

**Michael McGibbon**

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**From:** Gordon Best [REDACTED]  
**Sent:** 16 April 2019 13:38  
**To:** DevelopmentPlan@midulstercouncil.org  
**Cc:** info@mpani.org  
**Subject:** MPANI Submission to the Mid Ulster Council draft Plan Strategy April 2019  
**Attachments:** Final MPANI Submission to Minerals Section of MUC dPS April 19.pdf

Dear Sir/Madam

Please find attached the Mineral Products Association NI (formerly QPANI ) Submission to the Mid Ulster Council draft Plan Strategy April 2019.

I would be grateful if you could acknowledge receipt by return email.

Regards  
Gordon Best  
Regional Director MPANI



## **QPANI Response to Minerals Section of the Mid Ulster District Council Preferred draft Plan Strategy**

April 2019

### **Background**

MPANI welcomes the opportunity to comment on the Mid Ulster District Council Draft Plan Strategy. This response focuses fully on the sections dealing with Minerals Development.

The MPANI is the principal trade association for the quarrying and mineral products industry in Northern Ireland affiliated to the Minerals Products Association (MPA) in the UK. Members of the MPANI produce over 95% of the Northern Ireland's primary aggregates, as well as the major proportion of other construction materials such as asphalt, ready mixed concrete, recycled and secondary aggregates, lime and silica sand.

Modern industrial society is, quite literally, built upon mineral products. Whether it is our physical built environment, our transport links or the wider infrastructure on which we all rely, aggregates are utterly essential to economic growth. If we want to improve the lives of people in Northern Ireland, it is vital that the contribution of our local quarrying and minerals industry is fully understood by those with the power to support it.

### **Local Industry to meet Local Need**

Councils have resources literally beneath their feet that need strategic, and sympathetic usage. To fail to consider this is to throw money away. The aggregates industry in Northern Ireland directly employs some 5000 people, produces approximately 24 million tons of aggregates per year and has a turnover of around £650 million per year (2% of NI GDP). Quarrying is a varied industry, with the majority of NI quarries family owned, alongside a number owned by large multinational companies. Regardless of who owns them, however, quarries are predominantly a rural business, supporting jobs in areas identified by Government as targeting social need (TSN).

We all need mineral products. We need them for construction and for manufacturing, with each of us in Northern Ireland using more than 14 tonnes of aggregates per year, on average. Local industry offers sustainable solutions to the challenges of creating and maintaining our built environment, coping with climate change and providing for a growing population.

Each house that we build will require around 60 tonnes of stone. When you add that to the materials required to construct our roads, paths, water and sewage infrastructure you need to ask yourself "Where within our local area will those materials come from?"

## **Minerals in Mid Ulster**

Mid Ulster is a major producer of hard rock, sand and gravel vital for the manufacture of construction materials such as concrete products, roof tiles, cement and road materials.

The minerals sector is more important to the people and economy of Mid Ulster than to any other NI council district, producing mineral products with a total value of around £200m each year. The Mineral Products Industry employs more than 1250 people in the area. In terms of the 1250 jobs at an average salary of £30,000 per year this equates to £37,500,000 injected directly into the local economy providing income for other local businesses such as shops, restaurants and other retailers.

Another economic contribution that the Draft Plan Strategy fails to recognise is the significant contribution the minerals sector makes to the Councils Rates Income. MPANI estimates the combined rates income from our Industry in Mid Ulster is in excess of £750,000.

The Mid Ulster Precast Concrete Sector contains a number of the largest manufacturers in the UK in FP McCann, Creagh Concrete, Macrete, Tobermore Concrete and Acheson and Glover. These companies have been providing sustainable well paid jobs for local people for many years. They will only continue to do so with a readily available and permitting raw material of sand, gravel and hard rock secured for future years.

