



2 SITE LOCATION & CONTEXT

2.1 Location of the Subject Site

This chapter has been compiled by Gavin Lawlor and Bernard Dwyer of Tom Phillips + Associates on behalf of the Applicant – Milford Quarries Limited. The rEIAR accompanies an application under Section 177E of the *Planning and Development Act 2000, as amended*, for development at an existing sandstone quarry at a site in the townland of Clogrennane, Co. Carlow.

Gavin Lawlor is a Director of Tom Phillips + Associates. He holds a BA (Social Science) from University College Dublin, where he graduated in 1995 with a Masters in Regional and Urban Planning (MRUP) Degree and is a Full Member of the Irish Planning Institute (IPI) with 25 years' experience. Further competent experts have been engaged to address specific issues and/or portions of the EIAR.

Bernard Dwyer is an Associate at Tom Phillips and Associates. He holds a Master's in Planning and Sustainable Development (MPLAN) from University College Cork where he graduated in 2014 and is a full member of the Irish Planning Institute (IPI) with 11 years' experience.

The subject site encompasses a total area of approximately c. 41.86 ha in a wider landholding of 45.68 hectares, under ownership of the applicant, Milford Quarries Ltd. The land is located within the townland of Clogrennane, Co. Carlow and directly sits along the Co. Laois/Co. Carlow border. The site is approximately 6 km south west of Carlow town and approximately 3 km north-west of Ballinabranna.

Within the overall landholding is the subject site, which consists of a sandstone rock quarry, Redrock. The site is bounded by a private rural road that is connected to the L7129 Road to the west and the L7134 Road to the east. The M9 motorway can be accessed via junction 6 approximately 5.5km to the south east of the site.

The site is about 2.5km west of the River Barrow, and the associated River Barrow and River Nore Special Area of Conservation (SAC - 002162).

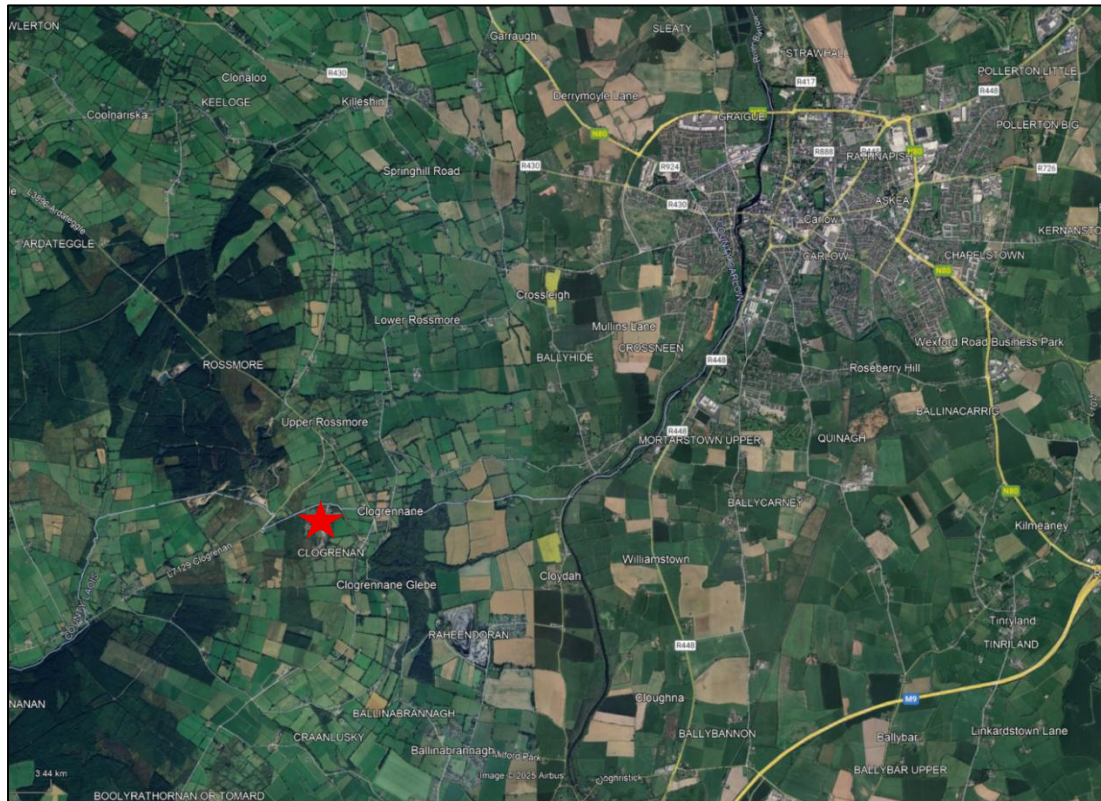


Figure 2.1: Location of existing disused quarry indicated by red star in relation to Carlow (source: Google Earth; annotated by TPA, December 2025)

