



4 ALTERNATIVES

4.1 Introduction

This chapter of the Environmental Impact Assessment Report has been prepared by Gavin Lawlor and Bernard Dwyer of Tom Phillips + Associates on behalf of the Applicant, Milford Quarries Limited. The EIAR accompanies an application under S37L 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. This chapter details the rationale underpinning the proposed development and an examination of alternatives.

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Bernard Dwyer is an Associate at Tom Phillips + 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.

This Chapter assesses the key alternatives considered by the Applicant in line with Schedule 6 of the Planning and Development Regulations 2001 (as amended), Section 2(b), which states:

"A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the person or persons who prepared the EIAR, which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the Proposed Development on the environment."

It is important to note that the development site comprises of an existing disused quarry. This 37L Application, proposing the reopening of the quarry in addition to the expansion of quarry works on greenfield lands within the development boundary, is intended to run concurrently with the associated Substitute Consent Application under Section 177E of the Planning and Development Act 2000 (as amended).

The subject site comprises of a sandstone quarry and associated infrastructure and agricultural lands. The site consists of an area of c. 41.86 hectares within a total landholding of c. 45.68 hectares, which is also currently subject to an application for substitute consent under Section 177E of the Planning and Development Act 2000 (as amended) in order to regulate previous unauthorised development.

The proposed development will involve the blasting, extraction, and processing of rock using mobile primary crushing/screening and associated plant on the proposed quarry floor. The proposed quarry void will be extracted over 4 no. phases to a depth of 2 no. benches of c.10m



each to a quarry depth of c.300m AOD with a proposed rate of extraction of c.200k tonnes per annum. The proposed development will include the construction of earthen screening berms, soil storage areas, and will utilise the existing quarry entrance from the northern boundary linking to the L7130 local road to the east. Existing and proposed access tracks and existing settlement ponds will be utilised as part of the proposed development. The proposed development will be accompanied by a phased restoration plan.

4.2 Rationale for the Proposed Development

The rationale for the proposed development is based on the need to safeguard the existing and future operation of the quarry, as well as all buildings and ancillary industries/uses. The site currently exists as an unused quarry that has been inactive for some time. The quarry in its current state has the facilities to accommodate active extraction works once recommissioned. The site itself has an abundance of sandstone and shale resources that have the potential to contribute further to the robust extraction industry made up of Limestone material, where sandstone/shale quarries, such as Redrock, bring a wider variety of raw materials to Ireland's market. Moreover, given that the quarry void has already been opened working faces established, the cost and construction effort required to remove the valuable materials from the quarry is considerably more cost effective and sustainable than opening a quarry on a greenfield site.

The proposed development aims to recommission and expand the existing site, as the site has been historically used as a fully operational quarry, with land that is appropriate for further extraction.

This proposal is supported by the Department of the Environment, Heritage and Local Government's Quarries and Ancillary Activities – Guidelines for Planning Authorities (2004), which states 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."*¹

The proposed extraction area consists of c. 16.17 hectares which is currently a combination of lands previously subject to extraction (c. 8.66 ha) and agricultural land but encompasses a wider landholding of 45.68 ha.

Given the quality of rock reserves in the existing quarry and adjoining lands, the importance of the continued/recommissioned extraction activities on-site (and all associated ancillary buildings) result in a significant capital investment made at the site. Therefore, the proposed quarry recommissioning and extension, in addition to the continuation of other ancillary and

¹ Department of Environment, Heritage and Local Government (2004), Quarries and Ancillary Activities – Guidelines for Planning Authorities, p.30 – 31.



related activities are considered appropriate and in accordance with the provisions of the Guidelines.

4.3 Main Alternatives Studied

4.3.1 Alternative Locations

As previously stated, the Development Site is part of a disused quarry, with historic extraction activities and ancillary machinery still evident on site. The Applicant, Milford Quarries, obtained the site in 2023 with the intention to recommission the site and realise the full potential of the resources that have already been identified within the quarry. Recommencing extraction operations on site would be beneficial to the local economy, as the operation itself would generate additional jobs and the quarry extraction would bring additional resources (i.e. gravel, aggregate) to businesses and works, particularly at a local level. The material available at the quarry is very suitable for farm roads. The proposed quarry extraction boundary also has regard for additional sensitive receptors that have arisen since the quarry ceased operation in 2014.

Additional desirable factors of this location include its relative remoteness from sensitive receptors and lack of visual impact due to its elevation. The site is in proximity to the national road network, approximately 8 km from the M9 and 10 km from the N78 which provides an onward connection to relevant destinations.

Further, as a result of Section 261 and Section 261A of the Planning and Development Act, 2000 (as amended), a large number of quarries across Ireland were required to cease operations. As a consequence, due to the current development pressures (housing crisis) there is a growing demand for locally won raw materials. The extraction of rock from suitable sites proximate to large growth centres such as Carlow is important as it reduces the tonnes miles that the materials must travel thereby minimising emissions, traffic and noise.

Quarries are not a footloose form of development and raw materials can only be extracted where they exist. The location of the proposed quarry has significant advantages in terms of its proximity to a key development centre, Carlow. Allied to this, the site is not a green field site and as such the construction efforts required to recommission the quarry is a lot less than that of a greenfield quarry. This will mean that the carbon footprint of this project is significantly less than if Milford sought to develop a quarry on a separate greenfield site. As such the proposed development is a more sustainable alternative than the development of a new quarry on a greenfield site.

The proposed continuance and extension of the existing quarry at the subject site is considered to be the most appropriate development.

4.3.2 Alternative Designs/Layout

The Applicant was not involved in the historic extraction at this location, but it is understood that the previous landowner extracted materials from the site due to the presence of valuable sandstone. The experience of the Applicants in the operation of other quarries in the vicinity



has aided in the preparation of the proposed quarry design, particularly in terms of the proposed phasing. There are no real alternatives to the design of the quarry as proposed having regard to the existing quarry void the land ownership boundaries and the topography of the site.

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. Any specific alternative mitigation measures that may be available are discussed directly in the relevant chapters.

In addition, a separate Substitute Consent Application under S177E of the Planning and Development Act 2000 (as amended) has been submitted in tandem with this 37L Application in order to regularise any development that has occurred on the site to date. A grant of the Substitute Consent Application would further confirm that the historic development has not resulted in a significant impact to the receiving environment and is not resulting in any negative impacts on the natural environment and that the site is suitable for this type of extraction works.

As assessed in this EIAR, 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

A ‘Do Nothing’ Scenario would comprise of leaving the site as is, with no further quarrying or expansion. The site would restore naturally without any management or mitigation of any potential future impacts. It would result in an unusable site that could attract antisocial activity, such as illegal dumping, and could potentially have significant environmental impacts such as the breakdown of the settlement pond system which would allow for sediment run-off to pollute the adjoining waterways.