### **Members of the MPANI operating within the Mid Ulster Council Area are;**

Creagh Concrete, Acheson & Glover, FP McCann, Macrete, Tobermore Concrete, Northstone Materials, Stanley Bell Sand and Gravel, Douglas Acheson, Campbell Contracts, Lafarge Holcim, Barrackhill Quarries, CDE Global (Affiliate ), Core Aggregates, McGarrity Brothers Concrete, George Crawford & Son, Irwins Quality Aggregates, P Keenan & Sons.

## **Comments on the draft Plan Policy**

### **The Draft Plan Strategy Review**

#### **Page 10 – Plan Strategy**

*“The Plan Strategy sets out the strategic objectives to accommodate growth in the form of new homes and economic development to improve quality of life and to meet needs of growing population, whilst also protecting the environment”.*

***MPANI view – economic growth, new homes etc depend on the sustainable supply of local construction materials and local skills.***

#### Page 23 – Section 2.5 Economic Trend

*“The high prevalence of manufacturing is linked to a thriving Minerals Industry in the district, particularly the extraction of sand and gravel . As a spin off to this extraction activity there is a very strong manufacturing sector specialising in crushing and screening equipment. It has been estimated that NI provides 40% of the worlds mobile and crushing equipment and undoubtedly a large proportion of this is supplied by companies within Mid Ulster”.*

**MPANI View – these comments are to be welcomed. Reference should also be made about the strategic partnership that has been formed between the Industry and the local South West College in the delivery of engineering apprenticeships and offering young people from Mid Ulster the opportunity to live, work and raise their families at home in the Mid Ulster Council area.**

#### Page 29 – Local Development Plan Vision and Objectives, Section 3.3

*“Within that cohort we see Mid Ulster retaining its role as a key Industrial Centre outside Belfast with a strong engineering and agri food base. We also recognise the role of minerals and are eager that they are not just extracted from but also processed in Mid Ulster with our aggregates exported to other areas”.*

**MPANI view – We again welcome the reference to the role of minerals in the Mid Ulster area. Mid Ulster is home to the largest precast concrete manufacturing sector in the UK and Ireland.**

#### Page 31 – Creating Jobs and Prosperity

*“Promoting diversity in the range of jobs on offer recognising the importance in the primary sectors ( agriculture, forestry and minerals )”.*

**MPANI view – We again welcome the reference to the important economic role of minerals in the Mid Ulster area.**

#### Page 33 – Section 4

*Comment “ our strategy is based on Regional Guidance which is geared to ensuring an adequate supply of land to facilitate economic growth”.*

**MPANI view - This does not reflect the need to identify, through the GSNI Resource Maps, and “safeguard” important construction aggregates and minerals around existing operating quarries and pits and the future aggregate reserves in other parts of the Mid Ulster Council Area. Council has only identified 3 historic areas on mineral reserves that have been protected from other forms of development over a long period of years.**



**MPANI view – We also welcome the Councils support for upgrading the A29, A4 and A5. We would point out however the delivery of these projects is dependent on the availability of local construction materials.**

**Page 57 – General Principals Policy**

**MPANI view - We welcome the policy to ensure balanced decision making in integration of a variety of complex social, economic environmental issues in the long term public interest.**

**MPANI view - We also welcome the proposals on the use of sustainable drainage systems (SUDS)**

**Page 76 - Housing in the Countryside**

*“In MUC 40% of housing is based in the countryside”.*

**MPANI view - this reinforces the need for a detailed policy on the safeguarding of existing and future mineral reserves to prevent sterilisation from housing or other forms of development.**

**Page 114 – Economic Policy and Creating Jobs and Prosperity**

*“Mid Ulster will require creation of 8,500 jobs over plan period. This will be achieved by ensuring that there is adequate supply of economic land available”.*

**MPANI view – this again does not reflect lack of Councils protection of futures construction aggregate and minerals reserves for future sustainable use. The MPANI have given information to the Council previously indicating an approximate value of turnover in excess of £210 million for the mineral products industry within Mid Ulster. In terms of the 1250 jobs at an average salary of £30,000 per year this equates to £37,500,000 injected directly into the local economy providing income for other local businesses such as shops, restaurants and other retailers. Another economic contribution that the Draft Plan Strategy fails to recognise is the significant contribution the minerals sector makes to the Councils Rates Income. MPANI estimates the combined rates income from our Industry in Mid Ulster is in excess of £500,000.**