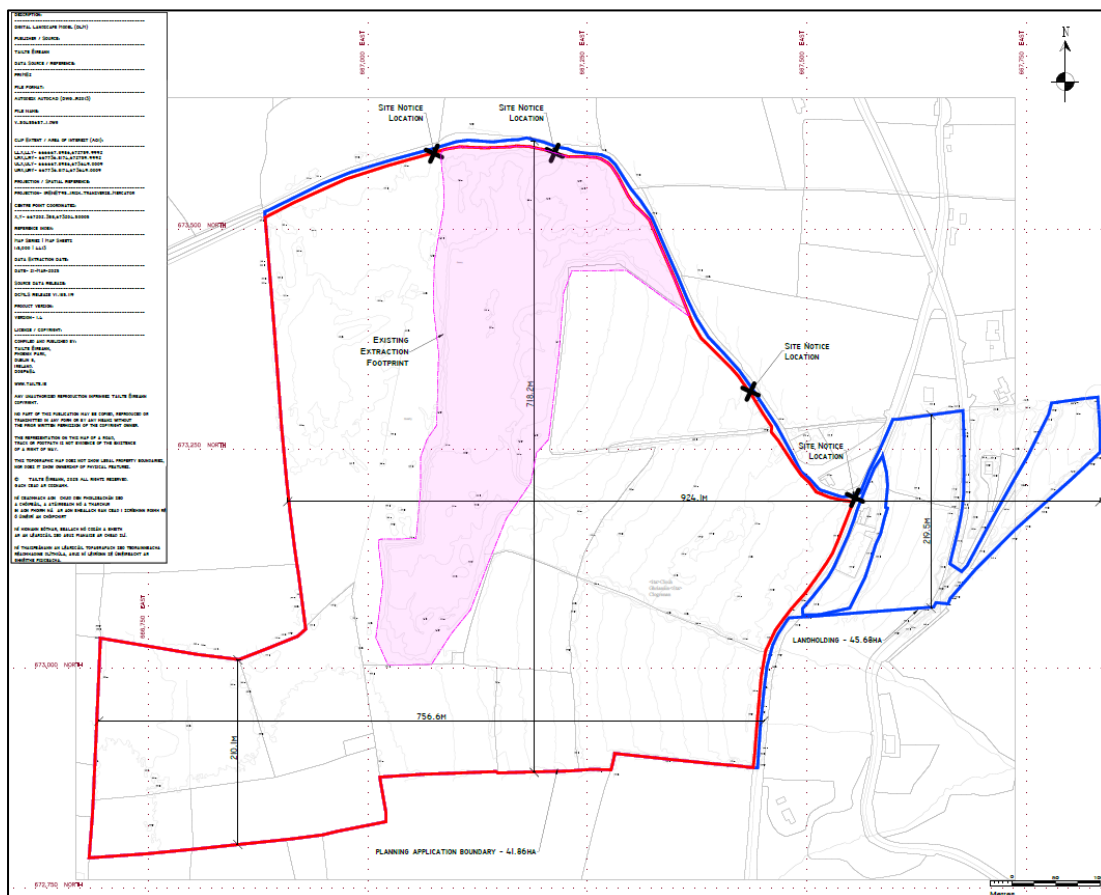


Figure 2.2: Extract from Dwg. No. P1687-0-1225-A2-102-00G 'Site Layout Map' prepared by Hydro-Environmental Services.



2.2 Description of the Subject Site and Context

The subject lands are in an elevated location west of the River Barrow Valley in an area dominated by agricultural lands and forestry. There are several inactive quarry pits in the surrounding area with the Clogrennane Lime Ltd. Quarry located to the south east. There are a number of small settlements in the immediate area including Ballinabranna, Kileeshal and Bilboa. Connectivity in the area is characterised by several intersecting local roads which have been shared by the topography of the area.



2.3 Existing Quarry

The quarry was registered in 2005 under a different operator and included for the extraction of sandstone and siltstone, conducted primarily through mechanical methods. The total area extracted over the lifetime of the quarry was approximately 8.66 hectares. The quarry was originally registered on the basis of pre-63 origins owing to historical maps which showed a borrow pit in the north eastern corner of the site.

The applicants acquired the site in 2023 and there has been no extraction activity on the lands since this date. This S177E Substitute Consent application is being sought in order to regularise historic unauthorised development identified during the S261A process.

