

Our Ref: 1827 - Glencore

Forward / Strategic Planning
Corporate Headquarters,
Limerick City and County Council,
Merchant's Quay,
Limerick V94 EH90.

3rd September 2021

Re: Draft Limerick Development Plan 2022-2028

Dear Sir/Madam

We, MacCabe Durney Barnes, have been asked by our client, Glencore Zinc Ireland Ltd, to make a submission on the *Draft Limerick Development Plan 2022-2028*. Our client welcomes the opportunity to further participate in the process.

Our client, Glencore Zinc Ireland Ltd is a subsidiary of Glencore, an international mining company. Glencore Zinc Ireland has its registered offices in Dromkeen, Co. Limerick and has operated in the county for many years. It holds a number of prospecting licences for barytes, base metals and silver and has been actively drilling in the county for over ten years.

1 BACKGROUND

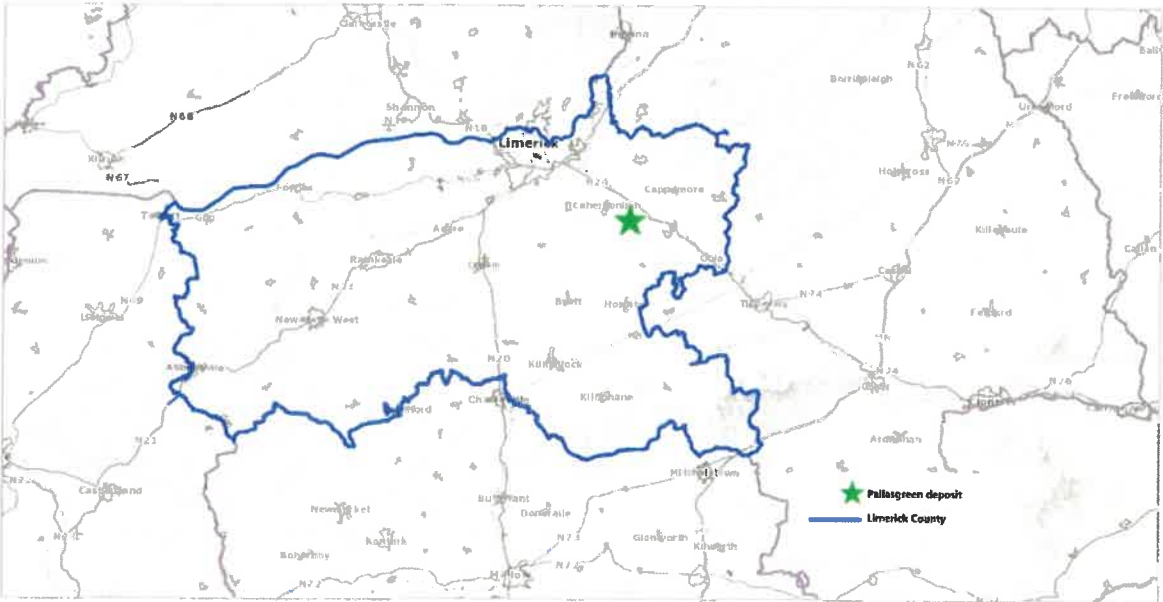
Lead and Zinc in County Limerick

Ireland is host to some of the world's largest zinc deposits and has a long history of lead and zinc mining. In 2012, it was Europe's largest zinc producing country (32% of all European zinc mine output) and the 10th largest producer in the world (2.5% of the world output). It was also the 3rd largest producer of lead metal in concentrate (13% of the European lead mine output) and 12th in the world (1% of the world output). In 2020, only one active mine remains, Tara Mines near Navan, Co. Meath.

Limerick is the host of the some of the country's largest zinc deposits, namely the Pallas Green deposit (see figure 1 below), which is currently at exploration stage. The Pallas Green deposit presents significant potential with an estimated resource of 45.4 million tonnes grading 8%

combined zinc-lead. This is substantially higher than the former mines’ reserves at Galmoy (4.02 mt) and Lisheen (10.58mt)¹ (EMD, 2016).

Figure 1: General Locations of the Pallas Green Deposit



Economic Impacts of Mining

In 2013, the then Department of Communications, Energy and Natural Resources (DCENR, now Department of Climate Action, Communication Networks and Transport (DCACNT)) commissioned INDECOR to prepare the *Assessment of Economic Contribution of Mineral Exploration and Mining in Ireland*² (generally referred to as the INDECOR Report). The report measured the main components of the overall economic impacts of mineral exploration and mining in Ireland and their economy-wide impacts.

