

Chloe Duddy

From: Park Against [REDACTED]
Sent: 27 January 2020 14:47
To: Local Development Plan
Subject: Amended Comments on LDP Strategy Plan Consultation Document
Attachments: LDP submission (total) Jan2020.docx

Dear Sir/Madam

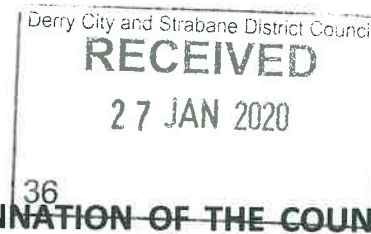
I have attached an amended document containing comments and objections in regards to the LDP Strategy Plan for Derry & Strabane for the next 12 years.

Please do not hesitate to contact us in regards to any section of the document. We look forward to hearing from you.

Yours sincerely

PARC





24th January 2020

SUBMISSION FROM PARK AGAINST THE RUINATION OF THE COUNTRYSIDE (PARC)

To whom it may concern,

Please find our submission below to the consultation on the Derry City & Strabane District Council Local Development Plan (LDP) 2032 Draft Plan Strategy. PARC have scrutinised the document and have outlined our comments and objectives below relating to several different areas.

In relation to the document we have concerns in regard to some of the planning aspects, how it will be rolled out, assessed and adequately policed.

The Local Development Plan 2032 is a welcome asset to Council planning over the next 12 years. We welcome the opportunity to give our voice to elements which will have an impact on ourselves, our families and our communities. It is disappointing, however, that there has been little opportunity given for a more involved, joined up, public consultation with the wider community on different aspects and forums ie community groups, cottage industry entrepreneurs, environmental groups etc. The consultation period has been too narrow to allow an open and full scrutiny of the impact of such a large scale plan on our local economy, environment and communities. It is disappointing that such a costly piece of work will not reach a wider audience.

Worryingly, the strategy does not incorporate for a third party appeals process. This is a fundamental flaw in the planning strategy and denies the public a voice, especially where planning applications can have a detrimental effect on the environment. Communities and individuals have to go down the judicial route to challenge applications. The costs for this are prohibitive. The Republic of Ireland operates a third party appeals process which is workable and enables the broader community to actively participate in the planning process. We would suggest that the council examines this practice in the Republic of Ireland with a view to adopting a similar appeals process.

Please see further detailed comments below:

Part C – Economy –Strategy, Designations & Policies

13. Minerals Development

We have given particular consideration with respect to Mining of minerals, given that there have been substantial prospecting licences awarded to external mineral mining companies in the SDCC area in recent years.

Questions

1. Who are the experts - who has been consulted with regard to mining of minerals and the impact it will have on the environment, water sources and rural communities. Use of environmental experts should be consulted with particular attention to legacy of mineral mining and in an independent basis.
2. 13.17 (LDP, P202) states 'the Council will reduce the potential for conflict by requiring an appropriate degree of separation in consultation with relevant consultees to be kept between minerals working and other developments, particularly where mining involves blasting' This, I feel, has an ambiguous edge to it. I believe this requires independent experts in environmental legislation and impact when it comes to agreeing planning for mining due to the negative impacts mining can have on communities during its working life and its legacy. 'The mining sector...policy and practice tend to be reflected in the nature of agreement making among government and industry'.(<https://www.investopedia.com/terms/s/social-license-slo.asp>). Given that the licenses for prospecting have been granted without community consultation, my concern would be that there is little scope for any voice or assessment of the impact of mining or in fact mineral extraction outside the remit of governmental and mining companies. The adoption of MDAs into Planning Policy will not be adequately scrutinised without Independent expert assessment of impact and legacy for communities and the environment.
3. 13.20-22 Transporting materials to and from mineral sites - impact on poor existing road infrastructure - environmental impact of heavy diesel

usage, traffic and noise going through small villages and rural communities - see Dalradian's plan for Proposed mine in Tyrone. If prospecting licences are granted for areas in the Sperrins including Sawel and Dart the impacts mentioned above will be difficult to police with resources and financially available as it will have to be funded from the coffers of the ratepayer. Given the move toward lowering the carbon imprint this mineral mining and transportation of will be at odds with your own proposal for sustainability and protection of the environment. The level of pollution afforded by diesel will also have a negative impact on the health of those living along the roads that could be used to transport minerals out of the area, particularly those with breathing illnesses such as asthma.

