

Elaine Mullin

From: David Donaldson [REDACTED]
Sent: 19 April 2019 12:09
To: DevelopmentPlan@midulstercouncil.org
Subject: plan strategy
Attachments: PLAN STRATEGY BEAGHMORE.pdf

Dear Sir/Madam,

Please see attached representation.

Please acknowledge receipt.

Kind Regards,

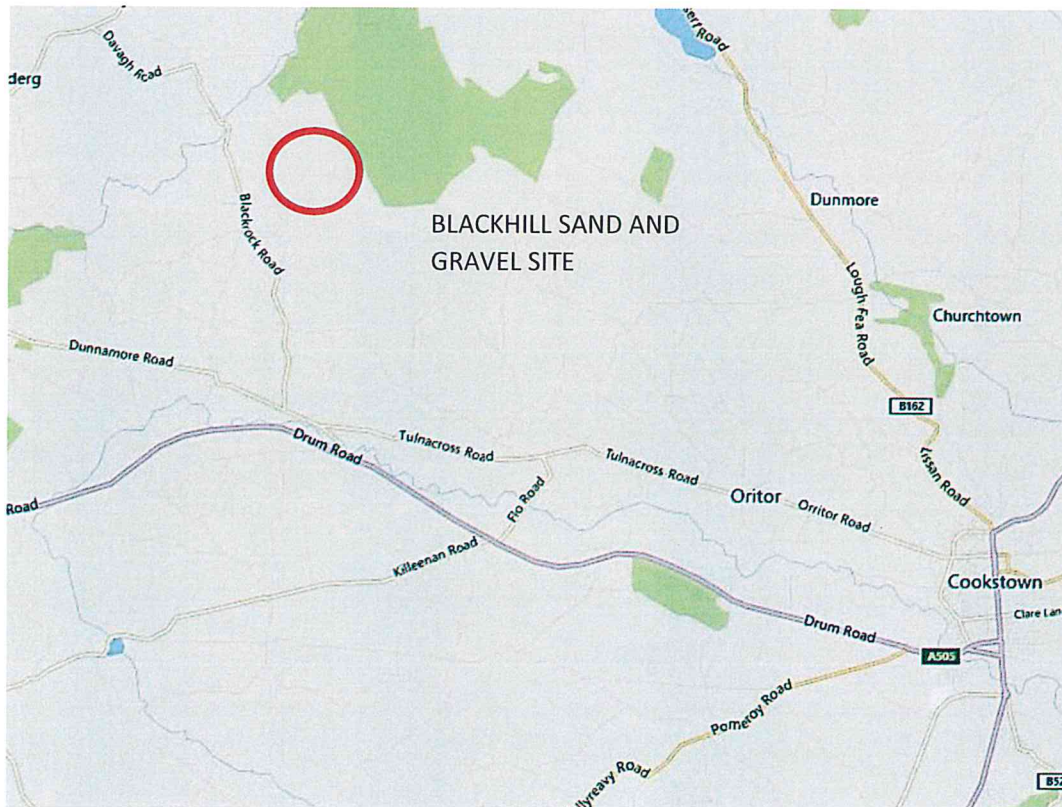
David Donaldson BSc Hons MRTPI
DONALDSONPLANNING
50a High Street
Holywood
BT18 9AE
[REDACTED]
Tel 028 90423320

PROPOSED AREA OF CONSTRAINT ON MINERAL WORKINGS

1.0 INTRODUCTION

1.1 This submission to the Draft Plan Strategy is on behalf of Blackhill Sand and Gravel. The company operates a sand and gravel quarry at Blackrock Road, about 7 miles north west of Cookstown.

1.2 The site location is shown below:



1.3 The company has had the benefit of planning permissions for extraction of sand and gravel at Blackrock Road for some 30 years. These permissions have been issued in the knowledge that that these low intensity workings have minimal landscape impact and are well screened from the Beaghmore stone circles.

2.0 RATIONALE FOR AREAS OF MINERAL CONSTRAINT

2.1 The SPPS recognises that mineral reserves make a valuable contribution to the economy. It advises that local plans should ensure sufficient resources can be made available; safeguard resources which are of economic or conservation value; and identify areas which should be protected from minerals development.

2.2 The Plan Strategy is considered to be **unsound** as there is insufficient evidence base to demonstrate that mineral workings in the Beaghmore area have had an adverse impact upon local landscape or environment.

