



**Submission by the Irish Concrete Federation on
“Ireland 2040 – Our Plan – National Planning
Framework – Issues and Choices”**

March 2017

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INTRODUCTION

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 4,000 people and operating in approximately 250 locations throughout Ireland. ICF members are involved in the extraction, processing and delivery of the essential materials used in the construction of Ireland’s built environment. The members of the ICF account for approximately 85% of total industry output in terms of volume and value.

ICF welcomes the publication of the Issues and Choices paper “Ireland 2040 – Our Plan” in February 2017 by the Department of Housing, Planning, Community & Local Government as part of the development of a National Planning Framework for Ireland. ICF also welcomes the opportunity to make a submission on the paper and looks forward to making a further, more detailed submission upon the publication of the draft National Planning Framework in due course.

Integral to the ICF comments on the Issues and Choices paper is the fact that aggregate and concrete products must be recognised as a strategic national resource, essential for the future development of Ireland and that access to the raw materials for these products must be safeguarded to facilitate the creation of the places, infrastructure and environment required to meet the economic, environmental and societal needs of Ireland for the coming two decades and beyond.

Notwithstanding the broad spectrum of issues raised in the consultation paper, this submission addresses a small number of key points specific to ensuring that Ireland’s strategic raw material reserves make the optimum contribution to Ireland’s future as outlined in the consultation paper. It is essential that these points be fully considered in the preparation of the National Planning Framework.

1. IRELAND’S AGGREGATES – RECOGNISED AS A STRATEGIC & ESSENTIAL RESOURCE

Aggregates (stone, sand and gravel) are the essential source of materials used for the construction of Ireland’s built environment. They are used directly as key construction materials and are also used in the manufacture of cement and concrete products including ready-mixed concrete, concrete blocks, concrete roof tiles, precast concrete units and concrete pipes. As an example, over 300 tonnes of aggregates are required to manufacture the building materials used to construct a typical single house, with substantially more required in a one-off rural dwelling. Aggregates are also used extensively in the construction, upgrade and maintenance of Ireland’s 98,000 km road network and other essential infrastructure such as schools, hospitals, offices and water / wastewater infrastructure. In essence, aggregates and concrete products are the

backbone of sustainable construction in Ireland, without which modern and future living would not be possible.

Notwithstanding the crucial role of aggregate based products as outlined above, it is a fact that policy makers and the general public often fail to comprehend the reality that the infrastructure on which our country depends is constructed from aggregate materials extracted from quarries located throughout the country. In the “Issues and Choices” paper, there is a single reference to the fact that meeting the increased infrastructural demands of the future will require secure supplies of raw materials which may contribute to land use pressures. The reality is that without a proactive national approach to safeguarding access to aggregate reserves, the objectives of the National Planning Framework and indeed, the country will not be realised. Indeed, there have been examples where the plans for public infrastructure projects have directly jeopardised the continued existence of the extractive operations from which the supply of materials necessary for the construction of the infrastructure are produced.

Ireland has a ready supply of high quality aggregate reserves. However, by their nature, aggregates can only be accessed where they occur. It is critical that the National Planning Framework recognises the strategic importance of access to a steady and dependable supply of local, high quality raw materials that will be used to construct Ireland’s future built environment and public infrastructure, thereby contributing to the country’s growth and development and the wellbeing of its people.

2. SECURITY OF SUPPLY & ACCESS TO RESOURCES – A NATIONAL POLICY NEEDED

The “Issues and Choices” paper points to the fact that substantial investment in our national infrastructure will be needed over the next 20 years to cater for the needs of 1 million extra people by 2040 but makes no reference to the need to identify and preserve the necessary raw materials to meet this infrastructural requirement. There will be a need for a greater amount of housing types, more school and third-level education places and better infrastructure of all kinds, including transport, energy, communications, healthcare and recreational facilities as a result of this growing population. Inevitably, this means that security of supply of resilient and sustainable construction materials is essential to support this development. In its simplest terms, the many objectives highlighted in the consultation paper will not be possible if there are insufficient aggregate based materials available in Ireland.