4. 9.3 Mining is viewed as a Developing Economy in Northern Ireland. how will mining in rural areas impact on other Developing Industries particularly the Tourism Market? LDP focuses also on the large rural population and economy in the North West area and how the economy can be developed in regards to Cottage Industries, organic farming micro industry, and Tourism. The conflict arising from the Proposed Plan of a mine in Tyrone against the Davagh Dark Forest Observatory is an example of one such conflict of interest. How will SDCC balance the rights of smaller micro industries against the economic might of the mining industry in these circumstances.

5. 'As a side effect of environmental legislation development and increased costs of waste management, mines moved from developed countries to other regions' (Carvahlo,2017, <https://onlinelibrary.wiley.com/doi/full/10.1002/fes3.109>). Mining companies set out to protect their stakeholders and profits initially, paying lip service to environment, indigenous communities and legacy. Any granting of mining licence to mineral mining companies will from the outset be contradictory to all edicts of ED 1 of LDP, P 117. The experience is that mining companies only do what is necessary within environmental law as opposed to what meets the needs of the environment. 'Since

mineral resources are a direct source of economic gain for governments, there is often collusion between companies and public authorities' (<https://www.culturalsurvival.org/publications/cultural-survival-quarterly/mining-indigenous-rights-emergence-global-social-movement>)

Given the recent political developments between the British, Irish and Northern Irish governments in regard to lack of tax revenue coming into the coffers of Stormont, the economic push to bring mining to Northern Ireland would concern me as it would quickly remedy that lack of finance.

There needs to be clear delineation between types of mining and how they are assessed. Mineral extraction is complex and its methodology has more negative environmental impact than quarrying. Use of cyanide processing methods, dry stacking of fine powder that contains toxic elements, mercury tailing ponds, heavy use of fossil fuels and heavy use of small local roads to transport leaves mineral extraction at odds with LDP Strategy on the protection of the environment. In quarrying the landscape is often returned to its original state if planning agreed is followed through properly.

Returning the landscape to its original form post mineral extraction is costly and the reason mining companies have moved operations to developing countries with less stringent environmental laws. Mineral Mining companies have a poor record of returning the land to a usable state and this would be particularly problematic for the large farming community in Northern Ireland.

Mineral mining will be at odds with LDP Strategy (p117):

- Adversely affecting the features of nature and historic environment of the Sperrins
- Emission of effluents
- Assisting promotion of Sustainability and biodiversity
- (Dry Stacking) having areas of storage adequately screened from public view
- Integration into landscape.

- (9.16) Storage of hazardous waste.

Alongside this, given that the companies who possess the prospecting licences are external to Ireland, there is a definite contradiction to the value of their SLO, their short-term Windfall economy and the legacy of mineral mining for our communities and environment.

Windfall economies such as Mineral Mining have a short term economic punch, the need for gold in this country is minimal and can be offset by landfill mining, which is becoming much more viable environmentally and economically. It would appear astute to look at the mining of minerals as economically viable in rural areas where the economic austerity of the last ten years on farming has been huge. However, allowing mineral mining companies to operate would give them a monopsony and a huge amount of 'leverage in their areas of operation because they are often the only source of stable employment and infrastructure'. (<https://www.culturalsurvival.org/publications/cultural-survival-quarterly/mining-indigenous-rights-emergence-global-social-movement>). Mineral mining is short-term, with long term negative impacts on the environment and indigenous communities. There would be little or no platform for objection for the indigenous population here should mineral mining industry be given a foot hold.

Mineral development covers a diverse number of extraction methods using a range of processing techniques. We would suggest that the gold mining needs a greater focus given that it can use significant amounts of water, electricity and cyanide. Extraction and processing methods using cyanide have been banned in Canada and Germany which singles it out as mining activity that should be scrutinised with particular care

13.9 mentions that planning applications should be supported by environmental reports and technical assessments. These need to be reviewed by specialists who are independent of the applicant to inform the planning recommendation.

