

**Sinead McEvoy**

---

**From:** Chris Tinsley [REDACTED]  
**Sent:** 18 May 2020 15:38  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** LDP Re-Consultation Correspondence  
**Attachments:** QP Correspondence.pdf

**Importance:** High

Dear Sir/Madam

Further to the letters received from Mid Ulster District Council (MUDC) dated 12th March 2020 in relation to the Re-Consultation on Local Development Plan 2030- Draft Plan Strategy and accompanying Sustainability Appraisal incorporating Strategic Environmental Assessment Report, please find enclosed correspondence from Quarryplan confirming that our previous joint and individual representations may be considered as our Clients' representations to the DPS.

Please see attached for reference, with hard copy to follow in the post.

If you have any queries please don't hesitate to let me know,

Regards  
Chris

**Chris Tinsley MRTPI**  
**Senior Town Planning Consultant**  
Quarryplan Limited  
10 Saintfield Road  
Crossgar  
BT30 9HY



**Elaine Mullin**

---

**From:** Chris Tinsley <[REDACTED]>  
**Sent:** 18 April 2019 18:04  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** MUDC LDP Draft Plan Strategy- Creagh Concrete Representation  
**Attachments:** Creagh Concrete Representation ISSUE.pdf; Representation-Form.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/ Madam

Please find enclosed representation to MUDC Local Development Plan 2030- Draft Plan Strategy, made on behalf of Creagh Concrete.

If you have any queries, please do not hesitate to contact me.

Regards  
Chris

**Chris Tinsley MRTPI**  
**Senior Town Planning Consultant**  
Quarryplan Limited  
10 Saintfield Road  
Crossgar  
BT30 9HY  
T: [REDACTED]  
Mob: [REDACTED]



**Submission of a Representation to Mid Ulster District Council Local Development Plan 2030 - Draft Plan Strategy**



Comhairle Ceantair  
**Lár Uladh**  
**Mid Ulster**  
District Council

**Local Development Plan**  
**Representation Form**  
**Draft Plan Strategy**

Ref:
Date Received:
(For official use only)

---

Name of the Development Plan Document (DPD) to which this representation relates

**Representations must be submitted by 4pm on 19<sup>th</sup> April 2019 to:**

Mid Ulster District Council Planning Department  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

Or by email to [developmentplan@midulstercouncil.org](mailto:developmentplan@midulstercouncil.org)

Please complete separate form for each representation.



**SECTION A**

---

**1. Personal Details**

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text" value="CREAGH CONCRETE PRODUCTS LIMITED"/>

**2. Agent Details (if applicable)**

<input type="text" value="MR"/>
<input type="text" value="CHRIS"/>
<input type="text" value="TINSLEY"/>
<input type="text" value="SENIOR PLANNING CONSULTANT"/>
<input type="text" value="QUARRYPLAN LTD"/>

Address Line 1	<input type="text" value="C/O AGENT"/>	<input type="text" value="QUARRYPLAN LTD&lt;br/&gt;10 SAINTFIELD ROAD&lt;br/&gt;CROSSGAR&lt;br/&gt;CO. DOWN"/>
Line 2		
Line 3		
Line 4		
Post Code	<input type="text"/>	<input type="text" value="BT30 9HY"/>
Telephone Number	<input type="text"/>	<input type="text" value="██████████"/>
E-mail Address	<input type="text" value="████████████████████"/>	

**SECTION B**

---

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the DPD does your representation relate?

- (i) Paragraph
- (ii) Objective
- (iii) Growth Strategy/  
Spatial Planning Framework
- (iv) Policy
- (v) Proposals Map
- (vi) Site Location

4(a). Do you consider the development plan document (DPD) is:

Sound  Unsound

4(b). If you consider the DPD to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6 (available on the Planning Portal Website at [https://www.planningni.gov.uk/index/advice/practice-notes/development\\_plan\\_practice\\_note\\_06\\_soundness\\_version\\_2\\_may\\_2017\\_-2a.pdf](https://www.planningni.gov.uk/index/advice/practice-notes/development_plan_practice_note_06_soundness_version_2_may_2017_-2a.pdf)).

