

Elaine Mullin

From: ann malone [REDACTED]
Sent: 19 April 2019 15:53
To: DevelopmentPlan@midulstercouncil.org
Subject: Local Development Plan consultation submission
Attachments: Targeted Threat Protection: Unsafe Links

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Dear Sir/madam,

Please find attached my response to the Draft local development Plan consultation.

Best regards

Pauline McHenry

Elaine Mullin

From: Postmaster <postmaster@midulstercouncil.org>
Sent: 09 May 2019 14:17
To: DevelopmentPlan@midulstercouncil.org
Subject: [Postmaster] Attachment Release
Attachments: MUDC response to Draft Local Development Plan.docx

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consultation submission
Message Date : Fri, 19 Apr 2019 15:53:52 +0100

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Development Plan Team,
Planning Department,
Mid Ulster District Council,
50 Ballyronan Road,
Magherafelt,
BT45 6EN

Response to Draft Local Development Plan 2030

Dear Sir/madam.

I would like to state at the outset that I wish to make a representation, with the possibility of an agent attending, to be heard orally at the independent Examination as per paragraph 15 of the PAC document procedures.

Procedural tests

P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?

P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

Consistency tests

C1 Did the council take account of the Regional Development Strategy?

C2 Did the council take account of its Community Plan?

C3 Did the council take account of policy and guidance issued by the Department?

C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

Coherence and effectiveness tests

CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

CE3 There are clear mechanisms for implementation and monitoring; and

CE4 It is reasonably flexible to enable it to deal with changing circumstances.

Firstly I strongly object to the predetermined structure, format and design of the draft Local Development Plan (LDP) and indeed the 3 criteria tests established for the Soundness Test. This breaks the soundness rules of P1, P2, P3, P4. The authors of this draft plan have predetermined a strict framework essentially making sufficient provisions to ensure that mining of precious metals and minerals plus the installation of wind turbines in Mid Ulster District Council is essentially guaranteed, against the will of the people – the Regional Development Strategy(RDS) does not mention precious metals and minerals which the Mineral Developments Section is largely based around. Rural Proofing effectively has been ignored, or paid lip service, by this LDP and in particular the safeguarding of rural communities. The LDP must be rewritten, all reference to precious metals and minerals removed.

This draft plan has at no point allowed our people the opportunity to choose what we wanted or did not want in our area. The actual designations of Special Countryside Areas, Tourism Opportunity Zones, Areas of Minerals Development, Areas of Constraint on Wind Turbines and high Structures, Tourism Conservation Areas, even Dispersed Rural Community etc. are predetermined and seemingly forged in stone.. On what basis of soundness were these areas determined, by whom, based on what criteria, who was consulted, what were the factors considered and for what purposes were these designations formed? These designations must be removed as they merely limit the options and is in strict contradiction to CE4. By creating these designations and then allowing for exclusions MUDC is effectively providing a roadmap to industrialise the MUDC region. Furthermore FODC use entirely different terms, different designations, different elements to for exclusion and different criteria hence by definition this RDS does not meet P4 and C1.

The vast majority of people do not want precious metal & minerals extraction or processing, the installation of more wind turbines, instead they want The Sperrins to be left intact and indeed, developed sympathetically as a core tourism destination. This is at odds of with the LDP and as a consequence fails P1-4,C1-4 and CE1-4.

At no point in previous Local Development Plans or RDS was precious metals and minerals even considered. Minerals Development, in terms of sand and aggregates, was considered in a sustainable, manner being sympathetic to the environment. The MUDC has essentially side-lined The Sperrins as an integral element of the tourism strategy, which has the potential to secure our economic livelihoods and our environment for generations to come. The LDP must be rewritten, all reference to precious metals and minerals removed. The MUDC has only experience of Minerals Development – aggregates, sand and gravel. There has never been any precious metal and mineral processing in MUDC, which requires a chemical processing element. This is an entirely more complex process requiring full environmental, health and economic assessments. Please remove any reference to valuable minerals and mining.

The travesty of this draft plan is that by allowing or facilitating the industrialisation of The Sperrins, MUDC are putting at risk the health of our people, aiding the devastation of our environment and fundamentally destroying tourism, agriculture and fishing in this region. The focus on tourism and the development of a truly

sustainable tourism product, lasting generations is being abandoned for the financial gain to foreign corporations, with little direct benefit to our economy, to facilitate a short termism strategy to rape and pillage our lands of our natural resources. MUDC, by pursuing this agenda and advocating this draft local development plan in its current form is complicit in facilitating the associated detrimental health, environmental and economic consequences of the industrialisation of the Sperrins. This LDP must place tourism as the core strategy for the entire Council area. It is failing soundness tests P1-4, C1-4 and CE 1-4.

The Local development Plan has essentially attempted to achieve “sustainable Tourism” by totally restricting the tourist areas to small self determined (MUDC planners) zones; Tourism Opportunity Zones & tourism Conservation Areas. The entire region is an unexploited and hidden tourism hub that was set aside for precious metals and minerals and the industrialisation of the Sperrins (wind turbines, Telecoms, high structures etc) by the MUDC and FODC.

Tourism funding (Sperrin Tourism) was deliberately removed from this region in 2013 and hence tourism was not allowed to develop which is a disgrace. These zones should be removed in the LDP and the entire Sperrins area should seek National Park status, as intended by Alex Attwood in 2012 (failed soundness P1-4,C1-4 and CE1-4). With the proper funding The Sperrins has the potential to become one of the most visited tourism destinations in Ireland. This is much more in line with the Regional Development Plan, Strategic Planning Policy Statement, Rural Proofing and HRA than being exploited for twenty years by a foreign coming before becoming a polluted burden to the taxpayer. Failed soundness P1-P4, C3, C4, CE1-2

It is fundamentally clear that MUDC has interpreted the various plans and strategies to focus on what is effectively known as the precious metals and minerals agenda and the industrialisation of the Sperrins and surround areas under the auspices of sustainable development. This regional and local development plan has been misinterpreted and contravened the spirit, ethos and direct intent of European Directive 2001/42/EC (SEA Directive). The entire plan fails the Habitats Directive (92/43EEC) “on the conservation of natural habitats and of wild fauna and flora”. Essentially the Local Development Plan attempts to develop minerals development at the expense of our AONB, Natura 2000 sites, SPAs, SACs and Ramsar Sites. Failed soundness P1-P4, C3, C4, CE1-2

MUDC is now making itself liable for future health and environmental claims based on their role in designing, facilitating, advocating and implementing these toxic and destructive proposals. The Local Development Plan (LDP) is evidence of same.

To reiterate, MUDC should now be fully aware of the potential health, environmental and economic consequences of this precious metals and mineral agenda (termed minerals development) and wind turbine strategy hence MUDC is fully liable for all future claims if this policy proceeds. The LDP must be rewritten, all reference to precious metals and minerals removed. P1-P4, C34, CE1-2

Despite having manipulated the format of the draft Local Development Plan by establishing a template to facilitate the industrialisation of The Sperrins the people have clearly voiced their opinion in support of the same. This process was extremely

complicated for the lay person to participate and engage in. One example of this is the requirement to base our consultation responses on the soundness principle. This was laughable when this was the first occasion the Soundness test was used for public consultation. This clearly demonstrate the various obstacles and techniques used to prevent local people from making a submission.

This local Development Plan fundamentally fails of Soundness test C4 and CE1 namely the Precious metals and minerals extraction and processing in the Sperrins including Uranium mining in Fintona area, Diamonds in Clogher Valley, Geological Disposal Facility in The Sperrins to store higher activity radioactive waste including Naturally Occurring Radioactive Materials (NORM), wind turbines in the Sperrins and the consequential health effects (Appendix 1), the roll out of 5G (appendix 2), an experimental technology that is medically and expertly proven to cause harm to humans and environment, in each town and then larger masts in the rural areas.

This LDP grossly fails to consider trans and cross boundary plans despite having detailed in 1.42 of local development plan C4, CE1,2.

It seems that MUDC has unilaterally adopted a precious metal and minerals strategy, and indeed the industrialisation of the Sperrins areas (ANOB – site specific) with total disregard to the local communities, while ignoring the main focus of the Strategic Environment Assessment (SEA) and consequently the related European Legislation, Regional Development Strategy (RDS), 2035, Habitats Regulation Assessment (HRA), and Strategic Planning Policy Statement (SPPS). The entire draft LDP has failed to take into account any Health legislation and indeed Human Rights(Under the Charter for Fundamental Rights) Legislation. The entire LDP will fails to comply with the Aarhus Convention and the Climate change legislation breaching soundness test P3,P4, CE1-4 C1-2.

Waste Management

The LDP, essentially embarked on extracting precious metals and minerals has failed to take the necessary regulations in terms of extraction and waste, namely EU legislation on extractive waste. This is not addressed on Minerals, Min 1-6, Environmental Policies chapter, Natural Heritage and in particular Waste Management WM1-4. It also fails soundness tests P1-4, C1-4 and CE 1-4.

Directive 2006/21/EC of the European Parliament and of the Council on the management of waste from the extractive industries

Implementing measures

In accordance with Article 22(1) of the Directive, the Commission has adopted by Comitology the following implementing measures:

1. Commission Decision 2009/337/EC on the Criteria for the classification of waste facilities in accordance with Annex III, adopted on 20/04/09, published on 22/04/09 (L 102, page 7)

2. Commission Decision 2009/335/EC on the Technical guidelines for the establishment of the financial guarantee, adopted on 20/04/09, published on 21/04/09 (L 101, page 25)
3. Commission Decision 2009/360/EC completing the technical requirements for waste characterisation, adopted on 30/04/09, published on 1/05/09 (L 110, page 48)
4. Commission Decision 2009/359/EC on the Definition of inert waste in implementation of Article 22 (1)(f), adopted on 30/04/09, published on 1/05/09 (L110, page 46)
5. Commission Decision 2009/358/EC on the Harmonisation, the regular transmission of the information and the questionnaire referred to in Articles 22(1) (a) and 18, adopted on 29/04/09, published on 1/05/09 (L 110, page 39)

In accordance with Article 22 (2) (a, b and e), the Commission has given a mandate to CEN in order to develop the required standardised sampling and analysing methods. CEN has also been mandated for the interpretation of the definition of inert waste, pursuant to article 22 (2) c). The final report was published end of 2012. For more details on the standards, please click here.

The Commission has also formally adopted a reference document on the Best Available Techniques (BREF) on the management of waste from extractive industries .

Other relevant EU legislation

- Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances (Seveso III)
- Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (IED)
- Directive 2008/98/ EC on waste and repealing certain Directives of the European Parliament and of the Council of 19 November 2008 on waste (Waste Framework Directive)

The entire draft LDP has failed the soundness test to take into account any Health legislation and indeed Human Rights(Under the Charter for Fundamental Rights) Legislation. The entire LDP will fails to comply with the Aarhus Convention and Climate Change legislation

Cross Boundary and Transnational boundaries

The lack of consideration of this regional significant project results in failing P1-4, C1-4 and CE 1-4 of the Soundness tests.

All cross boundary exploration and prospecting license (over 25% of land area of Northern Ireland) has been entirely ignored C4, CE1,2. Specifically no consideration

has been afforded to the FODC planning application - (LA10/2017/1249/F), a regional significant project and the catalyst for the rollout of the precious metals and minerals agenda. On the basis of the precautionary principle this Local Development Plan should have considered the impact of these proposals.

Just for clarity I will take an opportunity to provide the assessors a clear understanding of the planned impact of this single project and wider plans.

Dalradian Gold, intends to build the largest cyanide based gold processing plant in Western Europe, to be located in Greencastle Co. Tyrone. This is the catalyst for the roll out of the precious metals and minerals strategy (valuable minerals).

Indeed Dalradian has only officially identified one mining site (997 hectares) in its planning application however Dalradian intends to develop a "mine camp" (Patrick Anderson, MD of Dalradian) on its 122,000 hectare exploration and prospecting licenced area categorically impacting on C4 and CE01. All the various departments are fully aware of these plans and indeed the plans for companies that have purchased the licensing and exploration licences for over 25% of the land area of NI yet this information has not been filtered into this LDP, Why not? The LDP must be abandoned until this is carried out and the appropriate health, environment and economic assessments are carried out at a regional level, assessing the cumulative impact of these plans. It also fails soundness tests P1-4, C1-4 and CE 1-4.

The proposed cyanidation gold processing plant and mine network including mercury smelting plant, currently seeking planning permission, is in beach of C4 & CE1,2. This project is the catalyst for the rollout of the precious metals and minerals agenda that will detrimentally affect the health of the people, environment and economy (tourism, agriculture and fishing) of FODC & MUDC prior to be the forerunner to the storage of radioactive nuclear waste, based on the current policies, strategies and infrastructural works undertaken and planned.

