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Introduction

- 3.1 This Environmental Impact Assessment Report (EIAR) provides supporting information to accompany a planning application by Roadstone of their existing permitted quarry development at Curry and Cloonacaltry townlands, Brideswell, Co. Roscommon.
- 3.2 A full description of the proposed development is provided in EIAR Chapter 2 Project Description, but in summary, the proposed development will consist of:
- Permission for continued use of the existing quarry development currently permitted by P. Ref. 04/1479 and ABP PL20.215417 for a further period of 25 years, within an application area of c. 66.3 hectares, with an extraction area of c. 17.1 hectares and permanent overburden storage area of c. 3.9 hectares;
 - Permission for continued use of the permitted facilities consisting of: ESB substation (26m²), portacabin office facilities including canteen and washroom facilities (91m²), bundled fuel storage, vehicle circulation/access including wheelwash and weighbridge, settlement tanks/hydrocarbon interceptors for treatment of water, construction of overburden and screening mounds, all other associated site works and ancillary activities;
 - Permission for continued extraction of limestone using conventional blasting techniques and processing of rock using crushing and screening plant;
 - Upgrade of the existing WWTS and percolation area to new Secondary WWTS and constructed soil polishing filter area;
 - Provision of the permitted concrete block making facility and concrete batching plant, truck washdown facility with wash water recycled via a closed settlement tank system, the storage of aggregates; and workshop including storage room, canteen and washroom facilities (485m²); and
 - Restoration of the overall application site to a natural habitat including a permanent waterbody.
- 3.3 In the consideration of alternatives below, the need for the development, the do-nothing alternative and the issues of alternative sources of aggregates and alternative site locations have been addressed.

EIA Guidelines

- 3.4 The Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, at Section 4.12 notes that *'The Directive requires that information provided by the developer in an EIAR shall include a description of the reasonable alternatives studied by the developer. These are reasonable alternatives which are relevant to the project and its specific characteristics. The developer must also indicate the main reasons for the option chosen taking into account the effects of the project on the environment.'*
- 3.5 Section 4.13 goes on to state *'Reasonable alternatives may relate to matters such as project design, technology, location, size and scale. The type of alternatives will depend on the nature of the project proposed and the characteristics of the receiving environment. For example, some projects may be site specific so the consideration of alternative sites may not be relevant. It is generally sufficient for the developer to provide a broad description of each main alternative studied and the key environmental issues associated with each.'*

- 3.6 The location of quarries is determined in the first place by the location of the mineral resources which are to be exploited and for that reason neither the national guidelines nor the County Development Plan have positive guidance to direct quarries to particular locations.

Need for the Development

- 3.7 Project Ireland 2040 was published in February 2018 and is the overarching policy and planning framework for the social, economic and cultural development of the country for the next 20 years and further. It includes the National Development Plan: a ten-year strategy for public capital investment to 2027 and the 20-year National Planning Framework.
- 3.8 The National Planning Framework 2018 is the high-level strategic plan for influencing future growth and development up to the year 2040. The framework is intended to guide public and private investment, to protect and enhance the environment and create and promote opportunities.
- 3.9 The National Planning Framework states that:
- “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”.*
- 3.10 The extractive industries are considered important not just as a source of supply to a variety of sectors both domestic and for export, but extractive industries supply aggregates that are an essential requirement for Ireland's future. Project 2040 will not happen without a secure supply of aggregates.
- 3.11 The recovery in output in the Irish construction industry since 2013 has led to increased demand for construction aggregates and it is anticipated that demand will increase further in coming years following the pressure to increase residential housing output and the planned spend of almost €116 billion between the State and State-owned commercial companies under the National Development Plan and Project Ireland 2040 in the ten years from 2018 to 2027.
- 3.12 It is estimated that each new residential house typically requires 300-400 tonnes of aggregate. Every new school typically requires some 3,000 tonnes of aggregates and every 1km of roadway requires up to 30,000 tonnes of aggregates. On average each person within the EU consumes 6 tonnes of aggregate per year, however the current demand for aggregates in Ireland is twice that figure, at 12 tonnes per capita per year.
- 3.13 Based upon an average consumption rate of c. 350 tonnes of aggregates for every new house, the proposed continued development at Cam Quarry is equivalent to supplying enough building aggregates to construct nearly 43,00 houses.