Unacceptable adverse impacts as the critical policy test should specifically state Article 6 (Habitats Directive EU)

13.15 Water Environment. Who is going to **expertly** assess mitigating measures This needs to be specified along with a framework to ensure that all the 'appropriate assessments' are carried out?

13.22 In AOB the development of mineral extraction could have a detrimental effect on other economic development for example tourism which relies on maintaining the character of the landscape. Therefore, the short-term economic benefits of mining needs to be weighed against other more sustainable development.

MIN2

There is no map in the draft plan that outlines the full extent of ACMDs. When are these maps going to be produced? This needs to be included.

The fact that the Council will consider mining applications weakens the whole idea of a protected area. We cite the application for the largest cyanide processing plant in Europe currently under consideration in the Sperrins an AOB and ASSI. A protected area should mean that.

Furthermore, the detrimental effect of a mine underground can be widespread way beyond any surface boundaries e.g. the water table and can leave a legacy that can last 10s of years.

13.24 Who would be considered relevant consultees?

13.25 Using the ordinary meaning of 'significant' is in effect side stepping the Environmental Impact Assessment. This further weakens the protection of the ACMDs

MIN 3

13.26 In identifying MRAs discussions should also include other parties to give a balanced view to the vested interests of the mining companies.

E.g. the local community and those who wish to develop tourism, farming and other sustainable economic activity.

MIN 4

13.30 The phrase 'due weight' has been used. This is not explicit enough and it needs to be clarified.

MIN 5

Who assesses and decides the correct amount for the restoration fund?

In the event of contamination of land, air or water during the life of a mine, who will monitor pollutants and ensure decontamination?

13.32 Tailing heaps as a by-product of gold mining contain 9 heavy metals. By their very nature and coupled with our climate, they are not inert and pose a significant risk of leaching these metals into the water system. The idea of restoration is very much a case of closing the stable door when the

horse has bolted. This illustrates just one of the reasons that gold mining needs to be dealt with more thoroughly within a planning strategy.

Furthermore, there is no mention of the fact that we live in a high radon area and that this should be a consideration when extractive industries may make this issue more acute.

Part E- Environment - Strategy, Designations & Policies

21. Natural Environment

The overall impression from this chapter is that the council is wholly aware of the amazing natural environment that exists on our doorstep and we would obviously endorse that view. However, we would have concerns regarding the phrase 'planning permission will only be granted in wholly exceptional circumstances'. This phrase is used extensively throughout this chapter and it would seem to be a 'catch all' in order to cover the circumstance where planning permission is granted exceptionally. We would be concerned that this is allowed to negate everything that has been stated prior.

21.3 This section states that our unique natural heritage is a valuable resource for cultural, educational and leisure purposes.....enhancing the quality of life and well-being of our citizens. We would welcome this is key statement which should underpin this whole chapter. It is concerning, however, that the council are currently considering an application for mining which clearly goes against 'enhancing the life and well-being of our citizens'.

21.6 The phrase 'inappropriate development' is interesting. Again we would agree that this is a remit of the council and we would hope that they would adhere to this closely. Once more we have concerns with respect to the aforementioned planning application which is currently under consideration.

21.12 It is unclear to the reader why new designations are proposed, in particular in relation to the Sperrin Area of Outstanding Natural Beauty (AONB). It seems that it is to be changed to a Special Countryside Area (SCA). We are concerned regarding the need for this and the possibility that re-designation potentially downgrades the protection of this area.

NE2 and 21.16 The term 'legally protected species' is surely a misnomer as there are circumstances outlined where the 'legal protection' is overridden.

21.27 We are pleased to note that the LDP recognises that 'Our landscape is one of the key reasons why people come to visit our district'. However, it should be

noted that 'inappropriate developments' will actively drive people away and be potentially dangerous to visitors within this area.

NE5 All proposals should also make statements regarding what happens if the development comes to an economic end and the developers make the decision to leave the area. The statements should demonstrate how they intend to leave the area with regard to disposal of any materials, structures involved in the site.