Given the country’s need for a reliable supply of aggregate based construction materials, the development of a Government led national policy to protect and facilitate access to our national strategic aggregate reserve is essential. Ireland is a small country in land mass terms and the location of aggregate reserves is not influenced by county boundaries. The development of a consistent national policy to ensure the continued availability of affordable aggregates for future development to replace the current haphazard, inconsistent and uncertain, local based approach is essential.

Currently, policy with regard to the strategic use of aggregate resources in Ireland is determined by individual local authorities. With the exception of a few counties, little serious consideration is given to integrated aggregate resource assessment and associated planning and development control on a local, regional or national level. In the absence of any co-ordinated national policy,

it is very much up to individual planning authorities to set their own planning policy for the protection and use of aggregates. 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 in Ireland. The requirements on developers when accessing national aggregates vary greatly between local authority regions. This lack of consistency creates uncertainty for operators and contributes negatively to environmental performance and the development of a sustainable aggregate supply base throughout the country.

ICF would propose that a stakeholder group be formed to develop a national Government led policy based on likely future requirements for aggregates and on the future availability of aggregates, to feed into the draft National Planning Framework.

3. CO-ORDINATED AND COMPLIMENTARY REGULATORY FRAMEWORK

As mentioned in the previous section, the extraction of essential aggregates in Ireland operates in a highly complex policy and regulatory environment. However, there is the additional reality that quite often, policy in areas which interface with the regulation of extraction activities are often contradictory rather than complimentary in nature. A practical example of this is in the area of one-off housing. It is obvious that Ireland's housing need over the next 20 years will not be met solely by the development of one-off housing in an uncoordinated and fragmented manner. In recent times, this "ribbon development" has led to the sterilisation of the aggregate reserves necessary to build and maintain the public infrastructure required to serve the communities living in these areas. This highlights the need for a co-ordinated and complimentary policy and regulatory framework across Government departments and local authorities in areas such as environment, rural development, housing, transport and many others.

4. PLANNING & LICENCING AUTHORISATION PROCESSES

Currently, the planning and licencing processes to authorise access to aggregate reserves and to facilitate construction and demolition waste in Ireland is prolonged and unwieldy, much of which can be attributed to historically poor regulation and poor enforcement, allied to an ever more complex European environmental regulatory regime. The extractive industry operates in a planning system which has no statutory timeframes for decision making. The resulting reality is that typically, planning decisions can take up to 5 years even in the case of existing quarries and invariably involve both a local authority and an An Bord Pleanála appeal process. In addition, delays of up to 6 years are being currently experienced in the licencing of operations to process construction and demolition waste.

In the aftermath of 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. However the process of continuing the operation of existing quarry operations and authorising new quarries in order to meet the country's future needs, while ensuring best societal and environmental practice must become more effective and efficient.

5. A SUSTAINABLE EXTRACTIVE INDUSTRY – ENFORCEMENT

The “Issues and Choices” document points out that meeting the country’s future increased infrastructure demands will require secure supplies of raw materials which may contribute to land use pressures. Given the nature of the industry and the potential for its environmental impact, the aggregate and concrete industry recognises that it has a particularly sensitive role to play in relation to the environment. Against this background, it is essential that the industry meets all of its requirements to protect and enhance Ireland’s natural environment while contributing to the country’s future growth. The enforcement of environmental and other legislation on a consistent manner throughout the country is essential to achieve this objective. Indeed, it can be said that the lack of consistency in enforcement of planning and environment requirements in the extractive sector has been one of the principal causes of damage to Ireland’s environment by the sector in recent years.

Too often, advantage in the market place is bestowed upon the operator of least cost thereby conferring commercial advantage to those who avoid compliance costs, particularly in the area of planning and the environment. It is essential that the National Planning Framework clearly highlights compliance with planning and environmental requirements as a primary objective for the sector in the future.

6. PROCUREMENT - PROMOTING COMPLIANCE AND QUALITY

Given the requirement for the development of our built environment and infrastructure in the coming decades, it is imperative that the standard of design, construction and maintenance of this infrastructure meets the needs of future generations. In achieving this objective, public and private procurement policy and legislation must support the supply of high quality raw materials from sustainable sources to construct this infrastructure. The absence of a policy of procuring materials from sustainable sources, including by the State and local authorities, continues to damage our environment and threatens compliant businesses.