Replenishment of Depleting Reserves

Office of Planning Regulator ‘Quarries and the Local Authority Plan’

- 3.14 The need for timely replenishment of aggregate reserves was further emphasised by a Case Study Paper on ‘Quarries and the Local Authority Plan’, published by the Office of the

Planning Regulator (OPR) in May 2025. The stated aim of the study was to address knowledge gaps, provide support for both practitioners and planning authorities and to highlight best practice as the planning system embarks on further reform. The study was largely informed by detailed feedback to a questionnaire issued to 11 planning authorities and 3 regional assemblies. This report is provided in **Appendix B** of the accompanying **Planning Report**.

- 3.15 The OPR paper highlighted that the average length of time to make a decision on a planning application for quarry development was 34 weeks for Local Authorities and 42 weeks for An Bord Pleanála. The report concluded that a link must be made between the need for Ireland's future housing and infrastructure and the raw material supply chain that is required to facilitate its delivery and development. The report also highlighted the need to ensure that this supply chain in raw materials identified and protected.
- 3.16 The paper further highlighted that approximately 40% of national civil and construction related activity occurs in the Dublin region and, accordingly, this is where the highest demand for aggregates exists.
- 3.17 The OPR paper recognises and acknowledges that the stable supply of aggregates is critical to supply and sustain the construction industry in Ireland, and that local or regional shortages of extractable aggregate resource around areas of greater demand can create a higher carbon footprint and lead to higher development costs as a result of the requirement to haul aggregates and materials over greater distances.

Essential Aggregates (2019 report): Providing for Ireland's needs to 2040

- 3.18 It is estimated that Ireland will need to produce an estimated 1.5 billion tonnes of aggregates to meet housing and infrastructure targets set down under the Government's Project Ireland 2040 plan, according to the Irish Concrete Federation (ICF) in a major publication issued by them in October 2019. This report is provided in **Appendix C** of the accompanying **Planning Report**.
- 3.19 "Essential Aggregates: Providing for Ireland's needs to 2040" is an industry led call for Government to ensure that Ireland's future supply of aggregates (crushed rock, sand and gravel) is planned, monitored and managed in a sustainable manner, to provide for Ireland's future infrastructure development.
- 3.20 The report identifies that demand for aggregates in Ireland at 12 tonnes per capita is twice the current EU average, due to Ireland's infrastructural deficit, dispersed pattern of settlement and resulting large road network. The Federation warns that scarcities of some aggregates are now emerging in the Eastern and Midland regions, due to natural shortages, a lack of forward planning and delays and other shortcomings in the planning process. The report also highlights that:

"Ireland has abundant natural reserves of high-quality aggregates, but their future accessibility must be planned for and protected by Government. A lack of future planning and priority in the planning process and delays in achieving prospective quarry planning permissions will result in future shortages in the supply of some types of construction aggregates in certain areas of the country. The future supply of aggregates needs to be prioritised and addressed in a planned manner if we are to reach the ambitious construction targets as laid out in Project Ireland 2040".

Essential Aggregates (2025 Report): An Evidence-Based Assessment to Inform Ireland's Planning Policy

- 3.21 As a follow up to the 2019 report, the ICF commissioned RPS to examine current replenishment rates of authorised aggregate reserves in Ireland to determine the current

timeframes for planning decisions and provide recommendations to facilitate the long-term sustainably supply of essential aggregates with the State in order to deliver on housing and infrastructure needs, upon which the national strategic plans such as 'Project Ireland 2040' and 'Housing for All' are highly dependent upon.