*“Majority of economic land will not be designated until “Local Policies Plan”*

*“Mid Ulster is heavily reliant on the construction and manufacturing sectors. Twice as reliant as the NI average”.*

**MPANI view – It is noticeable that given earlier comments in the draft Paper there is no similar reference to the importance of the minerals and aggregates sector in this section.**

**Page 118 - Policy ECON 2**

*“Proposals for economic development in the countryside will conform with the plan where they represent firm and not speculative proposals consisting of one or more of the following scenarios*

*where they do not harm or undermine the character of the countryside or the amenity of nearby residents”.*

*“Where there are existing quarries, outside of areas designated for their nature conservation, heritage or landscape value favourable consideration can be given to a directly related industry eg cement, concrete works or glass manufacture”.*

**MPANI view – Need to add manufacturing of bituminous road materials that takes place in a number of locations within Mid Ulster.**

**Page 120 - Section 12.34**

*“Mid Ulster has been successful in developing a thriving quarry products related industry. This should be encouraged since it provides jobs locally rather than them being provided elsewhere. Therefore processing of minerals into quarry products such as cement, blocks and lintels can be given favourable consideration where the quarry has been permitted for long term extraction. In assessing such proposals consideration will be given to the long term benefits and the balance of environmental and economic issues”.*

**MPANI view – We again welcome the reference to the important role of minerals in the Mid Ulster area. As above you need to add manufacturing of bituminous road materials that takes place in a number of locations within Mid Ulster**

**Page 121 - Section 12.28**

*“Some proposed developments may be incompatible with economic development enterprises already operating in the vicinity. For example, certain types of industrial use would be incompatible with existing industrial undertakings requiring a particularly contaminant free environment (such as life sciences, food processing and research and development sectors). In other cases, new development, such as housing, could prejudice the continued existence of a particular economic development use. Such cases can arise where the particular processes being carried out have a tendency to cause adverse effects of some kind on adjacent land, even when all reasonable remedial measures have been taken by the operator”.*

**MPANI view - This is a clear rationale for safeguarding of mineral resources around existing quarries and pits.**

**Direct Comments on the Minerals Development Section**

We welcome the Council's production of a paper to provide background on how proposed Areas of Constraint on Mineral Development (ACMD) have been defined for the draft Plan Strategy. The paper also goes on to provide the information on the potential impact of surface development and our proposed SCA and ACMD on aggregate resources in mid Ulster.



In section 2.1 we acknowledge the Councils reference to *“Strategic Policy within the Strategic Planning Policy Statement (SPPS) states that our local development plan should identify areas (ACMD’s) which should be protected from minerals development because of their intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage). The policy states that there should be a general presumption against minerals development in such areas. However, where a designated area such as an Area of Outstanding Natural Beauty (AONB) covers expansive tracts of land, our Plan should carefully consider the scope for some minerals development that avoids key sites and that would not unduly compromise the integrity of the area as a whole or threaten to undermine the rationale for the designation”*.

In the Councils Preferred Options Paper MPANI contended that Areas of Mineral Constraint should be based on accurate information that includes not only landscape and habitat value but also consider the economic and social importance of the mineral and aggregate value in the ground. We believe that Council are failing the consistency test in still recognising most of the Sperrins AONB an ACMD without showing the rationale for doing so based on the evidence obtained from the Department of the Economy through the resource maps and the evidence of annual production and aggregate resources under planning permissions gathered from local operators. While the Council have acknowledged the existence of three historic of which two are dormant areas of mineral reserve for clay, coal and limestone the Council have totally failed to recognise the most important mineral in Mid Ulster, Sand and Gravel, and taken action to safe guard future reserves around existing operational sites and to identify the valuable reserves that lie into the current AONB. On page 251 in the section *“Monitoring of our Plan ”* under *“Creating Jobs and Promoting Prosperity”* outcomes, Council states;

*“ Mineral Extraction will continue to provide sufficient materials for the Construction Industry and related quarry products Sector”*

While MPANI recognise the steps that Council have gone to protect existing operational sites we would contend that much more is needed to identify and safeguard future “valuable” reserves of sand, gravel and rock.