As outlined in the previous paragraph, procurement in the public and private sector often favours the lowest cost operators, to the exclusion of regulatory compliance requirements. In addition to compliance with planning and environmental criteria, it is also essential that suppliers are compliant with the many product standards that have been developed by the National Standards Authority of Ireland, in consultation with other stakeholder bodies, in recent years. Many of these standards apply to aggregate and concrete products and are now called up in national Building Regulations. It is the view of the Federation that only businesses committed to the production of the required quality products to the appropriate standards and operating from a compliant planning status should be entitled to supply the materials for Ireland’s future infrastructure.

7. MARINE AGGREGATES

While Ireland has an abundant supply of high quality land based aggregate resources, it is highly likely that scarcities in particular products such as sand in the eastern part of the country will emerge in the coming decades. Preliminary studies have identified that substantial aggregates

resources exist in Ireland's coastal waters, but unlike the UK and many other European countries, no national policy or statutory framework exists in Ireland to facilitate commercial extraction of marine aggregates. It is imperative, that in order to prepare for this likely shortage of reserves, the National Planning Framework commits to investigating further the potential of Ireland's marine aggregates resources and establishing the required regulatory provisions to permit commercial extraction of marine aggregates to address any future shortage in land based aggregates.

8. THE CIRCULAR ECONOMY

The sustainable development of Ireland's infrastructure will require the efficient use of our natural resources and ensure the minimisation of waste. Concrete is by far the most used construction material on the planet and is made entirely from locally available materials. Businesses producing concrete are local businesses. Concrete manufacture is a local business across the entire value chain, deeply rooted in local economies. In addition, concrete is a highly durable and adaptable material and structures constructed with concrete can last for decades, can be repaired and refurbished with minimum intervention and can be recycled at the end of their long life.

In essence, the use of concrete is an efficient use of resources and promotes the circular economy. The National Planning Framework must promote the principles of the circular economy in communities through supporting the use of locally available, durable materials as well as promoting the recycling and reuse of these materials. Reference has already been made in this submission to the delays in the licencing process to for the processing of construction and demolition waste which must be addressed by the Framework.

9. CONCRETE - THE BACKBONE OF SUSTAINABLE CONSTRUCTION

Concrete is the most used man-made material in the world and provides the necessary foundation for a safe and resilient built environment as well as solutions to societal challenges such as those induced by increasing urbanisation and climate change. Concrete's inherent properties make it the material of choice for infrastructure such as housing, hospitals, schools, public buildings and transport infrastructure. It is an enabler of modern construction, providing multiple and unique properties, flexibility and value for money. Ireland's future built environment will depend upon concrete's inherent benefits including its versatility, fire resistance, durability, thermal mass and energy efficiency, sound resistance and water resistance.

Consistent with the principle of the sustainable use of resources, concrete buildings are designed to last and to be flexible and adaptable, meaning that buildings can be easily reconverted and internal layout can be easily changed to accommodate any design. Concrete buildings are easy to design, maintain and repair, and at the end of a long life, the concrete can be recycled thereby reducing environmental impact and preserving raw materials for future generations.

CONCLUSION

ICF greatly welcomes the publication of the discussion paper on Ireland's National Planning Framework but is greatly concerned that the development of the Framework would proceed without a strategic plan to secure the supplies of raw material necessary to meet future infrastructure demands.

The essential point is this submission is that aggregates and concrete products are the key construction materials that will be required to build the public infrastructure identified in the discussion paper as being necessary to meet the needs of the Irish people in the years leading up to 2040 and beyond. This is an often overlooked reality that public policy must recognise and reflect if Ireland's national objectives are to be achieved.

This consultation period and the intervening time before the final publication of the National Planning Framework represent an opportunity for Ireland to develop a national policy to ensure that the contribution of Ireland's natural reserves of aggregates to Ireland's future development is safeguarded, enhanced and maximised for the benefit of all.

ICF would welcome the opportunity to discuss the issues raised in the submission with all relevant stakeholder bodies.





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