



MPANI Response to Minerals Section of the Mid and East Antrim Council draft Plan Strategy

December 2019

Background

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

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

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

Local Industry to meet Local Need

The Mineral Products industry in Northern Ireland directly employs some 5000 people, produces approximately 24 million tons of aggregates per year and has a turnover of around £650 million per year (2% of NI GDP). The Mineral Products Sector is a varied industry, with the majority of NI businesses family owned, alongside a number owned by large multinational companies, it is primarily a rural industry, supporting jobs in areas identified by Government as targeting social need (TSN). The full economic impact of the geoscience industry to the wider NI economy is calculated to be 83,700 jobs, £3.7 billion in Gross Value Added (GVA) and £1.8 billion in wages. More information on the economic value of the Geo Science sector to the NI Economy can be viewed at https://www.ulster.ac.uk/_data/assets/pdf_file/0010/406936/Economic-Impact-of-Geosciences_final-report-12th-April-2019.pdf

As the Council rightly states an adequate and steady supply of mineral products is essential to ensure economic growth in the future. We need them for construction, energy and for manufacturing, with each of us in Northern Ireland using more than 14 tonnes of aggregates per

year, on average. Local industry offers sustainable solutions to the challenges of creating and maintaining our built environment, coping with climate change and providing for a growing population.

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

Minerals in Mid and East Antrim

Quarrying holds an important place in the district economy. Mid and East Antrim mineral and construction products businesses employ around 400 people, and extract raw product worth £14m, after processing this is worth around £86m to the district economy. This figure is higher than the £65 Million identified in the preferred options paper as a result of growth in the local and national construction sectors over the past two years. These businesses balance economic expertise with environmental understanding - through a variety of schemes such as biodiversity plans and tree-planting, our members effectively offset their environmental impact and delivery environmental Net Gain and increase in Natural Capital.. In addition the Mineral Products Industry in MEA contributes over 200,000 to the local rates bill.

Mid and East Antrim’s Mineral Products industry provides responsible, mature business, and we would urge you to do your bit to support it.

Members of the MPANI operating within the Mid and East Antrim Area are;

FP McCann, Northstone NI Ltd, Kilwaughter Minerals, Omya Uk Glenarm, Robinson Quarry Masters, Boville McMullan, Irish Salt Mining,

Comments on the draft Plan Policy

The main points of our MPANI representation in relation to the Minerals Section of the MEA DPS are as follows:

- We would respectfully suggest that the evidence base upon which the Value of the Minerals Industry and its contribution to the economy in the MEA Council Area is based upon is not robust and is therefore unsound.
- We would question the evidence base that leads to the proposed approach of designating ACMD’s in line with legacy designations set out in the Larne Area Plan 2010. We do recognise however 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.
- We would respectfully suggest that the proposed MIN 1 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”

MPANI would ask that the “can” be changed to “will” be granted. This brings this into line with other Policy wording.

- MPANI would suggest that, in line with the SPPS, Council identify buffer zones around existing quarries in order that both the medium and long term sustainability of local operators is 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.
- We would suggest that a wider list of options for restoration proposals is offered to allow for other sustainable development opportunities.
 - creation of new habitats and biodiversity;
 - use for agriculture;
 - forestry;
 - recreational activities;
 - waste management, including waste storage; and
 - the built environment, such as residential, industrial and retail where appropriate.

We support the Councils proposed approach on the use of financial bonds to ensure adequate and appropriate restoration in line with approved planning conditions.

- We would suggest that the Council consider and promote a draft policy with respect to secondary aggregate use within MEA.

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.

The Council states that 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.

The 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 may be misconstrued / miss-interpreted as indicating that prejudicing the exploitation of the salt may be excepted for certain developments.

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

“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.’

In section 7.4.29 MPANI welcome the recognition given by Council that 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. We further welcome the statement that “*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.

MPANI would endorse concerns from our Member Irish Salt Mining as to “Why is the risk of subsidence only from ‘old shafts or new mining’, why not from new shafts? or old mining? The section unnecessarily refers to liability “for safe development and secure occupancy”. We support the view 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.

MPANI would suggest that 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.'

Conclusions

MPANI look forward to building on the working relationship that we have with the Council. We will continue to work with and encourage our Members in the Mid and East Antrim Council Area to provide important production and resource information to enable the Council to develop supply and demand scenarios over the Plan period so that we have a truly sustainable minerals sector and one that ensures we supply the products, services and jobs to help sustain the local economy.

It is our opinion that if the changes and recommendations we have proposed above are adopted by Council then the Minerals Policy set out in the Plan Strategy is Consistent, Sound and Coherent. .

Gordon Best
Regional Director MPANI