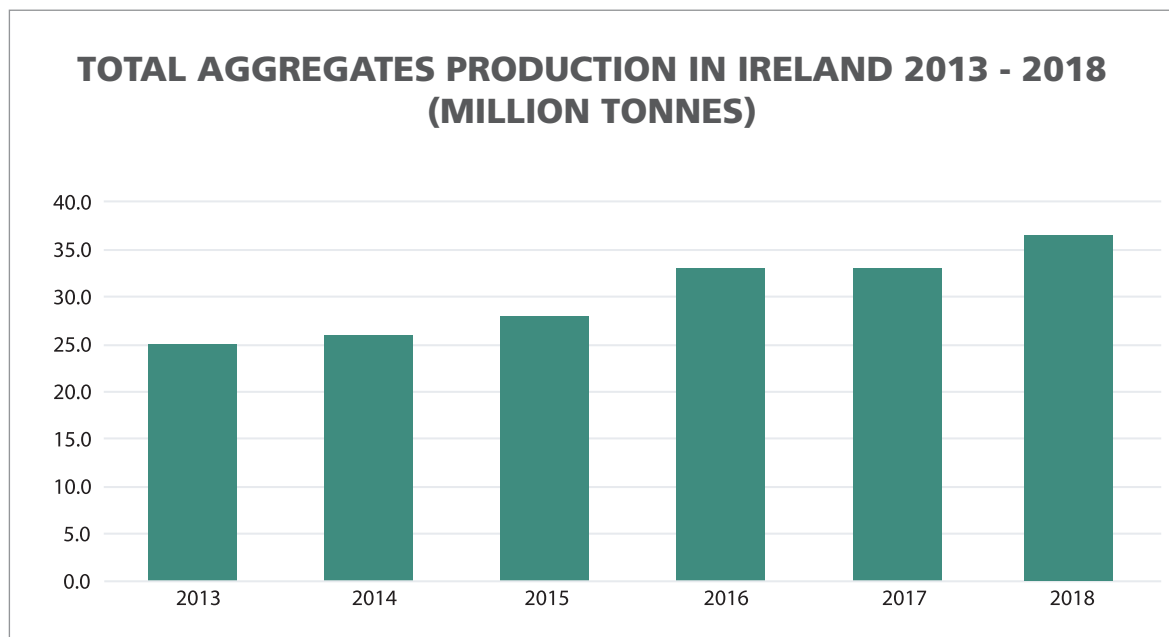


Figure 1

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.

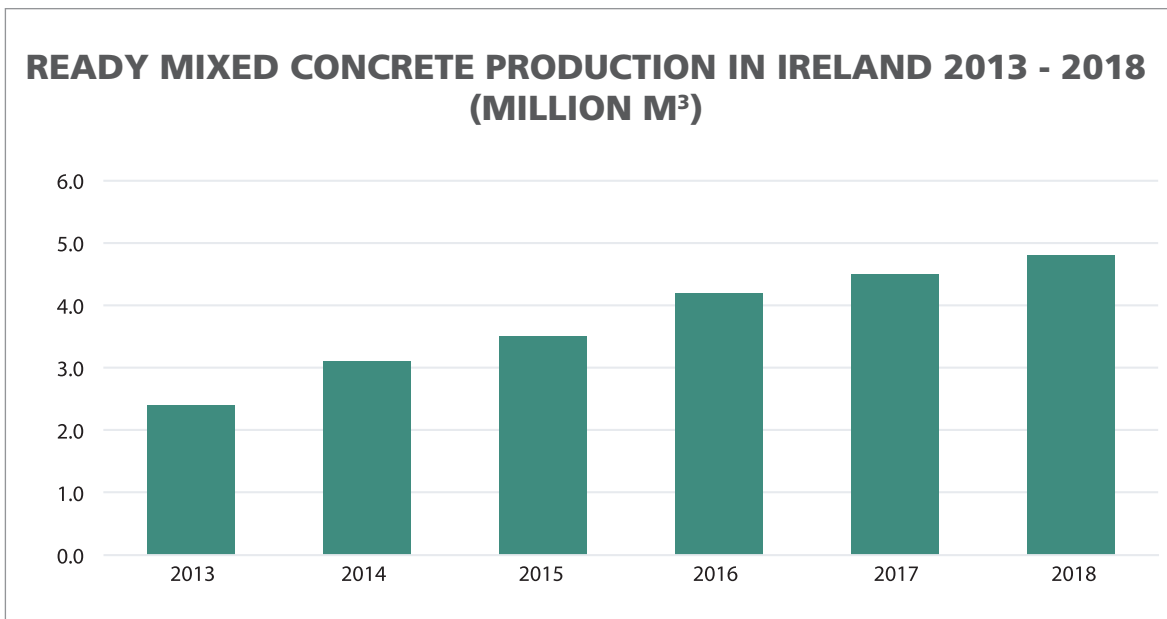


Figure 2

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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