The proposed toxic project is situated in an Area of Outstanding Natural Beauty, less than a kilometre from the local 160 pupil primary school and pre-school, community centre, playing fields & church. It is on an elevated hillside (approx 300m above sea level) exposed to wind, snow, rain with numerous underground water channels, ideal to spread pollution, and certainly not suitable for a proposed dry stack tailings storage facility.

The majority of local people are completely opposed to this toxic proposal and the associated health and environmental risks. The toxic discharge into the local rivers includes acid water (sulphuric acid), Mercury, lead, cadmium, chromium, Zinc, copper, arsenic, lead, nickel, etc. The area has one of the highest radon levels in the UK with an increased risk of radioactivity damaging people's health. MUDC must consider these and in terms of

Dalradian proposes to use 2 tonnes of cyanide per day, 365 days a year, where one gram of cyanide is enough to kill an adult human.

The huge toxic waste storage facility will be 895m by 365m by 53m high – 17 storeys high – when exposed to the air will release toxic chemicals such as lead, arsenic mercury, zinc and cadmium. The chances of skin, kidney, respiratory illnesses or cancers are high. This toxic tailings dust, given the elevated site and high wind levels, will spread widely to agricultural land, be ingested by native wildlife/agricultural animals and enter our food chain. MUDC will also be effected. Transportation of low grade gold/precious metals and minerals will have to travel throughout MUDC by roade.g. Greencastle will have a severe impact on Tran 4 and tourism Tou1-Tou4, AFE1-2. A full culmulative health, environmental and economic appraisal must be carried out. Precious metals and minerals must be prohibited from the area. Local Planning priorities must take precedence over any regional strategy.

All of the mine related figures come from Dalradian's own application, which is dealing with only ONE mine on a 997 hectare site. Dalradian has licences for 122,000 hectares. The requirements for this ONE mine is: Settlement ponds is 145million litres is toxic waste, 4.3m litres of diesel to run plant annually, electrical power equivalent to run 15,000 homes annually, 750,000 litres of water per day with the company claiming that it will come from rain water and recycling, this is fantasyland as they intend to use underground aquifers hence destroying our rivers and water table – this will be necessary when it is scaled up for the other mines. All government departments, like Dalradian, has focused on this single application, despite Dalradian announced the Mine camp scale of this enterprise. All departments have been working with Dalradian for several years hence by not addressing these issues in this LDP they too are negligent.

On 28 April 2017 the European Parliament voted with an unprecedented and overwhelming vote of 566 in favour and 8 against for the European Commission to ban the use of cyanide-based mining in the European Union as soon as possible. Our Civil Servants, political parties and DC are actively working to impose this toxic enterprise in this beautiful part of the world, sure to be detrimental to our health and environment. Our local development plan must NOT facilitate this destruction.

This particular application will inevitably directly impact on our major waterway flowing into the Strule, Mourne and then Foyle Basin. Even without pollution incidents Dalradian and the NIEA are in court as part of a judicial review to get the judge to rule that NIEA's original increased consent levels, be upheld. This I believe increased the consent discharge levels of 9 elements with, I think zinc, up to 10 times the current permitted levels. This is apparently a kill licence for aquatic live,

given that there are protected pearl mussels and salmon in that stream, they effectively have no chance – cumulative build up.

This coupled with the fact that NI Water only monitors and treats a select number of elements in its water treatment plants, the toxic sediment released from the cyanide processing will go directly into our drinking water, particularly heavy metals which are not even tested. NI Water must be held accountable based on health and environmental impacts. The LDP must be written so as to ensure that no precious metal and mineral mining should occur unless all potential contaminants are identified, EU consent parameters established, monitoring plan in place and most importantly a commitment that all water treatment plants are capable of providing clean drinking water, free from contaminants & heavy metals including lead, which it doesn't do at present. Breach C1-C4, P3&4, CE1-2

Dalradian intends to blast 1700 tonnes of material a day, grind to a the consistency of a fine sand, increasing volume and surface area, resulting in dust, PM10 and PM2.5. This ground material, will be placed on a tailings dump to be 895m long, by 375m wide and up to 17 storeys high (53m).

The dust, when processed, will also contain things such as arsenic, lead, zinc chromium plus whatever inherent radioactive properties they possessed.

The PM10 dust will spread for many miles just look at the Sahara dust. However the PM2.5 can spread hundreds of miles.

With PM2.5 when you breathe this dust, given its fineness, it stays in your lungs.

This tailings dump will be situated 300m above sea level, on top of a mountain, having extremely inclement weather (wind, rainfall and lower temperatures - not suitable for a dry stack tailings dump) being only over 1 km from schools with 160 pre school and primary school pupils and Greencastle village a little further.

Pregnant women, elderly and young children are the most susceptible to this.

To dislodge the 1700 tonnes, for this single mine (going to be many more throughout the country) there intends to be 2 blasting times, with two blasts with each blast having up to 25 explosive charges. This will happen 365 days per year.

To put things into further perspective, given the amount of explosives, the storage of up to 20 tonnes of cyanide on site, the mercury smelting facility, the cocktail of other dangerous chemicals, the smelted gold onsite, Greencastle will become the largest militarised facility we have seen. Is this what we want in our LDP – what will be the impact on tourism then. This has to be stopped.

Ammonia, a by product of Dalradian's proposed toxic cyanide gold processing plant, largest in Western Europe, to be situated in Greencastle Tyrone. NIEA is not too concerned with this, at all.

Security

Incidentally, if Dalradian gets its way all policing costs will be picked up by the

taxpayer, possible with contributions from MUDC. Dalradian, when mining its tiny exploration adit (small tunnel), had to have PSNI security for the delivery of explosives. After 8 months the PSNI sent Dalradian an invoice for £440,000.

Dalradian is disputing this in court. If they win the PSNI will be forced to police not only this mine, but all of Dalradian's other mines plus the mines of other mining companies. This will potentially cost us the tax payer tens of millions of pounds per annum.

Bear in mind, gold and silver is tax exempt, the only party after Dalradian's shareholders to benefit is the Crown Estates, receiving 4% of revenue. FODC or indeed NI assembly will not benefit from this precious metals and minerals strategy. Our health service, education service or welfare services will not benefit. Instead our health services will be burdened with the resultant additional health issues(respiratory, cancers, neurological, dermatological, mental health, etc)

Bear in mind tourism in this area has grown substantially particularly in the past 25 years. You would have witnessed a marked improvement in the tourism project since 1987, all this to be put in jeopardy for what, a mine which will be operational for at best 20 years. The loss of sustainable jobs in our tourism and agricultural industries will grossly outweigh the few local job offered by mining in the short term.

In the draft local development plan it is clear that specific policies and re-designations were designed to effectively decimate our AONB in pursuit of this industrialisation agenda. This seems to be clearly at the expense of our peoples' health, our environment and without any thought for our existing tourism product or our expanding tourism economy and its future potential.

The actual local development draft plan effectively airbrushed core issues such as the internationally designated RAMSAR site, the archaeological sites within The Sperrins area demoting other Special Areas (SACs, ASSIs and Nature Parks) to permit the industrialisation of The Sperrins. This is without even having an opportunity to discussing the imminent plans to impose 5G (See Appendix 2), a proven unsafe experimental technology that is intended to be rolled out across the entire district.

Just 5km from largest raised bog in Europe, The Black Bog, an internationally designated RAMSAR site, also ASSI and Natura 2000 site, which Dalradian has effectively ignored in their 10,000 page planning proposal.

Bear in mind this planning proposal essentially ignores or downplays the detrimental impact on the Black Bog. Dalradian plans 256 daily trips (365 days per year), vast majority by lorries, with associated diesel pollutants and CO2 emissions, these are the journeys that Dalradian has admitted for this application.

Bear in mind Dalradian's proposed plan is based on 997 hectares, however Dalradian will have many more mines given it has exploration licences for 122,000

hectares.

Several hundreds of daily journeys will be on these roads that NIEA, DfI or any other civil service department have not taken into account of. Dalradian continues to insist in public correspondence that as it is not on their application nothing else can be considered. There seems little hope for The Black Bog!

Dalradian has been working with the civil service departments for many years hence they have obviously been following their advice! How to successful gain planning approval!

The real issue is 25% of the land area of the north has been sold to these prospecting companies. How much additional pollution will this bring then?

The council should be using the Local Development Plan to safeguard this unique living wetlands having already taken several thousands of years to grow. Indeed FODC should use the Local Development Plan to protect our Ramsar sites, ASSIs, SACs, nature parks and AONB, instead of deliberately creating loopholes to allow mining and the saturation of wind turbines, as part of it's industrialisation of the Sperrins plan .

The reality is our people are the only protectors of our land and environment, we have been totally betrayed by the civil service departments and politicians. This LDP is another example of the workings of our civil servants against the public interest (failing all soundness tests criteria)

Their aim is to have gold, silver, cobalt, lithium, potentially copper, zinc and definitely uranium mines located throughout this region, with the intention later for fracking and lignite extraction.

The catalyst of this plan is to have the largest cyanide gold processing plant in Western Europe to be situated in Greencastle Tyrone. The NIEA and Dalradian are currently taking legal action to ensure the current water standards are very relaxed to essentially pollute our water. Water which we drink. The entire water system, will be polluted if these precious metals and minerals are extracted and processed

Our water treatment plants do not test for or treat heavy metals, a definite by product of precious metal mining & processing, hence we will be consuming these chemicals essentially oblivious to our regulatory bodies.

There are no plans for modernisation of water treatment plants, given the vast expense, so our people will effectively be slowly poisoned, all in the knowledge and authorisation of our civil servant departments, supported by the political parties.

This will be permitted as we do not have an Independent Environment Protection Agency (EPA) and the NIEA's role is to primarily support the developer, in the pursuit of economic growth, regardless of risk, providing the developer can get their consultant to produce a report stating same.

The health of our people, by the direct impact of this precious metals and minerals policy, specifically in terms of water and air pollution, will inevitably be put at risk.

The civil servant departments, supported by our political parties, have clearly placed economic growth, to be more important than our health in terms of what is best for the public interest.

Incidentally there has been no regional health, environmental or economic impact studies on the implementation of this precious metals and minerals strategy. The cost benefits in terms of health, tourism, agriculture and environment would greatly outweigh any financial gains.

The only winners would be these foreign mining companies and their shareholders.

The Sperrins despite it being an Area of Outstanding Natural Beauty, is essentially being designated an industrialised zone with a plan for several commercial wind farms prior to it being used for the storage of higher activity radioactive nuclear waste.

The underground higher activity radioactive waste geological storage facility was sanctioned by the SF/DUP NI Executive, supported by all main political parties, and is in legislation in The White Paper - Implementing Geological Disposal July 2014. This decision will be imposed on us by Westminster government who have given themselves power to do so in July 2015, by declaring this of national significance. This has been totally ignored by MUDC, a fundamental oversight given that all District Council CEO's were informed by letter in January 2018 the Geological Disposal Facility consultation. This was not placed in the public domain hence there were only 7 responses. The council CEO can in theory be considered negligent, given that this should be considered in the Local Development Plan. If approved this will have significant detrimental impact on our future. All supporting information, including July 2014 White Paper – implementing Geological Disposal – stating that Northern Ireland Executive have agreed to accept higher activity radioactive waste, Westminster ruling in July 2015, the current infrastructural plans and programme of works clearly point to this Geological Disposal Facility being sited in The Sperrins. This “oversight” in not including provision for a Geological Disposal Facility is tantamount to negligence. The Local Development Plan must now be written to include for provision of the GDF.

The above activities will make us an industrialised mining and wind energy region, with industrialised intensive farms, being the dumping ground for the UK and Europe's nuclear waste, however if Brexit occurs, we will be the global nuclear waste receptacle, namely USA, Japan, Australia and Canada.

This will all detrimental damage our water and air supplies.

Below is a some examples of where MUDC failed to meet the soundness test however I am really only touching the surface of issues.

Procedural tests

P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?

Community involvement specifically from the people of MUDC, has been ignored at the expense of mineral development (precious metal and minerals specifically), designation of areas, furtherance of the installation of wind turbines at the expense of community health, environment or objections

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?

They have essentially ignored the outcry regarding the goldmining and use of cyanide but worse still they have actually developed mitigating measures based on Dalradian's planning application. The outcry regarding wind turbines has been essentially ignored, even areas which are saturated with wind turbines is deemed to still have capacity while The Sperrin ANOB is now a targeted area for Wind turbines. The protection of the environment has been ignored in the pursuit of industrialisation hence the re-designations and opening up the region for industrialised processes. The recent motions taken by the council and expanded on by the local councillors to ban goldmining and stop Permittable Development Rights must be included in the LDP.

P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

No the key elements of the SEA was for sustainable development this has not been specifically considered in relation to the overall plans for the industrialisation of The Sperrins AONB. The Sperrins AONB must remain intact hence the entire LDP must be re-written to accommodate same.

Consistency tests

C1 Did the council take account of the Regional Development Strategy?

