

# LDP-PS-REP-70

Chloe Duddy

**From:** [REDACTED]  
**Sent:** 27 January 2020 11:45  
**To:** Local Development Plan  
**Subject:** Fwd: Submission on the local development Plan 2020  
**Attachments:** Submission on the local development Plan 2020.pdf; ATT00001.htm

Dear Sir / Madam

Please find my comments in relation to your presented plan for comment from the public

Trusting this is in order

Regards

Connie O'Kane

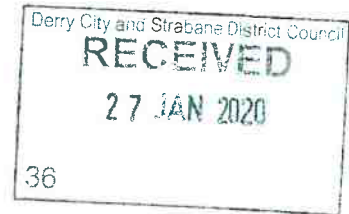


[REDACTED]  
[REDACTED] has attached the following document:

 Submission on the local development Plan 2020

This is a courtesy copy of an email for your record only. It's not the same email your collaborators received.  
Click [here](#) to learn more.

Google



**Submission on the local development Plan 2020**  
**27/1/2020**

Dear Sir, Madam

Thank you for the opportunity to voice my concerns on the Development Plan covering my 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 I would like to comment as there will be an impact on me, my 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 I would have liked the opportunity to have input before now, but communication outside of local press and your website has been non existent in my area. I did attend 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. I suggest you evaluate how you engage with the Public of this area on the plan, as I 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".

I am aware that this has probably been a lengthy process for planners, and [REDACTED]

In relation to the document I 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.

I 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.

My 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.etc. The applicant Dalradian who holds the prospecting licenses for my 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 Crocnaabuoy 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. I 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?

My 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 my lifetime there have been 2 extreme environmental flooding incidents, one in the 1970s and the other in 2016 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 my 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 to benchmark against ?

#### **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. NPSNI 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, Craigbane, 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.



I 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 over ruling 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 its been a p-rotected 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 radio- active 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? I 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 I appreciate the need for energy creation from renewable sources I 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 desoite 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.

Tere 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.

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

Conclusion

As a local person living in the same townland for 48 years, I 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.

Connie O'Kane, 