Soundness Test No.

TESTS P3; CE1 AND CE2

5. Please give details of why you consider the DPD to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

If you consider the DPD to be sound and wish to support the DPD, please set out your comments below:

SEE ACCOMPANYING LETTER

*(If not submitting online and additional space is required, please continue on a separate sheet)*

6. If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. There will not be a subsequent opportunity to make a further submission based on your original representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

SEE ACCOMPANYING LETTER

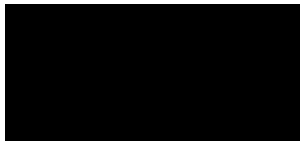
*(If not submitting online and additional space is required, please continue on a separate sheet)*

7. If you are seeking a change to the DPD, please indicate if you would like your representation to be dealt with by:

Written Representation  Oral Hearing

Please note that the Department will expect the independent examiner to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

---

Signature:    Date:  16TH APRIL 2019

File ref: CST/MUDC/DraftPlanStrategy/Creagh



**Quarryplan Limited**

10 Saintfield Road  
Crossgar  
Downpatrick  
Co. Down  
BT30 9HY

T: [REDACTED]  
E: [info@quarryplan.co.uk](mailto:info@quarryplan.co.uk)  
W: [www.quarryplan.com](http://www.quarryplan.com)

Mid Ulster District Council  
Planning Department  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

16th April 2019

Via email: [developmentplan@midulstercouncil.org](mailto:developmentplan@midulstercouncil.org)

Dear Sir/ Madam

**Re: Creagh Concrete Products Limited representation to Mid Ulster Local Development Plan 2030- Draft Plan Strategy**

Further Quarryplan's joint representation made on behalf of a consortium of mineral operators (April 2019), of which Creagh Concrete are a contributor, within Mid Ulster, Quarryplan is instructed by its Client, (Creagh Concrete) to prepare and submit an individual representation to the Draft Plan Strategy (DPS) which is currently the subject of a public consultation. For the avoidance of doubt and to streamline individual submissions we will not reiterate the points made in the joint submission (April 2019), however, it is confirmed that the points made in the submission are the views of the Creagh Concrete and should be recognised as such.

**Background**

Established in 1976, Creagh Concrete has grown to become one of the largest and most innovative producers of concrete products for a diverse range of market sectors throughout the UK and Ireland. These sectors include construction, civil engineering, house building, gardening and agricultural.

Creagh Concrete designs, manufactures and supplies an extensive range of concrete products. The Company operates from its head office in Toomebridge, with bases in Ardboe, Dunloy, Draperstown, Magheraglass, Murnells and Nottingham, England and Edinburgh in Scotland.

Creagh Concrete produces a diverse portfolio of products that continues to grow through research and new product development -the versatility of precast concrete ensures limitless possibilities and potential. Creagh Concrete's success is built upon the continued supply of sand and gravel won within the Mid Ulster District Council area, together with customer service, marketing and flexibility; with each project tailor made to fit the customers requirements.

It is predicted that Creagh Concrete will have an internal production requirement for 1million tonnes per annum, this allows for a modest increase of 3% in demand year on year from current levels, to be won, worked and supplied during the Local Development Plan period. The current demand is at c. 750, 000tpa. The existing split is such that 550,000 tpa is produced at the Company's Brackagh site whilst a further 200, 000tpa comes from Magheraglass and a further 70 000 tpa is purchased from

suitable external sources and used in non-colour sensitive products, such as ready mixed concrete and precast products. There is a shortfall of approximately, in terms of predicted growth, of 250,000tpa which the Company requires to make up through the acquisition of additional approved mineral reserve sites, planning permission and increasing purchases from other supply sources. The reserve at the recently acquired Murnells will provide an additional 100, 000tpa subject to pending planning permission. Currently, the Company has a predicted shortfall of 250Ktpa which will be required to be sourced as soon as possible and needs to be considered by the Council as part of the Plan Strategy for sustaining rural development and mineral supply.

