

5 August 2026

Senior Executive Officer,
Forward Planning Section,
Planning and Transport,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC.

SLR Project No.: 501.00456.00003.004

RE: Submission to Proposed Material Alterations to Proposed Variation No. 2 to the County Development Plan 2022-2028 (Amendment Ref. No. 42 Written Statement (MA42.1), on behalf of Roadstone Ltd.

Dear Sir/Madam,

SLR Consulting Ireland acts as planning and environmental advisors to Roadstone Ltd., Fortunestown, Tallaght, Dublin 24. This submission relates to the **Proposed Material Alterations** to Proposed Variation no. 2 of the South Dublin County Development Plan 2022-2028, and the designation of lands as 'Future Strategic Long-Term Development Area' (Amendment Ref. No. 42 Written Statement (MA42.1)).

Our previous submission sought to highlight the importance of protecting strategic aggregate assets within Roadstone's land ownership / interest and to ensure that South Dublin County Council adequately considers this issue when selecting locations for 'Future Strategic Long-Term Development Areas', in particular any future rezoning of the lands outlined on 'Amendment Ref. No. 20 of Variation no. 2' (MA 42.1 Belgard Road, refer to Figure 1 below).



Figure 1 Aerial View of the Proposed Belgard Lands

It is noted that at special meetings of the Council, on the 19th and, 24th June 2026, it was resolved by the Elected Members to designate the lands identified in Amendment no. 20 (Belgard Road), as '*Future Strategic Long-Term Development Areas (Future SDAs)*'.

It is further noted that the outcome of the meetings was to resolve to Materially alter Proposed Variation Amendment Nos 29, 32, 42, 48, 49, 55, 62, 63, within Variation No. 2 to the South Dublin County Development Plan 2022-2028. As a number of these alterations constituted a material alteration (MA) to the proposed variation, the proposed material alterations are now subject to further public consultation.

1.0 Basis of Submission

As part of this public consultation round, and on behalf of Roadstone Ltd, we want to re-iterate the importance of protecting strategic assets, in particular with respect to Material Amendment 42.2 which specifically relates to the text for '*Future Strategic Long-Term Development Areas (Future SDAs)*' at Belgard Road.

Roadstone Ltd. have significant interest in a large, strategically important property asset located in the townlands of Cheeverstown and Belgard, west of Belgard Castle, Belgard Road, Dublin 22. This important landbank comprises the head offices of Roadstone Ltd and includes the Belgard Quarry complex, which is located south of the N7 (Naas Road) between Newlands Cross and the Kingswood Interchange, and comprises c. 241 hectares with the following land uses –

- limestone extraction using industry standard blasting techniques.
- processing of extracted limestone by means of crushing, screening and washing.
- manufacturing of concrete, mortar, Flomix, blocks.
- manufacture of asphalt and road surfacing materials.
- buildings associated with manufacturing and processing, laboratories, facilities, stores and other infrastructure.
- offices and retail use.

Belgard Quarry is a long-established and economically important limestone quarry asset providing a continuous supply of natural aggregate supporting the construction industry at a national scale. This continued long term secure supply of aggregates is essential to supporting ongoing and unprecedented demand for infrastructure and residential development across the country.

Belgard Castle RPS 206 (DU021-026) is a protected structure located towards the north-east of the lands and is described as a Castle-Tower House incorporated into a three story, 18th-century mansion, associated with the Talbot family from the 15th to the 17th century.

The relevant lands are currently zoned "RU" land-use zoning objective, "*To protect and improve rural amenity and to provide for the development of agriculture.*"

While it is understood, as outlined in MA 42.1, the inclusion of '*Future Strategic Long-Term Development Areas*' will initiate preparatory efforts that will guide the future rezoning of these lands and plan-led development to enable the lead in time necessary for preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of such lands as the need arises in the 2030s, it must be balanced with the need to protect established developments in the area, including those of strategic importance.

It is considered that while Belgard Quarry continues in operation, the future rezoning of lands in this vicinity for residential use is extremely premature.



1.1 Compliance with the County Development Plan - Conflicting Land-use

The South Dublin County Development Plan 2022-2028 (SDCC) recognises the aggregate industry as “*an important economic sector that provides the raw materials for the construction industry*”. This is further re-enforced by policies and objectives within the SDCC functional area, including the following:

Policy EDE25: “*Quarries and Mineral Extraction: Support the sustainable extraction of aggregate resources at suitable locations within the County subject to appropriate environmental safeguards*”.

EDE25 Objective 5: “*To ensure that where new development is proposed in close proximity to authorised quarries, consideration is given to the safeguarding of valuable unworked deposits for future extraction*”.

It is therefore considered reasonable to expect that Belgard Quarry will continue to seek future permissions, as appropriate, to continue to operate in the area, and with current planning permissions, operations will extend well beyond the lifetime of the next South Dublin County Development Plan (2038). Accordingly, there is concern that the future rezoning of these SDA lands to residential would conflict with this existing land use and may not be feasible in the short to medium term.

Any rezoning of lands for residential development in close proximity to an operating quarry would be contrary to the Council’s objective of ensuring the protection of access to proven aggregate resources into the future. The aggregates extracted in the quarry area are strategically important and provide a long-term secure supply of key raw material. It is essential that these aggregate resources reserves and future access to / extraction of same are protected from sterilisation by other land-uses.

