Eco Advocacy Clg

Supporting Environmental Justice & Awareness

Our Reference: Phone: Main: +353 (0)1 888 2000, Paul Hogan: 01-8883960, Email: npf@housing.gov.ie

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning and Local Government
Custom House,
Dublin,
D01 W6X0

4th November 2017

Submit online: http://npf.ie/share-your-views/
NOTE: http://npf.ie/submissions-predraft/
Deadline: 12 Noon on Friday 10th November 2017

NATIONAL PLANNING FRAMEWORK

Dear Sir/ Madam

Further to the above, we make the following points. We have divided our submission into parts to make it easier to follow. These may be summarized as follows: -

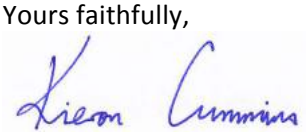
PART 1: Energy
PART 2: Tariffs
PART 2: Housing
PART 3: Transport
PART 4: Industry

Please note that we have no financial or other vested interest other than purely altruistic ideals in the national good and sustainability of the state.

Eco Advocacy is a charitable organisation and Company Limited by Guarantee. Our objects are purely altruistic in nature. Submissions made by us are informed by significant research and experience and made with the national interest as a priority.

Note that there are 12 pages in total to this submission inclusive of the cover page.

Yours faithfully,



Kieran Cummins, Secretary,
Eco Advocacy CLG

Trammon, Rathmolyon,
Enfield, Co. Meath,
Ireland

Phone: +353 (0) 86-7853333
Email: info@ecoadvocacy.org
Web: www.ecoadvocacy.org

PART 1 – ENERGY

VESTED INTAERESTS

1. **Exclusion of Vested Commercial Interests**: We are most concerned that the 20/40 plan exclude vested commercial interests, which have little to contribute by way of objective policies. We cannot help but note the existence of numerous self-serving submissions from such entities as part of this process, which is considered inappropriate and unacceptable. Some seek to have the East of the country designated for WIND development and ignore all other types of alternative energy in support of their own commercial interests. This type of self-serving commentary is wholly inappropriate and unhelpful and should be disregarded. Such submission are not within the spirit of a meaningful consultation and contrary to the wider interest of the community and society in general.

2. **Local Democracy**: An emphasis should be placed on local democracy and public participation as espoused under the Aarhus convention. There have been suggestions that certain planning functions should be removed from local authorities. Such suggestions come from vested interests. Notwithstanding, they are without foundation and contrary to Irelands obligations under the Aarhus convention. In fact the current situation is unsatisfactory in that it doesn't go far enough in allowing communities have their say in what is or is not permitted in their midst. The current situation is that authorities are merely to 'have regard to' submissions made. This urgently needs to be addressed. Otherwise public participation is nothing but a box ticking exercise with no real meaning.

STRATEGIC ENERGY ZONES/ CORRIDORS

3. We note the statement at 5:3:7. This is unworkable and inappropriate and should be removed. Energy should be harvested from wherever it is expedient to do so. For example in the case of Deep-Geothermal energy, one will go to the optimum locations where this type of energy can be harvested in the Earths Crust. As it happens we are fortunate in having a number of possible areas identified for this type of energy in Ireland.

4. Moreover if one were to go along with a 'designated zone' it follows that such zones would likely be required adjacent to cities. If one were to take this to its rational conclusion, then counties Meath and Kildare would be designated as such zones. This would be highly problematic for a number of reasons.

    a. Firstly the population density of these counties would make it unsuitable for certain types of alternative energy such as WIND.
    b. Furthermore, certain types of energy such as WIND would be contrary to the promotion of TOURISM in the counties and severely compromise Irelands Ancient East.

5. Therefore this strategy as laid out in the DRAFT should clearly be removed.

DEEP – GEOTHERMAL

6. We have done significant if not exhaustive research on the renewable energy forms available in Ireland. **By far the most promising form <u>Deep-Geothermal</u>.** There is surprisingly very little by way of mention or discussion on it. I have specifically dealt with 'wind energy' in a separate paragraph hereunder.