The need for substitute consent arises from previous S261A proceedings. Carlow County Council's determination in 2012 that historic extraction had taken place at the site which would have required a mandatory Environmental Impact Assessment as per Section 261(2)(a)(i) of the Planning and Development Act 2000 (as amended).

The Planning Authority also determined that development had occurred post 26th of February 1997, which would have required an Appropriate Assessment and this had not been conducted. Please refer to Section 3 for a detailed breakdown of the site's planning history in respect to quarry operations that occurred on site.

The S261A determinations and decision was referred to An Coimisiún Pleanála (then An Bord Pleanála) who upheld the determinations and decision of Carlow County Council.

The operators at the time were not in a position to remedy the above and as a result, large scale commercial extraction ceased in 2014 following the determination of An Coimisiún Pleanála in relation to the S261A proceedings.

It should be noted that to the best of our knowledge, no significant extraction activities began at the site until the period between 2000 and 2005, as evidenced by historic aerial imagery and based on discussions between the applicants and the previous operators of the site. Further assessment of historic aerial imagery of the site, confirms that the bulk of extraction at the site took place between 2005 and 2010-2012 timeframe. This is consistent with economic activity at the time.

The Aerial imagery further suggests that there was a small level of extraction from the lands following the S261A proceedings. Information on this is limited but we understand that relatively modest quantities of material were removed in campaigns c. 2018 and 2021. This material would most likely have been used locally for agricultural purposes.

As outlined on drawings prepared by Hydro Environmental Services, it is estimated that 650K m³ have been extracted in total from the site. The majority of this extraction took place in the period between 2005 and 2012. By 2012 550K m³ had been extracted. Following this a further 100K m³ were removed up until the applicants took ownership in 2023. This equates to just over 8K m³ per year on average over that period (2012 – 2023). The lands during this period had effectively reverted to serving as a borrow pit for local users where small scale extraction took place to serve local agricultural road building etc.

The lands are currently in a disused state, with previous surface water management features still intact and operational.



Figure 2.31: Interior of existing disused quarry.

2.4 Surrounding Area

The site is bounded by the Co. Carlow and Co. Laois border and is situated within rural Carlow. The site is surrounded by a mixture of agricultural uses with localised commercial enterprises and rural one-off houses. Further, the site is located in close proximity to Clogrennane Woods, that is owned by Coillte and is located to the East of the subject site.

Clogrennane has long been associated with the extractive industry with much of the limestone used to construct buildings and monuments in Carlow town sourced from this area.¹ An additional active quarry, Clogrennane Lime Ltd. is located approximately 1.5 km to the south-east of the subject site.

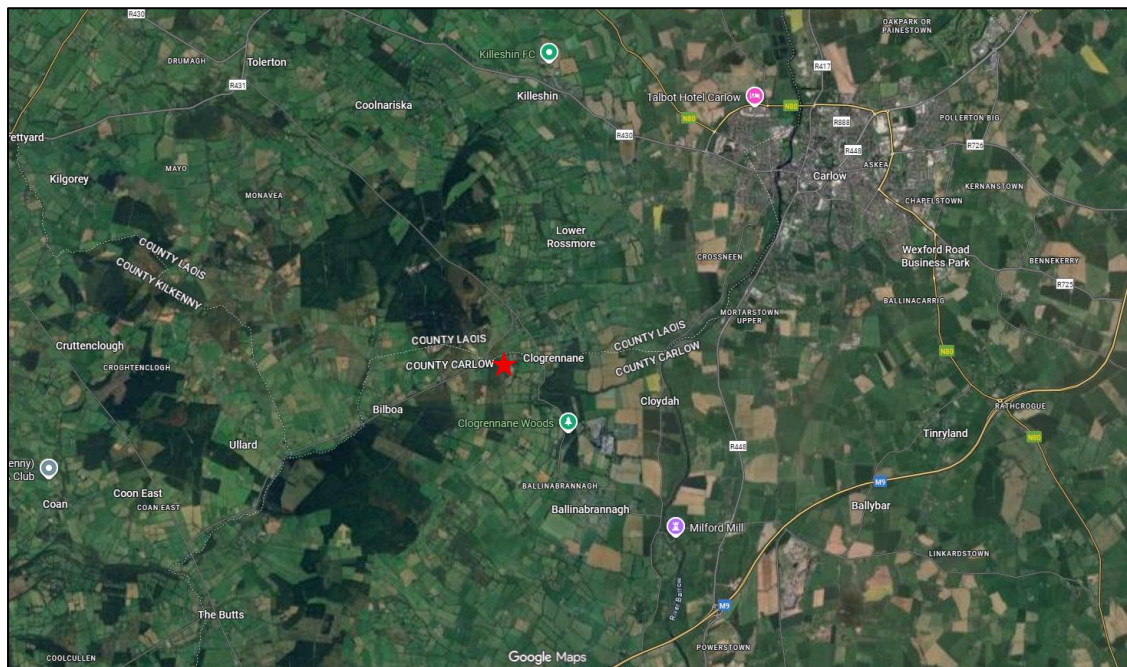


Figure 2.4: Context of the site (Indicated by red star).