No – indeed based on the soundness tests C1-C4 this LDP totally contradicts even itself given that in Section 1 it lists many documents and legislation that the LDC is based upon however C1, by definition only requires “Did the council take account of the Regional Development Strategy”.

RG11 text states that areas of landscape quality should be protected and that the countryside should be protected from inappropriate development. The Council has facilitated Dalradian through the designations developed, the Draft Policy Min01 explicitly through the policy clarifications. This policy clarification should be used to protect The Sperrins environment, the health of the people and the tourism infrastructure. As detailed in RDA key concerns are the air quality and water quality of Northern Ireland. These have been sacrificed in the policy clarifications.

The RDS states to Protect and extend the ecosystems and habitats that can reduce or buffer the effects of climate change. Many ecosystems and habitats (such as peat

bogs) act as sinks or stores for carbon if undisturbed. The FODC propose to destroy these areas by the adoption of this minerals development policy (FODC use this to mean precious metal and minerals)

The RDS 2035 does not mention mineral development at any point let alone linking it to precious metals and minerals which FODC has done. Instead please find below the RDS 2035 index showing the key Strategic Guidance – Economy, Society and Environment with all areas focusing on sustainable development. In terms of the economy the actual focus is on tourism. The environment is fully focused on sustainability, particularly protection of our air, water and natural environments while minimising waste (something which precious metals & minerals cannot achieve by the very nature of this dirty industry)

Strategic Guidance

1. ECONOMY

RG1	Ensure adequate supply of land to facilitate sustainable economic growth	31
RG2	Deliver a balanced approach to transport infrastructure	33
RG3	Implement a balanced approach to telecommunications infrastructure that will give a competitive advantage	34
RG4	Promote a sustainable approach to the provision of tourism infrastructure	35
RG5	Deliver a sustainable and secure energy supply	36

2. SOCIETY

RG6	Strengthen community cohesion	38
RG7	Support urban and rural renaissance	38
RG8	Manage housing growth to achieve sustainable patterns of residential development	40

3. ENVIRONMENT

RG9	Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality	43
RG10	Manage our waste sustainably	47
RG11	Conserve, protect and, where possible, enhance our built heritage and our natural environment	47
RG12	Promote a more sustainable approach to the provision of water and sewerage services and flood risk management	51

Prior to that the Regional Development Strategy Volume 1 Environmental Report 2010, does indeed refer to mineral development, however this mineral development purely focuses on aggregates with no mention of precious metals at any point.

The Strategic Environmental Assessment refer to minerals on many occasions however not once is it implied that the minerals are precious metals or minerals.

Alarming is that “aggregates such as sand, gravel, and limestone are widespread within the council area and can be found within the council area and can be found in areas of high scenic value and environmental sensitivity.” What is the basis of this – how many quarries are in ANOB or high scenic value areas – this is paving the way for the next killer sentence!

“Valuable minerals such as gold, silver, lead and copper are also present but are more limited in occurrence.”

This is the only reference to minerals that makes them classified as precious metals and minerals. This does not reflect the SEA nor any of the RDS's. How can MUDC change regional policy and change district policy by now defining minerals as essentially precious metals and minerals.

This new definition will have to be approved by a Stormont Minister and a specific policy established. None of the regional documents refers to this definition so therefore all references and inferences to "precious metals and minerals" should be fully removed from this draft strategy. This will be open to a Judicial Review challenge.

The fundamental difference between minerals as aggregates as opposed to precious metals and minerals extraction is the latter will require processing with toxic chemicals and by default will generate considerable waste, unlike conventional aggregate extraction.

Furthermore precious metal and mineral extraction will cause acid rock drainage for perpetuity, hence resulting in potentially hundreds of millions of pounds for remediation. Min05/6 does not address this sufficiently. There is no consideration of a bond for accidental chemical spillages during operational life which has the potential to cost hundreds of millions of pounds if an accident occurred – usually the company quickly goes into administration.

One now has to question the legitimacy of the issuance of exploration licences considering there was no provision for precious metals or minerals agenda granted by a MLA. On whose authority or following which policy did the Civil Service departments actively go over to Canada and promote Northern Ireland as being open for businesses and then grant exploration and prospecting licences for 25% of Northern Ireland.

Indeed when undertaking this strategic environmental assessment and environmental Impact assessment the overall cumulative impact of numerous precious metal and mineral mines, extraction of various other minerals and substances (cobalt, uranium, lithium, zinc, silver etc) and their associated chemical processes have to be considered on the environment, tourism, health and agriculture. Consideration must be given to the well documented and immensely negative impact on air, water - ground/surface, plus existence of radon, radiation from Chernobyl and potential uranium radiation). This has in effect been ignored to date, by both RDS, SEA and specifically totally ignored by MUDC draft strategy. An independent body should assess this appointed by MUDC to establish a baseline.

Bear in mind Dalradian to date is only seeking planning in for one underground mine, given the geological structure there will be several others including open cast mines. The impact of all precious metals and minerals mining and processing, and installation of wind turbines and 5G (See Appendix 2) must be considered holistically with the cumulative impact on health, environment and economy assessed. Failing to undertake these assessments clearly makes FODC liable for any future claims. Once The Sperrins AONB is industrialised for mining and wind turbines, it can never be restored to its former beauty.

As a by-note at the public meeting in Gortin, The head of Planning when advised of the dangers of gold mining explicitly stated that if we want to own and wear jewellery we must be responsible and mine the gold in our own country. When pointed out to her at what cost to the health of our children and to the environment, she retorted that it has to be mined somewhere and if we wanted the jewellery then we had to be responsible for it rather than mine it in a less prosperous country. This was obviously an extremely stupid and silly statement, not least in the fact that gold is not essential, like jewellery and that there is sufficient gold in vaults to satisfy our needs for over one hundred years. However what it did show was that the Head of FODC was fully supportive of the goldmining project. Does this explain as to why the draft plan is so precious metals and minerals orientated?

The entire draft LDP has failed to take into account any Health legislation and indeed Human Rights(Under the Charter for Fundamental Rights) Legislation. The entire LDP will fails to comply with the Aarhus Convention and Climate Change legislation

In term of tourism and jobs this LDP fails adopt the RDC in favour of precious metals and minerals.

Currently FODC is essentially in full employment. Civil engineering companies are unable to fill vacancies across the board, from professionals to skilled/unskilled staff so when an organisation comes into an area, claiming to offer 25%-30% more in wages this can only make the existing companies less competitive.

Now lets just take displacement of tourism jobs as a start. It is projected that Northern Ireland will employ 55,000 people in tourism related jobs by 2020, generating £1bn annually. This will all be thrown into turmoil is a precious metal and minerals policy is pursued.

Currently Mid Ulster District Council district employs approximately 3500 in tourism, with a tourism revenue of £30m per annum – 2016 (NISRA.gov.uk). Lets take a modest growth of 6% per annum over 20 years (NI Exec using 6% growth) – this equates to 7725 new sustainable local jobs, generating additional tourism revenue of £24m p/a after year 20, if tourism continues on its current path.

Contrast that to the scenario where this toxic cyanide processing plant was operational then lets assume a very modest 3% decrease in jobs equating to an overall reduction of 1163 jobs by year 20, reducing tourism revenue by £13.5m pa.

The difference in both scenarios would mean the economy would be less well of by approximately 8888 jobs/job opportunities and by £1.2bn in Tourism alone. Investing in tourism is sustainable, increasing the tourism product will last our future generations as opposed to destroying our environment, never able to restored, decimating future tourism potential. This goes against all documents in Section 1, and specifically against the precautionary principle.

The NI Executive departments have not undertaken a regional environmental, health or economic review based on the precious metals and minerals agenda, including the cumulative impact hence cannot meaningfully make an input in this process. They are in full knowledge of the potential hazards and impacts however they have failed initiate these reports. The precious metals and minerals agenda must be removed from the LDP.

MUDC attempts to interchange the terms mining and quarrying. It is abundantly clear there is no mining in MUDC (last was coal in coalisland) however this LDP attempts to seek mining through the back door – The RDS clearly identifies minerals development as extraction of aggregates (sand and gravel) not precious metals and minerals “mining”. All references to minerals development should be changed to quarrying.

The precious metals and minerals agenda must be removed from the LDP. In January 2019 the MUDC councillors passed a motion to prohibit goldmining in MUDC. This must be adhered to and the LDP changed accordingly. Furthermore, Councillor Mallaghan, coming from a quarrying background, explicitly stated there was no comparison between Quarrying for aggregates and mining for precious metals. Given that this motion was passed then mining MUDC must not pursue a precious metals and minerals agenda. It was very strongly stated that night that Councillors Milne, Clarke and McGuigan wholeheartedly condemned precious metals and minerals agenda on the basis of health, environment and economy. This council motion must be integrated to the LDP.

C2 Did the council take account of its Community Plan?

“Community planning is a process whereby councils, statutory bodies and communities themselves work together to develop and implement a shared vision for their area. It involves service and function delivery to produce a community plan that sets out the direction of a council area which promotes community cohesion and improves the quality of life for all its citizens.”

The plans for the mineral development (precious metal and minerals) is totally rejected in the community particularly in the ANOB. MUDC has indeed completely ignored the community instead MUDC under MIN01-03,5-6, has split the community and will unquestionably affect the quality of life of its citizens. This community sees sustainable development through tourism and agricultural as the key drivers in this area however MUDC is promoting mineral development, industrialisation of the existing AONB through redesignation while allowing wind turbines to be introduced to one of the most scenic areas of Tyrone. This has to be removed from LDP Doraville should not be allowed to progress given its scale, complexity and health impacts. This commercial wind turbine project is planned to be located on a AONB. Our AONB has to be maintained to preserve our tourism product, and the natural beauty of our landscape. The wind turbines will be there for generations totally destroying our unspoilt landscapes. MUDC seems to have placed much greater emphasis on economic development, way ahead of tourism, a sustainable approach. Our flora and fauna will be detrimentally destroyed. This also breaches C3,C4, PE1-4, CE1-4

CE3 Did the council take account of policy and guidance issued by the Department?

The draft plan seems to have significant input to allow precious metals and mineral extraction (including processing), industrialisation of The Sperrins by wind turbines in an ANOB, MIN01-MIN05 etc. despite there being no reference to precious metals and minerals in the Regional Development Plan.

CE4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

The plan has failed to take into account the cumulative impact of precious metal mineral mining on other areas and the impact on its peoples health, environment and economies, particularly relating to this site specific reference. Trans boundary arrangements has been ignored in terms of water and air pollution.

Fundamentally MUDC passed a motion on January 2019 to oppose the goldmining and precious metals and minerals mining in MUDC. This council motion MUST take precedence over all other policies as the motion was passed. The Sinn Fein led motion, was annexed by long statements from Sinn Fein members where they purported stated that mining for precious metals should not proceed in FODC. This motion specifically referred to Dalradian's goldmine and cyanide gold processing plant in Greencastle Co. Tyrone. Please refer to the recording of the minutes of the meeting to confirm same. Given the strong opposition to this goldmining plan, with essentially a unanimous vote this toxic cyanide processing plant and goldmining network must not be imposed in Greencastle, Co. Tyrone. This is a decision undertaken by the council members which clearly states that any form of precious metals and minerals mining is not welcome in MUDC.

CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;

Minerals development particularly precious metals and minerals has devastating impact on cross border issues. The council are not highlighting the fact that the largest cyanide gold processing plant planning application is intended to be situated in Greencastle, relating to this site specific reference. Yet the consequences of this cross boundary in terms of water and air pollution is immense, while the negative impact of having this toxic monstrosity will have a negative impact on tourism and agriculture. This is before we mention the cumulative impact of various other mines operating across the region.

Indeed there is a seam of uranium running from Donegal to Fintona direction which is surely destined to be mined in the near future. Gold mining is the most damaging to health and the environment only beaten by uranium mining. The impact of allowing these forms of mining in will be devastating. If this policy is allowed then fracking and extraction of Lignite will be sure to follow in MUDC.

Regarding Dark Skies project, MUDC is investing substantial funds into a Dark Skies Project however this will all be in vain if Dalradian's toxic cyanide gold processing

plant is operational. The light pollution is said to be that of a large airport. Bear in mind Dalradian has only applied for planning permission for one mine on with 944 hectares. It has licences for 122,000 hectares. The scale of this project is unprecedented working 247 365 days per year. There will be 2 blasting times, with two blasts at a time with each blast having up to 25 explosive charges.

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

Cyanidation method, relating to this site specific reference, like fracking should be prohibited. Firstly as it is not the Best Available Techniques as deemed necessary by PPC application as there are many more methods of extracting gold that does not require cyanide or mercury, which will be addressed later on. Ironically Galantas won an environmental award in 2017 as the process employed there is both cyanide free and mercury free.