The Companies current mineral resource operations are based at:

- Brackagh Sand and Gravel Pit, Disert Road, Draperstown;
- Magheraglass Sand and Gravel Pit, Magheraglass Road, Cookstown

The Company has also purchased additional resources at:

- Murnells Sand and Gravel Pit , Murnells Road, Cookstown (Subject to Planning) &
- Crocknamohill Greenfield Site , Crocknamohill Road, Draperstown (Subject to Planning)

Replacing the existing total output from Magheraglass & Brackagh with external supplies is not possible at the current cost base. Demand would far exceed existing surplus supply, to accommodate the Applicant's demand would require a significant shift in the regional land-won sand and gravel supply pattern of other external operators resulting in a shortfall in other market areas. In addition, this would see additional pressures being placed on other permitted reserves with the resulting increase in land-take at these sites and the requirement for earlier than currently planned extension applications. Inevitably the increased demand would result in prices increasing substantially. Consequently, the existing Toomebridge, Ardboe and Dunloy businesses would no longer be viable in their current form. In addition, the Applicant's ability to meet 85% of its existing requirement is critical for its cash flow and indeed the entire viability of its business.

### **Extraction Site/Reserve Areas**

Creagh Concrete currently operate two sand and gravel pits the larger at Brackagh, Draperstown and the second at Magheraglass, Cookstown. A third site, at Murnells, Cookstown, has recently been acquired by the Company. Whilst planning permission has been granted at this site as recently as 2013, the Company following the acquisition of the site, have submitted phased development plans and a final restoration concept; neither of which were provided or considered by the competent authority prior to the grant of the 2013 planning permission. These plans denote how the site will be worked, and until they are approved Murnells is unlikely to become fully operational. The operator has identified that there is the potential for approximately 100, 000 tonnes of sand and gravel to be won per annum from the Murnells site for a range of uses, including the associated value-added activities, where the mineral is used in manufacturing processes. As detailed above, the company has several manufacturing facilities across NI and exports good across the UK and Ireland. The resource extracted from Mid Ulster, therefore attracts expenditure in to Mid Ulster from across the UK and Ireland and derives economic benefits from across a much wider geographical area than just the Mid Ulster district. (Exports driving inward investment.)

Creagh Concrete's Brackagh Pit, Draperstown, produces an optimal annual output of some 550, 000 tonnes per annum. Remaining permitted reserves will not sustain the life of the pit throughout the adopted LDP timeframe. The remaining reserves will, at current output levels, be worked over the next 8 years.

Creagh Concrete's Magheraglass Pit, Cookstown, currently extracts at a rate of 200, 000tpa but extant planning permission has been considered at an optimal output level of 350, 000tpa. There are approximately 30, 000 tonnes of permitted reserves remaining within the site. Planning application LA09/2017/1801/F is currently pending a decision, and if permitted has the potential to release up to 1.8 million tonnes of in-situ sand and gravel – thereby providing no more than 9 years (subject to



waste generated via processing) of reserve on the foot of implementation of the planning permission; if granted.

Creagh Concrete's Murnells Pit, Cookstown, is currently not operational despite having planning permission to win and work minerals. This is due in part to the extant permission, whilst delivering the right to win and work minerals, it does not have a detailed geotechnical or approved phased development plans. These development plans form part of the planning application currently with the Council. If permitted, the pit will allow a further 850, 000tonnes of in situ mineral to be worked over a less than 8 year period.

Therefore, in terms of extant approved mineral, Creagh Concete presently have only one approved meaningful landbank at Brackagh, Draperstown; despite the Company's efforts and expenditure on planning and professional fees on average of £100K per annum to secure further permissions with the submission of additional planning applications over the last 2 years.

