



## 4.0 EXAMINATION OF ALTERNATIVES

### 4.1 Introduction

This chapter of the *Environmental Impact Assessment Report* has been prepared by Tom Phillips + Associates and details the rationale underpinning the proposed development and an examination of alternatives.

The proposed development comprises the extension of the life of the current permitted rock quarry<sup>1</sup> at Bellewstown Quarry, Bellewstown, Co. Meath from 10 years to 25 years on foot of a permission received for the continued extraction at the quarry and its expansion to the north and west of the existing void area, by An Bord Pleanála under Ref. No. PL17.QD0013 (in accordance with section 37L of the *Planning and Development Acts, 2000* (as amended)) (hereafter referred to the 37L development). In addition, the subject application seeks permission to develop a new dedicated private quarry access road, facilitating an increase in daily HGV traffic movements to / from the quarry to 81 No. loads per day, which will cross the Mullagh Road and fields in a northeast direction away from the quarry onto the L1615 across the townlands of Bellewstown, Hilltown Little, Gafney Little and Hilltown Great. This will allow extraction of the available rock reserve at this location over a 25-year period, which is much sought after nationally and internationally, particularly in road and construction projects.

### 4.2 Rationale for the Proposed Development

The proposal to continue the existing quarry operations on the subject site is based on the need to safeguard the existing operations and employment. In this regard, the proposed development is intended to safeguard the aggregate reserve on the subject site and the significant capital investment already made at the site.

Such proposals are supported by the Department of the Environment, Heritage and Local Government's *Quarries and Ancillary Activities – Guidelines for Planning Authorities* (2004), which state the following regarding proposals for quarry extensions:

*"In considering whether a further permission should be granted, the planning authority should have regard (inter alia) to the following factors:*

- a) The extent of the remaining mineral resources; and*
- b) The extent of existing capital investment in infrastructure, equipment, etc."*<sup>2</sup>

In addition, the *Guidelines* state that:

*"In deciding the length of the planning permission, planning authorities should have regard to the expected life of the reserves within the site."*

The total volume of recoverable reserves within the permitted quarry area is estimated at between 11.0 to 11.5 million tonnes. The 37L development proposed a level of extraction of c. 450,000 tonnes per annum, giving the production life for the extraction area of 25 years,

<sup>1</sup> Permitted by way of substitute consent by An Bord Pleanála (Ref. No. PL17.SU0101) by an *Order* dated 24<sup>th</sup> October 2018.

<sup>2</sup> Department of the Environment, Heritage and Local Government (2004), *Quarries and Ancillary Activities – Guidelines for Planning Authorities*, p. 30 – 31.



allowing for fluctuations in demand. This anticipated production level was equivalent to an average 81 No. daily truck loads.

However, planning permission received under the 37L development was granted for a limited period of 10 years (Condition No. 3) by An Bord Pleanála on 24<sup>th</sup> October 2018. Furthermore, Condition No. 4 limited the number of Heavy Goods Vehicle (HGVs) movements per day to 32 No. loads (64 No. two-way) (versus 81 No. loads (162 No. two-way) proposed). The presence of these Conditions on the Board's *Order* effectively limits the extractable reserve to c. 1.8million tonnes over the 10-year period.

The proposed development seeks to extend the life of the current permitted quarry from 10 years to 25 years (as originally proposed 37L development) and proposes to develop a new dedicated quarry access road to facilitate an increase in the permitted number of HGV loads to and from the quarry from a maximum of 32 No. per day to an average of 81 No. per day (with +/-15% fluctuations in the number of loads to and from the quarry proposed to address certain demands on the quarry as and when required,). This will ensure that the rock reserves in the permitted area are extracted and utilised to its full extent.

This new road will reduce the impacts on the local community by redirecting the HGVs away from Bellewstown Village. The new road will cross the Mullagh Road and fields in a northeast direction away from the quarry. The road is approximately c. 1.7m long starting at the Mullagh Road and has a minimum width of c. 6m increasing to up to 9.25m wide on some internal bends. The new road will also be used by the farmer whose lands it crosses to provide internal access to their farm for agricultural purposes. Importantly, the provision of this road will address the Board's concerns regarding the traffic impact of the development on the surrounding area.

Given the extent and quality of rock reserves in the existing quarry and permitted extension area, together with the significant capital investment already made at the site, the proposed quarry extension is considered appropriate and in accordance with the provisions of the *Guidelines*.

#### **4.3 Main Alternatives Studied**

##### **4.3.1 Alternative Locations**

The existing quarry is already fully permitted and fully operational. The Applicant has already provided a significant capital investment in the existing quarry and in this regard, the proposed development is not footloose, and an alternative location is not considered to be viable or make best use of the existing reserves in the local area. The proposed continuance and extension of the existing quarry at the subject site is considered to be the most appropriate development. The extension of the quarry also had regard to those sensitive receptors in the vicinity of the subject site which informed the location of the quarry within the overall landholding of the Applicant.

In addition, as a result of Section 261 and Section 261A of the *Planning and Development Acts, 2000* (as amended), a large number of quarries across Ireland that do not have the requisite permissions and particulars in place or that have significant negative impacts on the environment, will be required to cease operations. As a consequence, the importance of the



high-quality rock reserve on this site for use in construction activities cannot be underestimated.

#### **4.3.2 Alternative Designs/Layout**

The experience of the Applicant gained in the operation of the existing quarry has provided input into the proposed development, particularly around the increase in the number of loads per day from the quarry and the associated design of the access road, and the need to reduce traffic impacts on the local area. A number of alternative proposals have been investigated.

The road design that now forms part of the development proposal was chosen as it was considered to provide for the optimum solution in terms of reducing traffic impacts associated with the operation of the quarry, which also lends itself to creating the least visual impact in the surrounding area.

#### **4.3.3 Alternative Mitigation Measures**

The mitigation measures outlined in this EIAR, where appropriate, have been developed by competent experts relevant to the aspect of the environment under consideration and represent best practice with a view to avoiding or otherwise minimising potential impacts on the environment.

There are no predicted residual impacts once mitigation measures have been successfully applied and as such alternative mitigation is not considered necessary.

#### **4.3.4 “Do Nothing” Alternative**

The “do nothing” alternative would involve the continued operation of the existing quarry to its permitted footprint and depth and the use of the adjoining lands for agricultural purposes until such time as the existing planning permission expires. This may have an adverse impact on the local economy given the level of direct and indirect employment provided.

#### **4.4 Conclusion**

The selection of an alternative location for the proposed development is not applicable, given that the quarry is already in operation and the adjoining lands are considered to have significant reserves to continue this operation. The quality of the remaining rock reserves, as well as the capital investment on site means that the proposed development is not footloose and cannot be accommodated in an alternative location. By continuing extraction from the existing and permitted site, cumulative impacts are minimised.