7. This is essentially 'free' energy contained within the earths crust. Briefly, it entails boring 2 boreholes to depths of between 2 and 3 miles. It is dependant on the existence of a particular type of rock to conduct water from A to B. The water coming back up is superheated to temperatures of between 100°c and 200°c. A very small plant is all that is required on the surface to convert the energy into electricity. There are many examples around Paris, Austria, Germany, Iceland and so on. There is comparatively small investment in this energy when compared with that required to site a wind turbine.

8. The Irish position is that there is a fault line stretching from Limerick to Louth [the Caledonian fault line] where two tectonic plates collided many millions of years ago. All along this fault line there are numerous mines, the most notable being 'Tara Mines' in County Meath. Indeed the management at Tara have shared there knowledge on temperatures/ rock formations, etc to researchers of Deep-geothermal which was most helpful. The correct rock formation [Kentstown Rock Formation] lies beneath this area. Moreover there are numerous 'hot springs' all along this line and there is in fact a townland near Enfield, County Meath known as 'Hotwell'. At times of significant rainfall events, water comes up boreholes at c.22°c, such is the geothermal activity beaneath.

9. GT Energy (a specialist Geothermal energy company) had raised capital investment and was ready to being work here in Ireland in 2011, but due to a minor legal technicality they were unable to proceed. The legislation was to be changed to facilitate this, but sadly this has not thus far happened.

10. The legal position is that under the mining acts of 1940's, it is not legal to bore a bole below 300 yards. Currently there is a corrective bill before the houses of the oireachtas '*The Deep-Geothermal Energy Bill*'. Given the lack of political knowledge on the issue, this bill is making painfully slow progress and was last Autumn no.38 [in the 'B' list. This needs priority.

DEEP GEO-THERMAL – ADVANATAGES

11. The ADVANATAGES of Deep Geothermal over Wind are many and may be summarised as: -
    a. No visually obtrusive issues,
    b. No property devaluation,
    c. No health issues,
    d. No fluctuations in the availability of energy,
    e. No spinning reserve (backup) requirement,
    f. No wastage of finite natural resources such as sand and gravel, steel and so fourth.
    g. There are numerous suitable geological bedrock areas in Ireland.

12. **The 'National Planning Framework' document 'Ireland 2040 Our Plan' has all but ignored Deep-Geothermal energy, which may have been an unintentional oversight. It is essential that this be inserted into the new document and given priority and prominence.**

13. I would be happy to assist in providing any of my research into this area in furtherance of the sustainable electricity generation in Ireland.

WIND ENERGY – PROBLEMS

14. The current wind energy strategy is driven by Irelands National Renewable Energy Action Plan [NREAP], which was submitted to the EU in July 2010 and details the renewable energy plant up to 2020. This is revised every 2 years based on whether Ireland is meeting its targets. As I understand it, currently renewable electricity ambitions are 40% of which 90% is to come from wind, which is ludicrous in the knowledge that there is a much more sustainable and less intrusive solution in the form of Deep-Geothermal.

15. **Development in the EAST of the Country**: We are alarmed at proposals by certain vested interest that suggest that there is a need for 'WIND energy' in the EAST of the country. They ignore other energies such as Deep-Geothermal which would be far more desirable in terms of its stability and also avoid the obvious problems that arise with BIG Wind in populated areas that depend of tourism to support the local economy.