One of the most important alternatives is that of developing MUDC purely for tourism as opposed to adopting a precious metals and minerals strategy. To date nobody has produced a report showing the benefits of adopting a minerals development strategy, yet seemingly MUDC has embraced Minerals Development fully. Before MUDC adopts this policy it is essential to demonstrate why this council is prepared to risk our wonderful environment and the health of our people by producing evidence to prove same?

A full regional report, followed by a localised MUDC report, must be completed, showing the economic, social, environmental impact of such a minerals development policy, taking into account impact on health, increased security, impact and cost to water and air, impact on tourism, agriculture and fishing.

One of the largest negative impacts which we will cover later in all forms of precious metals and minerals extraction is that of acid drainage. This occurs for hundreds of years and costs hundreds of millions of pounds to remedy. Should our local rate payer foot the bill for this? Dalradian or Walkabout won't be here when we are left with the health effects and environmental damage.

CE3 There are clear mechanisms for implementation and monitoring; and
There is no clear mechanism for implementation and monitoring, the objectives, indicators and measures are poorly constructed (not SMART). A number of objectives seem to appear out of nowhere e.g. promote range of jobs then mining mentioned, Why? Page 251 bullet 2

Page 252 are negative measures. To enhance the environment then none of these objectives should be used. Contrary to objectives best to prohibit permissions at the outset.

Fundamentally key areas such as tourism has been omitted, impact on environment has not been considered and peoples health should have been paramount. More focus should be placed on improving our tourism offering. Fundamentally the health

of our people should be foremost with the environment next as our tourism economy hinges on it – Tourism is reported to generate £1bn per annum by 2020.

CE4 It is reasonably flexible to enable it to deal with changing circumstances.

The only manner that this is flexible is in the favour of mineral development, particularly relating to this site specific reference. This entire report has been designed to facilitate the precious metal and mineral plus industrialisation agenda at the expense of the environment, tourism and health based upon the prevalence of various exclusion clauses & mitigating measures. This has to be totally reviewed.

It is clear from reading this draft report that it does not incorporate an assessment of environmental effects, it fails to comply with the requirements of the European Directive 2001/42/EC and on the assessment of effects of certain plans and programmes on the environment (SEA Directive) and the Environmental Assessment of Plans and Programmes, Regulations (Northern Ireland) 2004, in relation to Minerals development particularly the provision of mitigating measures and exclusions to allow mineral development (more specifically precious metals and minerals), proposed designations in maps including the areas identified for wind energy, the essential downgrading of the internationally designated Ramsar sites (effectively airbrushed from the report), the merging of native quarrying processes to seamlessly incorporate the development of precious metals and minerals governed by the same rules, regulations and guidelines, ignoring the dangerous, toxic chemicals used in the processing of same.

Having read the SA and SEA it is apparent that MUDC has not taken in consideration these reports nor indeed that of the Regional Development Strategy. According to 5.3.11 of Practice Notes 6 (soundness) A council must be able to demonstrate that has met all the legislative requirements regarding SA and SEA. Looking at table 2.2 SEA Objectives (Final Environmental Report Sept 2015), all eleven of them support sustainable development with even no. 8 - Material Assets referring to point a) safeguard natural resources including minerals and peatland) and minimise unsustainable use.

Community involvement seems to be sacrificed to allow a minerals development friendly strategy, ignoring the key principles of the SEA.

The Draft Plan Strategy is so totally conflicted that it does not make sense. On one hand tourism is quite rightly being promoted as a sustainable strategy and then mineral extraction is being promoted in an AONB that will potentially effect ASSIs, SAC.

Draft Policy TOU01 – Protection of Tourism Asset and Tourism Development refers to the Council will not permit any form of development that would, to paraphrase, have an adverse impact. How can FODC have a sustainable tourism industry, as per SEA, but yet fully embrace a toxic mineral extraction industry and wind turbine installation programme essentially causing the industrialisation of the Sperrins, an

AONB? The precious metal agenda has to be removed from this draft strategy to ensure sustainable development.

The local development draft plan has been effectively designed around permitting valuable minerals development in our Council area, with carefully worded exclusions and exemptions to pursue the precious metals and minerals agenda, in the future (min1, Min2, Min3, Min4 & Min5). Precious metals should be removed from LDP, failing that all exclusions should be omitted from plan to safeguard against aforementioned issues. One of the most worrying aspects of MIN2

14.2 refers to mining and quarrying - there is no mining in this region, please remove the term mining from the LDP. The authors are attempting to make both words interchangeable, they are two totally different processes. Mining in "valuable" or precious minerals development uses a chemical treatment. The RDS only refers to minerals development in the form of quarrying.

14.7 traffic movements will result in refusal where the proposal would prejudice safety....Our roads will be congested with lorries heading to Greencastle. This will decimate tourism and generate severe air pollution. A cumulative economic study, with transportation audit, must be carried out to determine if precious minerals policy is worthwhile.

Min 2 – one of the most worrying developments is given that a precautionary approach will be adopted to assessing mineral development the onus will be on the developer to demonstrate no significant harm. This is "he who pays the piper picks the tune". Given that there is no independent EPA, limited expertise within the governmental departments, then the Developer can essentially do what he wants. The developer should set aside additional monies for the Civil Service department to appoint an independent consultant.

There should be a definitive policy that under no circumstances should mining activities should impact on international/national or local nature conservation importance including ASSIs, SACs, SPAs local/national nature reserves or heritigae interests should NOT be effected. The role of the local development plan should be to preserve our heritage and landscape with no exceptions when it comes to mining. Indeed 14.17 essentially states this in relation to Lough Neagh. This should be extended to these designations.

This ignores the main focus of the Strategic Environment Assessment (SEA) and consequently the related European Legislation, Regional Development Strategy (RDS), 2035, Habitats Regulation Assessment (HRA), and Strategic Planning Policy Statement (SPPS). The entire draft LDP has failed to take into account any Health legislation and indeed Human Rights(Under the Charter for Fundamental Rights) Legislation. The entire LDP will fails to comply with the Aarhus Convention and the Climate change legislation breaching soundness test PE3,PE4, C1-4 CE1-2.

14.19 – The economic benefits of exploitation of valuable minerals should not be the primary factor in determining extraction. Indeed there should not be a presumption

against their exploitation in any area. As stated above we have to preserve our natural heritage for future generations to enjoy.

14.21 – exploration for high value metalliferous minerals should not be carried out under Permitted developments rights given the potential damage caused. Planning permission must be sought with an environmental impact study carried out. This is in line with the above requirements. There have been a number of pollution instances when undertaking exploration drilling in Fermanagh and Omagh District Council area under permitted development which could have been avoided under full planning permission, given the toxic drilling fluids, the potential of radiation and lack of statutory supervision.

Soundness tests failed: C3, C4, CE1, CE2, CE3, CE4

Draft Policy Min05/06 – restoration and aftercare is woefully inadequate particularly relating to this site specific reference – As shown above given there is not a policy for a precious metal and mineral strategy hence MIN01-6 should be reworded purely for aggregates.

If still in existence and given the potential to harm environment and consequently people - The council should insist on realistic public liability insurance cover must be paid in advance for life of mining operation” by the applicant plus before planning is granted to cover worst case scenario a bond covering “accidents” during operation (e.g. £300m for cyanide).

At the outset a realistic Warranty and financial bond must be in place for closure and remediation so the public purse is not liable (local council). This must take cognisance of similar projects and environmental circumstances e.g. typical closure costs of gold mining in the US including monitoring and remediation of sulphurification/acid rock is \$200m to \$350m. This has to be paid for in advance and must be paid for for at least 100 years – As per previous example Dalradian has allowed only \$16m throughout life of mine and \$16m on closure, woefully inadequate. Tax payer will have to foot this bill and Dalradian will be long gone.

A full closure and remediation plan must be agreed at the outset, which will restore the landscape to its original condition.

Soundness tests failed: C3, C4, CE1, CE2, CE3, CE4

Draft Policy L01 – Firstly this undermines the AONB designation which should be of the highest protection and conservation. The Proposal Map has only a small area of The Sperrins AONB designated which is mystifying. The recommendation is to extend the entire Sperrins AONB to the highest level as per SEA 1.3 4.

Draft Policy HE02 – Archaeology

Proposed Area of Significant archaeological interest is too small.
This AONB and its archaeology must be protected rather than sacrificed for unsustainable industries, once again deviating from the SEA and HRA. Wind turbines, masts and high structures must not be allowed near any archaeological site. HE4 paragraph 2 must be removed as it is clearly written to benefit precious metals and minerals.

Soundness tests failed: C3, C4, CE1, CE2, CE3, CE4

Draft Policy Min04 – Unconventional Hydrocarbon Extraction – should include cyanide and mercury, - particularly relating to the aforementioned site specific reference

This proposal affords some form of protection from fracking “until it is proved that there is no adverse effects on the environment or public health”.
The same protection should be afforded to the use of cyanide and mercury as is for Draft Policy
Use of Cyanide and mercury should be prohibited until it is proved that there is no adverse effects on the environment or public health.
MEPs essentially voted to ban mercury in 2017 however our governmental departments seem to be allowing it on this application.
Dalradian proposes to be a member of the International Cyanide Management Code – This is a voluntary code developed by the mining industry in response to various mining disasters. It is not regulatory does not have any powers.

Germany, the Czech Republic, Hungary, Turkey, several Argentine provinces and the U.S. state of Montana have banned the use of cyanide to extract gold from low-grade ore, given the adverse effects on health and the environment.

On 28 April 2017 the European Parliament voted with an unprecedented strong vote of 566 in favour and 8 against for the European Commission to ban the use of cyanide-based mining in the European Union as soon as possible. Given this overwhelming vote to ban this toxic process are our Civil servants even considering gold processing using cyanide, in a region of that does not have a mining industry let alone monitoring or control mechanisms in place.

The European Parliament cited that *over the past 25 years more than 30 major accidents involving cyanide spills have occurred worldwide*, and that *“there is no real guarantee that such accidents will not occur again, especially taking into account the increasing incidence of extreme weather conditions, inter alia heavy and frequent precipitation events”*.

In view of the recent storm of 22nd August 2017 when large parts of the Sperrins slid down the mountainside, and indeed the devastating flash floods (1st & 8th June 2018) in parts of Tyrone, disastrous environmental consequences would have resulted had this toxic waste dump, tailings and settlement ponds been on site.

In the same vein, as Draft Policy Min3 and as part of HRA, SEA and indeed the RDS given that FODC is a member of Nuclear Free Local Authorities it is vitally important that the council specifically rejects higher activity radioactive nuclear waste being stored in a Geological Disposal Facility situated our District Council. This must be included in the Draft Policy to avoid future issues.

Natural Heritage

Draft PolicyNH1-6 –states that the council will not support any development that will adversely affect the integrity of an SCA International Designation, National designations, local designations, Protected species, habitats and AONB.

However each allows an exclusion or mitigating circumstance to allow destruction of same.

These Natural Heritage MUST be protected and should not be destroyed or detrimentally impacted upon under any circumstances.

This is the polar opposite effect of the SEA - 1.3.4 Aims and Objectives particularly in relation to “Furthering Sustainable Development” and Core Planning Principles particularly “Natural Heritage” to assist in meeting international, national and local responsibilities and obligations, reinforced by SEA objectives 2.2.3. Indeed this also goes against HRA. Where in the SEA does it provide the council with guidance to develop this exemption clauses?

According to Ramsar “A Ramsar site is recognised as being of significant value not only for the country or the countries in which they are located, but for humanity as a whole.” E.g. The Black Bog took thousands of years to grow and under no circumstances must it be put in danger. The Black Bog in its own right is a major tourist attraction to this area. It is a natural habitat to various rare flora and fauna.

Draft Policy NE01 takes no consideration of international law, and indeed essentially allows its destruction based on a benefit of regional or national importance.

This is an internationally recognised Ramsar site with the following designations (AONB, ASSI and EU Natura 2000). It is protected under the international (Ramsar) convention whereby adverse changes to the ecological character of a site is prohibited as per Article 3.2 of the Convention and Recommendation 4.8 (1990), which established the Montreux Record.

According to Article 3.2 of the Convention, “Each Contracting Party shall arrange to be informed at the earliest possible time if the ecological character of any wetland in its territory and included in the List has changed, is changing or is likely to change as the result of technological developments, pollution or other human interference.”

Contracting Parties commit to inform the Secretariat of such changes.

Has FODC informed the Secretariat of such changes - likely to change as the result of technological developments, pollution or other human interference? Have they informed the secretariat that they have made provisions in the Local Development Plan to allow such changes?

Soundness tests failed: C3, C4, CE1, CE2, CE3, CE4

Draft Policy RNW1 - renewable and Low Carbon Energy Generation - Wind Turbines
- Based on SEA and HRA MUDC should be/ trying to preserve the entire Sperrin AONB/MUDC region. According to 22.14 MUDC will presume in favour of renewable energy development unless it will be detrimental to human health or residential amenity. Given the recent reports wind turbines do cause significant harm to health hence MUDC must take this into consideration with health being the priority factor in determining permission.