### **Economic Contribution**

The business has identified demand of some c. 10 - 12 million of saleable tonnes of sand and gravel over the course of the plan period and as such, will require an extension to each of their existing sand and gravel pits, in order to allow the business to satisfy demand over the plan period. Present, consent and submitted planning permissions will (if approved) release no more than 6 million tonnes of in situ sand and gravel; when taking into account the percentage of by product to be removed during processing (silt), the remaining potential reserve for one of NI largest concrete manufactures and one of Mid Ulster's largest private employers, **is less than half amount of saleable mineral required during the plan period.** Despite efforts to secure greater permitted reserves, the Company, like others in the industry has been hampered by the lack of direction from the local planning authority. Presently, the Company has experienced a planning system which has not, as part of its legacy, established a sound mineral planning policy base or qualified development direction. This system has provided an unsatisfactory 'predisposition led planning system' in which large mineral projects, which could secure sand and gravel reserves for 40 years over two of three sites, are not considered appropriate due in part to prevailing paucity of plan led safeguarding and resource identification. This paucity of guidance from the current system greatly diminishes the capacity of the professional application to deliver strategic consents and places the planning officers and the developer at the mercy of a single consultees' alternative agenda; weakening the strategic promotion of 'balanced decision making' and a legislative requirement for a plan led system. Replicating this approach should be avoided at all costs.

As detailed in the accompanying table, the extraction of sand from Brackagh and Magheraglass makes a significant contribution not only to the Mid Ulster District, but also to other regions of Northern Ireland. The accompanying table shows that the turnover generated in lieu of primary mineral won (i.e. total sales) from Creagh Concrete for its Northern Ireland business was some £80 Million of the businesses total £92 Million (GB operations and sales). This is attributal directly to sand and gravel won at their pits within the Council area, but also reflects the Company's experience and ingenuity in converting the raw product into higher value-added products, where the sand is used in manufacturing processes and other products. In this instance, sand and gravels are used for concrete production, pre-cast manufacturing and specialist/bespoke concrete products.

The extraction of sand and gravel from Creagh Concrete's pits, therefore, generates significant economic benefits to the Mid Ulster District and beyond, with manufacturing processes directly reliant upon the mineral. As demonstrated in the joint representation, the evidence base presented by the Council which identifies the contribution of the industry to district, including that of Creagh Concrete, has been grossly undervalued. The policies contained within the plan are therefore not based upon a robust evidence base and as such, the plan is considered to fail to comply with Soundness Test CE2.

Further significant figures include those people directly employed by the Company; some 502 people with a wage bill of £18million, whilst the rateable value of the Company's sites amounts to some £153,000.

## Proposed Mineral Policies

Policy MIN 1 states that:

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

The DPS states that the aim of MRPA’s is to protect minerals **which have important economic benefits ...and which support an ongoing business in very close proximity**. As outlined above, the policies within the plan are not based upon a robust evidence base, therefore the economic contribution of the areas identified as MRPA’s (apart from the Limestone deposit at Cookstown) is questionable.

As demonstrated above, the economic contribution that the extraction of mineral from the Company’s sites extends throughout Mid Ulster and in to other districts in Northern Ireland and is considered to be greater than all those selected by the Council.

No consideration has been provided within the plan or as an alternative within the SA/SEA as to how this mineral resource, which clearly generates economic benefits, will be protected from surface development which could impact its future likelihood to deliver this important resource. As detailed above and understood by the Council, it is the intention to extend the existing quarries at Brackagh, Magheraglass and Murnells and as such, the potential resource and the extension lands should be appropriately identified and safeguarded within the LDP.

Given the economic contribution, the safeguarding of the resource is considered to be a reasonable alternative to the proposed policy however no assessment of the same has been undertaken within the Council’s Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA).

Furthermore, the Council has utilised its discretionary powers in order to take an approach whereby no areas at all have been identified as potentially suitable for future minerals development. Given the restricted availability of supply, given the locational constraints of minerals, surface development, designated sites and habitat constraints and the predicted demand over the plan period, it is considered that these areas could be identified for such as designation. No assessment of such an alternative has been considered within the SA/SEA, specifically for this site or indeed on a Council wide basis has been undertaken, for areas suitable for mineral development despite similar zoning for other forms of development that are less restricted by location.

As detailed in the Quarryplan joint response (April 2019), the Council’s approach in failing to designate such areas is considered to be insular and prohibitive, particularly in the light that mineral can only be worked where it is found and that the district is by far the single biggest sand and gravel producer in Northern Ireland.

As a result of the above, the policy is considered to fail to comply with Soundness Tests P3, CE1 and CE2.