- 3.22 The report is provided in **Appendix D** of the accompanying **Planning Report** for reference, with its headline finding on aggregate supply noting a worrying trend downwards:

"Over the past eight years (2017-2024) the 'replenishment' of aggregate reserves has been running behind annual consumption. On average, only 61% of the annual consumption has been replenished by means of new planning authorisations.

At current levels of land area authorisation, the replenishment rate of authorised aggregates will fall to 52% over the 2025 – 2040 period as demand for aggregates increases due to Ireland's growing population.

Planning permission has been refused for over half the volume (56%) of aggregate extraction for which authorisation was sought over the 2017 – 2024 period within the Greater Dublin Area (Dublin, Kildare, Meath and Wicklow).

At current levels of land area authorisation, the replenishment rate of authorised aggregates will be 24% over the 2025 – 2040 period in the Greater Dublin Area."

Roscommon County Development Plan 2022-2028

- 3.23 The Roscommon County Development Plan (RCDP) 2022-2028 is the statutory plan detailing the development objectives/policies of the authority, covering the application area. The plan came into effect on the 19th April 2022. The aim of the plan relates to the promotion of socially sustainable communities, sustainable economic development and heritage, sustainable resource management and the protection of both urban and rural areas.

- 3.24 In Section 6.5 of the RCDP (Extractive Industries) the Council acknowledges the need for extractive industries in terms of the supply of aggregates being a fundamental resource for the building industry. The RCDP acknowledges the potential for conflict in the operation of these industries with wider environmental issues needs careful consideration. By their nature, aggregates can only be worked where they occur, and the cost of haulage affects economic competitiveness in this sector. Section 6.5 of the RCDP states:

It is recognised that quarrying and extractive industry has an important function in the economy of the county and that it is an important source of employment in parts of the county. By their nature, aggregates can only be worked where they occur. However, it is also recognised that extractive industries can give rise to detrimental environmental and residential amenity impacts, including traffic congestion, dust, noise/vibration, water pollution, visual intrusion and the effects on local road networks may also be significant.

In considering proposals for quarrying and associated developments, the Council will have regard to the protection of residential amenity and natural resources, the prevention of pollution and the safeguarding of aquifers and groundwater. The development of new quarries will be strictly controlled in areas of high landscape value, in European designated sites, Natural Heritage Areas (NHAs), Nature Reserves or other areas of importance for the conservation of flora and fauna, or in areas of significant archaeological potential.

Section 12.21 sets out Development Management Standards applicable to proposals relating to the extractive industry."

Construction Aggregates

- 3.25 Natural rock, sands and gravels (called aggregate in the extraction industry) are important, valuable and highly prized resources in the construction materials sector. The aggregates

- have a use in almost all residential, commercial, retail and industrial building, including the manufacture of ready-mixed concrete, mortar, blocks, pipes, pre-cast floors, slabs, walls and tanks, construction of road foundations, production of road surfacing materials (asphalt), use as rail bedding, backfill to structures and trench support for water supply / wastewater pipes, use for surface water and land drainage etc.
- 3.26 The supply of high-quality aggregates has presented problems for the Irish construction sector in the past and continues to do, principally as a consequence of;
- the relative shortage of such permitted resources nationally;
 - their distance from key markets;
 - their occurrence in environmental sensitive areas; and
 - deficiencies in connecting road transport infrastructure.
- 3.27 The construction end-use ultimately determines specific requirements for the grade and quality of the aggregates to be used in construction. The limestone rock which occurs at the site is of a quality that is suitable for multiple uses including concrete, mortar, and asphalt production. The continued and ever-increasing regulation of the construction industry and construction materials sector is also driving the requirement and demand for high-grade construction materials.
- 3.28 The current planning application is principally for the continued use of the existing quarry, albeit over a smaller extraction area than currently permitted under P. Ref. 04/1479 and ABP PL20.215417 to include development that is permitted and which has not been constructed to date (i.e. the concrete batching plant, concrete block making facility and block storage yard, and the workshop).
- 3.29 The existing site is located in an area favourable to extraction activities, due to, *inter alia*:
- previous history of rock extraction at this site and in the general geographic location;
 - application site is a proven source of high-quality limestone;
 - ongoing and continued increases in the level of construction and development activity in the midland's region is generating ever increasing demand for construction materials;
 - within an appropriate topographic setting i.e. well screened from surrounding areas;
 - remote location, but with direct access to the regional road network and subsequent ease of access to the primary road and motorway networks;
 - best practice industry standard extraction methods can be used; and
 - the proposed development will continue to be carried out by a long established and experienced operator in the extractive and ancillary concrete / asphalt manufacturing industry with a proven track record in planning and environmental compliance within their overall pit/quarry portfolio.