2.5 Planning Context & Policies

This section provides a brief overview of the planning context including the planning policies that are applicable to the subject site.

2.5.1 National Planning Framework, First Revision 2025

The First Revision of the National Planning Framework was finalised in April 2025 to take account of changes that have occurred since it was published in 2018 and to build on the framework that is in place. The NPF estimates that in the period between 2022 and 2040 there will be roughly an extra one million people living in our country, requiring significant increases in new jobs and homes. In relation to the extractive industry the NPF states the following:

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

¹ Carlow Tourism, Clogrennane Wood Looped Walk, <https://carlowtourism.com/outdoor-activities/clogrennane-wood-looped-walk-2/>



extractive industries sector by identifying and protecting important reserves of aggregates and minerals from development that might prejudice their utilisation

This is underpinned by National Policy Objective 30:

*“Facilitate the development of the rural economy, in a manner consistent with the national climate objective, 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 biodiversity and the natural landscape and built heritage which are vital to rural tourism.”*

[Our emphasis].

Therefore, the NPF recognises the importance of aggregate and minerals extraction for the continued development of the country and indicates that it should be supported where it is compatible with the protection of the environment.

2.5.2 Quarries and Ancillary Activities: Guidelines for Planning Authorities

The Department of Environment, Heritage and Local Government (DEHLG) issued the Quarries and Ancillary Activities: Guidelines for Planning Authorities in 2004. The Guidelines are intended to offer practical guidance to planning authorities for assessing application for quarry developments and also to serve as a guide to the registration process for extractive industries.

The Guidelines outline that there will be a continuing need for new and expanded extraction operations to meet growing local and regional requirements that the challenge for the planning system is to ensure that there is an adequate supply to meet the likely scale of future demand while simultaneously protecting the country's natural and cultural heritage.

Chapter 3 of the Guidelines outlines the aspects of the environment that can be affected by the extractive industry and provides examples of best practice mitigation measures. The aspects outlined include the following:

1. Noise and Vibration;
2. Dust Deposition/Air Quality;
3. Water Supplies and Groundwater;
4. Natural Heritage;
5. Landscape;
6. Traffic Impact;
7. Cultural Heritage; and
8. Waste Management.



As outlined above, these elements largely coincide with various chapters that are to be provided as part of this EIAR.

2.5.3 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly

The Regional Spatial Economic Strategy is a strategic plan and investment framework to shape the future development of the region. The RSES for the Southern Region came into effect on 31st January 2020.

The Southern region is comprised of 9 counties, all 6 counties of Munster, with the addition of Carlow, Kilkenny, and Wexford. It represents 42.2% of the landmass of the country. The region's main urban centres are the cities of Cork, Limerick, and Waterford. Carlow is identified as a 'Key Town' under the RSES with specific importance as a gateway between the Eastern and Midlands Regions and the Southern Regions. The RSES displays various policies throughout the strategy to provide an approach for different sectors and types of development. In regard to extractive industries, the RSES approach is best identified under RPO 6.7 that states:

*"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 build heritage."*

[Our Emphasis]

Therefore, the RSES notes its continued support for rural economies through various industries, particularly the support of the enhancement of the extractive industries such as quarries.

2.5.4 Carlow County Development Plan 2022 – 2028

The Carlow County Development Plan 2022 – 2028 (CCDP) was adopted on 23rd May 2022 and came into effect on 4th July 2022. Under the new Development Plan, the approach to Rural Development and its relationship with the extractive industries has been refined. The CCDP recognises that aggregates "can only be worked where they occur". Section 14.16.1 of the CCDP seeks to ensure that:

"Extraction is compatible with the protection of the environment in terms of air and water quality, natural and cultural heritage, the quality of life of the residents in the vicinity, the capacity of the road network to accommodate the development, minimising landscape impact and appropriate proposals for site rehabilitation."

Section 14.16.3 of the Carlow County Development Plan 2022 – 2028 includes specific policies for the Extractive Industry in Rural environments.