WIND TURBINES – SUSTAINABILIT ISSUES

16. **STEEL**: To create 1,000 Kg of pig iron, you start with 1,800 Kg of iron ore, 900 Kg of coking coal 450 Kg of limestone. The blast furnace consumes 4,500 Kg of air. The temperature at the core of the blast furnace reaches nearly 1,600 degrees C. The pig iron is then transferred to the basic oxygen furnace to make steel. 1,350 Kg of CO2 is emitted per 1,000 Kg pig iron produced. A further 1,460 Kg CO2 is emitted per 1,000 Kg of Steel produced so all up 2,810 Kg CO2 is emitted. 45 tons of rebar (steel) are required so that equals 126.45 tons of CO2 are emitted. **[Further information available on request]**

17. **CONCRETE**: To create a 1,000 Kg of Portland cement, calcium carbonate (60%), silicon (20%), aluminium (10%), iron (10%) and very small amounts of other ingredients are heated in a large kiln to over 1,500 degrees C to convert the raw materials into clinker. The clinker is then interground with other ingredients to produce the final cement product. When cement is mixed with water, sand and gravel forms the rock-like mass know as concrete. For the turbines currently being proposed, upwards of 250 lorry loads of readymix calculate are required to anchor each turbine (in addition to lots of reinforcing steel). **[Further information available on request]**

18. **SAND & GRAVEL**: Sand and gravel are finite recourses and are typically quarried from eskers and drumlins, which are glacial deposits from the last ice age. It is sad that in the space of about 2 generations, we have exhausted all or most of our eskers to support the construction industry. In the UK and China they have begun to dredge the estuaries in an effort to get sand and gravel to support their respective construction industries. To contemplate burying sand and gravel in foundations for wind turbines, which are sporadic in their generation of electricity at best, is wanton stupidity. We must be more mindful of the use of finite natural resources. The UK and many other European counties have long since imposed an aggregate tax on every ton of material taken out of the ground. This is something that should be implemented in Ireland as a matter of urgency.

19. **ROADS**: Infill for access roads: sourced from crushed rock derived from quarrying are also required.

20. **RARE METALS**: Each and every wind turbine has a magnet made of a metal called neodymium. The mining and refining of neodymium extraordinarily dirty and toxic – involving repeated boiling in acid, with radioactive thorium as a waste product – 90% of it comes from – Baotou, China. **[Further information available on request]**

21. Having regards to the foregoing, it is manifestly obvious that wind energy is not a long-term runner and is currently being artificially driven by significant grants, which serve only to create a rush for grants by investors and corporate's driven purely by 'returns' piggybacking on the 'Green' label.

22. Moreover the sitting of the wind turbines in midland areas of the country is utterly crazy and unacceptable. The midlands have significant populations, together with significant heritage sites, which is of enormous touristic potential.

23. **If one were to persist with wind energy (even in some small manner), they should at the very least be prohibited in the populated and predominantly flat landscape of the midland counties.**

24. I can understand why Wind Energy became the front-runner as it was perhaps the most visually obvious. However, when all the facts are viewed objectively, it is utterly crazy to persist with this strategy. As we have seen above, this is badly flawed. Moreover, the emphasis on wind is largely derived from a lack of public consultation early on in this debate, which is contrary to basic democratic principles and more recently to the Aarhus convention and the Public Participation Directive.

WIND TURBINES – OTHER PROBLAMATIC ISSUES

25. There are a lot of problems with wind energy which we have summarised them as follows: -

    h. **Erratic supply**. In times of cold frosty weather when air movement is very slow, energy needs are high to cope with the additional heat requirements. "*Good winds coincide with neither the heating nor the air-conditioning season. Wind is a willy-nilly source of electricity, and as such is not very useful".* —Richard C. Hill, Bangor (Me.) Daily News, Dec. 24, 2005

    i. **Backup required (spinning reserve)** (a readily available back up source of power): A backup source of energy has to be maintained in order to provide energy when the wind is not blowing. "*Because wind energy is intermittent, there always must be conventional generation, primarily natural gas or coal, ready to supplement electricity when the wind either dies down or blows so hard wind generators cannot operate. Electric generation is also needed to provide what are called "ancillary" transmission services, such as maintaining proper voltage throughout the transmission grid."* —Texas Co-op Power, August 2008. Also "*It is not just that wind farms are producing significantly less power than predicted, but that other power stations are required to run in an inefficient manner to support them ... this inefficient practice results in them producing higher levels of CO_2".* —Andrew Chapman, Inverloch, Aust.