NE6 We would be interested to know how a measure would be made as to whether a development proposal would be of 'such regional or national importance to outweigh any potential detrimental impact'. This would need to a clear and transparent process open to public scrutiny.

21.35 It is heartening that the SCA is considered an Area of Mineral Constraint. However, on considering the policy within the Mineral Chapter of the LDP it seems that, yet again, this seemingly protective mechanism can be removed with various flimsy provisos. There seems little point in introducing a protective mechanism unless it is used appropriately. We would argue that any mineral development within an AONB will always compromise the integrity of the area.

NE7 All proposals should also make statements regarding what happens if the development comes to an economic end and the developers make the decision to leave the area. The statements should demonstrate how they intend to leave the area with regard to disposal of any materials, structures involved in the site.

21.46 Given the importance of monitoring the possible devastating consequences of lack of effectiveness of the LDP it is hugely concerning that this section is so brief. Also, depending on the seriousness of the lack of effectiveness in enhancing and protecting the natural environment, changes made at the LPD 5-yearly review and/or the LDP replacement might be considered wholly inadequate or too late. We would consider that this section requires much more attention to detail.

22.4 It would be hoped that the work with DfI and DAERA would produce robust baseline data that would fully inform regarding the current state of our coastlines. If this data doesn't exist, then it is impossible to plan effectively for the future.

22.6 This is a fairly 'broad-brush' statement which could be judged as somewhat contradictory.

CD1 It would seem wholly irresponsible to develop in areas of the coast which are known to be a risk from flooding, coastal erosion or land instability. Clearly this goes against fundamental environmental protection principles.

Once more, the LDP uses language which would negate supportive environmental statements which have been laid out previously. We would be interested to know how a measure would be made as to whether a development proposal would be of 'such regional or national importance to outweigh any potential detrimental impact'. This would need to a clear and transparent process open to public scrutiny.

22.9 In order to make valid decisions regarding our coast it would seem prudent that the extent of our coast is understood. We would suggest that this is a piece of work that should be completed.

22.11 In order to make valid decisions regarding our coastal it would seem prudent that the extent of our coastal zone is understood. We would suggest that this is a piece of work that should be completed.

22.24 This is a similar observation to that made for 21.46. Given the importance of monitoring the possible devastating consequences of lack of effectiveness of the LDP it is hugely concerning that this section is so brief. Also, depending on the seriousness of the lack of effectiveness in enhancing and protecting the developed and undeveloped coast, changes made at the LPD 5-yearly review and/or the LDP replacement might be considered wholly inadequate or too late. We would consider that this section requires much more attention to detail.

HE1 Once more, the comment 'development which would adversely affect such sites or the integrity of their settings must only be permitted in exceptional circumstances'. The inclusion of this statement within this document is hugely concerning and does not instil faith in the council as custodians of our historic environment.

HE2 We would suggest that planning permission should not be granted in sites known or likely to contain archaeological remains.

24.25 This is a similar observation to that made for 21.46 and 22.24. Given the importance of monitoring the possible devastating consequences of lack of effectiveness of the LDP it is hugely concerning that this section is so brief. Also, depending on the seriousness of the lack of effectiveness in achieving the required objectives, changes made at the LPD 5-yearly review and/or the LDP

replacement might be considered wholly inadequate or too late. We would consider that this section requires much more attention to detail.

Submission on the local development Plan 2020

27/1/2020

Dear Sir, Madam

Thank you for the opportunity to voice our concerns on the Development Plan covering our area for the next 12 years. The plan has presented some great ideas for the area and much of this is welcome. There are a few issues on which we would like to comment as there will be an impact on us, our families our livelihood and the greater community in this area.

The briefing period for public consultation was short given the 2-week public holiday for Christmas and New Year and we would have liked the opportunity to have input before now, but communication outside of local press and your website has been non-existent in our area. We attended the presentation of the plan at St Columb's Park House and at the Guildhall for PAC and was disheartened to hear that planners felt our area had not been engaging with them on the consultations prior to the launch of the Plan.