EP P1: *Facilitate adequate supplies of aggregate and mineral resources to meet the future growth needs of the country and wider region where there is a proven need for*



a certain aggregate mineral while addressing key environmental, traffic, and social impacts and details of rehabilitation.

EI P2: *Ensure that extractions (e.g. stone, sand and gravel pits, limestone reserves) which would result in a reduction of visual amenity of sensitive landscapes or damage to designated sites, habitat types or species shall not be permitted.*

EI P3: *Exercise appropriate control over inappropriate developments(s) that would significantly hinder the effect or effective recovery of the county's natural resources, by seeking to prevent incompatible land-uses that could be located elsewhere from being located in the vicinity of the resource, since the extraction of minerals and aggregates is resource based.*

EI P4: *Ensure that all existing and proposed quarries comply with the requirements of "Quarry and Ancillary Facilities – Guidelines for Planning Authorities (DECLG) 2004 or any replacement document and to promote a while of life plan for an extractive location, including restoration/rehabilitation plans and proper land use management. The Council will seek the delivery of environmental benefits in the form of sustainable habitat creation in conjunction with the restoration phases of development.*

EI P5: *Ensure that extractive developments do not adversely impact on environmental quality, including water quality, tourism value, existing infrastructure, residential amenity or the amenity value of neighbouring lands*

EI P6: *To ensure that development for aggregates/mineral extraction, processing and associated process does not significantly impact the following:*

- *Existing and proposed European Sites;*
- *Other areas of importance for the conservation of flora and fauna;*
- *Areas of significant archaeological potential including recorded monuments;*
- *Important aquifers and sensitive groundwater resources;*
- *Sensitive landscapes; and*
- *Established rights of way.*

EI P7: *Ensure that the extractive industry (aggregates and mineral resources) and associated development minimise adverse impacts on the road network in the area and that the full cost of road improvements, including during operations and at time of closure, which are necessary to facilitate those industries are borne by the industry itself.*

EI P8: *Ensure compliance with the overall objectives of the Water Framework Directive in the context of quarry development(s) and extractive industry.*

In addition to the policies above, the CCDP 2022 – 2028 includes a series of objectives specific to the Extractive Industry.

EI O1: *Support RSES policy for the adequate supply of aggregate and mineral resources to ensure the continued growth of the county and region and to ensure that all quarrying activities and projects associated with extractive industry comply with all relevant Planning and Environmental Legislation.*



EI 02: Consult with the Geological Survey of Ireland (GSI) with regard to any developments likely to have an impact on Sites of Geological Importance listed in Chapter 10 of this Plan.

2.6 Planning History

The following provides a summary of the planning history relating to the subject site and the wider Milford Quarries Limited landholding (outlined in blue in Figure 2.2).

- The quarry was registered by the previous owner in 2005 over an area of 25.7 hectares and had 18 conditions imposed in 2007 by Carlow County Council under Section 261(6)(a)(i), (Carlow County Council reg. ref.: QY14). A small gravel pit is indicated on historic maps dated 1913, and evidence of a quarry is shown on a map dated 1906 which accompanied the registration application.
- As part of the registration the site was declared as Pre-63 with output 300-500,000 tonnes per annum.
- In 2012, Carlow County Council measured the current extraction area as 15.52 hectares and reasoned that the pit appeared to have been abandoned from 1913 (0.16 hectares) until 2000, when works recommenced and intensified in the period 2005-2010.
- In August 2012, Carlow County Council determined under section 261A(2)(a)(i) that quarry development was carried out after 1st February 1990, which development would have required, having regard to the EIA Directive, an environmental impact assessment but that such an assessment was not carried out. The reason given was that the site exceeded the mandatory threshold of 5 hectares for an EIA.
- The determinations and decision of the Planning Authority were referred to the Board by the previous owner for review (ABP ref.: QV01.QV0145).
- The subsequent Board order dated January 2014 confirmed the determination of the Planning and concluded that the development would have required EIA and the decision that the extraction works do not have a pre-1964 authorisation and do not have a valid planning permission,
- Milford Quarries Limited acquired the abandoned quarry in 2023 and applied for leave to seek substitute consent in May 2023 (ABP Ref: LS01.317194). Following the enactment of the Planning and Development Amendment Act 2023 the need to apply for Leave for Substitute Consent was removed from the legislation with effect from 16th December 2023. This application was therefore considered withdrawn by An Bord Pleanála.
- Historical excavation has removed materials over an area of approximately 8.66 hectares.

The planning history in the vicinity of the site has been fully considered in terms of the assessment of potential cumulative impacts. The table in Appendix 2.1 includes a summary of recent developments in the area.