Policy MIN 2 states that:

*“In Areas of Constraint on Mineral development (‘ACMD’) the extraction and processing of hard rock and aggregates will conflict with the Plan...elsewhere, extraction and processing of hard rock and aggregates will conform with the Plan, subject to environmental and transportation considerations”.*

Our client welcomes the fact that sites at Brackagh, Magheraglass and Murnells have not been identified within the proposals maps as falling inside an ACMD. Given that the extraction of sand from two of these sites are currently the subject of a planning application, any proposed designation is considered likely to be seriously prejudicial.

The policy states that

*“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”;*

The DPS states that the aim of MRPA’s is to protect minerals which have important economic benefits. As outlined above, the policies within the plan are not based upon a robust evidence base, therefore the economic contribution of the areas identified as MRPA’s (with the exception of the Limestone deposit at Cookstown) is disputed.

No detail is provided within the DPS as to how this the mineral resource at Brackagh, Magheraglass or Murnells or other sand and gravel resources within the district, which clearly generate economic benefits, will be protected from surface development which could impact their future likelihood to deliver this important resource, or indeed how the MRPA’s included were selected. As detailed above, it is the intention to extend the existing quarry sites and as such, the potential extension lands should be appropriately identified and safeguarded within the LDP (see attached Figures 1, 2 and 3 denoting safeguarding areas in which there should be a presumption in favour of future resource at Brackagh, Magheraglass and Murnells respectively). These proposed areas of safeguarding are provided based on, inter alia, the provision of existing operations and infrastructure. However, other unworked areas and sites should also be considered by the Council where the sand and gravel (economic) mineral resources, which are clearly important to the Council area, are proven through geological analysis.

Given the economic contribution, the safeguarding of the resource is a reasonable alternative to the proposed policy however no assessment of the same has been undertaken within the Council’s Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA).

**Policy MIN 2** states that:

*“In Areas of Constraint on Mineral development (‘ACMD’) the extraction and processing of hard rock and aggregates will conflict with the Plan...elsewhere, extraction and processing of hard rock and aggregates will conform with the Plan, subject to environmental and transportation considerations”.*

Our client welcomes the fact that all of their operational site have not been identified within the proposals maps as an ACMD. As detailed within the joint response, our client is **opposed** to the designations of ACMD’s until such times as the Council has **robust evidence** upon which to base any future designations upon. As detailed in the joint response, the existing evidence base is inadequate.

As outlined separately within the joint submission Creagh Concrete have asked us to emphasise their concerns regarding the contradictory wording of the policy which indicates that such development will conform with the plan and therefore a presumption in favour of mineral development exists, whilst setting a higher bar than is prescribed in the SPPS which seeks a balanced approach to mineral decisions, whereas the policy introduces the requirement for a precautionary approach. This approach is unjustified, and no assessment has been provided as to the introduction and why the Policy should run contrary to the SPPS.

Furthermore, the introduction of the term “significant biodiversity loss” under MIN 2 has no basis or definition in guidance and is considered will add confusion rather than clarifying the existing difficulties encountered in interpretation of PPS2 and in particular NH5 policies. The Local Development Plan Strategy provides an opportunity to provide clarity of interpretation and the introduction of undefined tests without justification or assessment within the supporting SEA is unsound. As highlighted earlier, it is considered that this paucity of information and therefore certainty, greatly diminishes the capacity of the professional application of sound judgement and places the planning system and the developer at the behest of a single consultees’ alternative agenda; weakening the strategic promotion of balanced decision making

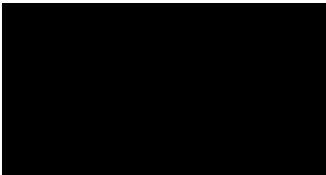
As a result, the policy is considered to fail to comply with Soundness Tests CE1 and CE2.

To conclude further consideration of the true value / contribution to the Mid Ulster Economy by the Council is encouraged before moving on to the next stage, given that the figure of £13.2M quoted is so far removed from the reality that it cannot reasonably be relied upon as being evidentially sound. Upon establishing an accurate picture regarding Value / Contribution of the Mineral Industry within Mid Ulster the Council are encouraged to consider extending proposed designations to protect against alternative forms of surface development and the proposition of Area Suitable for Mineral Development commensurate with the actual contribution derived from the resource, from which all subsequent prosperity is derived.

