



IRISH SALT MINING & EXPLORATION CO., LTD.

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Local Development Plan Team
County Hall
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11th December 2019

DRAFT PLAN STRATEGY - RESPONSE

Irish Salt Mining & Exploration Co. Ltd (ISME) own and operate the Kilroot Salt Mine at Kilroot, Carrickfergus and welcome the opportunity to comment as follows on section 7.4 - Minerals Development of the Mid and East Antrim Local Development Plan (Draft Plan Strategy).

Policy MIN5 Area of Salt Reserve, Carrickfergus

An Area of Salt Reserve is designated east of Carrickfergus and to the north of Kilroot as identified on the District Proposals Map 3.

Within this designated area, planning permission will not be granted for surface development that would prejudice the exploitation of the proven Salt Reserves with the exception of:

- structures related to and necessary for established businesses including agricultural buildings where these require planning permission; or*
- the improvement, extension or replacement of dwellings which comply with Policy HOU9 Replacement Dwelling and Policy HOU3 Residential Extensions and Alterations.*

Review Commentary – Policy MIN5

The above Policy MIN5 wording should be consistent with the wording in Section 7.4.29 of the Justification and Amplification 'This policy will ensure that surface development does not prejudice the exploitation of the proven salt reserves'. The current Policy MIN5 wording (refer to underlined text above) may be misconstrued / mis-interpreted as indicating that prejudicing the exploitation of the salt may be **excepted** for certain developments.

Recommended Amendment to Policy MIN5:

Policy MIN5 would be more coherent and consistent if worded as follows (revised wording is shown in red text below):

'An Area of Salt Reserve is designated east of Carrickfergus and to the north of Kilroot as identified on the District Proposals Map 3.

Email addresses:

Sales: sales@irishsaltmining.com
Mine: surveyor@irishsaltmining.com
Administration: [REDACTED]

Registered address as above

Registered No. N.I. 6389

Within this designated area, planning permission will not be granted for surface development that would prejudice the exploitation of the proven Salt Reserves. However, the following development may be permitted within the Area of Salt Reserve:

- *structures related to and necessary for established businesses including agricultural buildings where these require planning permission; or*
- *the improvement, extension or replacement of dwellings which comply with Policy HOU9 Replacement Dwelling and Policy HOU3 Residential Extensions and Alterations.'*

Justification and Amplification

7.4.29 The salt reserves at Carrickfergus are considered as a valuable mineral resource of regional importance and also rare in that this is the only active salt mine in Ireland. This policy will ensure that surface development does not prejudice the exploitation of the proven salt reserves.

7.4.30 Where planning permission is granted for surface development in this area, and where Council perceives a risk of subsidence from either old shafts or new mining, an informative will be attached to the consent indicating the potential risk of subsidence. This will inform the applicant that the responsibility and subsequent liability for safe development and secure occupancy of the site lies with the developer and/or landowner. Geological Survey Northern Ireland (GSNI) will be consulted for any proposed development on land above the Area of Salt Reserve.

Review Commentary – Section 7.4.30

Why is the risk of subsidence only from 'old shafts or new mining', why not from new shafts? or old mining? It is considered that reference should be made to 'shafts and mining'.

The section unnecessarily refers to liability "for safe development and secure occupancy". In this context it is noted that subsidence risk can arise from a range of causes not just shafts or mining, and that there are many factors which will determine any liability related to same. . It does not seem logical or appropriate to use this Justification and Amendment section to implement a disclaimer on liability.

There are other issues which may need addressed within the informative besides subsidence risk e.g. the possibility of experiencing some noise or minor vibrations from blasting within mining areas.

Recommended Amendments to Section 7.4.30

Section 7.4.30 would be more coherent and consistent if worded as follows:

'7.4.30 Geological Survey Northern Ireland (GSNI) will be consulted for any proposed development on land within the designated Area of Salt Reserve. Where planning permission is granted for surface development in this area, an informative may be attached to make the developer aware of any risks which may arise from shafts and mining in the area.'

For and on behalf of:

Irish Salt Mining & Exploration co. Ltd



Assistant Mine Manager