- 2.3 The background Minerals Paper to the POP noted that the PAC report ***'highlighted that the imposition of ACMDs in general, is potentially erroneous given the fact that insufficient data exists regarding the exact extent of mineral reserves across Northern Ireland. The publication of the Mineral Resource Map in May 2012 began to address this, but further investigation is required.'***
- 2.4 Plainly, the imposition of ACMDs in this Plan, without a proper evidence base in respect of available reserves, projected demand etc. will be **unsound**. The Council should consider carefully whether it is necessary or appropriate to impose any ACMDs in this area.
- 2.5 It must be noted that areas of scientific interest, nature reserves etc already benefit from policy protection, without the need to be designated as ACMDs.
- 2.6 Whilst ACMDs may be a necessary tool in some of the most significant landscapes, it is difficult to understand what they might add to the raft of policies and considerations which already apply to mineral development. In effect, they should be regarded as a strategic regional tool, to be carefully applied, perhaps to only the most sensitive landscapes such as the high Mournes, upper Sperrins, Antrim Glens etc, where mineral workings are likely to have a prominence and an impact which might extend over a considerable area. Whilst there is no doubt that parts of Mid- Ulster are of scenic value, there is no substantive evidence that they are under significant pressure from either existing or proposed mineral workings. Designations such as AONB should be sufficient to ensure that the landscape impact of proposed mineral workings can be properly considered and addressed. Low level sand and gravel workings (such as Blackrock Road) do not have widespread landscape impact, and so it is difficult to understand why they should be included in a designation which might unnecessarily constrain future operations.
- 2.7 In short, there is no evidence that ACMDs are either necessary or desirable in Mid Ulster.

3.0 PROPOSED POLICY FOR AREAS OF MINERAL CONSTRAINT

- 3.1 As there is no need for a minerals constraint policy in Mid-Ulster, the following comments on the proposed policy wording are made on a 'without prejudice' basis.
- 3.2 The proposed Policy MIN 2 does not completely prohibit development in ACMDs. However it is requested that the reference to ***'minor expansion of an existing mineral working'*** is revised to remove the word *'minor'* and substitute it with *'appropriate'*. The scale of any proposed extension can therefore be assessed with regard to the raft of other policy considerations, and with regard to site specific impacts. This will enable existing investments and valuable reserves to be secured and protected.

4.0 ARCHAEOLOGY AND BULT HERITAGTE

- 4.1 The Plan Strategy proposes an extensive Area of Significant Archaeological Interest (ASAI) in the Beaghmore area.

- 4.2 The proposed Policy HE1 states that development that would adversely impact on the distinctive heritage values and historic landscape will conflict with the Plan. It goes on to list development which would conflict as masts and pylons, turbines, large scale development, large agricultural sheds, and **quarrying and mining activities**.
- 4.3 As drafted, Policy HE1 of the Plan Strategy is **unsound**. It makes no reference to the nature or scale of the developments which will conflict with the Plan. For example it would include ALL quarrying and mining, which would encompass even the minor extensions which are acceptable under the draft ACMD policies. Complete prohibition would be an irrational and imbalanced approach to development in this area, and would fundamentally impact upon existing quarry operators, farmers etc. The policy must incorporate an element whereby individual proposals will be balanced against their individual landscape or heritage impact.
- 4.4 There is no objection to any requirement to carry out reasonable archaeological assessment or evaluation of proposed quarry areas – the primary concern relates to the introduction of unnecessary policy constraint which could prejudice the acceptability of any mineral extraction (including extensions to established businesses).

5.0 CONCLUSIONS

- 5.1 The need for ACMDs within this District must be questioned. In particular, the proposal to extend these over large parts of the rural area is illogical and lacks supporting evidence. There is absolutely no evidence that such extensive constraint is required. Furthermore, there is a complete lack of regional guidance in respect of mineral reserves, pressure areas, product demand, etc. The Council is requested to remove the proposed ACMD in the Beaghmore area.
- 5.2 In relation to the extensive Area of Significant Archaeological Interest which is proposed around Beaghmore, proposals in this area should be considered on their merits, (with the possible exception of wind turbines). Certainly, it should be made clear that any such policy will not prevent the acceptability, in principle, of appropriate mineral development.

DONALDSONPLANNING
50a High Street
Holywood
BT18 9AE
info@donaldsonplanning.com

19 April 2019