By undertaking this local area plan and by putting in place this development plan to allow more wind turbines in certain areas this means that MUDC must now be fully responsible and liable for any health issues arising from these wind turbines. FODC should specifically take cognisance of the health implications of Infrasound and low-frequency noise, as by creating this plan, and indeed by allowing other wind turbines in areas of Significant cumulative development FODC is liable. See Appendix 1 The LDP must take into account of this evidence and prohibit wind turbines until proven to not cause Health and environmental issues, as such it fails the soundness tests of P1-4, C1-4 and CE 1-4, plus it is not in the Public interest

Likewise by defining certain areas as in an Area of constraint on Mineral Development and then allowing a developer ways to mine these areas through mitigating measures, MUDC is complicit in allowing whatever future health and environmental consequences that results from the developers negligence. The health and environment should in effect be the primary responsibility of a governmental body, at no point should economic gain, particularly by a private entity, be given preferential treatment.

This is particular true when mining for precious metals and minerals when toxic chemicals processes are being utilised, which are well documented to cause health and environmental issues. For example cyanide is banned in several European countries, a number of US states and various countries throughout the world. FODC, by developing a policy document which essentially will facilitate developers, is unquestionably complicit and in my opinion joint and severely liable for any consequences.

Telecommunications

5G should be prohibited in the LDP, until it is proved that there are no detrimental health and environmental consequences (HE2/HE3/in particular Policy TOHS1) as such it fails the soundness tests of P1-4, C1-4 and CE 1-4, plus it is not in the Public interest

It is clear that RNW1 that wind turbines and high structures specifically refer to 5G masts or telecoms towers. 5G should be prohibited and this stated explicitly in the LDP until unequivocal evidence that it is safe and health is produced. There is irrefutable evidence that ICNIRP guidelines are not correct and that there is a danger

to our peoples health and to our environment. A moratorium should be placed on 5G until it is proven that there is no health and environmental concerns. Currently there are over 226 expert reports clearly demonstrating that 5G is damaging to health and environment. It is clear that in TOHS1 this policy was designed to accommodate the rollout of 5G in rural areas by using a 25m height restriction, conveniently the height required for 5G. 25m in a rural environment is too high, is visually nauseating where 15m structures should also be prohibited TOHS 1/RNW1 is clearly designed to have exceptions to facilitate 5G implementations. This must not be allowed and all references to these removed. This is millimetre wave technology, powered by line of sight masts, having over 20,000 satellites to create a global Electromagnetic Force, will be on continuously. This is weapons grade technology proven to cause cancers, brain and heart tumours, neurological disorders, infertility, etc. should not be allowed to be implemented until proved safe. As pre 21.6, 5G equipment should not be allowed on other telecoms equipment until technology proven safe to people, animals and trees.

Any electricity and telecommunications should be undergrounded to ensure no visual and environmental impact in The Sperrins AONB. Wind turbines should not be permitted in the Sperrins. To be added to LDP.

14.0 MINERALS

Overview

In the Overview of the Minerals section the Council highlights the extent of reliance of Mid-Ulster's local economy on the mineral industry 'with the District being nearly twice as reliant on the construction industry for employment as Northern Ireland as a whole'. Given the fact that the minerals industry is one of the most environmentally damaging industries globally, there is an imperative to find more sustainable alternatives urgently. This necessity is not reflected in the Mid-Ulster draft plan document, instead the plan ties the District into further dependence, and thus, further environmental devastation.

Your Council is required to understand what the precise social and environmental impacts of extraction activities to date are, and the strategic need for proposed future extraction. This essential analysis has not been done, therefore to commit to further extraction without this baseline information is premature and potentially extremely damaging to the environment and the well-being of the population within your District. You also have an obligation to reduce carbon dioxide emissions and extractive industries contribute significantly to climate change.

Soundness test failed:

P3, C2, C3

(soundness test failure further explained later in our document)

Regional Policy Context 14.6

We refer to the following text:

"The SSPS directs that our Plan should ensure that sufficient local supply of construction aggregate 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."

The SSPS cannot 'direct' the Council's Plan. The test for soundness considers whether the Council has 'taken account' of policy and guidance from the Department, however the Plan-led system gives legal precedence to the Local Development Plans of the Councils. Additionally, the assertion that Mid-Ulster Council should sacrifice its environmental integrity to satisfy external markets is extremely flawed. The lack of clarity also, of what 'beyond' means deems this policy statement untenable. Does this mean that Mid-Ulster must continue to extract from its fragile environment to satisfy building projects in other continents?

Soundness test failed: P3, C2, CE2, CE3, CE4

Community Plan 14.8

In response to the assertion that the Council's Minerals Policy helps support in the delivery of the economic aspects of your Community Plan, we would assert that the Minerals Policy directly undermines many of the stated outcomes of the Community

Plan, and one of three of its foundational cross-cutting principles, namely: Sustainable Environment.

Mid Ulster's Community Plan has identified 15 outcomes that the Council aims to achieve in Mid Ulster over the life of this plan. Below are some of these outcomes (in italic) and our comments (in plain text) showing how the Council's Draft LDP contradicts these outcomes with its overly permissive policies with regards to the extractive industries:

- *We have more people working in a diverse economy*

The extractive industry is preventing the development of alternative, more sustainable business. The Council's Draft Plan fails to consider in any meaningful way how the District can transition from an unsustainable and environmentally destructive economic model to a more just and sustainable model.

- *We will increasingly value our environment and enhance it for our children*
- *We give our children and young people the best chance in life*

The expansion of the extractive industry blatantly contradicts these sought-after outcomes. Our climate is in chaos due to our industrial activities and we are destroying the life-support systems that our children and the generations to come need to rely upon. There is a wealth of scientific evidence, most notably the IPCC's most recent report, showing how our environment is in peril and how our children will be much worse off in terms of security and a healthy environment if drastic, immediate action is not taken. Your Council's LDP should contain a comprehensive strategy on how to reverse our impact on Climate Change.

- *We are better enabled to live longer healthier and more active lives*

Extractive projects and industrial agriculture directly affect people's health and their right to clean air, water and a healthy environment. The Community Plan and the draft LDP fail to address the importance of healthy ecosystems and access to nature as being vital to wellbeing.

- *We care more for those most vulnerable and in need*

The most vulnerable are those most at risk from an ailing environment, especially our children whose future we are adversely affecting by continuing to rely on the extractive industries.

- *We are a safer community*

Permitting mining and other destructive projects without a clear social licence will only cause conflict and division within and between communities and will erode trust between citizens and government. Living beside a toxic mine or an unlawful quarry also does not equate to a safe community.

Additionally, one of the three cross-cutting aspects of the Community Plan is 'Sustainable Environment'. The preference given to the extractive industries in

the Council's draft plan directly contradicts this pillar of the Community Plan, for reasons already stated.

Soundness Tests failed: P3, C2, CE1, CE2, CE4

POLICY MIN 1 – MINERAL RESERVE POLICY AREAS

We object to the existence of Mineral Reserve Policy Areas for economic purposes. As already stated, the extractive industries have substantial, adverse and irreversible effects on our environment and as such, the LDP of the Council should be focused on transitioning to a sustainable, circular economy. Within such a transition, our towns need to be strategically improved and allowed space to evolve (in part, to avoid further encroachment into our countryside). The Mineral Reserve Policy Areas are extremely close to the towns of Coalisland, Dungannon and Cookstown – thus preventing the sustainable evolution of these towns, not to mention the health worries to the populations of these towns from living so close to industrial quarrying.

What has not been considered in this Policy, but what was mentioned in the Council's Overview, was the safeguarding of areas for mineral conservation. This would be necessary with the presence of hydrocarbons, for example, which should be conserved, and not exploited, if we are to avoid the worst effects of climate breakdown.

The Strategic Environmental Assessment (SEA) is both incorrect and inconsistent regarding Mineral Reserve Policy Areas. In one instance it states that 'None of the approaches [considered] were found to have any significant negative impacts.' Yet then goes on to state 'Both approaches are likely to be negative in terms of all of the environmental indicators because they will both involve a degree of quarrying which will have spin off impacts on traffic, landscape, air quality, water quality and on the landscape.' It then concludes 'However, there will be no major negative effects caused on any of the environmental indicators.' As stated earlier, if baseline evidence on the environmental and social effects of existing and previous extractive projects has not been carried out, then an SEA of the potential environmental and social impacts of future activity cannot be relied upon.

Soundness Tests failed: P3, C2, CE2, CE4

POLICY MIN 2 – EXTRACTION AND PROCESSING OF HARD ROCK AND AGGREGATES

ACMDs

We object to the exceptions to the constraint on extraction in ACMDs. These areas are, as your document states: 'areas of intrinsic landscape amenity, scientific, heritage value', as well as fragile habitats for protected species. A 'minor expansion' is still unacceptably damaging for these important areas and the provision of stone

for restoration and maintenance could be sourced outside these areas in need of special protection.

We also argue that the ACMD should be amplified to include the entirety of the Area of Outstanding Natural Beauty which is the Sperrin Mountains.

Elsewhere

We also object to the statement 'Elsewhere, extraction and processing of hard rock and aggregates will conform with the Plan'. To the contrary, we call for a moratorium on new extractive projects until all the following criteria are met:

- (a) A *cumulative* assessment on the impacts of all extractive industries in your Council area is carried out to develop a scientifically accurate *baseline* against which all future Environmental Impact Assessments for extractive industries can be reliably assessed
- (b) You carry out a *review of extant consents* for extractive industries to comply with the legal requirements under Regulation 45, 46, 50, 51 of The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 to ensure compliance with Article 6 of the Habitats Directive
- (c) An *objective* assessment is carried out of existing *unregulated and unassessed* extractive industries in your Council area to enable you to assess:
 - strategic need for further extraction
 - current volumes of extracted material (please note the annual minerals statement is not up to date and industry claims require independent verification)
 - human rights of communities affected by the industry
 - social impacts
 - economic impacts
 - environmental impacts
- (d) An *independent economic assessment* is carried out to assess the benefits and disbenefits of extractive industries that addresses at all issues including:
 - bonds for councils
 - restoration planning
 - clean-up costs
 - contribution to local economy
 - economic damage to other industries
 - impacts on road infrastructure, public health, impacts of unlawful extraction on lawful businesses, etc
 - benefits and disbenefits of existing extraction
- (e) Art 18 of the Quarries Order (NI) 1983 requires a return to be made each year by quarries. Until this is carried out and the figures assessed by your Council it is premature to approve any new quarries without objectively validating current extraction and strategic need

- (f) ROMPS – The Review of Old Mineral Permission is carried out either by the Department for Infrastructure or a similar exercise independently by your Council (Planning Act (NI) 2011 Schedule 2 and Schedule 3)
- (g) An assessment of human rights impacts of existing and proposed extraction addressing
 - Access to information, participation and access to justice/redress
 - Right to life
 - Right to pursue land-based livelihoods
 - Right to food, water, housing
 - Right to health
 - Children’s rights
 - Cultural rights

We also insist that the Council should adopt a policy against the granting of retrospective permissions to extractive activities. Unauthorised EIA development can never be approved retrospectively.

14.17: Regarding the Council’s assertion that the shores of Lough Neagh are protected from extraction, we argue that they are not protected from the extractive industry – due to the presence of processing plants and all the transport and infrastructure attached to this, thus we assert that more regulation is needed to protect this Special Countryside Area.

We object to the Council’s omission of Lough Neagh itself from the SCA as we believe the extraction of sand to be unlawful and therefore should be halted until proved otherwise.

14.18: As stated above, we object to the ‘presumption in favour of hard rock and aggregates extraction and processing’. It is premature for your Council to develop a robust, defensible and comprehensive minerals policy until the issues listed above are resolved, legal obligations fulfilled, baselines established, and orderly planning is carried out.

POLICY MIN 3 – VALUABLE MINERALS AND HYDROCARBONS

We object to the policy statement: ‘The exploration and extraction of valuable minerals including hydrocarbons and metalliferous minerals will accord with the Plan providing that there are no significant environmental impacts or significant risks to human health.’

The use of the word ‘significant’ regarding environmental impacts and risks to human health is subjective, open to a huge range of interpretations, and thus renders the policy statement invalid; significant by whose determination – the public or the mining industry? This policy statement should be replaced by a presumption against the exploration and extraction of hydrocarbons and valuable minerals, including metalliferous minerals, because of the environmentally damaging methods of extraction that are not acceptable. The policy regarding ‘unconventional’

hydrocarbons should be extended to include all hydrocarbons, due to their contribution to climate change.

14.19 In reference to the statement: 'There may be situations where minerals are discovered which are particularly valuable and the exploitation of these would bring about economic benefits', we question this conclusion that the exploitation of valuable minerals brings about economic benefits and ask the Council for its robust evidence for this. Given the cost of the environmental damage sustained, the cost of adopting to climate change -brought about, in part, by excessive extraction, the social costs of ill-health and community conflict, and the fact that the majority of profits from valuable mineral extraction leaves the country with the multi-national corporation, the economic benefits to the population of Mid-Ulster are negative.