These impacts are wide and are positive on a number of indicators, including sales turnover, expenditure gross value added, contributions to the Exchequer and to local communities. In summary, the report found that in 2012:

- Output in mining, as measured by sales turnover, amounted to €426.1m.
- Exploration and mining companies supported 1,373 full-time equivalent (FTE) persons and indirectly supported an additional 1,933 FTE persons through the application of multiplier impacts throughout the economy.

¹ http://www.mineralsireland.ie/files/2016_ZincAndLeadInIreland.pdf

² <http://www.mineralsireland.ie/files/AssessmentofEconomicContributionofMineralExplorationandMininginIreland.pdf>

- Total direct expenditure on wages and salaries for workers in the industry amounted to €107.3m. This resulted in multiplier impacts throughout the economic bringing the overall income impacts to an estimated €341m.
- Total expenditure in the industry totalled an estimated €313.2m with a combined direct, indirect and induced impacts of this expenditure totalling €809.7m.
- The overall Gross Value Added contribution of the mining sector to the Irish economic was estimated at €274m.
- It contributed a total of €56.6m in tax and other payments to the Exchequer and local authorities.
- Finally, in addition to creating and supporting jobs and expenditure locally, mining and exploration companies contributed to local communities through the provision of financial supports to community groups. The INDECON report estimated that in the year 2012 alone, some €460,000 was spent by mining and exploration companies on community activities and organisations.

The INDECON Report's findings were complemented by a *Social, Environmental and Economic Assessment of Galmoy and Lisheen Mines*, also commissioned by the Department of Climate Action, Communication Networks and Transport (DCACNT), published in 2020. The INDECON Report and DCACNT 2020 assessment report together refer to the higher economic multipliers attached to mineral exploration and mining in Ireland. Two types of economic multipliers are generally identified:

- Type I multipliers, measuring indirect effects, are influenced by the proportion of spending in other Irish businesses; and
- Type II multipliers, measuring induced effects, are influenced by how labour-intensive an industry is.

Both Type I and Type II are comparatively higher in mining than other industries, as they include a lot of Irish-produced input and rely less on importing; as well as being labour-intensive, requiring higher number of workers.

For Irish mining, the Type I multiplier was measured at 1.91, whereas Type II was measured at 2.59 (DCENR, 2013). In comparison, the CSO estimated that the Type I multiplier of the technology sector at 1.57 (IDA, 2018³).

Social and Environmental Impacts of Mining

The DCACNT 2020 report notes that employment generated by exploration and mining companies is the source of significant social impacts. Similar findings had already been established by the INDECON report from 2012.

³ <https://www.idaireland.com/newsroom/publications/ida-ireland-economic-benefits-of-data-centre-inves>

Having investigated both mines which are now closed, the 2020 report calculated that the two mines employed up to between 74% and 80% of persons living within a 30km radius around them, with 213 direct employees in Galmoy, Co. Kilkenny and 350 in Lisheen, Co. Tipperary.

Mining operations also are a source of training and upskilling, particularly as these are nearing closure to help employees transition to new employment. Mines also generate improvements in local services and hard infrastructure (roads, telecommunication, water supply) which benefit local communities beyond the lifetime of mines. For example, the Lisheen Mine included benefits to local services and infrastructure through road improvements, upgrading of local water schemes and the construction of a 60 MW wind farm, which have remained past mine closure (DCACNT 2020). As part of their Corporate Social Responsibility programme, mineral exploration and mining companies are known to contribute to the local life with funding provided for local sporting events, community activities and organisations.

Among the perspectives and findings of the DCACNT 2020 assessment report, positive effects on the environment are also included. For example, the creation of new wetlands as part of the Galmoy Mine's rehabilitation of the Tailings Management Facility, which have resulted in important direct benefits to water quality and biodiversity in the area. A similar approach was implemented at the Lisheen Mine. The investment in a wind farm at the Lisheen Mine brought added benefits of renewable energy, reducing emissions and supplying energy after closure to power 14,200 homes.

Current Planning Policy

The *National Planning Framework (NPF) 2040* includes National Policy Objective (NPO) 23 which seek to

'Facilitate the development of the rural economy 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 the natural landscape and built heritage which are vital to rural tourism.'

NPO 21 should also be noted as it seeks to enhance the competitiveness of the rural economy. Together with NPO 23, they contribute to the achievement of National Strategic Outcome 3 – Strengthened Rural Economies and Communities.