    j. **Tax Shelter**: "*Big Coal and Big Oil are some of the biggest developers of wind energy. Wind is a tax-sheltering adjunct to their business, not a replacement".* —"Huckle"

    k. And "*Before declaring itself bankrupt on 15 September, US investment bank Lehman Brothers was one of several major firms that invested in wind projects in exchange for the tax credit, which they used to reduce their federal tax bill".* —Nature, October 1, 2008

    l. And "*I will do anything that is basically covered by the law to reduce Berkshire's tax rate. For example, on wind energy, we get a tax credit if we build a lot of wind farms. That's the only reason to build them. They don't make sense without the tax credit".* —Warren Buffett, The Wall Street Journal, May 4, 2014

    m. **Noise:** *Calling noise a nuisance is like calling smog an inconvenience. Noise must be considered a hazard to the health of people everywhere. —William H. Stewart, 1978 (U.S. Surgeon General 1965-1969)*

    n. **Cumbersome**: *I don't believe that wind power would have a very big future, because, relative to the energy produced, it is far too cumbersome, on land as on the sea.* —Marcel Boiteux, President Emeritus, Electricité de France

    o. **Exaggerated claims:** "*Our politicians should never have asked, how many kilowatt-hours can we produce with wind — the real question should always have been, how much fossil fuel energy can wind energy replace. The two answers are very different, because so much fossil fuel energy is required in support of wind and that fossil fuel energy is in city-driving mode ... and burning its fuel a lot less efficiently than it would if you just used the natural gas plant instead of wind."* —Tom Stacy, Pat Miller Program, WOWO

p. **Negligible power/ not commercially viable:** "*People have to realize that a 25 percent renewable energy standard by the year 2025 in Illinois amounts to thousands of wind turbines."* —Joel Link, Invenergy

q. **Real Cost**: "*The cost of wind isn't just the wind generator, its wind plus gas so you have the capacity there when you need it."* —Dan Dasho, Cloverland Electric Cooperative, Sault Ste. Marie, Mich., Interlochen Public Radio, April 3, 2015

r. **Community**: "*The irreparable ecological damage, loss of amenity and distressing divisions within communities caused by industrial wind turbines far outweigh any benefit of their insignificant and unreliable contribution to our energy needs. Their tiny, intermittent output of electricity and negligible CO_2 savings cannot possibly justify the sacrifice of our most potent national symbol and finite resource - the magnificent landscapes of Wales."* —Angela Kelly, Country Guardian, U.K.

s. **Optics**: "*They're just a symbol for politicians who want to be seen to be green."* —Ann West, Country Guardian, U.K.

t. **Green Image misuse**: "*This industry has always wrapped itself in the mantle of green power and has sought to use the environmental benefits of wind power as an excuse for not doing anything about the environmental harms it causes."* —Rick Wiebe, Calif.

u. *One of the messages I presented to the coal industry was, "If you want to have major transmission built, start encouraging wind development." That's because the cultural value and acceptance of wind energy provides an opportunity to build transmission lines that are not as desirable with traditional forms of generation.* —Kevin Cramer, North Dakota Public Service Commissioner, North Dakota Public Radio, May 20, 2008

v. **And "***What industrial wind represents should be obvious to everyone: this is business-as-usual disguised as concern for the Earth. Far from genuine "environmentalism", it is the same profit- and growth-driven destruction that is at the root of every ecological crisis we face*." —Suzanna Jones, Vt., The Eagle, Feb. 6, 2013

w. **Environmental Damage**: "*To see remote tracts of countryside that, by and large, survived the industrialisation of the landscape now threatened with defilement for no good reason is scandalous. A conspiracy of vested interests is seeking to bludgeon communities into accepting what has become a money-grabbing free-for-all masquerading as an environmental panacea.*"—Philip Johnston, *Telegraph,* June 7, 2011