The numbers representing the whole catchment area of the plan where, insignificant given the population and surprising when a village of 440 people could provide 25% of the participants on the first engagement at St Columb's Park House and 75% at the second in the Guildhall. We suggest you evaluate how you engage with the Public of this area on the plan, as we don't feel there has been sufficient engagement with the public to gauge opinion and the timing of the launch has not been great.

To quote your presenter," the public might have time over the holidays to read the 500-page document".

We am aware that this has probably been a lengthy process for planners, and we are suspicious that given the launch timetable perhaps engagement with the public has been managed to ensure minimum responses.

In relation to the document we have concerns for the impact on the environment, on people's health and our water for human and animal consumption. This is influenced by proposals to extend our Mining and Minerals development to include precious metals, gold, silver and copper in 50-year-old designated areas of outstanding natural beauty.

We have questions in relation to the areas to which prospecting licenses have been granted covering 122,000 hectares of Counties Derry and Tyrone. License's granted by a Civil Servant with no Government Minister in place. What input if any, has planning had into the granting of these license's?

Who are the experts? Who has been consulted with regard to mining of natural resources and the impact it will have on the environment, water sources and rural communities?

Are your experts from companies currently working on or prospecting or mineral mining in Northern Ireland? If so, does this not represent a conflict of interests?

Mining has poor case records all over the world on health safety and environmental impact particularly in the legacy stages post 30 years after mines have closed. Experienced Experts need to be consulted on legacy impacts on communities from mineral mining.

Part C Economic Development

The Tier5 Designation Employment Opportunities Area within the plan allows for Economic Development in the Countryside.

9.12 General Criteria allows for economic development.

Mining should fail to meet all the criteria in ED1 yet The LDP plan focuses on mining as an employment growth area Why ?

ED7 Major Industrial Development in the Countryside with long term sustainable benefits How is long term defined? Is mining not a short term windfall economy project there for a short term?

9.43 The plan will consider economic benefits v wider long-term environmental effects of a proposal - What about the environmental impacts to minor roads, to local communities, from large lorries carrying hazardous waste and diesel usage impacting on the environment and loss of amenity for locals.

Our area is just recovering from a natural flood disaster in 2016, how would planners minimise such a risk if mining tailings ponds and toxic waste heaps were in the locality?

If the Mine in Greencastle, Co. Tyrone gets Planning Permission and associated mines pop up within the area of the high Sperrin's, how will the transport and associated travel plans impact on the local community? How will we be consulted on this area of any application?

9.44 Design of buildings and infrastructure accompanied by measures to assist biodiversity and integration into the landscape - Sand and gravel pits have historically blotted our landscape as an essential part of life. They have often been abandoned at the end of their life cycle in continuum as a blot on the landscape.

Extractive mining for precious metals such as gold, requires a range of infrastructural buildings, tailings, ponds, explosives stores, waste heaps, etc. The applicant Dalradian who holds the prospecting licenses for our area is Canadian and his ambitions are large scale in relation to "mine camps" across the country. Scale is something which has restricted generations of people living in the Sperrin's.

How do planners envisage that such infrastructure will be integrated into our landscape? Given that the project in Greencastle has a toxic heap one kilometer long, half a kilometer wide, and 17 stories high on the side of Crocnabuoy hill?

Part C Economy- Strategy, Designations & Policies

13 Mineral Development

Min1 mineral Development covers a diverse number of extraction methods and processes.

Gold and Precious mineral mining will require even more scrutiny because of the processes involved in the use of cyanide. Risks to water, land and air, processes which have been banned in Canada, Germany and Romania singling out mining activity.

13.2 Mineral Reserve Areas

Where will these be located, where are the maps?

Is it envisaged that the need for mining is so essential to the miner that the rights of the community must be set aside?

What considerations are being given to existing businesses in the area who rely on the image of a safe clean environment to sustain their family income through farming of livestock, manufacture of food, cheese, breads etc., tourism?

What considerations are being given to waterways, wildlife, and the beauty of the local area as it is?

13.3 You state that you have worked with the Sperrin Forum on the area plan. We have had an input into the community Plan but have never heard of the Sperrin Forum. Is this another area where smaller villages have been excluded?