Alternative Sources of Aggregates

- 3.30 For the foreseeable future there are no real alternatives to primary naturally won aggregates such as those currently extracted at Cam Quarry.

- 3.31 The recent National End of Waste (EoW) Decision by the Environmental Protection Agency (EPA) in respect of aggregates from construction and demolition (C&D) materials¹ is expected, over time, to facilitate the re-use of a higher proportion of excess C&D waste, principally waste concrete, to produce low-grade recycled (secondary) aggregate.
- 3.32 The National EoW Decision does apply numerous restrictions on the end-use of recycled aggregates and as such, this limits their versatility and value, particularly as a replacement for natural rock in the production of specific, higher grade construction materials.
- 3.33 Notwithstanding this above, the volume of C&D waste available and suitable for recycling into secondary aggregates across Ireland is likely to be very low relative to the overall national level of demand for aggregates across the construction and development sector. It is estimated that current levels of brownfield site redevelopment across Ireland would only generate sufficient C&D waste (if 100% recycled) to satisfy approximately 2% of national annual aggregate demand.
- 3.34 In the longer term (>25 years), there may be some scope for extraction of sand and gravel from marine sources, although this could be markedly constrained by possible future development of offshore windfarms.
- 3.35 In the absence of significant volumes of aggregates from recycled / secondary and marine sources, it is clear that land-based deposits (such as the proven reserves at Cam Quarry) will continue to be the main source of construction aggregates in Ireland, including Roscommon and the wider midlands and western regions.

Alternative Locations

- 3.36 This development is not comparable to a factory or other commercial enterprise that can be located at many potential locations. It is a resource-based development and therefore the aggregates can only be worked (extracted) where they are present in-situ, as acknowledged in Section 6.5 of the RCDP 2022-2028.
- 3.37 It is further recognised within paragraph 4.13 of the *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment* prepared by the Department of Housing, Planning and Local Government in August 2018:
- “For example, some projects may be site specific so the consideration of alternative sites may not be relevant.”²*
- 3.38 Aggregates can only be worked where they exist and where the environmental effects of working them can be minimised. However, this is not the only prerequisite which determines a suitable location for an aggregates site. Others include a willing vendor, distance from market, required quality and quantity to justify capital investments, etc. It is usually the case that a number of these prerequisites are not met, and the alternative is discounted.
- 3.39 The provision of aggregates is essential to meet the needs of society. As reserves of sand and gravel and rock are finite resources and eventually become exhausted at their location, it is therefore necessary for quarry operators to continually seek out new greenfield sites in tandem with maximising or extending extraction at existing established sites. Both options are essential and required to replace existing supplies that are being worked out and to provide a security of supply of aggregates and building materials to the construction sector.

¹ EPA National End-of-Waste Decision EoW-N001/2023 of 12th September 2023 establishing criteria determining when recycled aggregate ceases to be waste under Regulation 28 of the European Union (Waste Directive) Regulations 2011 – 2020

² Guidelines for Planning Authorities and An Bord Pleanála on carrying out EIA, August 2018