For the reasons set out within this individual representation and detailed within the joint representation, submitted under sperate cover, our clients consider the plan to be **unsound**, based upon its failure to comply with a number of the soundness tests, specifically Tests P3, CE1 and CE2.

I trust that the above is acceptable, however, if you wish to discuss any of the same please do not hesitate to contact me.

Yours sincerely,



**Chris Tinsley MRTPI**  
**Senior Town Planning Consultant**  
Enc



Site Address	Operator Name & HQ	Aggregate Extracted since commencement	Yearly Extraction rate	Remaining Reserves	Demand up until 2030 (2019-30)	Time remaining on Existing Planning	Extension Potential	Do You intend to expand this site before 2030
Disert Road Draperstown	Creagh Concrete Products Limited 36 Blackpark Road, Toome	15 Million tonnes	250K to Maximum of 550K tpa  Depending on market conditions	Estimated at 3.5million saleable tonnes following grant of planning permission in 2019.	6 million tonnes	Circa 8 years	Yes. Company controls and has vested interests in lands north, east and west of existing operational activities  See attached Plan Brackagh Potential Expansion Plan	Yes Recent grant of planning permission potentially releases estimated 3.2million tonnes of mineral  Likely northerly and westerly extensions in the plan period as stipulated.
Magheraglass Road Cookstown	Creagh Concrete Products Limited 36 Blackpark Road, Toome	3 – 4 million tonnes Following purchase of the site by Creagh in mid 1990's.	150 – 200 tonnes per annum	30,000	2.2million tonnes	Less than 1 month	Yes  Company have vested interest in lands to the west and east of the site. See attached plan. Magheraglass Potential Expansion Plan.	Yes. Planning Application currently pending decision by Council.  Company have vested interest in lands to the south, west and east of the site. See attached plan.  Likely easterly and south westerly directions.

Murnells Road Cookstown	Creagh Concrete Products Limited 36 Blackpark Road, Toome	50, 000 tonnes following purchase of site in 2016	Maximum of 100K tpa	Estimated at 80K tonnes under historic grants of planning permission	1.1million tonnes	Less than 1 month	Yes  Company have vested interest in land to the south and north of the existing site.	Yes. Current application with the Council which will release c. 850, 000 tonnes of mineral and rationalise the site.  Further mineral will be required to sustain the company and downstream value added products. Likely northerly extension to be submitted in the time period as stipulated.
Land to the north of Crocknamohill Road and East of Iniscarn Road, Draperstown	Creagh Concrete	None- site has been the subject of an EIA scoping exercise. No planning application has yet been submitted.	Proposed to extract up to 130,000 tonnes per annum.	0.5 million tonnes of in situ sand and gravel	3.8 years of life if granted planning permission	No planning application yet submitted.	Potential to extend in North and North West	Whilst at present there are no plans to expand the site before 2030, The Site may require future expansion, dependent upon future market conditions and availability of land- won sand and gravel.


Other Info

Turnover: £80million per annum

No. of staff employed: (Extraction) = 18  
(Manufacturing) = 502 Total in Mid Ulster  
Indirectly -sub consultants = 74

Annual Wage Bill: £18 million (500 jobs and 135 contractors).

Annual Rateable Value: £153, 188

Signed:  


On behalf of: *Creagh  
Concrete Products Limited*

Date: *17<sup>th</sup> April 2019*

Figure 1: Brackagh Draperstown  
Proposed Safeguarding and Proposed Economic Mineral Resource Area  
Creagh Concrete Products Limited




Proposed Safeguarding/  
Resource Area



Current Permitted Operational Area



Figure 2: Magheraglass, Cookstown  
Proposed Safeguarding and Proposed Economic Mineral Resource Area  
Creagh Concrete Products Limited