14.20: Regarding the statement: 'Where such high value metalliferous minerals are found, there will not be a presumption against their exploitation in any area' – we strenuously object and instead insist that there *should be* a policy presumption *against* the exploration and extraction of metalliferous minerals given their destructive impacts on communities, landscapes and ecosystems.

To support our objection we list the following reasons:

Reason 1: There is sufficient gold in circulation to meet the world's current industrial needs and there are alternatives such as urban mining (mining existing waste) to recover gold and other valuable minerals.

Reason 2: The policy presumption in favour of mineral exploitation "*in any area*" that may be "*particularly valuable to the economy*" as contained in 6.157 in the Strategic Planning Policy Statement, and which the Council echoes in 14.20, is exceptionally permissive and needs to be challenged by more sustainable policies in your Local Development Plan. This policy in 6.127 effectively gives policy supremacy for mining above *all other* land uses, such as farming, residential use, nature conservation and tourism.

Reason 3: The economic evidence from around the world demonstrates that these industries extract wealth from local economies, can adversely affect jobs in tourism and agriculture and leave long term problems with often irreparable damage that has a negative impact economically.

Reason 4: With the introduction of the plan-led system your Council is not *obliged* to follow the permissive policy and have a duty to pursue your own policies in your development plans.

Reason 5: Given the criteria identified in the section above a precautionary approach is needed to enable the regulatory and legal context 'catch up' so a robust planning framework can be established. To do otherwise and accept a permissive policy is premature.

Soundness tests failed: CE1, CE2, CE3, CE4

The protection of the environment and human rights should be core minimum policies for the regulation of this sector through the planning regime. Learning from international best practice, we believe your policies should:

- a) Develop an overarching resource vision that transforms wealth into inclusive sustainable development. Whether to extract or to leave resources in the ground requires questioning of the environmental, social and human rights costs and benefits for the country and future generations
- b) Ensure a new mineral resource ownership strategy with the Department for the Economy and the Crown Estates is established and how these mineral rights align with other surface rights to land
- c) Strengthen coherence and coordination with other regulatory bodies such as GSNI, Public Health Agency, NIEA and transboundary agencies from the Republic of Ireland
- d) Improve enforcement by your Council for existing extractive industries especially existing unauthorised activities which are significant
- e) Access to information, public participation and access to justice as required by the Aarhus Convention is a foundation to be established before new consents are issued. This will provide transparency and ensure an informed public can participate in decision making and provide mechanisms to hold decision makers to account
- f) A comprehensive strategy on restoration, financial bonds, and aftercare needs to be established
- g) To give certainty and security to other land uses and the human rights of others, the Council must address what are the acceptable distances of different types of extractive industries in relation to housing, farming, other land uses, schools and communities
- h) You will be aware of the UK commitment to the UN Sustainable Development Goals. I refer you to *Extracting Good Practices* from the United Nations Development programme. International best practice should evidently inform the Council's Mineral Policies.

14.21: Regarding the statement: 'Exploration for such high value metalliferous minerals can usually be carried out under the current permitted development rights however, where planning permission is required, full consideration will be given to the potential environmental impacts and any risks posed to safety or human health', we call into question this assumption that permitted development rights are applicable for exploration of high value metalliferous minerals, and as such escapes assessment of the potential environmental and human health impacts.

In anticipation of the outcome of the Department for Infrastructure's consultation on the issue of permitted development, we feel it is necessary to draw the Council's attention to concerns which have not been taken into account when considering Permitted Development Applications in respect of applications that fall under parts 16 and 17 of The Planning (General Permitted Development) Order (Northern Ireland) 2015 (GPDO).

Where any development is identified in either of the Schedules to the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 and an Environmental Impact Assessment is applicable, Permitted Development rights do not apply (see Article 3(8)(b)(i) of the GPDO).

This provision states that permitted development is not granted in respect of developments of a description mentioned in column 1 of the table in Schedule 2 to the EIA Regulations where any part of the development is to be carried out in a 'sensitive' area.

'Underground mining', 'deep drilling' and 'surface industrial installations' are all mentioned as activities within column 1 of the table in Schedule 2 to the EIA Regulations. Moreover, the Sperrins is classed as a 'sensitive' area within the meaning of the legislation due to the fact that it is both an Area of Outstanding Natural Beauty and in the proximity to an SAC within the meaning of regulation 9 of the Conservation (Natural Habitats) etc Regulations (Northern Ireland) 1995.

Accordingly, Permitted Development rights should not be granted in respect of such activities within the Sperrin Mountains without an EIA screening and a screening under article 6.3 of the Habitats Directive. It is clear that the cumulative impacts of exploration of metalliferous minerals require both a full Habitats Regulations assessment and an EIA.

Furthermore, the basic aim of permitted development is to exclude relatively minor and non-contentious development proposals from the requirement to obtain planning permission and to allow the planning department to concentrate on more contentious applications that may have greater impacts on amenity and the environment. In a comprehensive report to the Department regarding General Development Order in 2003, Nathaniel Litchfield and partners wrote, "permitted development should only be given to development which is marginal and incidental to existing uses of land". It is indisputable that exploratory mineral mining is not marginal nor incidental.

POLICY MIN 4 – PEAT EXTRACTION

We support the policy presumption against commercial peat extraction. We believe, however, that the exceptions to commercial peat extraction, especially 'where the peat land is not reasonably capable of restoration', will invite planned despoliation of fragile bogs. A more comprehensive policy, to ensure that this is not the case, is required. As the Council rightly points out, our bogs are our most important carbon stores that we have, given our severe lack of woodlands, and thus must be afforded the highest protection possible. To this end, a more stringent policy on enforcement of infringements needs to be developed.

POLICY MIN 5 – RESTORATION OF MINERAL SITES

We refer to the following statement: ‘All applications for mineral development must include, where appropriate, satisfactory and sustainable restoration proposals’; clarification is needed on the stipulation ‘where appropriate’; for this policy to be effective the Council would need to specify when it is appropriate and when it is not.

We would direct Mid-Ulster District Council to Fermanagh and Omagh District Council’s draft LDP, Draft Policy MIN02, which we would commend:

“All applications for mineral development must be accompanied by satisfactory proposals for: the final restoration scheme and proposed future land use; •timescales for completion of restoration including details of completion of individual phases of restoration where a progressive scheme is proposed; •aftercare arrangements once restoration is complete; and site management arrangements including security during and after the process of restoration.”

Additionally, as part of any mineral development, a restoration and aftercare bond or other financial provision should be required to ensure full restoration and reinstatement of the site.

14.31 – the policy justification points to ‘successful progressive restoration proposals which have witnessed sites being used for a completely different purpose post exploitation than was the case pre exploitation’. Whilst we do not object to progressive restoration proposals, we would object if the commercial benefits of restoration proposals were to be taken as a material consideration for the granting of extractive projects.

POLICY MIN6 – MINES, SHAFTS AND ADITS

To be added to this policy, we wish to see a statement clarifying that disused mines, shafts and adits should not be used for the disposal of toxic or hazardous waste - for example, radioactive waste.

Failures of Soundness tests further explained

Procedural tests

P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

The SEA is inadequate and reaches incorrect conclusions. As well as our reasons stated under POLICY MIN 1, it fails to take into account key information, evidence and legislation concerning environmental protection. When alternatives are presented there is insufficient analysis of what they mean or insufficient breadth in their scope that takes into account sustainable development, climate change and the principles and policies that underpin the Regional Development Strategy.

Alternatives are constrained by a 'development at any cost' ethic. There is in addition insufficient consideration of transboundary impacts of pollutants to the Republic of Ireland. For example, there is no analysis of the nitrates, ammonia and phosphates crises on protected sites or the significant deterioration in recent years of water quality. The duty to restore protected European sites to favourable conservation status is not addressed in breach of the Habitats Directive and the duty to adopt a precautionary approach is ignored. Climate change and the need for mitigation and adaptation is not addressed in any meaningful or coherent way.

Consistency tests

C2 Did the council take account of its Community Plan?

Please see our comments under the Community Plan 14.8 section above.

C3 Did the council take account of policy and guidance issued by the Department?

The Northern Ireland Executive's, '**Everyone's Involved - Sustainable Development Strategy**,' (May 2010) aims to 'improve our society and communities and utilise our natural resources in an environmentally sustainable manner'. The Sustainable Development Strategy's intention is 'to address global issues such as climate change' and has 'living within environmental limits' as one of its guiding principles. As stated in many parts of our representation, the Mid Ulster District Council's draft LDP fails to align to this national strategy. See our section on Climate Change for further evidence of this.

C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

The document fails to address the impacts of mining and quarrying and intensive agriculture for neighbouring Council areas or the impact of those sites (existing and proposed) that are located in neighbouring Council on your Council area. There is no consideration given as to how SEAs for these adjacent council areas will strategically align together.

Watersheds are shared between Northern Ireland and the Republic of Ireland and the cumulative impact of potential impacts from extractive industries and industrialised factory farms are not understood with the degree of scientific certainty needed to inform a robust planning process. In this regard ammonia, nitrates and ammonia pollution from your Council area (from intensive agriculture) is likely to be adversely affecting the Republic of Ireland but nowhere are these land, air and water trans-frontier impacts assessed. This is in breach of the SEA Directive, ESPOO Convention and Gothenburg protocol. In this regard the Habitats Regulation is fatally flawed.

Coherence and effectiveness tests

CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;

Throughout our representation we have identified where the policies within your DPD are not coherent, nor do they logically flow. Please see all points above for the particular details.

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

There is a lack of evidence to underpin the Council's policies on Minerals. Particularly, as previously stated, there is no baseline data on previous and existing extractive activities in order to meaningfully undertake a Strategic Environmental Assessment on the potential environmental consequences of further extraction. There is also a lack of evidence to back up the economic arguments in favour of continued reliance on extractive industries.

CE3 There are clear mechanisms for implementation and monitoring;

Given the failure to monitor current extractive activities and the failure to implement enforcements for breaches, there can be no confidence that further extraction can be adequately monitored, nor restrictions implemented.

CE4 It is reasonably flexible to enable it to deal with changing circumstances.

The certainty that the breakdown of our climate will bring drastically changing circumstances is globally accepted by the vast majority of the scientific community. This is not, however, reflected in any way in the Council's draft Plan. We refer you again to our section on Climate Change.

Yours Sincerely

Pauline McHenry

Appendix 1

Home Wreckers: Finnish Study Finds Wind Turbine Infrasond Unsafe For Residents Living Within 15 Km

February 1, 2019 by [stopthesethings](#) [10 Comments](#)



The Finns are renowned for their stoicism, but grinding, pulsing wind turbine noise is too much for any sentient being, even the Finnish.

The evidence proving the unnecessary damage done to wind farm neighbours by the noise generated by giant industrial wind turbines is mounting by the day: Germany's Max Planck Institute has identified sub-audible infrasound as the cause of stress, sleep disruption and more (see [our post here](#)); and a Swedish group have shown that it's the pulsing nature of low-frequency wind turbine noise ('amplitude modulation') that is responsible for sleep problems in those forced to live with it (see [our post here](#)).

Making a mockery of planning rules that permit giant industrial wind turbines to be splayed within a thousand metres or so of residential dwellings, a Finnish study reckons that the safe setback distance is more like 15,000m.

Pilot study shows no significant reduction in damage caused by infrasound until residents more than 15 kilometers from wind farms

Finnish Environmental Health – SYTe ry
Suomen ympäristöterveys
10 January 2019

The pilot study carried out in Satakunta and Northern Ostrobothnia in Finland shows that the damage caused by infrasound from wind power plants will only decrease significantly more than 15 kilometers away from wind turbines. The study was carried out by the Finnish Association for Environmental Health (SYTe) in the spring 2016.

– It has been noticed from experience that after the construction of wind power plants, usually within a few months, people in the surrounding area have begun to get a wide range of symptoms, says Markku Mehtätalo, Chairman of the Finnish Association for Environmental Health.

– It is possible to study the matter quite easily and the Finnish authority responsible for the public health, the Department of Health and Welfare (THL), has tried to do this, for example, Mehtätalo continues. However, in THL's study in 2016, it was assumed that the symptoms would decrease significantly in the first 10 kilometers, with more symptoms near the wind turbines. The study did not take into account the impact of wind farms elsewhere in the environment.

– But it is known from experience that the symptoms of people do not usually decrease at this distance, says Mehtätalo. Measurements have also shown that the infrasound pulses from the wind turbines that are currently being built will not be significantly reduced at this distance. Other risk factors very close to the wind power plants are audible sound and electromagnetic fields.