The current *Limerick County Development 2010-2016*, as extended, is also supportive of mineral exploration and extraction activities with section 5.6.3 recognising the significant contribution of the industry to economic development and particularly through Objective ED O28: Mineral Extraction which states that:

'It is the objective of the Council to identify areas containing significant aggregate resources and to safeguard these valuable un-worked deposits for future extraction.'

Mineral Exploration and Mining Policy

The *Draft Policy Statement on Mineral Exploration and Mining in Ireland*, currently in the consultation process, echoes a positive indication on the need for and importance of mining in Ireland, recognizing that mining is geo-fixed and a key aspect in realizing the implementation of the NPF 2040 and economic recovery. The draft policy is also supportive of Ireland's transition to the circular economy and achieving net-zero emissions in line with the Climate Action Plan and European Directives, which aligns well with overall sustainable development goals of mining companies and local area plans.

2 STAGE 1 ISSUES PAPER CONSULTATION

We had previously made a submission on the Issues Paper highlighting the importance of mineral development in the County. The Chief Executive's Report of November 2020 responded as follows:

"The contents of the submission are noted. The Council recognises the importance and economic value of aggregates and the mineral sector to the national, regional economy and will seek to establish policies and objectives to protect the operations of working quarries and proven aggregate resources in line with national and regional policy and subject to appropriate levels of environmental assessment."

The summary concluded that *"The Draft Plan will set out policies and objectives to protect access to mineral resources."*

3 SUBMISSION ON DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

We welcome the formulation of a comprehensive planning framework for all forms of development in Limerick City and County. We would like to comment on a number of provisions of the Draft Plan.

Chapter 1 – Introduction and Strategic Vision

This chapter sets out the strategic vision for the County. It highlights several key ambitions, including:

1. A Green Region
2. Embracing the River Shannon
3. Resilient and Connected Communities, and
4. A Sustainable, Innovative and Competitive Economy

These are supported by 10 objectives.

Submission

Glencore fully support the aim of developing *A Green Region* where Limerick will develop as an environmentally sustainable and carbon neutral economy.

This will require an associated transformation of energy, industrial and land use systems to achieve this. Decarbonisation of the global energy demand will be assisted through providing metals such as copper, cobalt, zinc and nickel that are essential to the transition to a low-carbon economy.

In this regard, support for the development of the zinc deposit at Pallas Green, and support of mining in general towards achieving sustainability goals, could illustrate how Limerick can be a pioneer in sustainable development, contributing to the regional, national and global sustainability challenges. It would be beneficial for the Plan to reference the *Draft Policy Statement on Mineral Exploration and Mining in Ireland*, which highlights the critical role of minerals in realizing the implementation of development plans, and meeting national and international goals through supporting Ireland's transition to a circular and resource efficient economy.

The exploration and exploitation of mineral deposits in the County will also support the aim of *Resilient, Connect and Inclusive Communities* through making a major contribution to *A Sustainable, Innovative and Competitive Economy* by attracting significant foreign direct investment which will generate direct and indirect employment in a rural area with limited opportunities.

These general aims and broad objectives need to be fully reflected in the more detailed policies and objectives of the Plan.

Chapter 2 – Core Strategy

There are a number of towns in the immediate vicinity of the ore body which would benefit from its development. These include Caherconlish, which is a Level 3 settlement as defined by the Core Strategy, Pallasgreen, which is a Level 4 village and Dromkeen a Level 6 cluster.

Submission

In accordance with the principles of sustainable development, these settlements, particularly the higher-level ones, should be self-sustaining, where possible. This means providing and facilitating employment opportunities in close proximity where possible, thereby reducing the need to travel to work and to reinforce population and service targets for these towns. The exploration and exploitation of the mineral resource in the area would support the maintenance of the core strategy levels for these towns.

Chapter 3 - Settlement Strategy and Housing

As indicated above, Caherconlish is a designated Level 3 settlement. The Draft Plan acknowledges that it requires consolidation and targeted 'catch up' investment in services, infrastructure, suitable

transport options, amenities and local employment, whilst balancing housing delivery and focusing on consolidation to become more self-sustaining.

Objective SS 09 Level 3 – Towns – This policy indicates that the focus of the policy is on ensuring these towns become more self-sufficient, in terms of job creation and services.

Submission

The exploration and exploitation of the mineral resource in the area will significantly contribute to the realisation of this objective.

Chapter 4 – A Strong Economy

This chapter outlines the main provisions of the Draft Plan in relation to employment.

Objective ECON 028 relates to facilitating employment opportunities in rural areas. It cross-references the agricultural zoning provisions of the Draft Development Plan.