  
Proposed Safeguarding/  
Resource Area

  
Current Operations and Pending 2017 planning application LA/2017/0382/F



Source: Google Earth



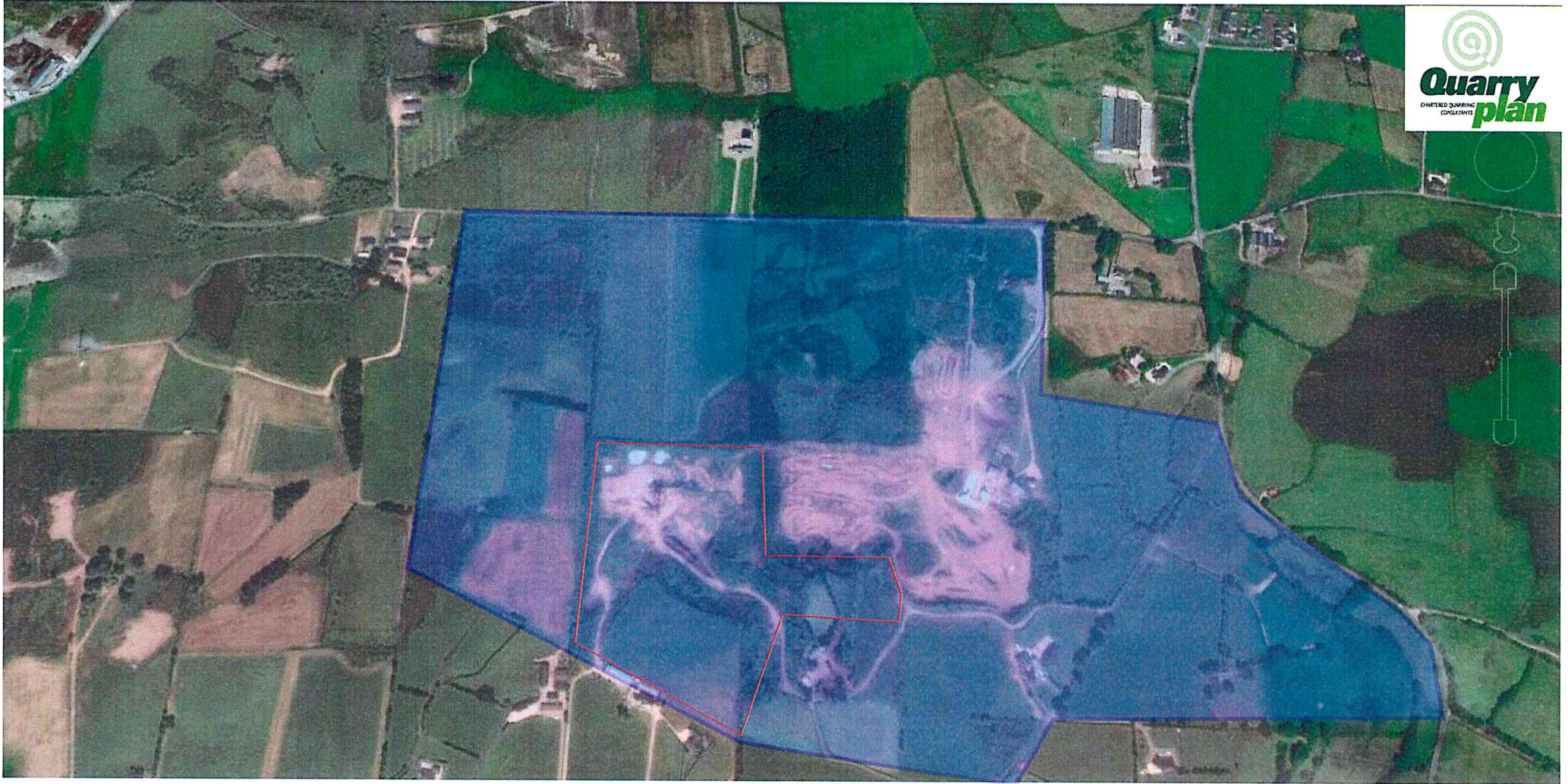


Figure 3: Murnells, Cookstown  
Proposed Safeguarding and Proposed Economic Mineral Resource Area  
Creagh Concrete Products Limited



Proposed Safeguarding/  
Resource Area

Current Operations and Pending 20187planning application LA09/2017/1801/F



Source: Google Earth