- 3.40 The existing site is an established quarry in a remote location and has direct access to the regional road network providing access to and from it that has proven to be suitable for this type of development previously.
- 3.41 This planning application is solely related to the continued use of the existing quarry to extract rock that is currently permitted by P. Ref. 04/1479 and ABP PL20.215417. There is no lateral extension or quarry deepening proposed beyond what is already permitted.
- 3.42 The site is deemed appropriate for the following reasons:
- suitability of the economic limestone rock reserve;
 - extent of the lands over which the applicant has an interest in, and which are available for development;
 - access and road infrastructure with proximity to the national road network and key transport corridors, namely the R363 / R362 regional roads; the N61 / N62 / N63 / N55 and N6/M6 national primary routes;
 - low environmental impact: topography assists with screening of the development (no significant visual intrusion), no recorded monuments within the application or landholding area; and not within a designated ecological or landscape area;
 - detailed water and ecology studies indicate the development can proceed without impacts on the surrounding hydrogeological and ecological regimes.
- 3.43 On the basis of the above, it is considered that the proposed continued use of the existing quarry, subject to implementation of best environmental management practice and compliance with appropriate planning controls (i.e. planning conditions and standard emission limit values for the sector) can be carried out without any significant environmental impacts on the surrounding area.

Alternative Designs / Layouts

- 3.44 Alternative designs were assessed during the original planning application and EIA process as part of the grant of permission under P. Ref. 04/1479 (ABP PL20.215417), including alternative layouts within the site were considered with particular attention being paid to the location of the processing plant and ancillary facilities in general being located away from the public road and nearest residences where possible, along with the direction of working within the extraction area.

Ecological Consideration

- 3.45 The original design was to work the quarry in a gradual manner so that it will lead only to a gradual land take at any one time over the life of the development, instead of immediate overburden stripping and extraction over the full extraction footprint. This gradual land take was to help to ensure that a dramatic sudden impact on the fauna of the area did not occur, instead allowing them to adapt to the workings and relocate to adjoining lands. This is evident from viewing historical imagery of the site on Google Earth along with the fact that there is c. 5.5 hectares of topsoil/ overburden still to be stripped within the permitted operational area.
- 3.46 The need for removal of or disturbance to habitats has been minimised as far as possible, further evidenced by aerial imagery showing large areas of scrub undisturbed within the application boundary. The overburden storage area footprint to the southwest of the existing quarry void has been kept relatively small compared to the permitted area.
- 3.47 Ecological surveys and assessment during the course of this EIA process has influenced the final layout of the proposals and provides a revised design to that currently permitted. Of

most significance, the ecological assessment has resulted in the retention of existing scrub areas over the southern portion of the site due to the observation of Marsh Fritillary butterfly and suitable habitat, Devil's Bit Scabious, within this area during ecological surveys carried out in 2024. The area shaded red (c. 4.8 hectares) on **Figure 2-3**, will now be omitted from the extraction area as part of this planning application. In addition, the overburden storage area is also greatly reduced in footprint size and will also avoid the Marsh Fritillary butterfly and suitable habitat areas.

Residence Consideration

- 3.48 As part of the original planning permission, perimeter screening berms were constructed using soils stripped from the extraction area. The screening berms were located along the perimeter of the site, with the berms in the vicinity of the site entrance having been planted with native hedgerows.
- 3.49 Also as part of the original scheme, the R363 regional road was realigned to the south within the original Roadstone Landholding boundary to provide an improved carriageway alignment (both vertically and horizontally) along the entire northern boundary. This improvement, set-back the residences R1 & R2 by a distance of 20m from the regional road.
- 3.50 No extraction operations are permitted on Sundays or Public Holidays.

Landscape & Visual Consideration

- 3.51 As part of the original planning permission, extraction operations were commenced in the southwest corner some 600m from the nearest residences R1 & R2.
- 3.52 To minimise the visual impact and help mitigate any potential impacts from noise and dust emissions it was decided to progress the extraction operations in an easterly and northerly direction to ensure that the quarry faces themselves could provide maximum protection to outside views and adjoining land uses from the working area
- 3.53 Perimeter screening berms were constructed using soils stripped from the extraction area. The screening berms were located along the perimeter of the site, with the berms in the vicinity of the site entrance having been planted with native hedgerows. The site access road was also curved to prevent any visibility into the site from the entrance.