13.8 Policies for mineral Development-Promote sustainable development resilient to Climate Change.

The plan states that permission will **not** have an adverse impact on the natural environment in respect of climate change. Would it not be better to abandon the precious minerals mining agenda as gold is not an essential to life in N. Ireland, it is stored in vaults all over the world.

We live in a high Radon Gas area, 1 in 2 people currently get cancer, do we need to expose people to greater health risks by allowing mining of this nature? Cyanide processing, risk of pollution to air from processed materials finer than grains of sand in a high wind environment. Why create a further risk to life?

One of our member's son, some years ago, got Leukemia, the consultant at the time quoted Chernobyl and radioactive rainwater. Farmers on high ground over the Glenshane Pass where not allowed to sell stock for a period after this disaster.

In the last forty years there have been 2 extreme environmental flooding incidents, one in the 1970s and the other in 2017 when livestock, bridges, trees and farm buildings were washed down the mountain side. Our environment is not suitable for toxic waste heaps to be cited on the sides of mountains with tailings, ponds and associated risks from spillage into rivers and streams. Why set up a scenario where we could have another environmental disaster with much greater unknown environmental impacts?

The Sperrin Mountains offers people in these uber stressed times, an opportunity to get away from it all to somewhere unspoilt by man, where the dark sky is the dark sky, where nature is at peace with itself.

Local tourism is thriving in our area with five local listings for accommodation. Park Village in the past has been a tourist hub when the Castle operated as a Youth Hostel and Camping Park. The recessionary years had made this market unsustainable but recently it has begun to grow and grow as food businesses take on day trips, cycling, and the Sperrin region has come back into focus as people are searching for the more remote and unusual destination.

A mining application in this area would put these livelihoods at risk, as it would farmers. Our animal produce is secured on the image of a clean, green, unpolluted land. Mining has the potential to leak nine heavy metals into our water streams. Why create circumstances where many livelihoods could be jeopardized?

Water is essential to all people and animals alike, not all homes are linked to the main waterway and sewage works. Wells and streams do provide water sources for animals and humans in some locations. Mining needs a lot of water which may influence the water tabling, creating supply pressures for existing users. How would this problem be eradicated?

Roads in this area are not in great repair, they are windy and narrow. We don't get many lorries as they are unsuitable. Children can walk to school or to the bus, and people use the safety of local roads for amenity work and leisure.

13.9 Environmental Reports and Assessments.

LDP accepts that mineral development impacts on the environment. The objective being to minimize those impacts via environmental reports and technical assessments. Who is going to conduct these assessments?

Is the polluter going to be allowed to assess and report on their own polluting? This would not be acceptable to wider society.

What legislative controls will the assessors be referencing, and who will be checking their work?

13.10 The Natural Environment

Extensions to existing mineral working sites is preferred- Mines of this type do not appear to be in ANOBs in our area currently. Would there be a chance that permission currently for an aggregate mine could result in a later permission for a gold or precious metal mine? How would the public be able to object to such a permission?

Mineral Development within close proximity to Areas of Special Scientific Interest Nature Reserves and Areas of Outstanding Natural Beauty will be protected.

The river Faughan has atlantic salmon spawning, rare otters, wildlife flowers and fauna

This being the case, why is a Planning Application being considered for a Gold Mine in Greencastle, which meets all of these designations? Could the same happen on Sawel and Dart or within the prospecting licensed areas in these new Mineral Reserve Areas, which no maps are available for as yet?

13.12 Landscape and visual amenity this point provides some comfort in relation to mining however as with the application in Greencastle **13.13** what steps can be taken to minimise scale of toxic waste heaps should permission be granted in the high Sperrins?

13.15 Water Environment- Given our history of natural flooding disasters and run off from Sawel and Dart how would this assessment be carried out which would allow permission for tailings ponds, in this location?

How would tailings ponds be assessed as safe in this environment?

What about leakage from processing getting into rivers and streams is this not likely to affect the quality of drinking water for humans and animals alike as not all homes and farms in this area have mains water supply and are reliant on wells for water. The experience in Greencastle resulted in permission being granted to Dalraidian with 43 environmental clauses attached a subsequent review allowed as easement on the clauses dealing with discharge into 2 protected rivers. A subsequent Judicial review has concluded by NIEA that they should not have given easement.

