

LDP-PS-REP-60

Chloe Duddy

From: [REDACTED]
Sent: 26 January 2020 20:05
To: Local Development Plan
Cc: parc_notomining@yahoo.com
Subject: LPD 2020

[REDACTED] shared a link to the following document:

 LPD 2020



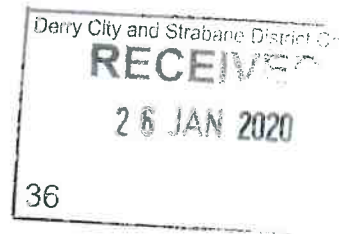
Dear Sir/madam

I have attached my comments in regard to the LDP Draft Plan Strategy for your consultation. I look forward to hearing from you in regard to my queries and comments.

Yours Sincerely

Helen Sharkey

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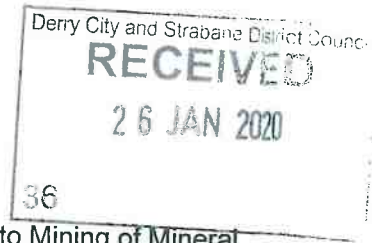


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Response to Draft Local Development Plan SDCC 2019 in regard to Mining of Mineral Resources and granted mining licences in SDCC area.

The Local Development Plan 2032 is a welcome asset to Council planning over the next 12 years. And I welcome the opportunity to give my voice to elements which will have an impact on myself, my family and my community as a rate payer. 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 is 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. In relation to the document I have concerns in regard to some of the planning aspects, how it will be rolled out, assessed and adequately policed. And in particular 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). 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.

CONCLUSION

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 in the long-term.

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.

This in mind, we are asking that

- there be a clear demarcation between mineral mining and quarrying in this document
- The biodiversity, environment and community supersedes mineral extraction
- The development of a set of environmental rights within the LDP to protect our environment from an industry that has long term negative environmental impact.