We believe that if there are important aggregate and mineral reserves within ANOBs or any other designated area that are vital to the economy then extraction should be permitted under certain conditions that ensure that the works are carried out to the highest standards and that robust restoration plans are put in place to ensure that the activity has minimal effect on the landscape characteristic of the local area and that what the site is restored to can actuality add to the landscape and the amenity of the local Community. We would highlight the fact that most of the English mineral development is in the peak district National Park that is clearly an ANOB.

The MPANI would contend that given the PAC decision on ACMD in the Northern Area Plan in 2011 that the Mid Ulster Council has ignored the previous recommendations and has not carried out a full and proper assessment of the appropriateness of the ACMDs in the Council area. Simply put MPANI does not believe the basis on which the current areas of ACMD in sections 3.7, 3.8, 3.9, 3.10 have been made merely on environmental grounds and on the basis of landscape characteristics renders them “unsound”. In our view MUC has simply tinkered with the boundaries of the AONB around existing operating minerals sites for the basis of the plan. **We would contend that this approach is unsound and inconsistent and will not meet the economic and social needs of the Council beyond the plan period.**

In section 3.2 of the paper on Areas of Constraint on Minerals development the Council states *“Because of their nature, scale, location and duration of operation, mineral developments often impact more severely on the environment than other forms of development. They may damage or destroy nature conservation sites and structures and remains of historic and archaeological interest that are of importance. They can also have a significant visual effect on the landscape and on peoples living conditions”.*

Where is the evidence for this? If there is evidence why has that operation been permitted? This is a very inaccurate statement and can certainly not be descriptive of the vast majority of responsible minerals operations across the Mid Ulster Council Area and Northern Ireland.

In section 3.5 we welcome the Councils efforts *“In identifying the lines of the ADCMD we have also sought to identify and exclude those areas with the largest concentration of quarries so as to ensure that the minerals industry in Mid Ulster can continue to contribute to the construction industry and the economy in mid ulster and in Northern Ireland. The quarries in Mid Ulster (based on the information available to us) are mapped at Appendix 1. The map at Appendix 2 reflects the issues under consideration in identifying the ACMD lines”.*

MPANI acknowledge this but would contest that this does not ensure the long term sustainability of the aggregate and minerals supply in Northern Ireland as the Council have not investigated, identified and safeguarded future reserves around existing sites and further into the designated AONB.

## **Page 140 – Minerals Section**

### **Section 14.1**

**Very negative First line states** – *“Mineral Development represents a key challenge in Mid Ulster in that we must decide how to facilitate appropriate mineral development whilst also protecting our important landscapes and areas of nature, scientific, conservation and heritage interest”.*

**MPANI view** - Given earlier positive comments highlighting the importance of the minerals sector in Mid Ulster this introduction gives a very negative start to the Minerals Section of the DPS.

#### **MPANI view – We welcome the following statements**

*“ that Minerals represent a very important resource for our district”.*

*“Provide a valuable source of employment as well as generating large amounts of revenue on an annual basis”.*

*“Mid Ulster possesses more jobs in mining and quarrying than any other district in NI circa 1250”*

*‘again reference made to the 40% of worlds crushing and screening equipment.*

## **Page 141- Overview - Section 14.3**

In relation to the economic contribution that the aggregates and mineral products Industry makes in the Mid Ulster Council Area MPANI would question the figure of £13 million pounds of value of aggregates. We acknowledged that this figure has been derived from the Annual Quarry Return



which is collected annually by the Department of the Economy. The statistics for aggregate production collected from individual operators give annual tonnage and average value per tonne before Tax, Aggregates Levy, Transportation Costs and Profitability (i.e. the production cost). MPANI would caution against using this figure as a measure of the economic and social contribution to the Community in Mid Ulster Council Area.