x. **And "***Turbines are getting so big and overpowering as to be outrageous in any rural context. Their impact on the landscapes and lives of people is totally disproportionate to the minuscule contribution they make in providing renewable energy and the pitiful savings they offer in CO_2 reductions*." —Peter Ogden, Council for the Preservation of Rural Wales, Western Mail, 5 Dec., 2006

y. **Resources**: "*Wind power is an idea that is appealing to the imagination. It sounds like a 'free' source of energy that would be non-polluting and stable in cost. I am an optimist, and I love technology. If I thought for one moment that windmills would be a source of low cost energy, I would be building them. The reality is quite the contrary — wind power is wasteful of human and natural resources*." —Fergus Smith, Vt

z. **Health Issues**. There are now proven health issues relating to wind turbines. Asperger's is known to be one such disorder. Infrasound is another. "*I signed a wind turbine lease in 2008. If I had known then what I know now, I wouldn't have signed. Since the turbines went up I have had frequent headaches lasting three days. I never had these before. My mother has ringing in her ears and headaches. I have spoken to others in the community who have been affected by the turbines. One has dizzy spells. Another does not feel healthy until she leaves McBain. They*

are now planning on moving, but have been told by realtors that they will have trouble selling their home because of the turbines. ... I now believe that the only safe place for turbines is at least a mile and a half from anyone's home." —Dianne M. Ziegler, McBain, Michigan, letter, *Cadillac News*, June 19, 2014

aa. **Property devaluation** (peoples homes).

bb. **Payments to operators to power off**: given the variable nature of wind, quiet often when there is too much wind coming onto the grid, the authorities require turbines to power off. The operators must of course be paid to do so costing yet more money to the exchequer.

cc. **Touristic Resources**: it goes without saying that the imposition of giant wind turbines across the countryside has significant impacts on the viability of tourism in an area thereby affecting people's livelihoods.

26. **Eco Advocacy submit that**: - Intervention by the state in the form of financial assistance to developers of big wind forces taxpayers to hand over a financial windfall to developers who already receive state payoffs when turbines have to be turned off is a gift to the privileged developer. The taxpayer would only see in return wind turbines dotting the landscape, the potential loss of tourism revenue, which is the economic lifeblood of many region and a tiny handful of permanent jobs. The taxpayer also has to suffer the health effects of such ill-advised developments.

PART 3 – TARIFFS

COMMUNITY TARRIFS

27. **Grid Feed In**: There is currently no support to facilitate feed-in of electricity from micro-generators known as the Renewable Energy Feed in Tariff (REFIT). Currently they are unable to feed excess generated electricity back in to the national grid. This issues need to be redressed as a matter of urgency.

28. **PSO Levi**: The current PSO levy, which is collected on each household electricity bill, is absolutely unacceptable. It is essentially a tax on the poor and middle-income families to support commercial entities. If the money generated by the Levy was being used appropriately to address community energy or micro-generation, it wouldn't be all that bad, but to be paying this money over to big wind is utterly unacceptable and shameful. This should be addressed in the new plan.

29. Some RE technologies are supported by government schemes and initiatives such as the Renewable Energy Feed-In Tariff (REFIT) administered by the Department of Communications, Energy & Natural Resources (DCENR) to support renewable electricity, however these do not stimulate community RE schemes to any great extent and require revision.

30. There should be feed-in tariffs for all renewably sourced electricity e.g. solar, deep geothermal. (The current RE Feed in Tariff (REFIT 3) schemes expires after 2017. The new scheme should also incentivize renewable heat installations, providing grant aid to citizens willing to invest in renewable technologies to upgrade businesses and domestic sites. It should also include Deep Geothermal and other known sources of alternative energy.