Alternative Processes

- 3.54 Roadstone Limited are a company with expertise and experience in the field of quarrying, aggregates production and the manufacture of value-added products.
- 3.55 As the proposed development comprises the continued use of an existing quarry with standard extraction and processing methods implemented, alternative processes are not considered relevant in this instance.

Do Nothing Alternative

- 3.56 Under a 'do-nothing' scenario, Cam Quarry would cease operation once the permitted extractable resource is exhausted, resulting in the loss of employment and income for c. 30 personnel currently employed at the quarry either on a full-time basis or employed in indirect roles (such as contract hauliers / drivers, suppliers of products and support services).
- 3.57 From an environmental perspective, any emissions associated with continuation of extraction activities (most notably noise and dust) would cease and the overall site would be restored

- in line with the existing planning permission. Over time, with no further site emissions and establishment of vegetation there would be a slight, positive impact on the local environment.
- 3.58 Notwithstanding any quarry closure, a market demand for natural rock aggregates would remain and will most likely increase over the short-to-medium term, driven by increased levels of construction and development activity within the local area and wider Midlands Region. If extraction activities at Cam Quarry were to cease, demand for these materials would need to be met from other quarries supplying natural rock aggregate of comparable quality.
- 3.59 The 'Do Nothing Scenario' would therefore result in demand displacement and require all aggregate output heretofore supplied from Cam Quarry to be met by the intensification of extraction activities and increased output from one or more quarries across (and possibly beyond) the region.
- 3.60 This would in turn generate an increase in, and intensification of, HGV movements along the local road network around those other source sites (if permitted by the existing planning permission). Locally, the social and environmental impacts of such changes would be dependent on surrounding settlement and land-use patterns and the quality and capacity of the local road network which serves them.
- 3.61 It is most likely that any alternative source of natural rock would be located at a greater distance from the local market. Any increase in haul distance between alternative source sites and established Roadstone production facilities would generate increased carbon emissions and increased haulage costs, over and above those which otherwise have been generated had the same materials been sourced and supplied from Cam Quarry. The increase in haulage costs would ultimately have to be passed on to the purchasers / end-users of any construction products requiring aggregates supplied from more distant quarries.
- 3.62 Over time the displacement of demand to other quarries across (and possibly beyond) the region would hasten the need to provide for the extension of, or deepening of, those other source sites (in a like manner to that currently proposed at Cam Quarry), as the rate of depletion of proven reserves increases.
- 3.63 In summary therefore, a do-nothing scenario will result in:
- the loss of direct and indirect employment at the quarry site;
 - displacement of demand for rock aggregates to, and intensification of activities at, other quarries at greater distance within (or beyond) from the local area;
 - haulage distance from other quarries to established Roadstone production facilities, resulting in increased carbon emissions and an increase in cost to purchasers / end-users.
- 3.64 Taking account of each of these factors, it is concluded that relative to the current development proposal, a do-nothing scenario would have an overall moderately adverse impact.

Conclusion

- 3.65 In light of the foregoing therefore, it is considered that the proposed continuance of use at Cam Quarry will result in fewer and notably less significant adverse impacts relative to other feasible alternatives.
- 3.66 In summary, the proposed development is considered the most favourable alternative for the following reasons
- The limestone rock reserves are proven, of comparable high quality and readily extractable (i.e. they are contained within the existing operational site);

- Most of the development-related impacts at Cam Quarry are already long-established within the local area, with the result that the proposed continued use will only result in relatively minor localised change.
- This compares to other options which could change the character of the surrounding area (for new quarry development), give rise to more pronounced change and/or impact a greater number of potentially sensitive receptors as a result of intensification of output, emissions and/or traffic levels (at other locations);
- In minimising associated changes in land-use and avoiding potential increases in haulage distance to market, it results in reduced carbon emissions and has a lower carbon footprint than other possible alternatives.