Mineral extraction is detailed in section 4.7.12. It states that:

“It is recognised that the aggregates (stone, sand and gravel) and concrete products industry contribute to economic development and are essential building materials. However, they can give rise to land use and environmental issues which are required to be mitigated and controlled through the planning process.

Objective ECON 032 Mineral Extraction and Environmental Impacts

It is an objective of the Council to:

- a) Minimise environmental and other impacts of mineral extraction through rigorous application of development management and enforcement requirements for quarry and other developments; and*
- b) In particular, to have regard to visual impacts, methods of extraction, noise levels, dust prevention, protection of rivers, lakes and other water sources, impacts on residential and other amenities, impacts on the road network (particularly with regard to making good any damage to roads), road safety, phasing, re-instatement and landscaping of worked sites*

Submission

We refer the Council the two reports referred to in section 1 above, which present the positive economic and social contributions of the mineral exploration and mining industry in Ireland. There is ample evidence nationally of the socio-economic benefits on local businesses and communities that arise from the development of mining operations, as well as positive benefits to the environment through remedial measures. These present enormous economic, employment and sustainable opportunities for rural areas.

Objective ECON 032 represents the main policy relating to mineral development. It is titled “Mineral Extraction and Environmental Impacts”. However, the preamble in the section only relates or refers to aggregates (stone, sand and gravel)⁴. Notwithstanding the potential for reinforcing the county’s economy, sustaining employment in a rural location, and potential investment in one of the largest zinc ore deposits in Europe, there is no reference to the importance of mining and mineral development. Furthermore, there is no reference to the need to safeguard these deposits for future extraction and the objective is drafted purely from an environmental protection perspective. We fully accept the need for environmental protection, but there is also a need to facilitate, promote and protect ore deposits. This does not reflect the conclusions set out in the Chief Executive’s report on the Stage 1 consultation as outlined above in Section 2. Further, this objective should also reference or reflect the objectives of the *Draft Policy Statement on Mineral Exploration and Mining in Ireland*, which states the importance of sustainable development of this nationally important resource sector. This represents a regressive policy step when compared with Objective ED 028 in the current *Limerick County Development Plan 2016-2020*.

We respectfully request that the following amendments be made to Section 4.7.12 and Objective ECON -032 (additions in red, deletions with ~~strikethrough~~)

*“It is recognised **that the exploration and extraction of minerals**, aggregates (stone, sand and gravel) and concrete products industry contribute to economic development, ~~and~~ are essential building materials and **are required for sustainable industrial processes**. However, they can give rise to land use and environmental issues which are required to be mitigated and controlled through the planning process.*

Objective ECON 032 Mineral Extraction and Environmental Impacts

It is an objective of the Council to:

- a) **Protect access to mineral and aggregate resources***
- b) **Minimise environmental and other impacts of mineral extraction through rigorous application of development management and enforcement requirements for quarry and other developments;.....”***

Chapter 11 - Development Management

Section 11.6.10 relates to the Extractive Industry. However, it only refers to aggregates and not to minerals. Development of extractive projects will need to adhere to a set of criteria which are

⁴ While the definition of minerals under the Planning and Development Act 2000 (as amended) includes stone, gravel sand and clay, they are specifically excluded from the definition of minerals under the Minerals Development Act 2017.

outlined in the Plan. The section acknowledges the requirement for mining developments to obtain an IPPC licence from the EPA.

Submission

Glencore fully accepts that the extraction of minerals will have to comply with the environmental protection criteria set out in the Plan. As one of the largest mining companies in the world, it prides itself in good stewardship and environmental protection afforded to its projects.

The Planning Authority may consider including reference to mining developments in this section, as it appears to relate almost exclusively to quarries.

Chapter 12 – Land Use Zoning

The chapter sets out land use zoning objectives for certain settlements, which are defined in Volume 2 of the Draft Plan. Extractive industries/quarrying is permitted in principle in *industrial* zones and open for consideration in *agricultural* zones.

Submission

The zoning only relates to those settlements/areas covered by zoning maps for settlements in Volume 2 and Local Area Plans (LAPs).

4 CONCLUSION

Our client is generally supportive of the provisions of the Draft Limerick Development Plan 2022-2028. However, we respectfully request Limerick County and City Council to consider amending Objective ECON 032 to include and support mineral exploration and extraction and protect access to resources. This is aligned with the NPF 2040's objective to strengthen rural economies and communities, with NPO 23 on the diversification of the rural economy, and objectives of the *Draft Policy Statement on Mineral Exploration and Mining in Ireland*.

Yours faithfully,


MACCABE DURNEY BARNES