The MPANI have given information to the Council previously indicating an approximate value of turnover in excess of £210 million for the mineral products industry within Mid Ulster. In terms of the 1250 jobs at an average salary of £30,000 per year this equates to £37,500,000 injected directly into the local economy providing income for other local businesses such as shops, restaurants and other retailers.

Another economic contribution that the Draft Plan Strategy fails to recognise is the significant contribution the minerals sector makes to the Councils Rates Income. MPANI estimates the combined rates income from our Industry in Mid Ulster is in excess of £500,000.

The Mid Ulster Precast Concrete Sector contains a number of the largest manufacturers in the UK in FP McCann, Creagh Concrete, Macrete, Tobermore Concrete and Acheson and Glover. These companies have been providing sustainable well paid jobs for local people for many years. They will only continue to do so with a readily available and permitting raw material of sand, gravel and hard rock secured for future years.

**MPANI believe that given the lack of economic assessment carried out by the Council and statistics to support it this leaves the plan unsound and would recommend further work with the Industry to evaluate and then communicate a more realistic level of economic and social contribution by the Industry in the Mid Ulster Council Area.**

#### **Page 141 - Section 14.5**

We are concerned that there is no reference and no recognition of the significant industry evidence, not just from this Country, but across the UK and Europe that well managed and properly operated mineral sites have the potential to host variety of flora and fauna. All Industry evidence shows that with detailed and focused restoration many minerals sites can become wild life havens and in effect enhance habitat designations and protect endangered species such as birds of prey and pollinators. Over 700 designated ASSI sites across the UK are former Quarries.

#### **Page142 – Section 14.8 Ref to Community Plan**

*It states “A stable supply of minerals is vital to maintain a diverse range of jobs and to provide a local supply of construction materials for important building projects and as such our Mineral Products help support the economic aspects of our Community Plan”*

**MPANI welcome this statement.**

#### **Page 142 – Our Strategy; section 14.9**

Council state *“Our strategy is to identify areas where there will be a presumption against mineral*

*exploitation; known as Areas of Constraint on Mineral Development (ACMD). These areas are designated based upon their intrinsic landscape, amenity, scientific or heritage value. Within these areas, mineral development will not be permitted except in a small range of circumstances and with certain caveats, including where development will be limited to short term extraction”.*

#### **Section 14.10 –**

*“We also designate areas where minerals deposits are to be protected; known as Mineral Reserve Policy Areas (MPRA ’ s). The minerals within these areas will be of economic importance and may well be linked to an ongoing industrial operation. Within these areas, surface development will not be permitted because this would prejudice the future extraction of these mineral deposits”.*

**MPANI view** - While the Council have acknowledged the existence of three historic, of which two are dormant areas of mineral reserve for clay, coal and limestone, the Council have totally failed to recognise the most important mineral in Mid Ulster, **Sand and Gravel**, and taken action to safe guard future reserves around existing operational sites and to identify the valuable reserves that lie into the current AONB.

#### **Page 142- Policy Min 1 – Mineral Reserve Policy Areas**

*“Within a Mineral Reserve Policy Area, surface development which would prejudice the future extraction of minerals, shall not accord with the plan”*

MPANI welcome this Policy. However within the Dps the Council, in a number of sections, have clearly recognised the importance of the mineral products sector to the economy and prosperity of the Council Area but has totally failed to recognise, identify and safeguard the most important, and therefore valuable mineral, **sand and gravel** which is the raw material from which the activity and turnover of over £210 million, a wage bill of almost £38 million and a rates bill and payment of £500,000 starts.