1.2 OPR Case Study Paper CSP07 -Quarries and the Local Authority Development Plan

The OPR Case Study Paper CSP07, titled “Quarries and the Local Authority Development Plan,” was published in May 2025 by the Office of the Planning Regulator (OPR) found that extractive industries are critical for economic development, housing, and infrastructure, with Ireland’s aggregate demand (12 tonnes per capita) double the EU average.

The report further acknowledged that the; “location of quarries is fixed, and aggregates are a finite resource, the sustainable management and proper safeguarding of these finite resources is essential”.

Key findings from the case study suggest a need to build on existing development plan policies to provide “*a strategic direction in identifying construction material requirements on a construction market basis*”.

It is respectfully requested that South Dublin County Council review and consider this case study as part of the future studies to inform the rezoning of ‘*Future Strategic Long-Term Development Areas (Future SDAs)*’ and in particular in consideration of Amendment no. 42 (MA 42.2) which will impact on the operation of Belgard Quarry and its ability to provide a fixed, finite resource for the local economy.

1.3 Protection of Strategically Important Reserves

1.3.1 Essential Aggregates – Providing for Ireland’s Needs to 2040

As part of future studies of lands associated with MA 42.2, we would respectfully request that the planning authority should consider the published document, ‘Essential Aggregates –



Providing for Ireland's Needs to 2040 prepared by the Irish Concrete Federation (ICF) (refer to copy appended to this submission).

The objective of this document is to highlight to Government the need for a national planning policy for aggregates (including cement raw materials), which will underpin local and regional planning policy and ensure the sustainable supply of aggregates for Project Ireland 2040 and beyond. The document provides further detail on the role of locally supplied aggregates in supporting the demand for new homes, new schools and better infrastructure. In meeting the demand arising from the projected population increase, it is worth noting that every new home typically requires up to 400 tonnes of aggregates and every new school typically requires some 3,000 tonnes of aggregates. These requirements are most sustainably met by local sources and suppliers.

The document also makes recommendations to ensure that Government's stated objectives on aggregates are implemented, not just for the benefit of the extractive industry, but also for the achievement of the ambitious goals of Project Ireland 2040. It highlights three important points that statutory planning policy needs to address at all spatial scales. These are:

1. Importance of Extractive Industries and Aggregates
2. Identifying and Protecting Reserves
3. Enabling Extraction of Aggregates

1.3.2 Essential Aggregates – An Evidence-Based Assessment to Inform Ireland's Planning Policy

The planning authority should also consider the recent report published by the Irish Concrete Federation (ICF) – "Essential Aggregates – An Evidence-Based Assessment to Inform Ireland's Planning Policy" that examines current replenishment rates of authorised aggregate reserves in Ireland, to determine the current timeframes for planning decisions and to make recommendations on appropriate measures within the planning system (refer to copy attached to this submission). This report presents the findings of the study along with the key recommendations to facilitate the long-term sustainable supply of essential aggregate materials within the Ireland in order to deliver on housing and infrastructure needs.

2.0 Concluding Remarks

Roadstone Ltd is supportive of South Dublin County Council and its work to identify suitable landbanks to facilitate the residential needs of the County, however, it must be stressed that this needs to be balanced with the protection of strategic assets which will ultimately facilitate future residential developments construction needs.

With respect to Material Amendment MA 42.1 which specifically relates to the text for '*Future Strategic Long-Term Development Areas (Future SDAs)*' at Belgard Road, there is concern that any future rezoning of these lands is extremely premature given the proximity of Belgard Quarry which is likely to be in operation for the foreseeable future, and it is considered that while the quarry is in operation, there is a direct conflict with residential use on the identified lands.

As part of future studies of lands associated with MA 42.1 (Belgard Road), we would respectfully request that the planning authority should consider the published document, 'Essential Aggregates – Providing for Ireland's Needs to 2040 prepared by the Irish Concrete Federation (ICF) (refer to copy appended to this submission).

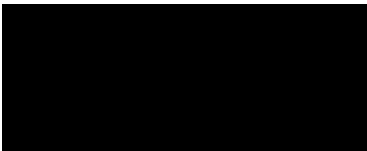


Roadstone Ltd, as a landholder of the subject lands would welcome the opportunity to participate in further consultations with South Dublin County Council as work on the SDA process progresses in order to inform feasibility of these proposals in the context of existing land uses and ecological sensitivities.

Roadstone Ltd looks forward to engaging further with South Dublin County Council in due course. In the meantime, should you have any queries on the above submission, or wish to discuss any matter further, please do not hesitate to contact the undersigned.

Regards,

SLR Environmental Consulting (Ireland) Ltd



Donna Ryan
Principal – Planning

cc Mr. S. Geraghty (Roadstone Ltd.)

Attachments: Essential Aggregates – Providing for Ireland's Needs to 2040 (ICF)
Essential Aggregates – An Evidence Based Assessment to Inform Ireland's Planning Policy (ICF, 2025)
OPR Case Study Paper CSP07 (OPR, 2025) - Quarries and the Local Authority Development Plan