How will planning policy in this instant protect our waterways from mining effluents containing 9 heavy metals not currently in our water table?

In the event of permission being given would it be appropriate to establish a base water quality standard to benchmark future tests on water?

13.16 Public Safety, human health

Dust and airborne particle finer than sand will be blown for miles if sand can make it here from the Sahara. This material if rinsed in cyanide will produce a dangerous cocktail and may be injected by people and animals as has been seen in other mining areas all over the world poisoning our land air and water.

how can this be mitigated.?

7.88 & 7.89 Air Quality will this plan be sufficiently stringent to take into account air borne dust from Gold mining as not similar to traditional quarry dust due to the processes involved.?

13.17 Noise from blasting twice a day 365 days a year is unacceptable

7.73 & 7.75 7.76 7.77 Noise and the World Health Organisation Policy Statement.

NPSN I identifies 3 types of noise consideration would need to be given to mining in the Sperrins or further Wind Farms introducing noise to a quiet area from transportation and blasting and effects on people's mental and physical health

13.18 & 13.19 Risk to dwellings above given the situation of the GAA pitch in Monaghan where sink holes are appearing regularly and the miners response to the community is let us get planning permission for more drilling and we will build you a new pitch. Further demonstration of the greed of foreign companies who care little for land man nor beast less for the environment.

13.20. Road Safety and convenience of road users

Roads in the Sperrins, Glenelly Valley, Park Village, Craighane, area are generally single file roads and are unsuitable for heavy road traffic. They are windy mountain roads with open grazing for animals, part of the sustains cycle path system with poor surfaces, potholes and flood holes arising daily when it rains.

We note that discussion with planners the developer and DFI exclude the community from the conversation on increased traffic carrying hazardous waste!

13.22 Gold has no importance to the area! The economy has been sustained for years without it in the local area, this statement implies that easements may be granted overruling regular site visibility requirements because Mineral mining would be important to the economy. Would planning be working more in the interests of development in this regard?

Min 2 Areas of Constraint There is no map in the draft plan that outlines the full extent of ACMDS. When are these maps going to be produced? This needs to be included. The fact that, council would consider mining applications weakens the whole idea of a protected area. I cite the application for the largest cyanide processing plant in Europe currently under consideration in the Sperrins AOB and ASSI. A protected area should mean exactly that It's been a protected area for 50 years. Furthermore, the detrimental effect of a mine underground can be widespread way beyond any surface boundaries e.g. the water table and can leave a legacy for generations!

Who would be considered relevant consultees?

Using the ordinary meaning of significant is in effect side- stepping the Environmental Impact Assessment. This further weakens the protection of the ACMDs

Min 3 Mineral Reserve Areas

13.26 In identifying MRAs discussions should also include other parties to give a balanced view to the vested interests of the mining companies. e.g. the local community and those who wish to develop tourism, farming and other sustainable activities.

Min 4 Valuable Minerals

13.30 The phrase due weight has been used. This is not explicit enough and needs clarified.

Min 5 Restoration - Mining Restoration projects all over the world fail-why would projects in N Ireland be any different. Mining companies generally achieve planning permission through a prospecting company, once the mine is up and running it is sold on to a mining company how do planners enforce environmental conditions attached to the original permission on to the new developer?

Once the resources of the mine have been almost exhausted the mine will be sold to another mining company much smaller who will go bust before the restoration phase.

The Canadian government has ceased paying retribution payments to countries all over the world damaged by Canadian miners

Problems with tailings ponds, toxic waste heaps causing leakage into rivers waterways may not be evident until 30 years after the mine has closed who will be responsible then when the miners are long gone and heavy metals have infiltrated human health causing cancers.

How significant will a restoration bond or Restoration guarantee be in this type of timeline?

Will it be worth the paper it's written on? What weight will these associated documents have in protection of the environment?

7. 11.6 Contamination - Statement on Contamination of Land - does this need to be strengthened to benchmark Green field land prior to mineral development?