The research material was collected from Satakunta and Northern Ostrobothnia

The sample of the pilot study meets the requirements of a statistical analysis. The data was collected from Satakunta and Northern Ostrobothnia, mainly from areas where wind turbines were built 0.5– 1.5 years before the interview (see Figure 1 from Northern Ostrobothnia). The subject of the study was about 50 families, with symptoms of each family member found out. A total of about 200 people were involved in the study.

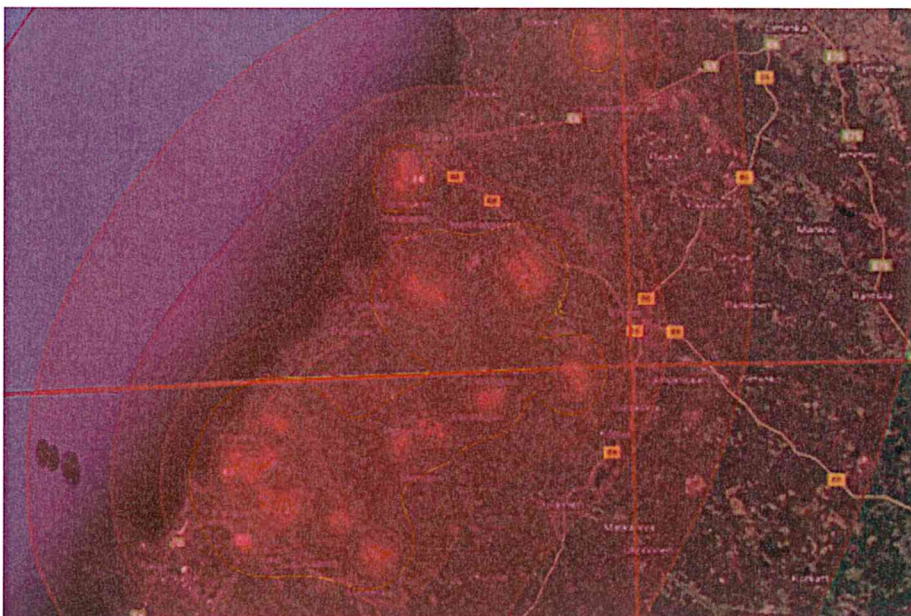


Figure 1. In the yellow-bounded area, the infrasound from wind turbines is almost continuous. The area is located in the south of Oulu Province in Finland.

– In addition, the pilot study took into account the location of all wind power plants in Finland and did not exclude beforehand the possibility that the effect of the wind farms could be greater and reach longer than the impact of a single, clearly separated area, says Mehtätalo.

Nocturnal disturbance is a typical symptom caused by infrasound

The basic research question was whether the family had noticed changes in health status in the last six months or a year within. The wording of the question regarding the time was dependent on when the impact of the nearest wind turbines could have started. The interviewees were not told in advance about the possible connection with wind turbines.

– The majority of respondents were unable to name a change in their overall health status. However, they gave many responses to separate symptomatic questions, says Mehtätalo.

– The most typical was sleep disturbance or change in the need for night’s sleep, fatigue and various pains. Only very few, some respondents, considered wind power plants as a possible cause.

Harmful or severe symptoms three times more common near wind turbines

The responses were categorized according to the severity of the symptoms and subjected to a statistical analysis. There were about three times more harmful or more serious symptoms near wind turbines (less or about 15 km from wind power plants) than further away (see Figure 2).

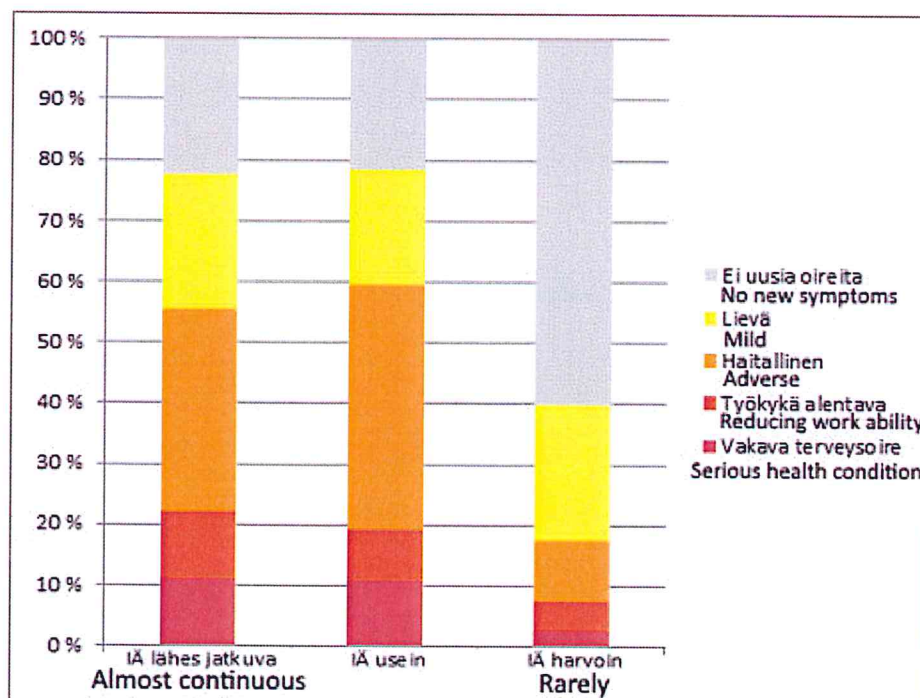


Figure 2. Symptoms of almost continuous or often persistent infrasound exposure (less or about 15 km from wind turbines) and further (over 15 km) from wind power plants.

– Based on the analysis, it seems strongly that, after the construction of wind power plants, the majority of people in the surroundings of wind turbines are having concomitant symptoms. Most of the symptoms are typical stress symptoms, says Mehtätalo.

Although some people have suspected that the symptoms are caused by wind turbines, especially if the wind power plants are visible or if they have heard beforehand about their potential harmful health effects, people have symptoms regardless of attitude. – The pilot study shows that the symptoms are not caused by attitudes, says Mehtätalo.

The occurrence of symptoms decreased significantly only over 15–20 km from the wind power plants (see Figure 2). If there are wind turbines in different directions and a person stays a lot in the area, the risk of symptoms increases.

The assumed harmful area caused by infrasound is too small

– Later in 2017, based on infrasound measurements made in different parts of Finland, it has been found out that 15–20 km is a typical distance where the infrasound pulses of wind turbines can be detected by measurements to travel in almost all circumstances, says Mehtätalo [1–4]. According to an American study, infrasound travels under favorable conditions to a distance of 90 km from wind farms [5].

If the sample of the pilot study is representative, about 400,000 of the Finns suffer from symptoms due to wind turbines and only about 10,000 of them combine the symptoms with wind power plants. Because of the small amount of research data, strong conclusions must be taken with caution.

– However, the study clearly shows that in all previous studies, the harmful area has already beforehand been presumed to be too small, says Markku Mehtätalo. – Among other things, the extensive, in-depth material of another American study, used in several publications, has been gathered within a radius of 11.7 km from wind turbines. For this reason, the harmful health effects cannot be found in the studies, because the symptoms do not vary at this distance, he concludes. – syte

Completed translation of the original text: SYTe (2019). “Pilottitutkimus osoittaa infraäänihaitan vähenevän merkittävästi vasta yli 15 kilometrin päässä tuulivoimaloista.” 2016. Available: <https://syte.fi/2019/01/10/pilottitutkimus-osoittaa-infraaanihaitan-vahenevan-merkittavasti-vasta-yli-15-kilometrin-paassa-tuulivoimaloista/>

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Finnish Environmental Health

Appendix 2

Energy and Climate Change

Committee Written evidence submitted by Yvonne Tinckler (SMR26)

There has been a decade of warnings from researchers, doctors, professors and governments, that WiFi is potentially harmful especially to children and pregnant women and should be reduced or avoided.

Experience of Smart Meter installation in the US and Australia has shown that a significant number of people are made extremely sick by them, so much so that Australia has WiFi free zones in several hospitals & those affected by WiFi are obliged to use these when needing hospital treatment.

Smart Meters will not be removable once they are installed. It will be extremely difficult if not impossible to avoid the effects of them in a neighbourhood even if they can be removed from an individual house (those individuals also having to reorganize heating/cooking/washing to cope without grid meters). Studies show 4–5% of the nation may have EMF hypersensitivity.

There is no doubt the lack of freedom to avoid the devastating effects of Smart Meters on a significant minority of individuals and consequently their families will contravene several Articles on the EU Charter of Fundamental Rights.

The Bioinitiative report has just been updated, and covers Smart Meters:
<http://www.bioinitiative.org/>

The Sage Report on Smart Meters, including letters from experts:
<http://sagereports.com/smart-meter-rf/>

May, 2011—World Health Organization (WHO) reclassifies microwave radiation from wireless communication devices and mobile phones as classification Class 2B “possible carcinogen.” This is the same class as lead, DDT and car exhaust. [Click here for CNN article](#)
[Click here for Press Release](#) [Click here for Journal of Nature article](#)

May, 2011—The Council of Europe recommends WiFi be banned from schools. The Council of Europe has 47 member states and is highly influential in policy-making. [Click here for article.](#)

February, 2011—Scientists at the National Institutes of Health in the U.S. find that microwaves emitted by cell phones cause changes in the brain. These biological changes are well below the “thermal level”. Click full study: [Effect of Cell Phone Radiofrequency Signal](#)

[Exposure on Brain Glucose Metabolism](#). Click The Globe and Mail: [Radiation from long cellphone calls stimulates brain](#).

February, 2011—Scientific Panel concludes that standards for WiFi and other wireless devices are “entirely inadequate” and “strongly recommends that schools do not install wireless internet connections that create pervasive and prolonged EMF exposures for children.”

November, 2010—National Research Council Press reports that many Canadians are being exposed to dangerous levels of radiation in its journal *Environmental Review*. It concludes that a new biologically based guideline is needed, instead of the dangerous, outdated thermal guideline. Click study: [Biological effects from exposure to electromagnetic radiation emitted by cell tower base stations and other antenna arrays](#).

September, 2010—Study finds that sitting at a laptop computer with the WiFi enabled for just four hours can damage sperm. No research has been done on possible DNA damage to female eggs because of the technical and ethical difficulties studying female eggs. [Journal of Fertility and Sterility September, 2010](#)

April 27–29, 2010—Canadian Government’s Parliamentary Standing Committee on Health heard two days of testimony including international scientists calling for people to stop exposing children to microwaves from systems such as cell phones, cell towers and unnecessary WiFi transmitters in schools.

October 2009—The U.S. government releases classified military documents on the biological effects of Microwave Radiation from 1971. The detailed report by the Naval Medical Research Institute lists hundreds of papers from around the world showing that microwave radiation causes biological changes. The report was declassified in 2009. Note the index which lists every symptom that has been experienced in Simcoe County Schools. Here is a PDF of declassified [U.S. Navy Report on the Biological Effects of Microwave Radiation](#). Many of the individual documents can be viewed at <http://www.magdahavas.com/>. The entire collection was donated to Dr. Havas by the author, Dr. Zory Glasser.

October 2009—U.S. Government, National Institutes of Health, released a stem cell study linking microwave from carrier frequencies like cell phones and WiFi, to [Leukemia and Cancer, especially among children](#).

July 2009—Dr. Magda Havas PhD., professor at Trent University issues a [public warning to all School Boards](#) saying “It is irresponsible to introduce Wi-Fi microwave radiation into a school environment where young children and school employees spend hours each day.”

January 2009—French National Government announces it will tighten safety regulations for cell phones and children.

November 2008—The European Parliament votes almost unanimously (522 to 16) to urge Cabinet Ministers across Europe to introduce stricter regulations for microwave exposure. Russian Ministry of Health have issued guidelines stating that youth under 18 should not use cell phones.

July 2008—The [French Public Library System gutted its WiFi](#) after only a year because the labour unions complained about a growing number of symptoms suddenly being reported by workers. These are same type of symptoms now being reported in Simcoe County Schools along with several other [Paris libraries](#) are WiFi-free

November 2007—Toronto’s Chief Medical Officer of Health recommends Health Canada’s Safety [levels for microwave exposure be lowered by a factor 100X](#).

September 2007—Germany’s Federal Government issues a national warning to citizens: “Avoid exposure to radiation emanating from WiFi and Amex ports in cafés, schools, public “hot spots”, and private homes.”

August 2007—The BioInitiative Group, of 20 Scientists, doctors and professors release their [610 page report](#) warning that the effects of prolonged exposure of radio frequencies (ie. WiFi) on children is unknown and there cannot be declared safe. The report concludes that, “This could have serious implications to adult health and functioning in society if years of exposure of the young to Radio Frequencies result in diminished capacity for thinking, judgement, memory, learning, and control over behaviour.”