#### **Page 143 - Policy Min 2 – Extraction and Processing of Hard Rock and Aggregates**

*“In Areas of Constraint on Mineral development the extraction and processing of hard rock and aggregates will conflict with the Plan except for minor expansion of an existing mineral working or where it provides important benefits, such as the provision of stone for the restoration and maintenance of vernacular and other buildings of conservation interest. Elsewhere, extraction and processing of hard rock and aggregates will conform with the Plan, subject to environmental and transportation considerations. Particular attention will be given to significant to potential impact on human health and public safety, caused by dust, noise, blasts and vibrations resulting from activity on the site and vehicles travelling to and from the site. A precautionary approach will be adopted to assessing mineral development and therefore the onus will be on the developer to demonstrate that development will not:*

*a) Prejudice the essential characteristics of a site of international / national or local nature conservation importance including ASSI ’ s, SAC ’ s, SPA ’ s and local /national nature reserves or other heritage interests;*

*b) Result undue harm or loss to protected species or contribute to significant biodiversity loss;*



*c) Cause significant risk to public safety or amenity caused by dust, noise, blasting or the use of chemical and/ or biological agents;*

*d) Impact negatively upon the safety and amenity of occupants of development in close proximity to the mineral working and / or its transport routes as a result of noise, vibration and dust arising from the excavation process or from the transportation of materials. This criteria will be of particular relevance to proposals involving the use of explosives in the extraction process;*

*e) Significantly impair the safety and amenity of road users along the roads where extracted materials will be transported, by virtue of the unacceptable volume of traffic or by vibration, dust or noise associated with the proposed development;*

*f) Cause undue obtrusion in the landscape, particularly by breaking the skyline or failing to utilise natural landscape features to aid integration or as a result of poor siting of plant machinery, waste material or the stockpiling of equipment.*

*g) Scar the landscape for future generations ensuring that adequate restoration proposals are provided in line with Policy MIN 5.*

**MPANI View - We oppose Policy Min 2.** Where is the evidence that extractive operations in Mid Ulster have been or are being operated in such a way? If there is evidence that an extractive operation was impacting the environment and neighbours as described it would be an indictment on the local Councils enforcement policy and questions would have to be asked as to why that operator had not been stopped and possibly prosecuted. This is a very inaccurate statement and can certainly not be descriptive of the vast majority of responsible minerals operations across the Mid Ulster Council Area and Northern Ireland. **MPANI would certainly view Policy Min 2 as failing both consistency and soundness tests.**

**MPANI is also very concerned about the introduction of the “precautionary approach”. We see this as a move away from the stated “balanced approach” within the SPSS.**

**14.15** Areas of Constraint on Minerals Development (ACMD) have been defined in line with regional policy to protect areas of intrinsic landscape amenity, scientific, heritage value. The ACDM locations are identified on the District Proposals Map. These areas comprise of Beaghmore and the High Sperrin’ s which are rich in terms of archaeology and represent the wilder, unspoilt and most scenically valuable parts of this Area of Outstanding Natural Beauty. It also includes the Clogher Valley and its escarpment because of its scenic value and earth science interest, and has been extended to include Slieve Beagh, which is also internationally important as a natural habitat. In addition it should be remembered that there a large number of sites recognised regionally and nationally as being important and are protected for their wildlife, scientific value or heritage interests. In effect these also act as areas of constraint on mineral development.

**14.16** “New large scale commercial extraction in these areas would have a profound and irreparable impact on the heritage and scenic qualities of the landscape and therefore it is unacceptable. Within these areas of constraint, there are a few existing working quarries and it is not the intention of the Plan to prevent their operation, however it must be recognised that even minor expansion needs to be carefully assessed. Elsewhere there are also pockets of local stone, needed for the repair of vernacular buildings in the Sperrins and the Clogher Valley. Any proposals for extraction in these



areas need to have minimal surface impact and need to be carefully assessed in relation to the size, scale and duration of the extraction”.

