



JAMES STEVENSON [QUARRIES] LTD



Public Works Contractors

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MEA-DPS-040

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Dear Sir/ Madam

4th December 2019

Reference: DRAFT PLAN STRATEGY

Representation by James Stevenson (Quarries) Ltd in relation to the Draft Plan Strategy for the LDP by Mid and East Antrim Council

Further to the Council's publication of a Draft Plan Strategy we wish to submit the following comments in relation to the document. Furthermore whilst we appreciate that this is the draft strategy stage we consider it important to highlight the unique nature of the operations at Clinty Quarry where site activity covers more than minerals extraction and processing.

Operations at the Doury Road also include associated industrial activities such as Clinty Chemicals who provide turnkey solutions for industrial water and waste clients. From consultancy and lab analysis, to the physical installation of effluent treatment plants, in addition to the manufacture and supply of inorganic coagulants, acids, caustic and polymers to the industry.

Furthermore it is important to note that the Inter-basaltic clay that is extracted at Clinty Quarry is of higher economic value than aggregates and the ready availability of this type of mineral reserve is limited. As such the deposits found at Clinty (and referenced as Bauxite within the current area plan) provide significant value to the local economy. The customer base for the business is spread across Northern Ireland and further afield into the Republic of Ireland. As a consequence it is considered beneficial to advise the Council of the important role of the business across a number of economic sectors (and not simply the aggregates industry).

With specific attention to the minerals development section of the draft strategy we appreciate the acknowledgement within the document of the important role of the minerals sector within the local Council area. Furthermore we note the reference to its role in maintaining jobs and the ongoing exploitation of mineral resources in a sustainable manner.

Within reference to the minerals section we suggest that the evidence base upon which the value of the minerals industry and its contribution to the economy within the Council Area is not sufficiently robust and could potentially be considered unsound.

We also question the proposed approach of designating ACMD's. Though we note that Council have stated that any future review and re-designation of ACMDs will be evidence based and brought forward at the Plan Policies Stage of the LDP.

In relation to MIN 1 we would respectfully suggest that the proposed policy wording does not allow for the presumption in favour of sustainable minerals development outside of ACMD's/SCA's envisaged in the remainder of the DPS supporting technical information. In particular on page 156, under Policy MIN1, the strategy states:

"Outside of Special Countryside Areas and Areas of Constraint on Mineral Development planning "can" be granted for the extraction and/or processing of hard rock / aggregates when the Council is satisfied when the developed will not have an unacceptable adverse impact"

We would suggest that the word "can" be replaced with "will" be granted.

In addition we would suggest that the Council identify buffer zones around existing quarries in order that both the medium and long term sustainability of operations are protected from sterilisation as a result of other forms of development.

We also suggest that in line with SPPS Policy that Council, in partnership with the Department of the Economy, identify other areas of mineral reserve in the Council area that must be protected from other forms of development and that will ensure the long term supply of minerals for the local economy. For example the valuable mineral deposits of Inter-basaltic clay at Clinty Quarry support other industrial activities within the Council area.

With reference to restoration policy MIN8 we would suggest that a wider list of options for restoration proposals is offered to allow for other sustainable development opportunities.

We look forward to working with the Council in moving the LDP forward and meanwhile if you would like to discuss any of the content in this submission please do not hesitate to contact me directly.

Yours faithfully