September 2006—A group of thirty Physicists, Doctors, Professors, Union Reps and Politicians meeting in Italy released the [Benvenuto Resolution](#) that confidently stated: “We take exception to the claim of the wireless communication industry that there is no credible scientific evidence to conclude there a is risk. New standards should be developed to take various physiological conditions into consideration, eg, pregnancy, newborns, children, and elderly people.”

February 2006—[Lakehead University banned WiFi](#) to protect students staff and visitors from unnecessary microwave exposure. Lakehead’s sitting president was a trained Biologist who understood the dangers moreso than most. This now includes the new [Orillia Campus](#).

2005—Irish Doctor’s Environmental Association. A group of [Irish physicians declared](#) that, “The current safe levels for exposure to microwave radiation were determined based solely on the thermal effects of this radiation. There is now a large body of evidence that clearly shows that this is not appropriate, as many of the effects of this type of radiation are not related to these thermal effects.”

June 7, 2000—Twenty Doctors, Physicists and Professors meet in Salzburg Austria to discuss the growing concern with microwave radiation from the erection of Cell Phone Towers in Europe. They declare in the [Salzburg Resolution](#) that current “safe limits” for microwave exposure, such as Health Canada’s, are 100 to 1,000 times too lenient to be declared safe for humans.

International Warnings

WiFi

Wingspread Conference on the Precautionary principle: <http://www.sehn.org/wing.html>

German Government advises against WiFi:

<http://www.independent.co.uk/environment/green-living/germany-warns-citizens-to-avoid-using-wifi-401845.html>

http://www.icems.eu/docs/deutscher_bundestag.pdf

In 2010 the Hesse minister of education and cultural affairs (Germany) replies to a request regarding Wi-Fi in schools with the recommendation to prefer wired network solutions whenever possible.

http://download.bildung.hessen.de/medien/einrichtungen_medien/support/Drucksache_18_19_24_Laptop_WLAN_Gesundheitsgefaehrung_an_Schulen.pdf (in German but can be translated)

In 2007 the Bavarian parliament (Germany) recommended the use of wired networks in all Bavarian schools due to health concerns and had each single school informed about this recommendation by the state secretary himself.

http://download.bildung.hessen.de/medien/einrichtungen_medien/support/Bayer-StaMi-Empfehlung-20070823.pdf The parliament of the Canton Thurgau clearly recommends since 2006 that schools use wired networks.

http://www.wgrgeko.tg.ch/docs/00000064_00000E85_WEB.pdf (in German but can be translated with GOOGLE) European Environmental Agency advises the precautionary principle for WiFi: <http://www.eea.europa.eu/highlights/radiation-risk-from-everyday-devices-assessed> <http://www.independent.co.uk/environment/green-living/eu-watchdog-calls-for-urgent-action-on-wifiradiation-402539.html> Austria medical association pressing for a ban on WiFi in schools: <http://www.telegraph.co.uk/news/uknews/1549944/Warning-on-wi-fi-health-risk-to-children.html>

Herouville St Claire Normandy removes WiFi from schools:

<http://freepage.twoday.net/stories/5670096/>

(USA) Progressive Librarians Guild urges the precautionary principle for WiFi in libraries June 2008: <http://libr.org/plg/wifiresolution.php> France: Paris City Council launched a study on WiFi June 2008 (in french):

http://www.lemonde.fr/technologies/article/2008/06/16/wi-fi-le-conseil-de-paris-lance-une-etude-surles-risques-sanitaires_1058950_651865.html#ens_id=1053227 UK: The

Association of Teachers and Lecturers (ATL) with 160,000 members has called for a government investigation into the biological and thermal effects of “WiFi” networks:

<http://news.scotsman.com/education/39Wifi-in-schools-may-give.5156371.jp> Penang

Malaysia to study health effects of WiFi. October 2008:

<http://freepage.twoday.net/stories/5250937/> England: Health Protection Agency launches

study on health effects of WiFi Oct 2007:

<http://www.guardian.co.uk/technology/2007/oct/13/internet.internetphonesbroadband> USA:

Sebastopol CA. City Council chooses the precautionary principle and terminates contract for free city wide WiFi:

<http://www1.pressdemocrat.com/article/20080324/NEWS/803240314/1033/NEWS>

Sebastopol Area WiFi petition: <http://www.petitiononline.com/mufifree/petition.html>

European Parliament Sept 2008 voted 522 to 16 to adopt text: “is greatly concerned at the Bio-Initiative international report concerning EMFs, which summarizes over 1500 studies on

that topic and which points in its conclusions to the health risks posed by emissions from mobile-telephony devices such as mobile telephones, UMTS, WiFi, WiMax and Bluetooth, and also DECT landline “. “The limits on exposure to electromagnetic fields [EMFs] which have been set for the general public are obsolete.”

<http://new.marketwire.com/2.0/release.do?id=901580> England schools dismantle wireless networks: http://www.timesonline.co.uk/tol/life_and_style/education/article642575.ece

England: Teachers union call to suspend WiFi in schools:

<http://www.dailymail.co.uk/news/article-1039235/Suspend-wi-fi-schools-says-union-chief-followingreports-causes-ill-health.html> Bavarian state parliament advises schools against WiFi: (in German): http://www.buergerwelle-schweiz.org/fileadmin/user_upload/buergerwelle-schweiz/Mobilfunk/MF_03.07_Kein_WLAN_in_bayer_Schulen.pdf

Glastonbury residents “Why WiFi” Campaign: <http://www.glastonburynaturalhealth.co.uk/WhyWi-Fi.html>

Ireland: Jan 2008 The City of Dublin Ireland did not install WiFi due to a EU law: <http://www.rte.ie/news/2008/0109/wifi.html> WiFi code for Welch Schools: <http://www.independent.co.uk/environment/green-living/child-safetyfears-prompt-wifi-code-for-welsh-schools-403255.html>

Frankfurt, Germany: Bans WiFi in public schools (in German): http://www.buergerwelle-schweiz.org/fileadmin/user_upload/buergerwelle-schweiz/Mobilfunk/Frankf_Rund_keinWLAN.pdf

Hospital Techies urge limits on “white space” WiFi: http://news.cnet.com/8301-10784_3-9930441-7.html

Spain: Ecologists in Action statement on WiFi:

<http://www.ecologistasenaccion.org/spip.php?article11598> http://www.es-uk.info/news/20080319_belmonte_en.pdf

GreenWarriors of Norway oppose WiFi in schools: <http://www.miljovernforbundet.no/render.asp?rticleno=1471&segment=1&session=>

Dr. Magda Havas open letter to schools and teachers on WiFi health risks:

http://www.magdahavas.com/wordpress/wp-content/uploads/2009/10/09_Havas_WiFi_schools.pdf

Austrian health director Dr. Gerd Oberfeld advising against WiFi: <http://www.antennafreeunion.org/salzburg.pdf>

Sweden Prof. Olle Johansson scientist WiFi letter:

http://www.powerwatch.org.uk/pdfs/20070723_wifi_olle.pdf

Dr. George Carlo WiFi video: http://www.mcs-international.org/red_alert_1_wifi_schoolchildren.html

Green party MEP/concern with WiFi in schools:

<http://www.carolinelucasmep.org.uk/2007/10/12/green-meps-demand-investigation-into-wifi-inschools-after-study-links-electro-magnetic-fields-and-cancers/> (USA) Dr. Mercola

wireless warning: <http://articles.mercola.com/sites/articles/archive/2008/06/21/are-you-allergic-to-wirelessinternet.aspx?source=nl>

(Canada) Dr. Magda Havas Report opposing WiFi in San Francisco: http://www.magdahavas.com/wordpress/wp-content/uploads/2009/10/07_Havas_WiFi-SNAFU.pdf

The Gathering Brainstorm:

http://www.theecologist.org/pages/archive_detail.asp?content_id=1179

Dr. Jeff Fawcett: WiFi Blues: <http://ezinearticles.com/?The-WiFi-Blues&id=169261>

WiFi in Schools UK: <http://wifinschools.org.uk/index.html> Santa Fe Librarians letter supporting WiFi free Public libraries: <http://www.santafenewmexican.com/Opinion/Their-View-Librarians--Keep-public-library-Wi-Fi-free>

“Wireless Networks (WiFi) Consumer Health and Safety Advice” EMFacts handout: <http://www.emfacts.com/wifi/> Porto Alegre Resolution 2009: http://www.icems.eu/docs/resolutions/Porto_Alegre_Resolution.pdf Venice Italy Resolution 2008: <http://www.icems.eu/resolution.htm> London Resolution 2007: http://www.icems.eu/docs/resolutions/London_res.pdf Benevento Italy Resolution 2006: http://www.icems.eu/benevento_resolution.htm Catania Italy 2002: <http://www.emrpolicy.org/faq/catania.pdf> Salzburg Austria Resolution 2000: http://www.salzburg.gv.at/salzburg_resolution_e.pdf Vienna resolution 1998: http://www.icems.eu/docs/resolutions/Vienna_Resolution_1998.pdf Other Concerns Bioinitiative Report: <http://www.bioinitiative.org/>

Bioinitiative Report video with co-author Cindy Sage: http://www.youtube.com/v/7tZDor_co0

Brussels determines new EMR safety standard of 3 volts per meter: <http://www.next-up.org/Newsoftheworld/Belgique.php#2>

2009: The European Parliament passed the EMF Resolution calling for caution on the use and expansion of electromagnetic fields, particularly radio frequency exposure from wireless technologies. The resolution was endorsed by an overwhelming margin of 559 members in favor, 22 opposed, and 8 abstaining. The EP calls on member states to follow the example of Sweden to recognize ES as a disability and grant adequate protection as well as equal opportunities. <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P6-TA-2009-0216+0+DOC+XML+V0//EN>

French Health and Security Agency (Afsset) recommend reducing exposure to mobile phones and other portable wireless devices. OCT 2009
http://www.breitbart.com/article.php?id=CNG.9264422c2946d8bf1cb62cde139e996e.c21&show_article=1

(USA) NIEHS and NIOSH classifies EMF's as a hazardous substance. NIEHS advocates prudent avoidance of EMF's.
<http://www.niehs.nih.gov/research/resources/library/consumer/hazardous.cfm>

Prudent avoidance has been adopted in Australia, Sweden, and several U.S. states, including California, Colorado, Hawaii, New York, Ohio, Texas, and Wisconsin:
http://www.who.int/peh-emf/meetings/southkorea/en/Leeka_Kheifets_principle_.pdf

Collaborative on Health and the Environment CHE EMF statement:
http://www.healthandenvironment.org/wg_emf_news/772

California EMF program 7 million dollar gov't mandated study. up to 95% certainty leukemia caused by EMF's. Up to 80% certainty brain cancer related to EMF's. Advocate prudent avoidance of EMF's. <http://www.dhs.ca.gov/ehib/emf/> 2009 Counties of LA (CA), Pima (AZ) City of Portland Oregon, Cities of Sebastopol, Albany and Glendale CA pass resolutions requesting the federal government repeal section 704 of the Telecommunications Act of 1996.and/or requesting the FCC to update RF studies:
<http://www.cloutnow.org/localres/>

Chinese breakthrough study how EMFs promote childhood leukemia:
<http://www.microwavenews.com/XRCC1.html>

European Union adopts ALDE report advising the precautionary principle for EMF's:
[http://www.alde.eu/index.php?id=42&L=2&tx_ttnews\[tt_news\]=9559&cHash=2fec11e0cc](http://www.alde.eu/index.php?id=42&L=2&tx_ttnews[tt_news]=9559&cHash=2fec11e0cc)

USA, NJ. Sussex County school to close due to unsafe power lines near playground:
http://www.nj.com/news/index.ssf/2009/09/sussex_county_school_to_close.html (NZ) Dr. Neil Cherry: <http://www.neilcherry.com/>

(USA) Dr. Louis Slesin: <http://www.microwavenews.com/>

(Canada) Dr. Magda Havas: <http://www.magdahavas.com/> <http://www.magdahavas.org/>

Electrical Sensitivity Germany 2002: Freiburger Appeal signed by 30,000 doctors:
<http://www.starweave.com/freiburger/>

2005 Ireland IDEA Irish doctors concern over EMR health effects:
<http://www.ideaireland.org/emririshresearch.htm> Switzerland: Dr. Rau Paracelsus Health Clinic : treats 10,000 people annually. They assess health in light of EMF exposure. Although health issues are multi factorial, his assessment is EMFs are a hidden factor in many illnesses:
<http://www.paracelsus.ch/welcome>

US Access Board: Report on Indoor Environmental Quality Released: <http://access-board.gov/news/ieq.htm> Dr. Christine Aschermann: Observations from a Psychotherapy Practice on Mobile Telecommunications and DECT Telephones:
<http://emfsafetynetwork.org/wp-content/uploads/2009/10/Aschermann2009.pdf>

France Eco village white zone for EHS recovery: <http://www.zoneblanche.fr/index-eng.html>

2008: Electromagnetic Hypersensitivity Wikipedia:
http://en.wikipedia.org/wiki/Electrical_sensitivity

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