13.32 Waste Planning Policy 3 & 4 Tailings heaps, as a by product of gold mining contain 9 heavy metals. By their very nature and coupled with our climate, they are not inert and pose a significant risk of leaching these metals into the water system. The idea of restoration is very much a case of closing the stable before the horse has bolted. This illustrates just one of the reasons that gold mining needs to be dealt with more thoroughly within a planning strategy. Living in an area of already high radon levels should be a consideration when contemplating permissions for extractive industries as this may make problems more severe.

This section deals with refilling with existing materials and the use of existing refill, would there ever be a scenario where the infill would come from other sources other than the local area, e.g radioactive waste from other areas, dangerous classified waste- how would the filling in of the mine or mine shaft be monitored. How would the public be consulted in this scenario?

13.35 Section 76 Agreements Do they currently extend far enough to cover a timeline of 100 years? hazardous

13.36 Habitats Creation for Minerals Industry RSPB Is this the only safe return yardstick to be used in reinstatement? We would have thought that this area of work needs to be extended!

Part E Renewable and Low Carbon Energy Development

From the map in Appendix 1 of the document it would appear that our area is designated as high wind and suitable development of wind farms. Whilst we appreciate the need for energy creation from renewable sources, we would wish to warrant caution in terms of scale size and overdevelopment of this type of industry. Currently 42 % of people in NI are experiencing fuel poverty. Government policy to achieve 40% renewable energy in Northern Ireland was rolled out with no emphasis on public safety. Industrial wind turbines have been erected to close to dwellings with no proper proven established setback distance "rule of thumb" is not safe while using ETSU-RU-97 guidelines that according the report on 2/3/2015 stated "that noise guidelines were seriously out of date in urgent need of review and not fit for purpose" These same regulations are still being used today despite the findings of this report.

The issues of infrasound and low frequency noise and shadow flicker caused by industrial wind turbines are not properly considered in the current planning process in Northern Ireland. Government has a duty of care to protect its citizens and its environment and this is not happening when the wind industry is involved.

There should be no subsidies or constraint payments made to the renewable industry as this money would be better spent in our schools and hospitals where we get value for our money.

Clean free Green renewable energy isn't any of these as the use of rare earth elements are mined leaving lakes of toxic waste as shown in the Channel 4 Report on "The wind Industry Dirty Little Secrets" revealed and the public is being seriously misled by the propaganda of the wind industry.

Every industrial wind turbine requires 2 tonnes of rare earth elements in its construction, who knows how much rare earth elements are used in the manufacture of electric cars- not so green after all.

How will this plan monitor and mitigate for true green energy for the citizens of this area through this policy?

Section G Specialised Requirements

33. Hazardous Substances and Major Accidents

How will this policy mitigate on a mining application where dangerous substances essential to the mining and by products of the mining process be managed on rural roads in the Sperrin area how would a major accident be dealt with in respect of damage to life and the environment. .?

34.4 Developer contribution for Communal Benefits I'm very concerned that Developer Contributions are sought as a bias for planning agreements under section 76 of the planning act. Does this allow the developer to purchase planning advantage?

New Developments within the lifetime of the plan

Care and caution needs, to be exercised when planners are presented with new advances- The PAC spokesperson in Guildhall eluded to the fact that many advances had occurred in the lifetime of the previous plan which had not been envisaged at the planning stages. I would urge the Public to be consulted as in the case of Gold Mining in NI we found out by accident what has been planned for our area and its life changing consultations of this nature are essential if the environment is to survive the destruction of man.

We have concerns for the development of 5G networks, farm industrialisation, wind farms, toxic mining, and nuclear waste dumps going into the future.

Conclusion

We feel that mining is the biggest threat this community has ever seen. Environmental disasters, we have seen cause much damage here to our landscape over the years, they were natural disasters. With climate change concerns influencing much of the world economy, now is not the time to be creating mines in the Sperrin's. Consideration should be given to National Park Status for the region. Development of long-term sustainable employment through the agri- industry, cottage industry and tourism developed by local people should be encouraged and supported. Growth in our economy should not be driven by companies external to Ireland who are opportunists and here only for a windfall.

Park Against the Ruination of our Countryside