**14.15 & 14.16 – MPANI are very concerned at this approach and would highlight our previous comments concerning the identification and designation of ACMDs.**

“The Special Countryside Area around the shores Lough Neagh introduces a tight constraint on all development including mineral extraction in recognition of its landscape qualities and the international importance of this wet land. Whilst the shores are designated an SCA and are therefore protected from extraction the Plan has not introduced a SCA on the Lough, which has historically been used for sand dredging. This activity is subject to a regionally significant application being dealt with by Department of Infrastructure. Mid Ulster District Council will review the approach to extraction in light of the outcome of that application. In the interim the Lough continues to be afforded protection by other statutory bodies through the various environmental designations that have been placed on it by virtue of the RAMSAR, SPA and SAC and ASSI designations”.

**14.17 – Concerned about the Lough Neagh comments**

**14.18** Elsewhere within Mid Ulster there will remain a presumption in favour of hard rock and aggregates extraction and processing in recognition of the importance of this activity to the local economy and its importance in providing materials for construction regionally. All proposals will be assessed in accordance with Policy GP1 General Principles Planning Policy and other plan policies.

**MPANI welcome these comments**

**Page 145 Policy Min 3**

**MPANI would question the linking together of Valuable Minerals and Hydrocarbons.**

**Page 147 POLICY MIN 5 – RESTORATION OF MINERAL SITES**

*“All applications for mineral development must include, where appropriate, satisfactory and sustainable restoration proposals. Restoration proposals should take account of the specific characteristics of the site and its locality and restore and/or enhance the landscape character of the area. Any opportunities for enhancing biodiversity, community recreation and access should be considered.*

*The site restoration scheme must include a programme of works and a timetable whereby the restoration scheme will be implemented in a phased approach if necessary. Once mineral working has ceased, the land should be reinstated at the earliest opportunity to a suitable standard. Submitted phasing and restoration proposals should provide for the use in progressive on-site restoration”.*

**MPANI view - We welcome these comments and would ask for further engagement and discussion with Industry. Industry will oppose the use of restoration bonds.**

**14.29** *“This policy will apply to all proposals for mineral development”.*

**14.30** *“Mineral Development can have a major impact on the visual amenity of the landscape, particularly in remoter, rural areas. For this reason, the restoration of the site to a satisfactory state is a vital part in the mineral exploitation process”.*

**MPANI view – we acknowledge this and would require industry engagement with local council biodiversity officers, and NGO partners through our MPANI Biodiversity Group.**

*14.31 “The best restoration proposals do not always involve a site being simply restored to its former use. In recent years there have been some successful progressive restoration proposals which have witnessed sites being used for a completely different purpose post exploitation than was the case pre exploitation”.*

**MPANI view – we acknowledge this and would require industry engagement with local council biodiversity officers, and NGO partners as we have on our MPANI Biodiversity Group. There are best practice case studies in restoration from across the industry locally and nationally.**

*14.32 “The preferred types of restoration and after use depend on the characteristics of the deposits, nature of excavation, availability of fill materials, the surrounding landscape, and the needs of the local community as well as the potential for nature conservation on the site”.*

**MPANI view – as stated above**

### **Conclusions**

- 1. We would make reference to the clear Strategic Planning Policy Statement (SPPS) instruction that the plan should ensure sufficient supply of construction aggregates can be made available for the local market, and where appropriate the regional market area and beyond, to meet likely future development needs over the plan period. Given the intention of the Plans economic strategy to encourage economic growth and prosperity and to sustain “a vibrant minerals and quarry products industry” we believe the absence of a clear safeguarding of construction aggregates and minerals strategy makes the plan is “unsound”.**
- 2. In our view MUC has simply tinkered with the boundaries of the AONB around existing operating minerals sites for the basis of the plan. We would contend that this approach is unsound and inconsistent and will not meet the economic and social needs of the Council beyond the plan period.**
- 3. MPANI believe that given the lack of economic assessment carried out by the Council and statistics to support it this leaves the plan unsound and would recommend further work with the Industry to evaluate and then communicate a more realistic level of economic and social contribution by the Industry in the Mid Ulster Council Area.**
- 4. MPANI would certainly view Policy Min 2 as failing both consistency and soundness tests.**

Gordon Best  
Regional Director MPANI