PART 3 – HOUSING

HOUSING UNITS – 2 issues have been problematic and should be tackled: -

31. **Storage**: There is a major deficiency of storage for occupants with all recent and proposed builds currently. Storage areas are needed to facilitate recycling/ bicycles/ Kayaks and other large items. We have elaborated below: -

32. **Storage Issues**:

    a. **Recycling**: Modern living necessitates environmental recycling which requires significant additional interior space; not less. There isn't enough space for acceptable family living, let alone for a recycling area within occupant's houses. Recycling requires a number of bins. There is inadequate space for this, which is unacceptable.

    b. **Bicycles**: Likewise there is no storage space for bicycles. A classic family of two parents and two children would be expected to have upwards of 4 bicycles. Where is the space to accommodate these? This too is unacceptable.

    c. **Patio Furniture**: where are people to store patio furniture during the winter months?

    d. **Hobbies**: Where are the occupants to store large items such as Paddle Boards, Surf Boards and Kayaks? As with the above there is no storage. It is not reasonable to expect people to live in such cramped conditions. Adequate provision of storage is essential. This is a major shortcoming of the proposed development, which needs to be urgently addressed. A way to address this issue might be the provision of underground storage or additional shed space.

DENSITY

33. **Density**: We acknowledge that space and land availability are limiting factors. Therefore proper utilisation of existing space is paramount.

34. **Optimum Land Usage/ Underground**: Storage is enormously problematic with most recent builds. The trend in other developed parts of the world is to utilise the underground portion of the land that the house occupies (including a driveway/ garden) to create a storage area/ basement. This could also facilitate underground car parking. The recent trend to leave cars outdoors is not environmentally friendly and should likewise be addressed.

35. **Inappropriate house types**: in cases where there is a lot of terraced housing proposed, we pose one obvious question?
    In the event that these houses are not passive and have oil as their source of heating, is it acceptable that supply pipes / hoses are dragged through occupants homes to fill a tank at the rear of the property? Therefore integrated solutions, which account for heating should be incorporated into future plans.

36. **Car Parking Spaces**: it should be noted that many people drive large HGV's as part of their employment. To this end, the provision of standard car parking spaces *en mass* is usually inadequate to accommodate occupants who may need to park their work vehicle proximate to their home. It is unacceptable that other areas in the vicinity of new builds are used for the purposes of parking large HGV's. This issue also needs to be addressed in the new plan.

37. **One-Off Housing in Rural Areas**: We don't wish to object to one-off houses *en-mass*, but we have in recent times observed totally inappropriate planning consents for such developments where they clearly should not have every been permitted. We have witnessed to bogus claims by applicants to support their applications in totally inappropriate areas. Likewise we have seen houses being built in the middle of fields thereby breaking the symmetry and essentially leaving a site either side of the

newly constructed house. In such circumstances the planning authority should have directed the applicants to re-site the proposed structure in a corner.

BUILD QUALITY

38. **Sound Proofing**: in general terms, sufficient sound insulation continues to be problematic in Ireland. Sound proofing standards in Ireland are regrettably lagging behind most other western countries. Concrete flooring is essential at all levels above ground to facilitate this. So too is adequate layers of acoustic sound barriers. It should not be possible for any sound to permeate to an adjoining property and it should be perfectly feasible for the occupants of any given property to play a musical instrument without annoyance to neighbors in adjoining properties. The new plan should address the above issues.

39. **Sustainability: passive energy**: We were unable to find sufficient detail as to the build quality of housing developments in the DRAFT plan. It is essential that all builds going forward should be as near as possible to passive in terms of their energy requirements. Likewise we were unable to find anything in the application on rainwater capture and storage. Given the current controversy with water usage, it is imperative that water capture is built into all future developments. Using treated water to flush toilets is ridiculous.

40. **Regeneration/ proper planning**: There are constant calls for regeneration of certain areas. Recently there were calls for the demolition and replacement of 10,000 houses in a call for regeneration. This shouldn't be happening if the units were properly planned to begin with. Apart from the capital cost, the waste of resources must also be considered with this type of poor planning.

