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Our Ref: 1827 Pallas Green

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

28<sup>th</sup> November 2022

**Re: Draft Caherconlish Local Area Plan 2023-2029**

Dear Sir/Madam

We, MacCabe Durney Barnes, wish to make a submission in relation to the Draft Caherconlish Local Area Plan 2023-2029. Our submission relates principally to natural resources and is made to support the activities of Glencore Zinc Ireland Ltd.

### **Background**

Limerick is the host of the some of the country's largest zinc deposits, namely the Pallas Green deposit, which is currently at exploration stage. Exploration has been ongoing over an extensive period of time and is required in order to confirm the extent of the deposit. Exploration, and in due course exploitation of the deposit, has and will continue to contribute to the local economy of Caherconlish. Zinc is essential to many manufacturing processes and plays a key role in transition to a low carbon economy. For example, it is used an alternative to lithium in battery manufacturing and plays a critical role in enabling other green technologies, like solar and wind. Zinc coatings protect solar panels and wind turbines and prevent rust.

### **Limerick Development Plan 2022-2028**

The role which mineral exploration and extraction has to play in economic development is highlighted in section 5.8.18 of the Limerick Development Plan (LDP). It states:

*"It is recognised that the exploration and extraction of minerals, aggregates (stone, sand and gravel) and the concrete products industry contribute to economic development, are essential building materials and are required for industrial processes."*

Objective ECON O39 Mineral Extraction and Environmental Impacts states:

*It is an objective of the Council to:*

- a) Recognise the potential of the extractive, mineral and mining industries to contribute to Limerick's economy and endeavor to protect access to these resources, where known.*
- b) Minimise environmental and other impacts of mineral extraction through rigorous application of development management and enforcement requirements for quarry and other developments; and*
- c) 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.*
- d) Ensure that development for aggregates/mineral extraction does not significantly impact on County Geological Sites / Sites of geological interest."*

We are fully supportive of this objective in the LDP.

#### **Draft Caherconlish Local Area Plan 2023-2029**

##### **Vision and Objectives**

We wish to highlight a number of provisions of the Draft Plan. The proposed strategic vision is as follows:

*"The strategic vision for Caherconlish is to fulfil its role as a Level 3 settlement as identified in the Limerick Development Plan. This will include the provision for growth in population and employment through a mix of quality residential development (choice and tenure), education and employment opportunities, sustainable mobility choice, strengthened retail/commercial village centre, community infrastructure, active lifestyles and recreation choice, and sustaining Caherconlish's unique heritage assets. The future development of Caherconlish will provide for low carbon, sustainable growth in a coherent spatial manner."*

The vision is supported by overall strategic development objectives. Of relevance is Objective 2 which seeks to *"Promote sustainable economic development, enterprise and employment opportunities and prioritise the village centre, as the primary location for retail and commercial activity."* Objective 5 is also noted as it states: *"Protect, enhance and connect areas of natural heritage, blue green infrastructure and open space for the benefits of quality of life and biodiversity, capitalising on climate change adaptation and flood risk measures."*

In relation to climate change, Objective CH01 indicates that it is an objective of the Council to, inter alia: *"d) support the development of low carbon and green technological businesses and industries"*.

Submission

We are supportive of the vision and associated objectives, as they can contribute to sustainable development and a green economy.

**Land Use Framework**

Chapter 10 sets out the land use framework. Section 10.1 of the Draft Plan indicates, that:

*“The purpose of zoning is to indicate to property owners and the public the types of development, which the Planning Authority considers most appropriate in each land use category. Zoning is designed to reduce conflicting uses within areas, to protect resources and ensure that land suitable for development is used to the best advantage of the community as a whole.”*

The Land Use Zoning Map is to be read in conjunction with the Land Use Zoning Objectives below, and the Land Use Zoning Matrix. Section 10.2 indicates that *“the matrix acts as a generally guideline and the list is not exhaustive.”*

Table 10.5 is the zoning matrix. It identifies ‘*Extractive Industry/Quarry*’ as a category of land use.

Submission

In the exploration and exploitation of the mineral resource at Pallas Green, which extends over a very wide area, there may, in due, course be certain ancillary elements which may fall within the overall LAP area, both at surface and subsurface levels (e.g. surface water outfalls, pumping facilities, air vents and connecting deep substrata infrastructure). These elements are not yet determined but will be critical to the overall development of the project. We highlight that these ancillary elements of the project are clearly distinguishable from the principal extraction of any minerals which may be deemed or perceived as incompatible with other uses.

The ancillary elements should be considered as part of any large project and determined in accordance with the policies and objectives of the County Development Plan and the LAP relating to sustainable development and environmental protection.

In order to avoid uncertainty, we request the following amendment (in red):

Amend Table 10.5

Land Use Zone
Extractive Industry/Quarry <sup>3</sup>


*3. Excludes ancillary elements which will be assessed against the overarching policies and objectives of the Limerick Development Plan and this Local Area Plan*

Subsequent footnotes would be renumbered.

**Conclusion**

We are supportive of the provisions of the Local Area Plan, as they can contribute to sustainable development and industries which support the green economy. In order to avoid any ambiguity that may impact any future project, we request that, in relation to the land use framework, the above footnote be inserted in Table 10.5.

Yours sincerely



**Jerry Barnes**  
**Director**  
**MACCABE DURNEY BARNES**