

Causeway Coast & Glens Preferred Options Paper: consultation comments

Minerals and Petroleum Branch/Geological Survey of Northern Ireland (MAPB/GSNI) welcomes the opportunity to engage with Causeway Coast & Glens Council in the preparation of its Local Development Plan (LDP).

The Council's preferred options in relation to mineral development indicate an informed approach to this subject which requires a careful balance to maximize the potential economic benefits while ensuring adequate protection for the environment. Set out below are comments on each of the preferred options in relation to the minerals section in Chapter 6.

MAPB/GSNI colleagues would welcome an opportunity to meet with the Council to discuss any issues that may arise from our response or offer any help that you may require. To arrange, please contact Lorraine Fleming Lorraine.Fleming@economy-ni.gov.uk.

Preferred Options

MN1: Promoting Sustainable Minerals Development - Buffer Zones

Preferred Option: Define buffer zones around quarries to exclude inappropriate development.

The recognition that existing quarries may provide the most appropriate locations for ongoing aggregate extraction is valid. Establishing the proposed buffer zones will rely heavily on accurate geological information. The extent of bedrock and superficial distribution will dictate the location and size of appropriate buffers.

MN2: Promoting Sustainable Minerals Development - Areas of Constraint on Minerals Development (ACMDs)

Preferred Option: Designate areas to be protected from mineral development and define other areas elsewhere where mineral development will be acceptable in principle.

Areas of constraint on mineral development should be considered carefully to ensure that large extents of land are not removed from future consideration. We welcome reference at 6.132 of the need for a cautious approach in relation to the wholesale exclusion of mineral development when listing the potential areas of mineral constraint.

MN3: Development in the Vicinity of Abandoned Mines, Adits and Shafts

Preferred Option: Provide policy to restrict development on land known to be at risk of instability.

The preferred option recognizes the risk to the public posed by development in areas of potential land instability and the importance of preserving the industrial heritage of the Borough Council area. In providing a policy to restrict development on unstable land the Council should consider the following:

- Risks associated with abandoned mines include land subsidence, surface collapse, water discharges and gas emissions.
- Mine workings naturally deteriorate over time and development over and proximal to historic mines can result in associated risks increasing locally.
- A total of 551 known abandoned mine workings are distributed throughout the Borough. Geological Survey of Northern Ireland can provide information and data on areas of greater risk due to abandoned mines.
- Development on land overlying abandoned mines should be avoided entirely, wherever possible. While not all land overlying abandoned mines is at current risk of subsidence, all development proposals upon land containing abandoned mines should include a Mine Risk Assessment and, if necessary, specialist investigation works to assess the suitability of the land for development.
- Development within a 20m radius of mine shafts and adit entrances should not be permitted in the interest of public safety.
- Abandoned mines are an important historical and cultural resource for the Borough Council and have potential to enhance the historic environment and promote the industrial heritage of the area. Historic mine infrastructure and artefacts are, in some locations, retained on the landscape, further enhancing the historical value of abandoned mines to the District Council.

The Department would welcome consultation on formulating a policy to restrict development on land containing abandoned mine workings and other locations of potential instability including areas of landslip and compressible ground.

MN4: Lignite Resources within the Borough

Preferred Option: Retain the existing designation and amend existing policy framework to provide greater flexibility for development.

Retention of the existing policy is welcomed. The 600mT deposit at Ballymoney represents a significant potential resource for Northern Ireland and protection against sterilization by surface development should be maintained. The proposal to amend policy to provide greater flexibility for development should be treated with caution. Local agendas and assumptions should not be permitted to override protection for what amounts to a regional resource. Opinions regarding what constitutes appropriate development may vary considerably. The proposal exposes the potential for development to slowly snowball unless clearly defined limits are established.

As mentioned earlier, there is no option proposed for handling of high value minerals within the council boundary. Consideration of, and consultation on this matter would be welcomed.

Additional comments

The Minerals chapter does not reference in the narrative or in Map 3 the mineral prospecting licences in the Council area. These are available to view on the Department's website at the following link <https://www.economy-ni.gov.uk/publications/mineral-prospecting-licences-map-council-boundaries>. There is also no options proposed for handling of high value minerals exploration or extraction. The options deal clearly with aggregates and quarrying and with lignite as a specific high value mineral. The preferred options affecting exploitation of high value minerals should be considered separately from those applied to low value aggregates. The lack of distinction made between high value minerals and aggregates in the Minerals Discussion paper may have precipitated this omission.

Minerals Discussion Paper

The preferred options are supported by a minerals discussion paper that is used as a base for the sustainability appraisal. There are some areas of the minerals discussion paper which need to be clarified and these are set out below.

Minerals Discussion Paper – clarifications.

Paragraph 2.2 - The Crown Estate issues options (not licences, though they amount to the same thing in practical terms) for precious metals (gold and silver), which do not fall under the Mineral Development Act (NI) 1969. These options are not linked to a DfE licence and a DfE licence is not required to be taken in conjunction with a Crown Option, nor vice versa.

However, it is common practice for a licence holder to apply for a licence from DfE and an option from the Crown if both precious metals and other metals are expected or anticipated to be discovered through the exploration process.

Mining licences are only awarded by DfE for minerals that fall under the 1969 Act. Gold and silver mines are classed as Mines Royal and a mining licence is granted by the Crown Estate, not DfE. In either case planning permission is required from the Department for Infrastructure.

Paragraph 2.3 - the use of 'All Minerals' in the description of the DfE licence refers only to all minerals vested in the Department for the Economy. It does not include precious metals.

Minerals that are covered by the planning regulations are not covered by the 1969 Act. The distinction between aggregates and sand and gravel (covered by planning legislation for quarries) and high value minerals (covered by the 1969 Minerals Development Act) could be better clarified to avoid confusion.

Tourism

GSNI currently works with a number of organisations across Northern Ireland to encourage and develop responsible tourism based on their geological features. GSNI sits on the World Heritage Steering Group for the Giant's Causeway and Causeway Coast World Heritage Site which is one of only 2% of around 2000 World Heritage Sites around the globe that have been designated because of their geological heritage. We are aware of the significant visitor pressures that the site is under and feel that there are opportunities available based on the wider area's considerable geological heritage that could be developed to significantly reduce these. We would therefore welcome the establishment of Tourism Conservation Zones and Tourism Opportunity Zones (Option 2) and would encourage the Council to

consult with GSNI in the establishment of such zones in order to maximise the growth of sustainable tourism which would, at the same time, protect the natural and historic environment.