RURAL

41. **Villages**: It is a cause of embarrassment, that in general, villages in Ireland have had housing developments appended to them as a result of appalling zoning and a very shortsighted mindset. Contrasted to UK, where in general, the character of their villages has been jealousy protected and such developments would be considered an anathema to good planning. It is submitted that all zoned lands attaching to villages be de-zoned without delay in an effort to retain what bit of character still remains in Irish villages.

PART 4 – TRANSPORT

PUBLIC TRANSPORT

42. **Rail Link**: Progress on a rail link from Dublin to Navan is but one issue worthy of further investigation.

43. **Connections**: planning for proper connections between public transport corridors is essential. Otherwise someone living in say Kells and working in Swords for example would have no alternative but to drive. If they got a train from Kells to Dublin. They still need to get to Swords. Currently the systems are not properly connected to facilitate this type of commuting.

BROADBAND

44. While we acknowledge and support the necessity of High speed Broadband to rural areas, we recommend that this be done by way of physical connection via cables. This would eliminate the need for satellite broadband, which is, comes with its own problems. It requires antennae to be situate on an elevated position in a rural area where views and prospects are important. Secondly there is an unknown regarding electromagnetic signals and or radiation.

LEINSTER ORBITA ROUTE

45. If the county is pursuing tourism (and given the amount of antiquities which the County is most fortunate in having coupled with its proximity to Dublin and the Airport, this strategy is a good one). There are two conflicts with the tourism strategy (Points 1 and 2 below): -

46. **Heritage County**: A major motorway through a self-proclaimed Heritage county is anything but desirable. Tourists come here to see heritage and escape hustle and bustle. Apart from the destruction to the countryside, motorways generate a hell of a lot of noise.

47. **Car Dependence**: we need to put an emphasis on public transport and get away from car dependence.

48. **Resources Hungry**: Motorways are very resource hungry. It isn't good enough to propose a motorway without having regard to a source of Aggregates and of Sand and Gravel. Gouging out large holes in the landscape of the midlands and going into the water table is not ideal or sustainable. Moreover Sand & Gravel comes from Eskers and Drumlins. We have in the space of but 2 generations exhausted much of this resource. The UK are now dredging estuaries in and effort to get sand and gravel and have imposed a levy on extraction of what reserves they have left. China likewise has similar issues and is also dredging estuaries in an effort to get sand.

SOURCING OF AGGRIGGATE

49. **Supply**: it is not good enough to aspire to various transport corridors, be they roads or otherwise, without considering where aggregate is going to come from. Here to fore this has not been considered and we have seen enormous quantities of aggregate being sourced from unauthorised development.

50. It has also given rise to a plethora of unauthorised developments and pits in an unplanned manner. These usually apply for retrospective consent, which is usually granted. This is very poor planning practice and urgently needs to be addressed.

PART 5 – INDUSTRY

EXTRACTIVE INDUSTRY

51. **Procurement**: Enforcement has proven to be disasterous. A prohibition on the purchase of product from operators of unauthorised developmets.

52. **Reinstatement:** The evidence dictates that a far greater emphasis be placed on progressive reinstatement in future Planning policy documents. This is an issue, which may well be forced by the European Authorities, and it is suggested that a very hefty reinstatement bill could end up having to be footed by the authorities, which could be avoided if developers were forced to take remedial action. It is further submitted that far stricter enforcement aspirations are enshrined in the Planning Framework Policy.

53. **Sourcing Aggregate:** Currently the aggregate sector is totally unsustainable. The landscape is being destroyed and has suffered staggering changes in the space of one generation. These are natural recourses and should not be treated as a warehouse to provide a few short-term jobs. Much more stringent policy objectives must be included as a matter of the gravest urgency. E.g. policies should be drafted to encourage the reinstatement of spent quarries.